

TABLE WITH WRITTEN COMMENTS

Received by TF members/observers on the Analysis of the development needs and potential of the territories covered by the strategy for integrated measures to be financed under CBC Programme between Republic of Bulgaria and Republic of North Macedonia 2021-2027

Thank you for the comments and recommendations. We greatly appreciate the quick response and in-depth knowledge of the topic. The Territorial Strategy for the development of the cross-border area is the work of joint efforts both on our part and on your part. All references will be expertly evaluated and will find their place in the final text of the strategic document and after the final list of operations.

Thank you once again for your cooperation and your willingness to cooperate.

Member/observer of TF /Institution	Comments/remarks	Justification / Response
	<p>III. Analysis of the development needs and potential of the territories covered by the strategy:</p> <p>1. Principled comments:</p>	
<p>NATIONAL ASSOCIATION OF MUNICIPALITIES IN THE REPUBLIC OF BULGARIA – Silvia Georgieva – Executive Director</p>	<p>1. Although partial and not so thorough, the elaborated Analysis correctly reflects the main areas characterizing the development of the cross-border region. In view of the references to the underdeveloped system of social assistance and the presence of people at risk of poverty and social exclusion, it is appropriate to add to the document an analysis of the state and trends in the development of social services;</p>	<p>1. The findings in the summarised SWOT analyses are based not only on statistics, but also on a study of strategic documents for development of the regions in both countries. Given the identified needs, potentials for development of the CBC area and hence - the Strategic objective with subsequent possible interventions, we consider the information provided on social services sufficient at this stage.</p>
	<p>2. The SWOTs prepared after each of the main sections of the document should be positively assessed. However it is noteworthy that some of the conclusions and findings in them, in addition to the overlapped ones, do not correspond to the analytical part and therefore cause ambiguity on what basis they are formulated. In this regard, it would be appropriate a summary SWOT to be presented instead of the several in different areas of development;</p>	<p>2. The findings in SWOT analyse a summary product for analytical studies of the existing situation, documents of European, national and regional importance and author's views. A detailed bibliographic reference will be presented in the final version of the Strategy.</p>
	<p>3. There are both repetitive texts in separate sections of the analysis, for example on the number of municipalities and settlements, on cross border checkpoints, on natural and cultural heritage, and very extensive and without added value descriptions, especially in the sections Cultural-historical and natural heritage and Tourism.</p>	<p>3. The repetition of information in the separate sections is in view of different possibilities and different points of view. The detailed refinement is forthcoming after the final list of operations is made.</p>

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	It will be appropriate to eliminate these repetitions, as well as to optimize the texts.	
	2. Specific comments and remarks:	
	<p>1. Section 1: Geographical characteristics and environment: For some conclusions and findings in the sections "Weaknesses", "Opportunities" and "Threats" of the SWOT, practically no data are presented in the analysis part of the section. In view of this, they do not correspond to the analytical part and it is unclear on what basis they are formulated. Examples in this regard are findings such as "Insufficiently developed and depreciated infrastructure for disaster and accident risk prevention", without an analysis of this type of infrastructure; "Direct support for SMEs in the field of green economy"; "Isolation of smaller municipalities", etc. In this regard, it is appropriate either to delete the cited findings from the SWOT or to analyze them with their respective data;</p> <p>2. Section 2: Demographic characteristics and the labor market: Here too are discrepancies between the sections "Weaknesses", "Opportunities" and "Threats" of the SWOT, with the analysis part of the section. Examples are findings such as "Discrepancy between the level of professional qualification and the needs of the labor market"; "Creating conditions for cooperation between educational and training institutions and business" and others:</p> <p>3. Section 3: Aspects of socio-economic development: Again, there are discrepancies between the sections "Weaknesses", "Opportunities" and "Threats" of the SWOT, with the analytical part of the section. Some of them are contained in the SWOTs of the previous sections of the document. Examples are findings such as "Insufficient development of the social assistance system"; "Presence of people at risk of poverty and social exclusion" and others, in</p>	All findings in the SWOT analyses are based not only on the summarised thematic analysis by us, but also on the basis of programme documents of the respective regions and sectoral strategies of the two countries.

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	the absence of analysis in the field of social services and the population living at risk of poverty;	
	4. Section 4: Transport and Engineering Infrastructure: As in the "Strengths" of the SWOT is highlighted the relatively short distances of the region from the international airports in Sofia and Skopje, it is questionable how appropriate is the finding that amongst the "Weaknesses" is the lack of airports in the CBC region;	Considered.
	5. It would be appropriate the sections Cultural-historical and natural heritage and Tourism to be consolidated, as reasonably as the SWOT elaborated for all of them;	Given the large amount of information and the importance of the details (connection of the cultural heritage not only with tourism, but also with the development of the economy, education, etc.), the two sections are considered separately. One Specific objective is on tourism and in view of this, using the potential of the natural heritage, in the SWOT analysis the two parts are united.
	6. In conclusion, the Analysis has to be expanded with description of the Identified needs and Development potentials on which the Strategy for Integrated Territorial Development of the CBC area will be based upon.	Considered.
Zhulieta Gjurkova – Member of the Task Force Mima Stanoevska – Deputy Member	1. There is no information on wastewater treatment plants in the Republic of North Macedonia, although we have many in the three regions; 2. In the Analysis there are no data on forest fires in the Republic of North Macedonia; 3. There is no information about Seismic Hazard in our country; 4. The information about the road infrastructure in our country is very little, scanty and not well covered, although we certainly have institutions that can provide this information; 5. No information about Water and Sewerage, etc...	Detailed information and specific data are contained in the strategies of the respective regions. An informed sample was made in the presented analysis, in view of the subsequent Strategic objective. We should not forget that the Analysis is thematic. In this regard, it will be further shortened and summarised, in line with the displayed list of operations.
	We don't have information whether from the consulting company engaged for preparation of the strategy have in their team at least one member from Macedonian side or if there	We appreciate the proposed assistance, we will keep it in mind

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	<p>is some institution who is responsible to provide all available data and information from North Macedonia, but if there isn't we would suggest maybe Ministry of Local –Self Government to coordinate the process for collection of all necessary data from national, regional and local institution and provide them to the consulting company.</p>	
<p>Ing. Gorgi Peovski Head of Department for Local Economic Development Municipality of Berovo</p>	<p>Dear, At the beginning, I would like to express my satisfaction and words of praise for the prepared document. In addition is my comments for some segments in the Strategy (attached). They are marked as comments on page 5, 8, 11, 12, 40 and 60. Given the short period for such important data, I think that additional time is needed, and the involvement of experts from the Macedonian side for more relevant data. I am not an expert on English toponyms, but I notice different names of the Maleshevo Mountains and different Latin letters (Malashevaska, Maleshevo mountains, Maleshevski Planini, Malaševo), It is desirable to unify them so as not to have the impression that everyone is different, but in fact it is the same mountain. They do not have to be acceptable or relevant, but they are my remarks on the document and contribution. Thanks for understanding.</p>	<p>Thank you. Thank you for your attention to detail. The notes are reflected. We also count on future expert participation in the joint work.</p>
<p>Comments from Rositsa Djambazova - Business Incubator - Gotse Delchev, Entrepreneurship Promotion Centre and Zhivko Ivanov -</p>	<p>Dear Task Force Members, The time for the feedback by the Task Force Group members is quite short to go in detail however the Business Incubator - Gotse Delchev, EPC and Business Information and Consulting Centre Sandanski believe the opportunity for</p>	<p>The feedback time is in accordance with the approved technical documentation. It is a consequence of the time for developing the strategic document. In this line of thinking, we also believe that time is not enough, both for work and for coordination.</p>

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<p>Business Information and Consulting Centre – Sandanski</p>	<p>public consultations will provide for time for improvements and suggestions Here are our notes and suggestions based on our experience in the CB region:</p> <ol style="list-style-type: none"> 1. The priority of A greener, low-carbon Europe is well presented and justified in the strategy for the future CB programme and it is reflected in SME investments, Education and Tourism. 2. What is missing is digitalization which is another important EU priority for A smarter Europe - innovative and smart economic transformation. The unpredictable and very dynamic COVID -19 situation has forced governments, education, people, SMEs to become more digital to survive, to be more effective and flexible. So I would like to suggest the above mention priority to be included in the strategy and the new CBC –IPA programme as SMEs, Education and Science as well as Sustainable tourism need support for digitalization of their activities to untap their potential and address the challenges of the dramatically changing environment. 3. Concerning tourism as the priority for the CB region: The focus should be sustainable tourism and the reorientation from mass to individual tourism and thus: <ul style="list-style-type: none"> • sustainable use of natural resources connected with cultural ones, • Keeping the balance in promoting and protecting the nature the parks, waterfalls, biodiversity, endemic flora and fauna. • For individual travelers the Internet visibility of the tourist products, sites, and offer is very important (digitalization) • Raising awareness of ecosystems, preserving nature and saving resources Justification: The EU and world trend in tourism presented in the analysis of the territorial strategy is the decline of the International tourism and shift from mass to individual tourism “The pandemic has catalysed the trends towards sustainable 	<ol style="list-style-type: none"> 1. We strongly agree with the opinion on the importance of digitalization and therefore one of the measures in the strategic part is written on this subject. Your opinion confirms our vision of the priorities for development of the CBC zone. Digitalisation, sustainable, individual tourism, sustainable use and promotion of natural and cultural values, awareness raising are the main focus of the developed strategic part - Strategic objective, Specific objectives and Measures. The subject of the digitalization will be further represented in the list of operations. such as the introduction of a digital platform bringing together universities in "cities - centers of knowledge" where training can take place at any level, or the digitization of cultural and historical heritage sites on both sides of the border to be connected in virtual routes, etc.
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	<p>tourism and the reorientation from mass to specialized tourism. Transformations have already begun that may prove to be lasting. Increasingly, short holidays of various kinds will be combined, with preferences changing dynamically and with a focus on individual travel; Rich natural and cultural resources pointed in the territorial strategy</p>	
	<p>4. Could you justify why “Development of ski tourism and all other forms of winter tourism” is in focus? In the analysis it is undelined that should be 4 seasons tourism development. It is not clear why it is selected providing that the ski tourism needs large investments however the CBC IPA programme has limited budget, smaller than the other programmes? Best regards</p>	<p>We use the potential of the developed infrastructure for winter tourism and the opportunity for its inclusion in the scope of tourist services and the transformation of the tourism into a four-season one. The efforts are focused on using the potential of the territory to make the tourist service a sustainable four-season priority.</p>
<p>Antonio Davitkovski Centre for Development of the South-East Planning Region</p>	<p>Dear colleagues and members of the Task Force, Generally, considering the document, the impression is that there are lack of important data for Macedonian side in comparison with the data for BG CBC region.</p> <p>Considering the targeted document and its draft-format for overviewing,as well as the proposed time that we had to provide feedback, as member of the group I had several notes</p> <p>:- In all given maps - Centres of the regions of RNM (Kumanovo, Stip and Strumica) are not properly highlighted (bold and larger font) as centres in BG (Blagoevgrad and Kyustendil)</p> <p>- not any particular data for the rivers of Vardar basin as well as waters in regions of R.NM (1.2.Environment - Waters)</p> <p>- no any data for seismic hazard and forest fires for the territory of CB region in RNM</p>	<p>Detailed information and specific data are contained in the strategies of the respective regions. An informed sample was made in the presented analysis, in view of the subsequent Strategic objective. We should not forget that the Analysis is thematic. In this regard, it will be further shortened and summarised, in line with the displayed list of operations According to expert opinion, specific recommendations have been taken into account, such as font size, data on the Vardar River basin and others. and are reflected. Thank you.</p>

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	<ul style="list-style-type: none">- needed more details/not updated data about nature and biodiversity for RNM-territory - e.g. part of Osogovo's region is also natural protected territory ...https://www.krivapalanka.gov.mk/novosti/23931 (1.2. Environment- \Biodiversity, Protected areas and sites)- demography data/migration and aging to be relevant and updated (the used sources of information must be confident and adequate to the current situation.- data for roads and communal infrastructure are also not complete I do not have for the documents and institutions communicated during the preparation of the document but generally it need improving for RNMK side	
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ANALYSIS AFTER COMMENTS OF THE TASK FORCE		
Member/observer of TF /Institution	Comments/remarks	Justification / Response
Antonio Davitkovski Centre for Development of the South-East Planning Region	To unify names of the toponyms letters as...č, ch, zh, etc... To use same names in whole document ... ex. Kochani or Kočani...Strumitsa or Strumica ... č, š	It will be considered.
	„On the territory of the Republic of North Macedonia“ Environment	It is a technical error and will be considered. The name of the paragraph is ENVIRONMENT
	Considering the previous version – the text for the basins is deleted ...? Text for forest fires is deleted ? More info about the floods....In the previous Calls there were several projects for flood protection	The Analysis is thematic. In this regard, it will be further shortened and summarised, in line with the list of operations.
	Comments regarding NATURA 2000 in Republic of North Macedonia	The programme finances projects and activities related to the joint development of the functional area. It does not take into account specific affiliations in the territories in both countries. The materials concerning the territories for future inclusion in NATURA are not the subject of this study. However, the strategy is a "living" document that can be supplemented over time and can be reflected when the source information changes.
	To unify sources MAKSTAT/BULSTAT SSO/NSI	It will be considered.
	The designed railway Kumanovo-Gyueshevo is in phase of expropriation of land.... Proposed construction time - 2026	Thank you for the information, we will consider it.
	Missing data for MKD ... table 18	We would be grateful if you could provide us with information.
	No data for 1. Monastery of St Joachim Osogovski..one of the most beautiful object on the Balkan	A website for additional information will be indicated to the cultural heritage objects presented in the Analysis. The team is impressed by the detailed presentation and

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	<p>2. Events – traditional International Folk Festival and International Theatre Festival in Kriva Palanka</p> <p>3. Sanctuary of the hermit St Joacim Osogovski in v.Gradec</p> <p>4. Archaeological site on v.Gradec</p> <p>5. Locality of Kuklica – Kratovo (wedding story...)</p> <p>6. city of Kratovo as sight</p> <p>7. Locality of Cocev Kamen ...Kratovo</p>	<p>aesthetic design of the platform https://www.macedonia-timeless.com/eng</p>
<p>Dear colleagues,</p> <p>In the attached file, you can find the draft document with the revision from today`s meeting with the Task Force members from Republic of North Macedonia. We will stay in touch for future collaboration. See you tomorrow on the meeting.</p> <p>Best regards, Tatjana Janevska</p>	<p><i>Ambient Air</i></p> <p>This sentence is not responding with the table below, where it is said that 5 stations are active – to be changed 2 to 5</p>	<p>It will be reviewed and correctly reflected.</p>
	<p>From here, to the end of the pasus, only for Kystendil and Blagoevgrad is the text. The title is for Republic of North Macedonia – to be added data</p>	<p>We would be grateful if you could provide us with information.</p>
	<p><i>Registered average levels of major air pollutants</i></p> <p>The table is not fillfull with data of all mention stations – to be added</p>	<p>We would be grateful if you could provide us with information.</p>
	<p>The text for the wather is cut – it is diferent from the previous – why?</p>	<p>The Analysis is thematic. In this regard, it will be further shortened and summarised, in line with the list of operations.</p>

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	NATURA 2000 - No data for Republic of North Macedonia – to be added similar table Fo Republic of North Macedonia table with protected natural areas and categories to be added	The programme finances projects and activities related to the joint development of the functional area. It does not take into account specific affiliations in the territories in both countries. The materials concerning the territories for future inclusion in NATURA are not the subject of this study. However, the strategy is a "living" document that can be supplemented over time and can be reflected when the source information changes.
	Because of it, the title for forests and forests fires have to be part of the strategy, not to be deleted. The title forest fires is deleted - why –we recommend the title and text to stay a floods title is added only with short text Landslides text and picture is extracted – why – it is important to be a part of the strategy	The data is statistical and has no relation to the future joint activities of the Strategy - tourism development.
	The map no 13 is extracted – why? The title water and sewerage is extracted – why? Renewable Energy Sources - The maps are extracted – why?	The Analysis is thematic. In this regard, it will be further shortened and summarised, in line with the list of operations.
	Or September??? (“The railway transport service in the CBC region is complemented by several railway branch lines. The General Todorov – Petrich branch line serves the municipality of Petrich, and Dobrinishte, Bansko, Razlog, Belitsa, and Yakoruda are served by Septemvri – Dobrinishte....”)	Septemvri is the name of the town.
	in p.”4.4. Waste Management” - to be filled with maps for Macedonia	We would be grateful if you could provide us with information.
	Text to be in English.	It will be considered.
	Map of the Republic of North Macedonia with its priority tourist destinations - The destinations are missing - Mega opservatory Kokino, Manastir Sv Joakim Osogovski, Sv Gorgi nagoricane, Cocev Kamen, Bislimska Klisura	It will be reviewed and correctly reflected.
	More text for conclusion to be added.	Please explain

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<p>Katya Vassileva Senior expert "Southwestern region" Department DG "Strategic planning and programmes for regional development" Ministry of regional development and public works Sofia 1618, 215 Tsar Boris III blvd. tel. +3952/ 9405 243</p>	<p>Dear Colleagues, After going through the document a few minor mismatches were identified as following: On page 7, second paragraph is quoted Table 26 but there is none such table in the document; On page 25, fourth paragraph, second sentence is quoted Table 8 but the information corresponds to data in Table 12 on same page. Could you please verify the same? On page 48, Map 17, the related legend remained in Bulgarian language.</p>	<p>On page 7 - it will be considered On page 25 - it will be considered On page 48 - it will be considered</p>
	<p>CORRECTION: On page 49 in the Territorial Strategy – Analysis – Heraclea Lyncestis must be removed (It is in the Municipality of Bitola – which is part of the Pelagoniski region)</p>	<p>It will be considered. Thank you.</p>
<p>Aleksandar Krstevski, Municipality of Kumanovo (23.04.2021)</p>	<p>Regarding the addition of information, we would like to suggest that the rivers in the Northeast should be supplemented - Pchinja, Kumanovka, Lipkovka, Kriva Reka also for a water treatment plant A whole point about fires and floods, we do not know why they do not exist because we have a constant increase of the same Also for tourist tours for Bislimska gorge and Kokino to be included in the document.</p>	<p>Detailed information and specific data are contained in the strategies of the respective regions. An informed sample was made in the presented analysis, in view of the subsequent Strategic objective. We should not forget that the Analysis is thematic. In this regard, it is to be further shortened and summarised, in line with the list of operations. The two tourist routes proposed by you will be taken into account when compiling the list of operations.</p>

All remarks concerning the spelling of departments, institutions and names of sites have been taken into account and will be reflected.

Thanks for the list of **Sites and landmarks of the North-east region**. The sites will be very useful in preparing the list of operations: