

Table of comments

TERRITORIAL STRATEGY for integrated measures to be financed under the INTERREG — IPA CBC Programme 2021—2027 Between the Republic of Bulgaria and the Republic of North Macedonia		
Member / Observer of TF / Institution	Comments / Remarks	NCRD Justification / Response
Lide Stojanovska Regional Center for Sustainable Development	<p>On page 17 – The text of VISION: <i>The territory of the Republic of Bulgaria — Republic of North Macedonia CBC region: a place for consolidation and stability of the cultural and historical reality through joint efforts for mutually beneficial cooperation, socioeconomic cohesion and sustainable development</i></p> <p>Is replaced with the text: <i>The CBC region of the Republic of Bulgaria and Republic of North Macedonia: a place for consolidation and stability of the cultural and historical heritage through joint efforts for mutually beneficial cooperation, socioeconomic cohesion and balanced sustainable development.</i></p>	Accepted
	<p>On page 31 – edited data for Regional Center for Sustainable Development Regional Center For Sustainable Development Kratovo The Regional Center for Sustainable Development Kratovo was formed in 2003. The Regional Center is a non-governmental and non-profit organization, based in Kratovo, which in other activities, covers the municipalities: Kratovo, Kriva Palanka, Rankovce, Staro Nagoricane and Probistip as main target areas, as well as Kumanovo, Kocani and Delchevo in the wider system. The center is aimed at supporting and sustainable development of the local community, if mobilization of resource allocation and socio-economic strengthening and integration of the situation is used, before you have your own framework, and then the integration of the Republic of North Macedonia within the EU. www.regionalcenar.org.mk</p>	Accepted

Table of comments

	<p><u>email text information:</u> Furthermore, I am sending a link to the Law on declaring the site Kuklica as a natural monument (village Kuklica, the town of Kratovo, locality Stone Dolls) https://www.moep.gov.mk/wp-content/uploads/2014/09/Zakon%20za%20proglasuvanje%20na%20lokalitetot%20Kuklica%20za%20spomenik%20na%20priroda%201.08.2008.pdf and also the law on declaring the old town core of Kratovo as a cultural heritage site of special importance http://arhiva.kultura.gov.mk/images/stories/2015/O_.pdf</p>	<p>Thank you for the information. It will be considered during the preparation of the projects.</p>
<p>Centre for Development of the East Planning Region (22.04.2021)</p>	<p><u>On page 10 –</u></p> <p>The text: DEVELOPMENT PROGRAMME FOR THE EAST PLANNING REGION 2020—2024 Is replaced with the text: PROGRAMME FOR DEVELOPMENT OF THE EAST PLANNING REGION 2021-2026 (Dear, in the document are not covered all SG, priorities and measures according to our Programme please add it all. The final version will be adopted at the next meeting of the Council for development of the East planning region on 23.04.2021)</p> <p>The text: ¹⁶ Програма за развој на Источен плански регион 2020—2024 година / Центар за развој на Источен плански регион Is replaced with the text: ¹⁶ Програма за развој на Источен плански регион 2021—2026 година / Центар за развој на Источен плански регион</p>	<p>Accepted</p>
	<p><u>On page 23:</u> Part “Zone of the European Green Belt” - Please, add that the green belt cover all 5 regions, and the crossing point from</p>	<p>Please explain</p>

Table of comments

	<p>Bulgaria to Macedonia is Blagoevgrad – Delchevo and the ending crossing point is Strumica – Petrich.</p> <p>Part “Zone of active transport communication“- Please add and other two existing border crossing points between Delchevo - Blagoevgrad and Strumica – Petrich.</p>	
	<p>On page 30: edited name of institution - Centre for Development of the East Planning Region</p>	Accepted
Tatjana Janevska	<p>If the source is with the programme with Turkey – is it suitable for our programme?</p>	A technical error, it will be considered. Thank you.
	<ul style="list-style-type: none"> - We suggest more details in this title - TERRITORIAL AGENDA 2030 - The priorities to be added - The strategic documents are adopted. The regions will send it for evidence, so you can use the date and number of the document, also the source. The adopted documents have some changes from the draft version, so you have to take it in consideration. <p>The Strategy is adopted under the name СТРАТЕГИЈА ЗА РЕГИОНАЛЕН РАЗВОЈ НА РЕПУБЛИКА СЕВЕРНА МАКЕДОНИЈА 2021—2030 (Службен весник на Република Северна Македонија бр.76/21) - You have to use this version of the document.</p> <p>Why this note is important to stay here? Is it general for the both country or only for Macedonian documents?</p> <p>-</p>	<ul style="list-style-type: none"> - There is a link for further information - If they are uploaded, please provide us with links to cite, as in other documents. - Accepted <p>The notes is related to the whole “Strategic context” due to which is in the end of it.</p>
	<p>Why only Strumica, when the Green belt is all over three regions in Republic of North Macedonia? We thing that all 3 regions have to mention in one more sentence</p>	The concentration as a centre of the green structure in two towns does not exclude the participation and benefits in all of the five regions considered in the Strategy.
	<p>Klepalo new border cross point to be mention and 2 municipalities from both sides</p>	It will be considered.

Table of comments

	<p>Why in the Zone of intervention Blagoevgrad and Stip are selected only? This part have to be more broadly because it covers all areas of intervention. Also, in Stip and surroundings, as well as other bigger cities are covered with mentioned areas. We do not think that only Stip is leading Centre.</p>	<p>The concentration in the educational centres in two towns does not exclude the participation and benefits in all of the five regions considered in the Strategy.</p>
	<p>To be cut. It is not appropriate for other religion types and faith.</p>	<p>It will be considered.</p>
	<p>“The role of the partners is emphasised by the participation of representatives of the civil society, the academic community, local authorities, socioeconomic entities and associations, etc., as members of the working groups which prepare the strategic documents.” - Working groups or Task Force</p>	<p>A technical error in the translation service.</p>
	<p>Long name of the country</p>	<p>It will be considered.</p>
	<p>Not Beatrix, other organization. The organization will give detail. Beatrix is deputy member.</p>	<p>We are expecting a proposal. We have contacted the organisation and did not received information in this direction.</p>
<p>CDSEPR comments</p>	<p>There is now an official document. The new period is 2021-2031 Link to the official document: https://mls.gov.mk/mk/%D0%B4%D0%BE%D0%BA%D1%83%D0%BC%D0%B5%D0%BD%D1%82%D0%B8/%D0%B4%D0%BE%D0%BA%D1%83%D0%BC%D0%B5%D0%BD%D1%82%D0%B8-%D1%80%D0%B0%D0%BC%D0%BD%D0%BE%D0%BC%D0%B5%D1%80%D0%B5%D0%BD-%D1%80%D0%B5%D0%B3%D0%B8%D0%BE%D0%BD%D0%B0%D0%BB%D0%B5%D0%BD-%D1%80%D0%B0%D0%B7%D0%B2%D0%BE%D1%98/2214-%D1%81%D1%82%D1%80%D0%B0%D1%82%D0%B5%D0%B3%D0%B8%D1%98%D0%B0-%D0%B7%D0%B0-%D1%80%D0%B5%D0%B3%D0%B8%D0%BE%D0%BD%D0</p>	<p>It will be considered.</p>

Table of comments

	<p>%B0%D0%BB%D0%B5%D0%BD-%D1%80%D0%B0%D0%B7%D0%B2%D0%BE%D1%98-%D0%BD%D0%B0-%D1%80%D0%B5%D0%BF%D1%83%D0%B1%D0%BB%D0%B8%D0%BA%D0%B0-%D1%81%D0%B5%D0%B2%D0%B5%D1%80%D0%BD%D0%B0-%D0%BC%D0%B0%D0%BA%D0%B5%D0%B4%D0%BE%D0%BD%D0%B8%D1%98%D0%B0-2021-2031</p>	
	<p>The Programme for development of the South-East planning region 2021-2026 was adopted from the Council for development of the South-East planning region on 15.04.2021. The official document is attached to the email. Please include the SG, PP and Measures from the official document. The Programme is also available on this web page: https://southeast.mk/wp-content/uploads/2021/04/%D0%9F%D1%80%D0%BE%D0%B3%D1%80%D0%B0%D0%BC%D0%B0-%D0%B7%D0%B0-%D1%80%D0%B0%D0%B7%D0%B2%D0%BE%D1%98-%D0%BD%D0%B0-%D0%88%D1%83%D0%B3%D0%BE%D0%B8%D1%81%D1%82%D0%BE%D1%87%D0%BD%D0%B8%D0%BE%D1%82-%D0%BF%D0%BB%D0%B0%D0%BD%D1%81%D0%BA%D0%B8-%D1%80%D0%B5%D0%B3%D0%B8%D0%BE%D0%BD-2021-2026.pdf</p>	<p>- We are grateful for the information and the provided link. The strategic documents of the Republic of North Macedonia will be considered in the same way as the rest of the cited documents in “Strategic Context”</p>
<p>Centre for development of the South-East planning region. (23.04.2021)</p>	<p>On pages 12 and 13: SouthEast to be corrected to South-East</p>	<p>A technical error. It will be considered.</p>
	<p>On page 24 “The leading centres are Blagoevgrad and Stip.” <u>Comment:</u> This should be erased. We don’t have leading centres in urban</p>	

Table of comments

	<p>areas, industrial zones and degraded lands, areas with tourism potential. Entire cross-border region have all these potentials. For example the South-East planning region has numerous of tourism potentials, industrial zones almost in every municipality and 6 urban areas. On the territory of our region is the only natural lake in the Cross-Border region with the only touristic zone – Dojran Lake; many waterfalls on Belasica mountain (the highest permanent waterfall in our country – Smolari waterfall, Koleshino, Gabrovo etc).</p> <p>Because of this we strongly believe that this part should be erased. We don't have leading centres in urban areas, industrial zones and degraded lands, areas with tourism potential. Entire cross-border region have all these potentials.</p> <p>The website to be replaced with http://www.rdc.mk/southeastregion/index.php/en/</p> <p>to be replaced with new web page of the Centre: https://southeast.mk/</p>	<p>The education and the awareness are basic for the development of the knowledge. We certainly do not underestimate the opportunities of the other areas, but to be further developed we will use the potential of the established educational centres. The message of the Strategic objective is harmonized with this. The word “Centre” is used not in the administrative meaning, but “a centre of knowledge” – in the sense of source from which departs the spreading of measures and future projects on the whole territory. As it is stated in the Strategic objective “Social inclusion and <i>cohesion</i> through sustainable economic growth “SO: <i>Social development and cohesion through sustainable economic growth based on a ‘knowledge economy’ and aimed at ironing out the significant differences between population centres at different hierarchical levels in the CBC region</i>”, future interventions will be searched mainly <i>outside</i> the big cities, seeking the desired <i>cohesion</i>.</p> <p>The website will be replaced.</p>
<p>(26.04.2021) National Authority</p>	<p><u>On page 6 –</u> “We can add to this that the information from the Annual Reports 2 on the programme shows that the main share of the implemented cross-border projects are connected with the large urban centres on both sides of the border.” - If the source is with the programme with Turkey – is it suitable for our programme? „From the findings so far, it can be summarised that the defined territory of the strategy:...” - Are this sentences and below conclusions based of Annual Reports with Turkey? If yes, than</p>	<p>The experts from the team also participate in the development of other strategies. A technical error was made in the preparation of the written evidence. Only the link is wrong. The conclusions refer to http://www.ipa-cbc-007.eu/bg/annual-reports.</p>

Table of comments

	<p>they are not valid for this programme. Have to be checked once more.</p> <p>2 http://www.ipacbc-bgtr.eu/en/annual-reports</p>	
	<p><u>On page 7 –</u> <u>“In June 2019, the European Council adopted a new agenda for the EU for the next five years: ‘A New Strategic Agenda 2019—2024’, which defines the priority areas of its work.” -</u> <u>We suggest more details in this title</u></p>	<p>In the present elaboration the strategic documents from regional, national and European level are indicated, the statements of which are the basis of the derived Strategic objective. A link for more details is attached to each document.</p>
	<p><u>On page 8 –</u> <u>The Territorial Agenda 2030 defines two overarching objectives: a Just Europe and a Green Europe, each with three development priorities (P). - The priorities to be added</u></p> <p><u>* The strategic documents of the Republic of North Macedonia referenced in the present Strategy are cited in more detail in this section because they have not yet been published and are, thus far, not widely available.“ - The strategic documents are adopted. The regions will send it for evidence, so you can use the date and number of the document, also the source. The adopted documents have some changes from the draft version, so you have to take it in consideration.</u></p> <p><u>STRATEGY FOR BALANCED REGIONAL DEVELOPMENT OF THE REPUBLIC OF NORTH MACEDONIA 2020—2030 -</u> <u>The Strategy is adopted under the name СТРАТЕГИЈА ЗА РЕГИОНАЛЕН РАЗВОЈ НА РЕПУБЛИКА СЕВЕРНА МАКЕДОНИЈА 2021—2030 (Службен весник на Република Северна Македонија бр.76/21) - You have to use this version of the document.</u> <u>14 СТРАТЕГИЈА ЗА РЕГИОНАЛЕН РАЗВОЈ НА РЕПУБЛИКА СЕВЕРНА МАКЕДОНИЈА 2021—2030</u></p>	<p>In the present elaboration the strategic documents from regional, national and European level are indicated, the statements of which are the basis of the derived Strategic objective. A link for more details is attached to each document.</p> <p>In a working version of the document, the priorities were cited but subsequently dropped out as not to complicate the document. If the group agrees, it is possible to return this version.</p> <p>- Thank you for the information and the link provided. The strategic documents from the Republic of Northern Macedonia will be reflected in the same way as the other cited documents in "Strategic Context".</p>

Table of comments

	<u>(Службен весник на Република Северна Македонија бр.76/21) – corrected period</u>	
	<p><u>On page 9</u></p> <p>DEVELOPMENT PROGRAMME FOR THE NORTH-EAST PLANNING REGION 2020—2024¹⁵</p> <p>СТРАТЕГИЈА ЗА РЕГИОНАЛЕН РАЗВОЈ НА РЕПУБЛИКА СЕВЕРНА МАКЕДОНИЈА 2020—2030</p> <p>15 Прграма за развој на североисточен плански регион 2020—2024 – the text is deleted.</p>	We don't understand the question. Please explain.
	<p><u>On page 10</u> – the text</p> <p>16 Програма за развој на Источен плански регион 2020—2024 година / Центар за развој на Источен плански регион - is deleted</p>	
	<p><u>On page 11</u> – the text</p> <p>17 Програма за развој на Југоисточен плански регион 2020—2024 година / Центар за развој на Југоисточен плански регион - is deleted</p>	
	<p><u>On page 14</u> -</p> <p><i>“It is important to note that a strictly selective approach has been applied in reviewing the documents referred to above in terms of their relevance to the Strategy and in close relation to their territorial aspect, cross-border specificity and the integral nature of the measures provided for therein.”</i> - Why this note is important to stay here? Is it general for the both country or only for Macedonian documents?</p>	The notes is related to the whole “Strategic context” due to which is in the end of it.
	<p><u>On page 23</u> –</p> <p>Corrected name – Shtip</p> <p>Zone of the European Green Belt</p> <p><i>“ The leading centres here are Kyustendil and Strumica which will serve not only as a link with the polycentric network but also as two distinct nuclei of application and dissemination of</i></p>	The substantiated justification for the system of centres, written for Blagoevgrad and Shtip, also applies to Kyustendil and Strumica. There are cities of knowledge, and here - cities of green structure. Again, the measures will be targeted mainly

Table of comments

	<p><i>interventions and innovations pursuing ecological ('green') aims within the framework of the measures of the Strategy. It is through them than an impetus will be given to the development of the entire area in the sphere of the green infrastructure and the circular economy.”</i> - Why only Strumica, when the Green belt is all over three regions in Republic of North Macedonia? We think that all 3 regions have to be mentioned in one more sentence. We suggest more data for the green belt – 2, 3 sentences more to be added.</p>	<p>outside the big cities, with a view to convergence and sustainable development in all settlements.</p>
	<p>On page 24 – Zone of active transport communication</p> <p><i>“The opening of a new border crossing point would lead to the expansion of that zone and to accelerated intensive development of the cross-border area.”</i></p> <p>- Klepalo new border cross point to be mentioned and 2 municipalities from both sides</p> <p>Zone of intervention - <i>the entire territory covered by the Strategy comprised of urban areas, industrial zones and degraded lands, areas with tourism potential (historical, cultural, natural, etc.), which provide a wide range of opportunities and weaknesses. The leading centres are Blagoevgrad and Stip</i></p> <ul style="list-style-type: none"> - Why in the Zone of intervention Blagoevgrad and Stip are selected only? - This part has to be more broadly because it covers all areas of intervention. Also, in Stip and surroundings, as well as other bigger cities are covered with mentioned areas. We do not think that only Stip is leading Centre. <p>Corrected text as filled :</p>	<p>It will be considered.</p>

Table of comments

	<i>The tourism sphere is possibly one of the most comprehensive strategic areas of cross-border cooperation, and the cultural, historical and natural assets, the numerous spiritual sites and places of worship on both sides of the border.</i>	
--	--	--

In conclusion, the team would like to thank once again to all of you, our partners, for the shared knowledge and the readiness for cooperation on this work.