

**Construction of new railway section from Kriva Palanka to
the border with Republic of Bulgaria, as part of Corridor
VIII**

Resettlement Action Plan

**Public Enterprise for Railway Infrastructure Railways of Republic of
North Macedonia – Skopje**

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Explanation note:

The project is expected to be financed in part by an approved Instrument for Pre Accession II (IPA II) grant. This grant shall be deployed through the IPA Operating Structure. See for further details: IPA 2014-2020 (IPA II) - CFCD (finance.gov.mk). In that context, the Environmental and Social instruments, including this document, shall be implemented by the Public Enterprise for Railway Infrastructure Railways of Republic of North Macedonia – Skopje in collaboration with the Contracting Authority, the Central Financing and Contracting Department within the Ministry of Finance, and the Ministry of Transport and Communication.

List of Abbreviations

Abbreviation	Meaning
AC	Alternating Current
BJE	Bureau of Judicial Expertise
CLO	Community Liaison Officer
CM	Cadastral Municipality
CP	Cadastral Parcel
DBL	Developed Building Land
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIB	European Investment Bank
ESP	Environmental and Social Policy
EU	European Union
E&S	Environment and Social
GRM	Grievance Redress Mechanism
GUB	Ground Under Building
GUIF	Ground Under Infrastructure Facilities (Artificial Infertile Land)
GUO	Ground Under Objects (Artificial Infertile Land)
kV	Kilovolt
OCL	Overhead contact line
OG	Official Gazette
PAP	Project Affected Person
PC	Partial Compliance
PE ZRSMI	Public Enterprise for Railway Infrastructure Railways of Republic of North Macedonia - Skopje
PPE	Personal protective equipment
PR	Performance Requirement
RAP	Resettlement Action Plan
RCF	Resettlement Compensation Framework
RNM	Republic of North Macedonia ¹
RM	Republic of Macedonia ²

¹ The country formerly known as the Republic of Macedonia officially changed its name to the Republic of North Macedonia. The renaming came into effect in February 2019. RNM is used for the acts and events that were adopted or happened after February 2019.

² Republic of Macedonia was the official name of the state before February 2019. RM is used for the acts and events that were adopted or happened before the change of name.

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Abbreviation	Meaning
RNMT	Railways of North Macedonia Transport
SEP	Stakeholder Engagement Plan
SPSS	Statistical Package for Social Science
TPS	Traction Power Substation
TSI	Technical Specifications for Interoperability
UBL	Undeveloped Building Land

Definition of Terms

Affected person refers to a legal or natural person experiencing either physical or economic displacement as a result of project-related land acquisition, and restrictions on land use, other assets or natural resources.

Compensation Payment in cash or in kind for asset/s and/or resource/s acquired or affected by the project.

Cut-of-date The date after which anyone who moves into the project area is no longer entitled to compensation and/or assistance. In practice, the cut-off date is usually the date of completion of the census of people and inventory of assets in the project-affected area, unless there are local legal provisions for another arrangement. Persons found occupying the project area after the cut-off date are not eligible to project compensation or other resettlement benefits. Similarly, fixed assets (such as built structures or crops) established after the cut-off date will not be compensated. Based on national legislative, the day of submission of the expropriation proposal is considered as cut-off date.

Vulnerable people or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths, and the elderly), physical or mental disability, literacy, political views, or social status. Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations, such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.

Economic displacement Loss of assets (including land) or access to assets that leads to loss of income or means of livelihood as a result of project-related land acquisition or restriction of access to natural resources. People or enterprises may be economically displaced with or without experiencing physical displacement.

Expropriation The right of the Government by means of Eminent Domain to take or limit ownership rights over a property subject to compensation at replacement cost.

Geodetic report / Elaborate for Expropriation According to the Macedonian Expropriation Law, a separate document Geodetic report is prepared for numerical data on the real estate for which expropriation is proposed. This report is developed on the database of the Agency for Real Estate Cadastre.

Grievance redress mechanism Project specific procedures and mechanism in place in parallel to official grievance panels, allowing affected people to lodge a complaint or a claim, related to direct or indirect impact from the Project, without cost and with the assurance of a timely and satisfactory resolution of that complaint or claim.

Involuntary resettlement Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets, or access to assets, including those that lead to loss of income sources or other means of livelihood), or both. The term ***involuntary resettlement*** refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

Land acquisition refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include:

- a) Acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes;

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- b) Repossession of public land that is used or occupied by individuals or households; and
- c) Project impacts that result in land being submerged or otherwise rendered unusable or inaccessible.

“Land” includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.

Livelihood refers to the full range of means that individuals, families and communities utilise to make a living, such as wages from employment; cash income earned through an enterprise or through sale of produce, goods, handicrafts or services; rental income from land or premises; income from a harvest or animal husbandry, share of a harvest (such as various sharecropping arrangements) or livestock production; self-produced goods or produce used for exchange or barter; self-consumed goods or produce; food, materials, fuel and goods for personal or household use or trade derived from natural or common resources; pensions and various types of government allowances.

Livelihood improvement or restoration refers to specific allowances or activities meant to support affected persons in improving or at a minimum restoring their livelihoods compared to pre-displacement levels.

Project Affected People/Persons (PAPs) Any person who, as a result of the land acquisition required by the project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, pasture or undeveloped/unused land), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Not all PAPs will need to move location due to the project.

Replacement cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs. In all instances where physical displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety. The valuation method for determining replacement cost should be documented and included in relevant resettlement planning documents. Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. To ensure compensation at replacement cost, planned compensation rates may require updating in project areas where inflation is high or the period between calculation of compensation rates and delivery of compensation is extensive.

Resettlement action plan is the document in which a client or other responsible entity specifies the procedures it will follow and the actions it will take to mitigate adverse effects, compensate losses and provide development benefits to persons and communities affected by an investment project.

Restriction on land use Limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the Project. These may include restrictions on access to common property resources, restrictions on land use within easements or safety zones.

Stakeholders are persons or groups who are directly or indirectly affected by the project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders belong in the following groups:

- (a) Project affected parties, including individuals and communities within the country who use or have used the cultural heritage within living memory; and
- (b) Other interested parties, which may include national or local regulatory authorities that are entrusted with the protection of cultural heritage and nongovernmental

organizations and cultural heritage experts, including national and international cultural heritage organizations.

Stakeholder Engagement Broad, inclusive and continuous process between the project proponent and those potentially affected by the Project that usually spans the life of the Project. It includes broad participation and input to project design and procedures, including consultations, consultations, information disclosure and dissemination.

Transitional allowance - Describes one-off cash compensation as an additional financial assistance to facilitate PAP adjustment in the area to which they are relocated. It is determined on a case-to-case basis, depending on information gathered during social survey and by obtaining relevant data on income and livelihood. Transitional allowance shall then be determined commensurate with the loss.

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1. INTRODUCTION

The Public Enterprise for Railway Infrastructure Railways of Republic of North Macedonia (PE ZRSMI) is a public company in charge of the construction and maintenance of the railway.

PE ZRSMI intends to select future build contractor to construct the 23.4km new single-track, 100km/h max. design speed railway between Kriva Palanka and the border with Bulgaria (the Project or Section 3), which is part of the Railway Corridor VIII - Eastern Section Project.

The European Bank for Reconstruction and Development (the “EBRD”) and the European Investment Bank (the “EIB”) are considering providing finance for this section as part of the loan agreement signed with the Republic of North Macedonia. This document presents the Resettlement Action Plan (RAP) for Section 3 of the railway, from Kriva Palanka to the Bulgaria border (hereafter “The Project”), which conforms to national legislation and best international practice, specifically: EBRD’s Performance Requirement (PR) 5 on land acquisition and involuntary resettlement; and EIB Standards 6 and 7 on land acquisition, expropriation and/or restrictions on land use.

The purpose of this RAP is to set out the principles, objectives, policies, procedures, measures, and organisational responsibilities and proposed schedules, related to the resettlement and compensation of Project Affected Persons (PAPs) for Section 3 of the railway. The RAP should be considered as a working document that will be updated and refined throughout the development and implementation of the resettlement process.

In addition, as the project design does not currently detail construction works that may have short-term and reversible impacts that might occur after appointment of a Project Contractor. The focus of the current version of the RAP is on the permanent, rather than temporary, resettlement impacts of the Project.

In terms of data, the current version of the RAP is based on the analysis of following main data sources (i) the *Socio-economic Survey* (including meetings, questionnaires, and interviews) supported by PE ZRSMI in May 2022, which is primarily used to establish a resettlement baseline; (ii) the *Elaborate for Expropriation* prepared by Geodetic company (on behalf of PE ZRSMI) in January and February 2022, which is primarily used to identify affected land, properties and PAPs eligible for compensation (results provided in full in Annex 1) and the Asset Inventory and Valuation prepared by the Bureau of Judicial Expertise (BJE), under the Ministry of Justice of the Republic of North Macedonia completed for the permanent way only.

In order to mitigate resettlement impact related to the access roads in Kriva Palanka, PE ZRSMI initiated an access roads redesign process that will result in saving total of 23 houses from demolition. At this moment, there is no Asset Inventory and Valuation data available for this part at this time and the estimate made on the available data is that 8 additional parcels are affected with an area of 13378 m² as well as a building of 73 m².

The finalisation of the RAP is contingent on Asset Inventory and Valuation for the access roads in Kriva Palanka.

The RAP is structured across the following sections: (1) Introduction; (2) Principles and objectives; (3) Project description; (4) Project Impacts (5) Legal review and GAP analysis; (6) Socio-economic survey and baseline; (7) Eligibilities and entitlements; (8) Resettlement and livelihood restoration; (9) Institutional arrangements; (10) Consultation and grievance redress and (11) Timetable and budget; (12) Monitoring and reporting; (13) Annexes.

2. PRINCIPLES AND OBJECTIVES

The key principles of this RAP are:

- Resettlement and compensation of affected households / businesses / land parcels shall be carried out in accordance with the applicable Country legislation, EBRD`s Environmental and Social Policy Performance Requirement 5 and EIB`s Standards 6 and 7. In the case of inconsistency between them, the highest standards will be adopted.
- Both the loss of land (physical displacement) and the loss of livelihoods (economic displacement) shall be minimised wherever feasible.
- Short-term temporary Project displacement impacts will also be considered and affected persons entitled to compensation or other assistance.
- The entitlements of all categories of affected peoples (including any host communities receiving resettled communities) will be established.
- Robust methods will be used to value affected assets or resources, or the access thereto, and livelihood impacts, involving independent qualified parties.
- Livelihoods and standards of living of affected persons shall be improved or at least restored to the level prior to project related displacement, in as short period as possible.
- Procedures will also be adopted to compensate persons with recognisable rights to land and property where owners remain unknown at the cut-off date.
- Compensation will be provided prior to any land or property expropriation.
- The Government of RNM will fund all RAP compensation and resettlement activities.
- All transactions to acquire land rights, as well as compensation measures and relocation activities will be documented.
- Affected persons and communities (including vulnerable groups and individuals) will be consulted to facilitate their early and informed participation in decision-making processes related to resettlement and ensure that acquisition and compensation activities are implemented with appropriate disclosure of information and consultation.
- Procedures will be established to monitor and evaluate implementation of the RAP and corrective actions will be taken as necessary.

The key objectives of this RAP are to:

- Minimize the negative effects of population displacement and resettlement.
- Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to land by providing compensation for loss of assets at replacement cost and ensuring that resettlement activities are implemented with appropriate disclosure of information, public consultation, and the informed participation of those affected.
- Improve or restore livelihoods and living standards of Project displaced persons.
- Improve the living conditions of physically displaced persons through the provision of adequate replacement housing.
- Establish organisational arrangements and procedures to monitor the implementation of resettlement plan and take corrective actions as necessary.

3. PROJECT DESCRIPTION

The Railway Corridor VIII – Eastern Section runs across the North-Eastern region of Republic of North Macedonia, the municipalities of Kumanovo, Staro Nagoričane, Kratovo, Rankovce and Kriva Palanka. It is a single-track railway and comprises the following sub-sections:

- Section 1: Kumanovo – Beljakovce (30.8 km) which was partially completed between 1994 and 2004 (approx. 50%). The original rehabilitation/ construction works under the EBRD loan were delayed for several reasons between 2013 and 2020 when the works were re-tendered in combination with Section 2. The works contract was signed with Strabag Sp.zoo. & Strabag ag & Strabag Rail a.s. in July 2022. Works commenced shortly after and are ongoing and plan to be completed by the end of 2024;
- Section 2: Beljakovce – Kriva Palanka (34 km) which was under construction between 1996 and 2004 when some of the structures (viaducts, tunnels, underpasses, culverts) were partially built. The rehabilitation/ new construction works under the EBRD loan were awarded to Gulermak Agir Sanayi Insaat Ve Taahhut Anonim Sirketi in July 2022. Works commenced shortly after and are ongoing and planned to be completed by the end of 2025.
- Section 3: Kriva Palanka – Deve Bair (the state border with Bulgaria) which is a 23.4 km-long stretch yet to be constructed with a maximum design speed of 100 km/h.

The Project comprises the construction of Section 3: Kriva Palanka – Border with Bulgaria and electrification of the Eastern Section (Section 1, Section 2, Section 3, i.e. 88 km in total). The Project alignment is shown on Figure 1.



Figure 1 Railway Corridor VIII – Eastern Section

The Project is expected to be tendered in 2023, with construction works commencing in 2024 and to become operational after 5 years, in 2027/2028.

The Project design was conducted in line with Macedonian and EU technical and operational standards (including the Technical Specifications for Interoperability – TSI).

Section 3 Railway Line.

The project area (Section 3) is located on the territory of the municipality of Kriva Palanka, which belongs to the Northeast Region of the Republic of North Macedonia. Section 3 starts before the town of Kriva Palanka (at km 64 + 942.01) and extends to the border with the Republic of Bulgaria (at km 88 + 364.65). The project area encompasses the following settlements: T'Iminci, Kriva Palanka, Gradec, Lozanovo, Drenje, Kiselica, Trnovo, Zidilovo, Krklja, Kostur and Uzem (Figure 1).

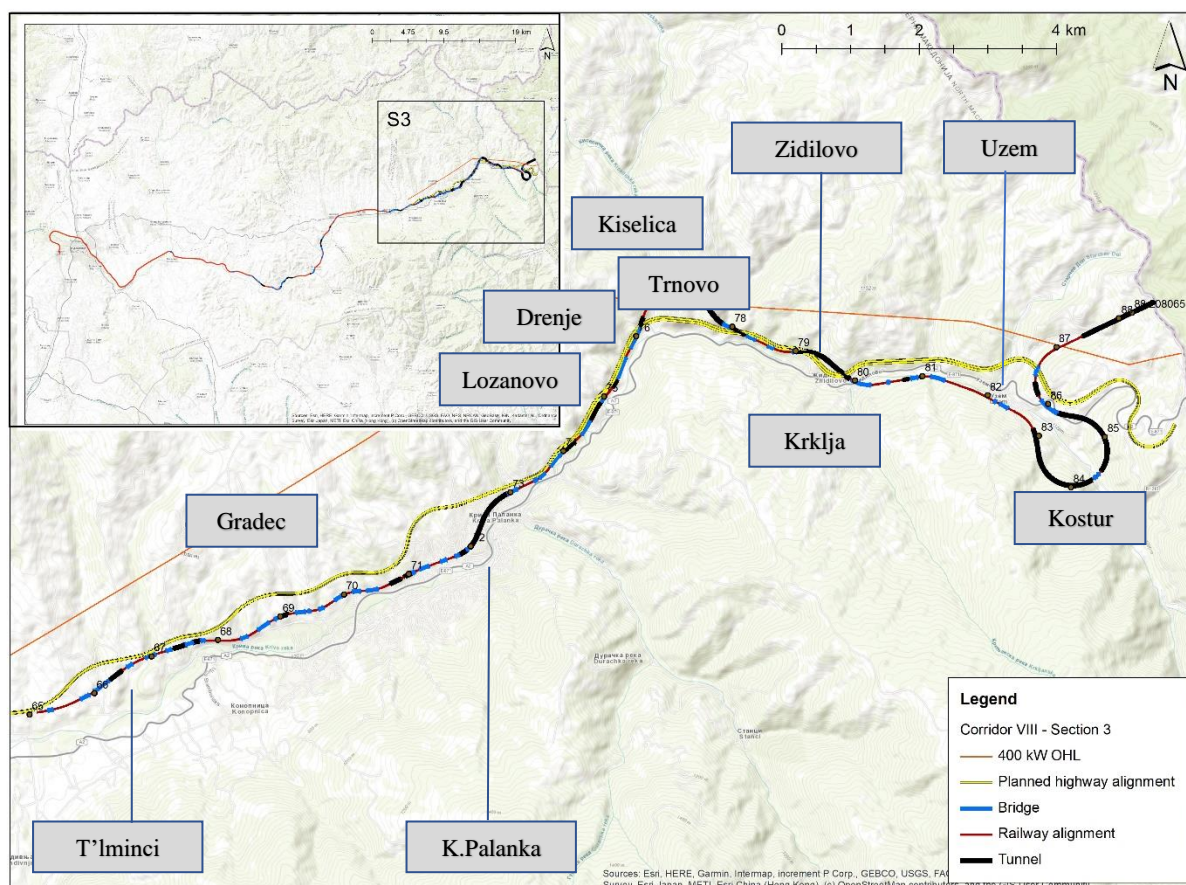


Figure 2 View on the Railway Corridor VIII – Eastern Section with a detailed overview of Section 3 Kriva Palanka (T'Iminci) to Deve Bair³

The Project comprises the following:

- Section 3: Construction of 23.4km new single-track, 100km/h max. design speed railway between Kriva Palanka and the border with Bulgaria. The scope includes the following:
 - a station in Kriva Palanka with 2 side tracks and 3 tracks for maintenance and stabilisation,
 - a halt in the village of Zhidilovo with 2 side tracks,
 - border tunnel "Deve Bair" on the territory of the Republic of North Macedonia,
 - 22 tunnels with a total length of about 10 km and
 - 52 bridges (viaducts) with a total length of about 5 km.
- Electrification for Sections 1, 2 and 3 which includes:

³ Figure taken from EIA 2012

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- Construction of approx. 90 km of overhead contact line (OCL) and the relevant earth protection system.
- Construction of 1 new traction power substation (25 kV TPS) 25 kV AC in Kratovo (located on Section 2: Beljakovce to Kriva Palanka) and 1 in Kriva Palanka.
- connection to 110 kV feeder and construction of 110 kV current transformer station on the same location of 25 kV TPS.

The scope of work related to Section 3 consists of the following activities:

- The execution of earthworks and drainage,
- The construction of 52 bridges and 22 tunnels, including reconstruction of the 1150m border tunnel within the Macedonian territory,
- The execution of 23.5 km main track, 4.3 km station tracks and 14 sets of points,
- The construction of a substation West of Kriva Palanka.

In respect of related facilities, Section 3 is foreseen to have:

- one station (in Kriva Palanka at km 70.58 with 2 side tracks and 3 tracks for maintenance and stabilisation),
- one halt in the village of Zhidilovo at km 80.37 with two side tracks, and
- passenger building and a railway maintenance facility.

The Project construction will require⁴ operation of borrow pits, quarries, concrete batching plants, disposal of excess spoil material (landfills) and construction of temporary roads to provide access to construction sites⁵. A total of 522 plots of land and an area of 646 801 m² is affected and will be permanently expropriated.

The preliminary and main designs for the Project were prepared in 2017 and are available in English. According to the design, a total of 46 access roads will be constructed (to a total length of 10.6 km) providing access to bridge abutments and piers, tunnel entrances and exits, and tunnel firefighting points (where there is no access from an existing road). Part of it, due to the significant social impact related with (demolition of 23 houses) is subject of redesign.

⁴ Considered as associated facilities.

⁵ Most of it already in place because of the ongoing construction of other infrastructural projects in the area.

4. Project displacement impacts

This section presents the key physical and economic Project displacement impacts, based on analysis of the available Geodetic report / Elaborate for expropriation prepared for PE ZRSMI in 2022, socio-economic survey and the completed Asset Inventory and Valuation for the permanent way. The Geodetic Report / Elaborate for Expropriation is based on the secondary data base provided by the Agency for Real Estate Cadastre. The registers or evidence of the Agency for Real Estate Cadastre are not always up to date with newer information.

The full results of the analysis of Geodetic report / Elaborate for expropriation, Asset Inventory and Valuation are contained in Annex 13.1.1.

The project displacement impacts are divided in two parts:

- ✚ Impacts related to permanent way. This includes project impacted land, asset, structures, and businesses located on the permanent way and access roads in Cadastre Municipality (CM) T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and CM Uzem and on the permanent way in CM Kriva Palanka, and
- ✚ Impacts related to access roads. This includes project impacted land, asset, structures, and businesses located on the access roads and slopes in the Cadastre Municipality of Kriva Palanka and CM Trnovo.

4.1 Impacts related to permanent way

The total number of the project affected land plots for permanent expropriation for the construction of the permanent way and access roads in the following cadastre municipalities: T'Iminci, Gradec, Lozanovo, Kiselica, Trnovo, Drenje, Krklja, Zidilovo, Kostur and Uzem and on the permanent way in the cadastre municipality of Kriva Palanka is 514. Of these 514 parcels, about 6% of them will be fully acquired, while 94% will be partially acquired. These land plots by ownership status are shown in table 1 below. However, the data set about the affected land parcels is given in the Annex 13.1.1.

Table 1 Land parcels affected by permanent project land acquisition for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and CM Uzem and the permanent way in CM Kriva Palanka

	Ownership	No of parcels affected by permanent land acquisition		
		No. of parcels	Area in m ²	%
1.	Private owned	293	232,792	36.69%
2.	State owned	217	391,051	61.64%
3.	Co-owned state / private	2	1,952	0.31%
4.	Company owned	1	1	0.00%
5.	Macedonian Orthodox Church	1	7,628	1.20%
	TOTAL	514	633,423	100.00%

The land acquisition by cadastre municipalities is shown in the next table.

Table 2 Land acquisition by individual owners of the land and assets and state-owned land for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

Cadastre Municipality		Permanent Land Expropriation by individual owners			Permanent Land Acquisition of state-owned land		
		Number of parcels	Area in m ²	%	Number of parcels	Area in m ²	%
1.	CM TIminci	43	20,246	8.70%	38	19,008	4.86%
2.	CM Gradec	25	21,878	9.40%	18	87,299	22.32%
3.	CM Lozanovo	-	-	-	4	16,804	4.30%
3.	CM Kriva Palanka	36	17,557	7.54%	65	58,576	14.98%
4.	CM Drenje	18	46,618	20.03%	3	1,468	0.38%
5.	CM Kiselica	8	24,289	10.43%	7	12,460	3.19%
6.	CM Trnovo	1	305	0.13%	3	15,400	3.94%
7.	CM Zidilovo	9	4,650	2.00%	23	68,721	17.57%
8.	CM Krklja	2	446	0.19%	13	55,115	14.09%
9.	CM Kostur	28	14,974	6.43%	-	-	-
10.	CM Uzem	123	81,829	35.15%	43	56,200	14.37%
TOTAL		293	232,792	100.00%	217	391,051	100.00%

Regarding the land use of the privately owned land, the overview is given in the following table.

Table 3 Types of privately owned land affected by permanent project land expropriation for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

	Land class / type	m ²	%
1.	Arable land -3-rd class	771	0,33%
2.	Arable land -4-th class	4,714	2,02%
3.	Arable land 5-th land	1,005	0,43%
4.	Arable land 6-th class	5,351	2,30%
5.	Arable land 7-th class	7,967	3,42%
6.	Arable land 8-th class	18,701	8,03%
7.	Pasture without class	158	0,07%
8.	Pasture – 4-th class	14,181	6,09%
9.	Pasture – 5-th class	10,644	4,57%
10.	Pasture – 6-th class	43,101	18,51%
11.	Pasture – 7-th class	9,243	3,97%
12.	Orchard 2-nd class	677	0,29%
13.	Orchard 4-th class	1,393	0,60%
14.	Orchard 5-th class	2,699	1,16%
15.	Orchard 6-th class	357	0,15%
16.	Orchard 7-th class	754	0,32%
17.	Stone covered areas	302	0,13%
18.	River	912	0,39%
19.	Public road	360	0,15%
20.	Forest 2-nd class	10,946	4,70%

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	Land class / type	m ²	%
21.	Forest - 3-rd class	26,737	11,49%
22.	Forest - 4-th class	20,042	8,61%
23.	Forest - 5-th class	17,560	7,54%
24.	Forest - 6-th class	8,900	3,82%
25.	Forest – 7-th class	8,383	3,60%
26.	Forest -8-th class	257	0,11%
27.	Vineyard	114	0,05%
28.	DBL(Developed Building Land)	2,831	1,22%
29.	GUB (Ground Under Building)	630	0,27%
30.	Yard	788	0,34%
31.	Meadows without class	892	0,38%
32.	Meadows 3-rd class	3,531	1,52%
33.	Meadows 3-th class	354	0,15%
34.	Meadows 5-th class	5,978	2,57%
35.	Meadows 6-th class	173	0,07%
36.	Meadows 7-th class	1,386	0,60%
	TOTAL	232,792	100.00%

Most state-owned Project affected lands are pastures and forests, as shown in table 3.

Table 4 Types of state-owned land affected by Land Acquisition expropriation for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

	Land class / type	m ²	%
1.	Arable land without class	1,116	0.29%
2.	Arable land -4-th class	2,256	0.58%
3.	Arable land 5-th land	19,485	4.98%
4.	Arable land 6-th class	278	0.07%
5.	Arable land 8-th class	2,636	0.67%
6.	Channel	14	0.00%
7.	Ravine – Dales	749	0.19%
8.	Pasture – 1-st class	773	0.20%
9.	Pasture – 4-th class	23,796	6.09%
10.	Pasture – 5-th class	52,588	13.45%
11.	Pasture – 6-th class	6,130	1.52%
12.	Pasture – 7-th class	13,197	3.37%
13.	Orchard 2-nd class	12	0.00%
14.	Orchard 5-th class	3,549	0.91%
15.	Orchard 6-th class	23,886	6.11%
16.	Stone covered areas	1,496	0.38%
17.	Streams	675	0.17%
18.	Streets	22	0.01%
19.	River	19,441	4.97%
20.	Public road	814	0.21%
21.	Uncategorized road	4,048	1.04%

	Land class / type	m ²	%
22.	UBL (Undeveloped Building Land)	44	0.01%
23.	Forest - 3-th class	41,410	10.59%
24.	Forest - 4-th class	34,145	8.73%
25.	Forest - 5-th class	99,297	25.39%
26.	Forest - 6-th class	18,386	4.70%
27.	Forest -8-th class	9,129	2.33%
28.	DBL (Developed Building Land)	606	0.15%
29.	GUB (Ground Under Building)	69	0.02%
30.	GUIF (Ground Under Infrastructure Facilities)	161	0.04%
31.	GUO (Ground Under Objects)	4,546	1.15%
32.	Yard	280	0.07%
33.	Meadow 3-th class	2	0.00%
34.	Meadow 4-th class	60	0.02%
35.	Meadow 5-th class	5,012	1.28%
36.	Meadow 6-th class	906	0.23%
37.	Meadow 7-th class	37	0.01%
TOTAL		391,051	100.00%

4.1.2. Project impacted structures

Based on the analysis of the Geodetic report / Elaborate for expropriation, the total number of affected houses was originally identified to be 48. But because all buildings are registered in the cadastre or in the Geodetic report / Elaborate for expropriation as Ground Under Buildings (GUB), subsequent ground truthing survey established the number of affected houses to be 38, with the other 10 buildings identified as garages or ancillary buildings. However, the total number of affected structures on the permanent way was 15, as most of the affected structures are located on project access roads and slopes subject to further project design changes or redesign.

Table 5 below shows the 15 structures proposed for demolition, alongside their legal status. It is significant to note that most structures are illegally constructed. Many of the owners of these structures have submitted requests for legalization. However, PE ZRSMI refused legal permission due to the planned construction of the railway.

The proposed house for demolition in CM Kriva Palanka on Figure 5, was constructed on the land parcel on state-private owned land parcel without permit building.

Table 5 Privately owned buildings affected by Land Expropriation and their legal status

	Cadastre Municipality	Number of the buildings	Illegally constructed buildings	Legally constructed buildings	No information
1.	CM Trnovo	-	-	0 ⁶	-
2.	CM Kiselica	1	1	-	-
3.	CM Kriva Palanka	7 ⁷	5	1	1
4.	CM Drenje	1 ⁸	-	-	1

⁶ The access road in this area will be redesigned with approval from the EBRD. With the redesign of the access road, the demolition of this house will be avoided. The house is given on the Figure no. 4.

⁷ One house for demolition is semi-detached house.

⁸ The valuation for this parcel was added later.

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	Cadastr Municipality	Number of the buildings	Illegally constructed buildings	Legally constructed buildings	No information
5.	CM Zidilovo	1	1	-	-
6.	CM Uzem	5	3	2	-
	TOTAL	15	10	3	2

The project affected houses in CMK.Palanka, Drenje, Zidilovo and Uzem are shown in the following figures.



Figure 3 The location of the proposed houses for demolition in CM Kiselica and CM Drenje

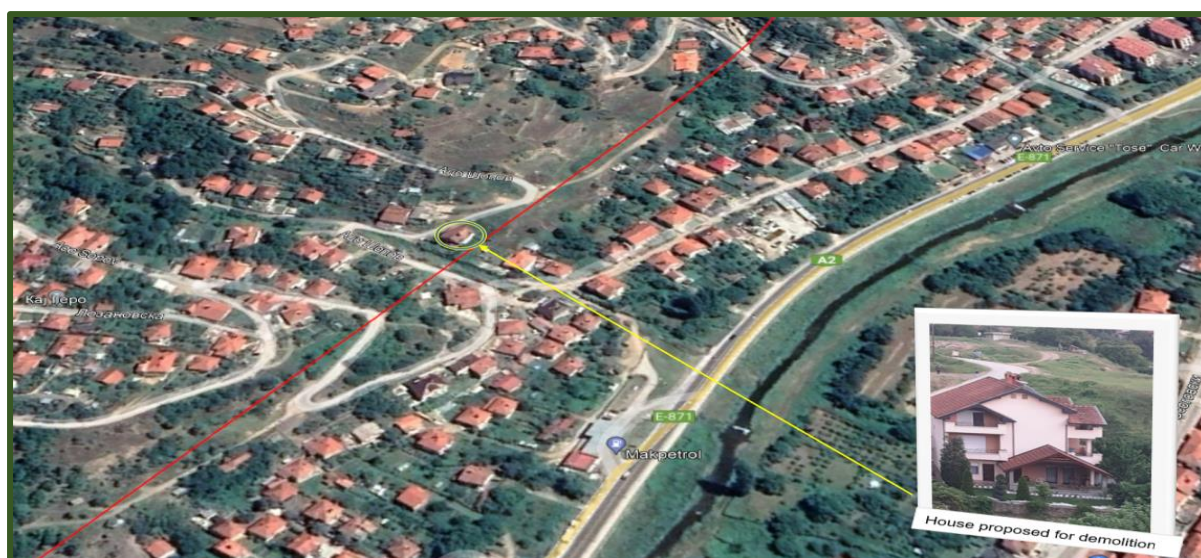


Figure 4 The location of the proposed house for demolition in CM Kriva Palanka



Figure 5 The location of the proposed houses for demolition in CM Kriva Palanka

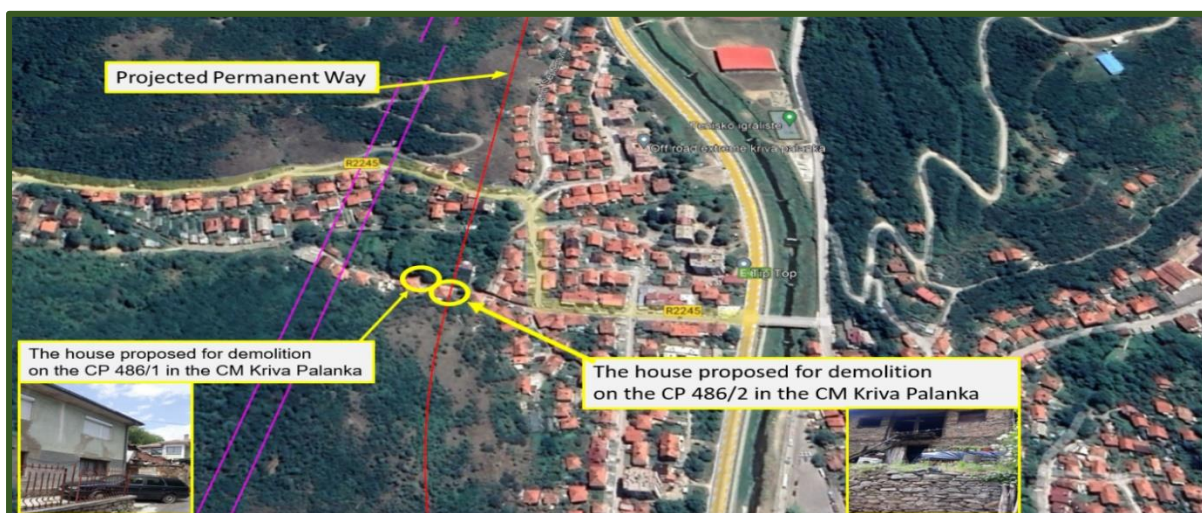


Figure 6 The location of the proposed houses for demolition in CM Kriva Palanka

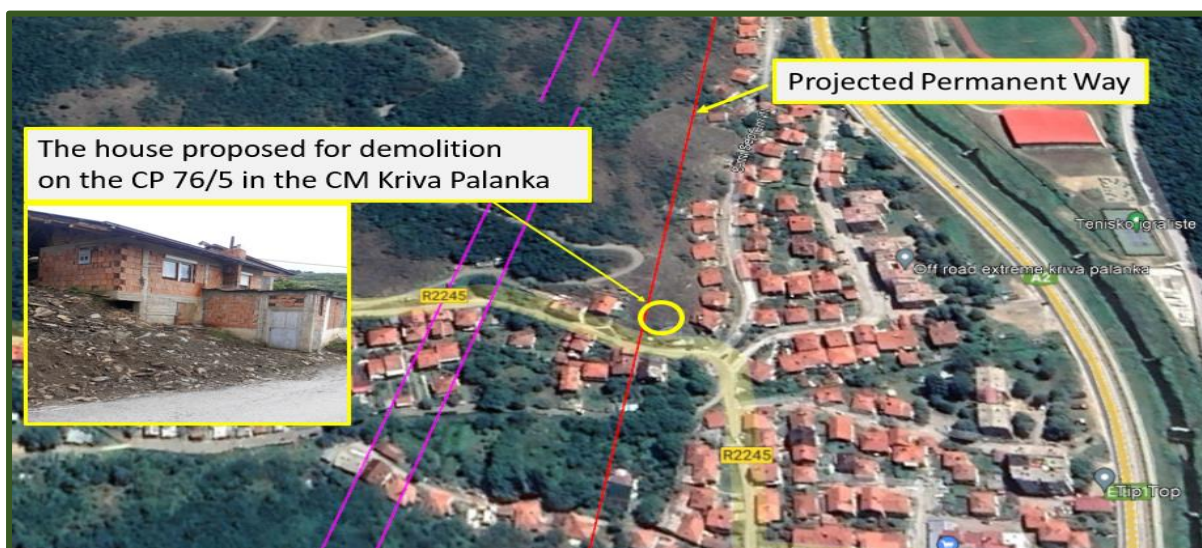


Figure 7 The location of the proposed houses for demolition in CM Kriva Palanka

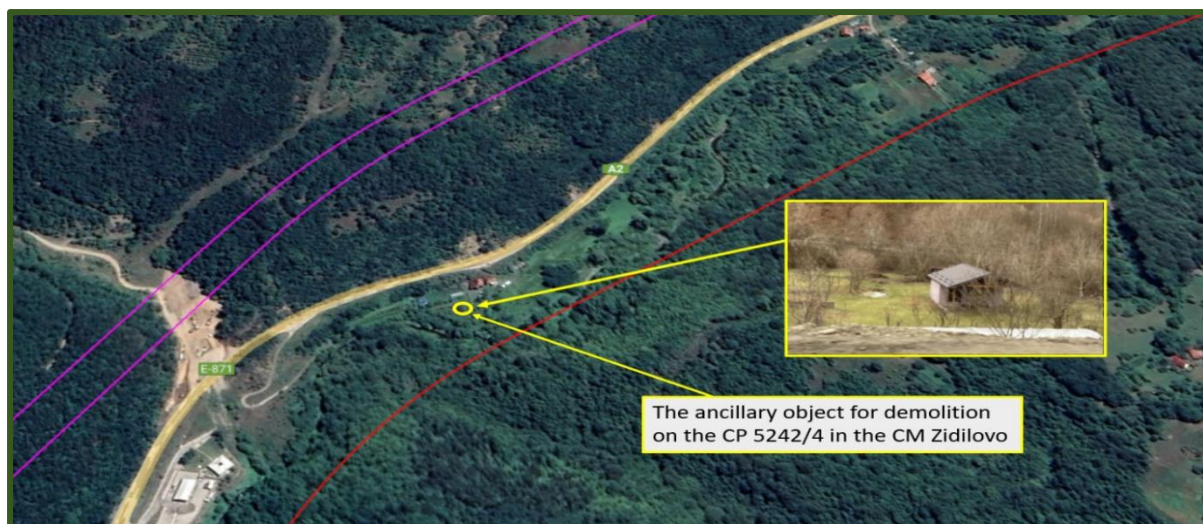


Figure 8 The location of the proposed house for demolition in CM Zidilovo (CP 5242/4)

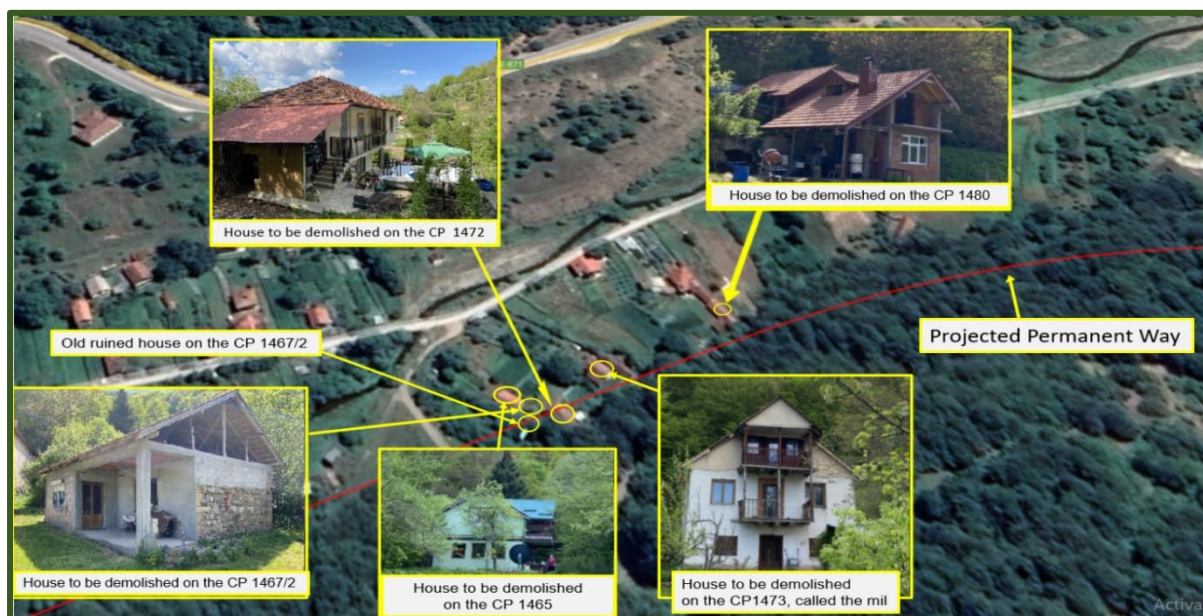


Figure 9 The locations of the proposed houses for demolition in CM Uzem

4.1.3. Project impacted businesses

In total, the project is affecting four businesses. All four of the businesses are registered and valid, in accordance to the relevant national legislation.

Based on the analysis of the Geodetic report / Elaborate for expropriation, one business was identified to be affected by the project, however, the subsequent socio-economic survey identified three more affected companies on land plots earmarked for expropriation.

The scope of the impact on three of four businesses includes land and buildings where the businesses are implemented. Additionally, the impact involves loss of income (profit).

One is registered at the address of a house proposed for demolition (CP 1430/2) and its garage and yard are used to perform registered working activities involving three persons undertaking car disassembly for onward sale of the parts. The location of this business is shown in Figure 10 below.

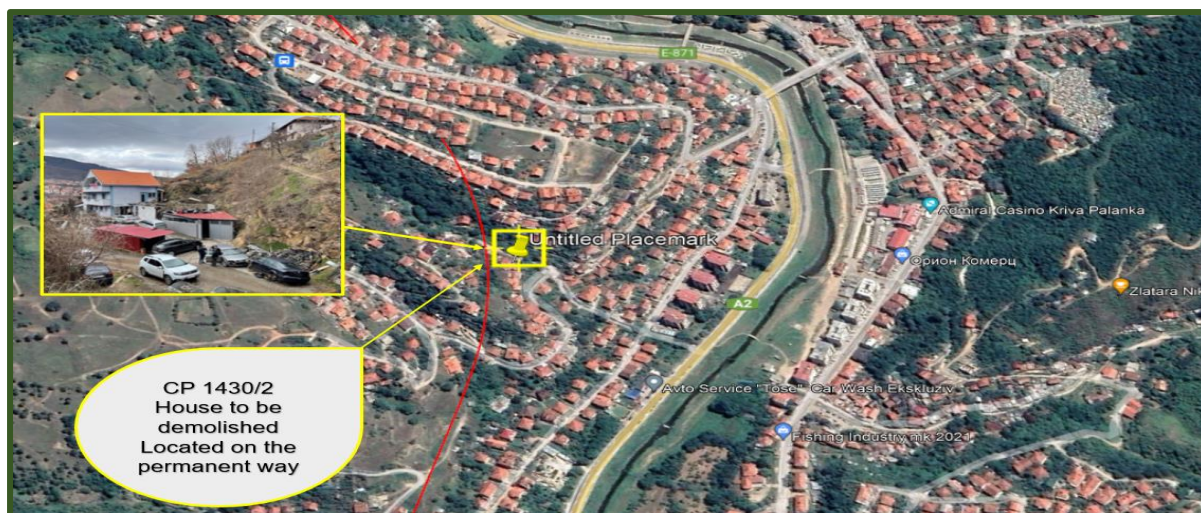


Figure 10 The location of the proposed house for demolition between the tunnels in CM Kriva Palanka

The second company is registered on the cadastre parcel 469. Three types of work premises have been built on this land parcel and the company is engaged in the production of PVC windows and doors, as well as meat processing. The company has several full-time employees. The company turnover in 2021 was more than 1.000,000 Macedonian denars.



Figure 11 The location of the proposed production premises for demolition, located at CP 469, in CM Kriva Palanka

The third structure was registered on the CP 1359/2 in the cadastral municipality of Kriva Palanka (Figure 12). During the last elections, this structure was used as the seat of an election headquarters.



Figure 12 The location of the proposed structure for demolition, located at CP 1359/2, in CM Kriva Palanka

The fourth affected business is part of a parcel located in CM Kostur. This one is affected only by land expropriation of only 1m² of the total parcel.

The assessment of businesses includes an assessment of the land, buildings and plantations. The capital assessment (company valuation) will be carried out, as well as an assessment of the amount of damage suffered, as a result of the discontinuance of the business activity. Also, an assessment of the damage caused by the changing of the location⁹ (if such occurred) will be carried out, as well as an assessment of the moving costs¹⁰.

In this phase of the valuation's preparation, the following assessments are prepared: assessments of the land plots, the buildings and all the possessions that are on the land plots (fence, well, etc.). The assessment of the loss of annual / perennial crops and trees in Kriva Palanka it to be done additionally. Further, due to the need to undertake the capital assessment (company valuation), it will be conducted by an expert who possesses a license for certified appraiser (valuer) of the capital of companies, public enterprises, and other business entities. The capital assessment will be conducted according to the Law on Appraisal and appropriate methodology.¹¹ The assessment of the amount of damage suffered as a result of discontinuance of the business activity, as well as the damage caused by the changing of

⁹ Compensation for economic loss incurred as a result of permanent relocation including any discrepancies in livelihood, either to the amount of up to a 30% increase in compensation for the structure (in accordance with the MKD Law on Expropriation) or payment of the value of economic loss until the restoration of business elsewhere (up to 1 year), therefore, the most favourable option is to be determined by the business owner.

¹⁰ An allowance will be made for all moving costs including transport and labour and any legal or other transaction costs.

¹¹ Methodology for capital assessment of companies, public enterprises, and other legal business entities.

the location, if such occurred, as well as the moving costs will be conducted by an expert witness¹² according to the Law on Expertise.

4.2 Impacts related to access roads

A redesign of the access roads in CM Kriva Palanka and CM Trnovo has been done that will save total of 23 houses. Since there is no Asset Inventory and Valuation data available for this part, the estimate on the impact is made based on the available data (overlapping project footprints and cadastral data).

In total, the redesign of the access roads in CM Kriva Palanka and CM Trnovo will affect 13,378 m², that is eight (8) parcels and one (1) building.

The redesign of the access roads in CM Kriva Palanka will need to acquire in total 10,696 m². According to the available information obtained by PE ZSRMI, the total number of affected land parcels will be six (6). Three land parcels are registered in the Agency for cadaster as pastures, two as a forest and only one as an orchard. All parcels are state owned, except of the parcel evidenced as an orchard, which is privately owned land. One building is also affected, located on a state-owned parcel, evidenced as a residential house of total of 73 m², according to the official cadastral data. All available data for this access road are given in the table in Annex 13.1.2. It will be necessary to develop a separate Geodetic report / Elaborate for expropriation, to conduct a geodetic survey to determine other necessary data about the total affected land, cadaster culture, ownership, structures, plantations, in order to prepare a census for the affected land plots from the construction of the access road in CM Kriva Palanka, as well as valuation for the identified assets.

It is important to take into the consideration that the redesign of the other two access roads and slopes in CM Kriva Palanka remain within the current expropriation line and expropriated land for permanent way. There is no need to acquire any additional land parcels for redesign of the access roads and slopes in CM Kriva Palanka.

The access road in CM Trnovo was additionally included in the redesign of the access roads to reduce the total social impact. With the redesign of this access road, the demolition of one privately owned house will be avoided. For the construction of this access roads, there will be a need of acquisition of 2,682 m² of state owned land. The affected area includes total of two (2) parcels, where as one is classified as a pasture and the other is classified as river, according to the cadastral data¹³. All available data for the access road in CM Trnovo are given in the table in Annex 13.1.2. These parcels will be included in the development of the separate Geodetic report / Elaborate for expropriation of the access roads and slopes in CM Kriva Palanka and CM Trnovo, in order to obtain the set of information related to complete the Census for the affected land plots from the construction of the access road in CM Trnovo, upon what valuations should be carried out

Based on the initial screening and bearing in mind the affected parcels and their ownerships related to the redesign of the access roads, additional relevant project affected person are the owners of the building and the orchard. As mentioned above, Geodetic report / Elaborate for expropriation and geodetic survey will be done to obtain the additional information for affected assets and persons, as well as Asset Inventory and Valuation.

¹² An expert witness should possess a licence for forensic expertise issued by the Ministry of Justice of RNM. Supervision over the application of the provisions of this law is carried out by the Ministry of Justice of RNM.

¹³ For this purposes, in accordance with the instructions received from the Ministry of Environment, additional hydrological data is provided to support the redesign

5. LEGAL REVIEW AND GAP ANALYSIS

5.1. Country legislation

The Law on Expropriation of RNM (Закон за експропријација) (Official Gazette of Republic of Macedonia / OG of RNM 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16, 178/16 and 122/21), regulates the deprivation and restriction of the right to ownership and property rights of real estate for the purpose of realization of public interest determined by law, and for the purpose of building facilities and performing other works (hereinafter: expropriation), determining the public interest, the expropriation procedure, and the procedure for determining the market compensation.

According to Article 6, public interest of importance for the RNM in accordance with this Law for expropriation is also determined by: Public interest established by the Law on expropriation in the treatment, rational use and humanization of the space, and protection and promotion of the environment and nature by constructing buildings and performing works of importance for the RNM and the units of local self-government, provided in the Spatial Planning Acts.

In the Macedonian legislation, in addition to permanent or complete expropriation, temporary expropriation is also prescribed, and it refers to the following cases:

- ✓ Temporary land take is performed for the purpose of previous works from geological, geotechnical, geodetic, hydrological, meteorological, urban, technical, technological, economic, energy, seismic, traffic and ecological character, as well as for the preparation of a geodetic report.
- ✓ Temporary land take is carried out for the purpose of conducting detailed geological research of mineral resources, in accordance with the Law on Mineral Resources. Temporary occupation of land may last no longer than six years from the date of transfer to possession of the land, i.e., until the expiration of the period for which the right to conduct detailed geological research has been granted.
- ✓ Temporary occupation of adjacent land is performed due to certain needs for construction and execution of works for realization of public interest (temporary accommodation of mechanization necessary for construction, construction of facilities for temporary accommodation of workers, construction of the access roads and safeguarding of the buildings). The temporary occupation of adjacent land may last for a period not longer than two years.

The Law on Expropriation also prescribes a procedure for expropriation of orphan land or the remaining part of the property. If during the expropriation of one part of the property it is established that the owner does not have any economic interest in using the remainder of the property, that part is also expropriated on his request. With the request, the owner must explain the reason for which he / she requests expropriation until the agreement is reached.

The provisions in the **Constitution of RNM (Устав на РСМ)** (1991) that refer to land title and rights are also relevant. These guarantee legal protection of the ownership and points out that no person may be deprived of his/her property or of the rights deriving from it, except in cases concerning the public interest determined by law. If property is expropriated or restricted, rightful compensation not lower than its market value is guaranteed.

According to the **Law on property and other real property rights (Закон за сопственост и други стварни права)** (OG of RM 18/01, 31/08, 92/08, 139/09 and 35/10) no person may be deprived of his/her property or of the rights deriving from it, except in cases concerning the public interest determined by law and the acts for spatial planning. In case of deprivation (complete expropriation) or restriction (incomplete expropriation), rightful compensation for the property not lower than its market value at the time of expropriation is guaranteed.

The following laws relating to Construction Land, Construction, Real Estate Cadaster, Appraisal,

Expertise, General Administrative Procedure, Administrative Disputes, and the Extra-Judicial Proceedings, also have a role in the application of expropriation.

The Law on Construction Land (Закон за земјоделско земјиште) (OG of RM 15/15, 98/15, 193/15, 226/15, 31/16, 142/16, 190/16 and OG of RNM 275/19) regulates the rights and obligations regarding the construction land, the arrangement of the construction land, the conditions, and the management of the constructed land, as well as other issues related to the construction land.

The Law on Construction (Закон за градба) (OG of RM 130/09, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16, 31/16, 39/16, 71/16, 132/16, 35/18, 64/18, 168/18, OG of RNM 244/19 and 18/20) regulates the construction, the basic requirements of the construction, the necessary project documentation for obtaining a building permit, the rights, and obligations of the participants in construction, manner of use and maintenance of the building, as well as other issues of importance for the construction.

The Law on Real Estate Cadastre (Закон за катастар на недвижности) (OG of RM 55/13, 41/14, 115/14, 116/15, 153/15, 192/15, 61/16, 172/16 and 64/18) stipulates and regulates the management of the geodetic-cadastre information system, the maintenance of the real estate cadastre, the establishment and maintenance of the cadastre of infrastructure objects as part of the real estate cadastre, the basic geodetic works, the geodetic works of special purposes, the real property survey performed in service of the real estate cadastre, the survey and the maintenance of the state borderline of Republic of Macedonia, the topographic maps, the mass property valuation, the establishment and the management of the graphic registry of construction land, the administration of the spatial units registry, the administration of the graphic registry of streets and house numbers, the supervision over the performance of the sole proprietors – authorized surveyors and trade companies for geodetic works, as well as the status, the organization, the functioning and the authorizations of the Agency for Real Estate Cadastre. The definitions of agricultural land and cadastral cultures are set in the *Rulebook of the method of cadastral classification and determination and registration of the change of cadastral culture and land class* (OG of RM 144/13, 149/17, 128/15, 95/15). This prescribes the method of cadastral classification and determination and registration of the change of cadastral and class of land.

The Law on Appraisal (Закон за процена) (OG of RM 115/10, 158/11, 185/11, 64/12, 188/141, 104/15, 153/15, 192/15 and 30/16) regulates the performance of appraisal, the areas, conditions and manner of performing appraisal, the subjects performing appraisal, the conditions and the procedure for taking a professional exam, for issuing or revoking the appraisal license, award and reimbursement of the costs for performed appraisal the competence, organization and operation of the Chamber of Valuers of the Republic of North Macedonia, as well as other issues related to appraisal. The procedure of valuation of agricultural land is defined in the *Methodology for Assessment of the Market Value of real estate* (OG of RM 54/12, 17/13, 21/13 and 142/14). This methodology is applied when estimating the market value of real estate in an expropriation procedure. According to the Article 37 of the Expropriation Law, the market value of expropriated property and property that is given as compensation shall be determined by a qualified appraiser by the governmental body Bureau for Forensic Expertise.

The Law on Expertise (Закон за вештачење) (OG of RM 115/10, 12/14, 43/14, 104/15, 148/15, 192/15 and 64/18) regulates the performance of expertise, the areas, conditions and manner of performing the expertise, the entities performing expertise, the conditions and the procedure for taking the professional exam for issuing, extending, terminating or revoking the expertise license for performing expertise in appropriate area, income and compensation of costs for the performed expertise, establishment, competence, organization and operation of the Chamber of Experts, as well as other issues related to the expertise.

The Law on general administrative procedures (Закон за општа управна постапка) (OG of RM 124/15) regulates the procedure for realization of protection of the rights and legal interests of individuals, legal entities and other parties, as well as protection of the public interest, which are obliged

to act by the ministries, state administration bodies, organizations determined by law, other state bodies, legal and natural persons entrusted by law to exercise public authorizations, as well as the bodies of the municipality, the City of Skopje and the municipalities in the City of Skopje, when in performing their legal competencies, act, decide and undertake other administrative actions in administrative works.

The Law on Administrative Disputes (Закон за управни спорови) (OG of RM 62/06, 150/10 and OG of RNM 96/19) In order to ensure judicial protection of the rights and legal interests of individuals and legal entities and to ensure legality, the Administrative Court in administrative disputes decides on the legality of acts of state administration bodies, the Government, other state bodies, municipalities, and the city of Skopje, organizations determined by law and of legal and other persons in the exercise of public authorizations (holders of public authorizations), when deciding on the rights and obligations in individual administrative matters, as well as on the acts adopted in misdemeanor procedure.

The Law on Extra-Judicial Proceedings (Закон за вон-парнична постапка) (OG of RM 9/08) determines the rules of the procedure according to which the courts act and decide on personal, family, property and other legal conditions and relations determined by this or another law. In the procedure for determining compensation for expropriated real estate, the court determines the compensation for the expropriated real estate. The procedure for determining compensation for expropriated real estate is initiated by the court ex officio when the documents will be submitted to it by the competent body of the administration. To determine the compensation for expropriated real estate, the court will first determine the value of the real estate and for that purpose schedules a hearing. The court summons the former owner and the user of the expropriation to the hearing and gives them the opportunity to comment on the evidence obtained ex officio, on the value of the expropriated real estate and on the amount of compensation. The participants can agree about the amount of compensation in cash for the expropriated real estate. If the participants do not agree, after hearing and presenting the evidence, the court will make a decision that will determine the amount of compensation.

The Law on agricultural land (Закон за земјоделско земјиште) (OG of RM 135/07, 17/08, 18/11, 42/11, 148/11, 95/12, 79/13, 106/13, 164/13, 39/14, 130/14, 166/14, 72/15, 98/15, 154/15, 215/15, 7/16, 39/16 and OG of RNM 181/19) regulates the use, disposal, protection, and conversion of agricultural land.

The Law on Social Protection (Закон за социјална заштита) (OG of RNM No. 104/19, 146/19, 275/19, 302/20, 311/20, 163/21, 294/21, 99/22, 236/22, 65/23, Article 4) regulates the system and organization of social protection, beneficiaries of social protection, rights to financial assistance and social services, procedures for exercising rights and using services, performing social protection activities, personnel, financing and supervision over the performance of social protection and other matters of importance for the performance of the activity of social protection.

Law on Housing (Закон за домување) (OG of RM no. 99/09, 57/10, 36/11, 54/11, 13/12, 55/13, 163/13, 42/14, 199/14, 146/15, 31/16). The key point from social perspective relevant to this project in the Law on Housing is that it envisages the possibility for renting apartments to socially endangered and homeless persons in accordance with the Law on Social Protection. This Law deals, among other things, with the issue of social housing and the housing of the vulnerable groups.

Box 1 below summarises the key points in relation to the national laws on expropriation

Box 1: Key points on compensation

The Law on expropriation guarantees fair compensation, which cannot be lower than the market value of the real estate. The market value of the real estate is determined under conditions and manner determined by this Law, according to the methodology, rules, and standards pursuant by the Law on Appraisal. Article 18 states that “the right to request compensation for expropriated real estate cannot become obsolete”.

Article 37 states that the market value of the expropriated property and property that is

given as compensation shall be determined by a qualified appraiser, pursuant to the Law on Assessment (for ex. on property value). In the following article it is stated that the compensation for the expropriated property shall be determined by rule in money. The legislator prescribed that the owner of the property that is expropriated shall also be entitled to compensation for the crops, seeds, forests on the land and the fruits, if they were not entered in the market value of the land.

However, the owner of the property which has been expropriated shall not be entitled to compensation for investments made following the date of submission of the proposal for expropriation. Macedonian law allows compensation for the loss profit/income for affected businesses if this is incurred because of expropriation. The owner of the immovable property that is expropriated shall also have the right to compensation for the plantations, sown fields, forests on the land and the orchards, if they are not included in the market value of the land.

The compensation for the restrictions on the right of land ownership shall be determined according to the amount of the lease reached at the market for that kind of immovable property. If damage is caused to the owner of the immovable property by the restriction on the right of land ownership, the owner shall have the right to damage compensation. The damage compensation shall be determined on a case-by-case basis by an expert in accordance with the Law on Expertise. If the characteristics of the land are destroyed by the temporary occupation so it cannot be used in the manner and for the purpose it has been used before the temporary occupation, the landowner may require complete expropriation of that land within a period of one year.

Macedonian law does not stipulate special measures relating to vulnerable groups. The Municipal Centre for Social Welfare in Kriva Palanka can provide some assistance, under the Law on Social Welfare, which enables provision of social welfare payments and services to vulnerable residents, as defined by the law. One of the available social welfare payments under the law is a once-off financial payment for those who find themselves in a situation of sudden and temporary need, including the need for accommodation (in this context, identified vulnerable project affected persons).. Assistance from social workers can be used to address the needs of persons with disabilities, single headed households, households with low incomes, etc. RNM also has a set of laws under which affected people can be assisted to improve their living standards (e.g., access to health care, education, personal documentation, social housing etc.) and these laws can be used as a basis for developing livelihood restoration programmes, particularly for vulnerable groups. Legal advisory assistance can also be provided to vulnerable people under the Law on Free Legal Assistance by lawyers from the Ministry for Justice and selected citizens' associations.

Expropriation procedure

The procedure for expropriation begins with the submission of an initiative for expropriation to the State Attorney who then submits the initiative for expropriation to the Government of RNM. After the acceptance by the Government of the RNM, proof of money deposited in a deposit account in the amount of the estimated value of the real estate to be expropriated is submitted.

With the implementation of the Law on expropriation, the right of ownership of people (private property) or business entities or the right of ownership of the units of local self-government (municipal property)

ceases, and the right of ownership of the RNM is established. The State Attorney of RNM¹⁴ submits a proposal for expropriation on behalf of public enterprise to the Government of RNM. The proposal should contain:

- Data on the real estate to which the initiative refers.
- Geodetic report for numerical data on the real estate marked for expropriation.
- Market value of the real estate.
- Excerpt from the act for spatial planning.

The Government of the RNM decides to accept the initiative and informs the submitter of the initiative to deposit funds in the amount of the estimated value of the real estate to be expropriated, in a deposit account.

Asset Inventory and Valuation

According to the data contained in the Geodetic Report / Elaborate for Expropriation or the list of indications for the cadastral parcels, PE ZRSMI inspects each cadastral parcel in cooperation with the surveyors of the hired designers and / or supervisors for the subject route to determine the factual situation. The inspection of the conditions of the land plots is done in the presence of a certified assessor (appraiser) from the Bureau for Forensic Expertise and involves the assessment of land plots, assets, crops, and plantations, affected by the construction. All project affected land plots, buildings, assets, crops, and plantations located on the projected section will be expropriated in accordance with the Law on Expropriation.

Bureau for Forensic Expertise will make an Asset Inventory and Valuation for the property (land plots, assets, crops, and plantations). The Asset Inventory and Valuation conducted by the Bureau for Forensic Expertise will be submitted to the PE ZRSMI. The Asset Inventory and Valuation will be used in legal proceedings, when the project affected people will be dissatisfied with the decision on expropriation. This decision can be appealed to the Administrative Court.

All collected data will be part of the Expropriation proposal that will be submitted to the project affected people (population) within the legal procedures. The date of submission of the Expropriation proposal will be considered as the cut-off date. Owners of real estate that will be expropriated are not entitled to compensation for investments on the plot, made after the cut-off date (the day when the Expropriation proposal was submitted to them).

The content of the expropriation proposal and the necessary documentation are given in box 2 below. The competent regional Office of State Attorney prepares the expropriation proposals. In this case, the Office of State Attorney in Kriva Palanka prepares all expropriation proposals supplemented with the necessary documentation. The Office of State Attorney in Kumanovo submits prepared expropriation proposal to the competent Sector for Administrative Procedure in Kriva Palanka¹⁵. The Sector for Administrative Procedure in Kriva Palanka then sends the expropriation proposals to the owners of the plots that should be subject to expropriation.

- ✚ **The Sector for Normative Property-Legal and Obligations Affairs** regulates the property-legal relations (preparation and proposing of legal regulations and bylaws), when one of the parties is the state (expropriation, privatization of construction land).

¹⁴ The State Attorney submits an expropriation proposal for realization of public interest for public enterprises, funds, agencies, directorates, public institutions, commercial companies, and other institutions established by the state.

¹⁵ Ministry of Finance of the Republic North Macedonia has the Department for Normative Property and Legal Affairs and Torts. This department deals with the property and legal relations (preparation and proposal of legal regulations and bylaws), where the state appears as one of the parties (expropriation, privatization of building land). The Property and Legal Affairs Office is organizationally divided into two sectors.

- ✚ **The Sector for Administrative Procedure** performs the activities related to the coordination of the affairs and tasks with the regional departments for administrative procedure from the property-legal affairs, supervision over the application of the regulations in administrative procedure, submission of directions and instructions for equal application of the regulations in the regional departments, as well as monitoring the work of the regional departments for implementation of the first instance procedure.-s

Box 2: Expropriation Proposal	
The expropriation proposal shall particularly contain information about:	
<ol style="list-style-type: none"> 1. The proposer of expropriation. 2. The real property proposed for expropriation. 3. The owner of the real property and the carriers of other property rights and their places of permanent residence, or headquarters, and 4. The building, or about the other works that are reason for expropriation. 	
Along with the expropriation proposal the following shall be submitted:	
<ol style="list-style-type: none"> 1. Proof that the proposer of expropriation had offered to the real property owner to solve the issue of acquiring the property right by mutual consent (a written offer for concluding a replacement agreement or a sale contract). 2. An extract of the spatial planning act or approved project for infrastructure. 3. A geodesic report on the numerical data for the property which is proposed for expropriation. 4. An offer of compensation equivalent to the market value of the property determined by a qualified appraiser pursuant to the Law on Assessment. 5. A list of property under proposal for expropriation. 6. A list of property which is offered as a compensation for the expropriated real property and 7. Proof that funds for compensation are in place. 	
The content and necessary documentation for expropriation proposal	

The procedure then continues with a consultative hearing to which the owner of the property or the holders of expropriated property rights and the applicant¹⁶ are called. A summary of the negotiations, consultations and possible agreements on expropriation are summarized in box 3 below. The expropriation authority shall schedule and hold a hearing on the proposal within 15 days of the submission of the proposal for expropriation to the owner of the property or the holders of rights to the property. At the hearing the existence of the public interest is determined, as well as the right of ownership and other property rights and the compensation.

Box 3: Consultative Hearing with PAPs and agreements	
Negotiated Settlement	The settlement is reached before the beginning of the expropriation procedure under provisions of contract law.

¹⁶ The applicant in this case is the beneficiary or user of the expropriation property. The expropriation authority on behalf of the user of the expropriation property is the applicant.

<p><u>Agreement on compensation</u></p> <ul style="list-style-type: none"> - Conclusion of the hearing with the agreement on the compensation package and closing of expropriation process. - Agrees on the deadline for its payment. - By signing of minutes agreement is considered as concluded. - Based on this agreement ownership of the land is transferred to RNM and <i>PE ZRSMI</i> obtains the right to use the land. 	<p>The agreement will be concluded when both parties agreed and signed the minutes.</p>
<p>The expropriation authority will adopt the decision on expropriation without full or partial consent of the owner.</p>	<p><u>Decision on expropriation</u></p> <ul style="list-style-type: none"> - Affected property owner agrees on expropriation but does not agree on the compensation package. - In this case expropriating body, depending on the facts determined in the procedure, adopts a decision on expropriation. - After the decision has been adopted there is one more attempt to reach agreement by inviting owners again for agreement. - If there is no agreement reached after the second attempt, decision on expropriation is transferred to court.

This hearing may end with the conclusion of an agreement for payment of compensation (settlement), which includes the amount of compensation and the deadline for payment. The agreement shall be entered in the minutes, which contain all the data necessary for fulfilling the obligations of the user of the expropriation and the former owner of the real estate or the carrier of other property rights. The agreement is concluded when both parties sign the minutes, which is the basis for registering the property right of the proposer of expropriation. With the conclusion of the agreement, it is considered that the expropriation procedure and the procedure for the determination of the compensation are legally completed.

The expropriation body is obliged to make the decision within 30 days from the receipt of the expropriation proposal. If an agreement is not reached, the expropriation authority reach a decision on expropriation, which can be appealed to the Administrative Court within 15 days upon receipt of the decision. If there is no lawsuit against the decision, property could be used by PE ZRSMI, but the process for negotiating values is ongoing until common agreement has been reached, however PE ZRSMI will have right to use the land and property once ownership rights are transferred to the state. The details of the appeal procedure on expropriation are given in Annex 13.2.

In some instances, issues related to the provision of compensation for land and assets can also be addressed through the implementation of the Law on Obligations. In principle, this law requires provision of compensation in cash to formal legal owners of land and assets (or those whose rights are recognizable under national laws) for damages or losses incurred because of investors/contractors (or others) accessing land or preventing access to land and/or assets. Compensation is provided after the damages and/or losses have already occurred.

Organizational Responsibilities

A Commission for Land Expropriation, with three members, will be established within PE ZRSMI, for which PE ZRSMI will be responsible. The commission will be established through a decision enacted by the Director of the PE ZRSMI. The commission members are authorized on behalf of the PE ZRSMI to carry out the activities necessary for fulfilling expropriation commitments, i.e., to support the preparation of the proposals for expropriation.

For the purposes of expropriation, a specialist land survey team will also be required; this will also be within PE ZRSMI. Land surveys will be prepared in accordance with expropriation laws. Selection of surveying companies is in accordance with the Law on public procurement.

With the aim to determine the market value of the real estates (structures) which are subject to expropriation, as well as the compensation of any crops (fertile parcels), the beneficiary of expropriation engages the governmental body, Bureau for Forensic Expertise. Bureau for Forensic Expertise will do an Asset Inventory and Valuation of the property (land plots, assets, crops, and plantations) and submit to the expropriation body with the expropriation proposals.

The proposals for expropriation are submitted to the Regional Property and Legal Affairs Office in Kriva Palanka, who again forward the proposals to the real estate's owners and the Agency for Real Estate Cadastre, where the expropriation will be registered. After, the expropriation body arrange for hearings with the real estate owner and the expropriation beneficiary. The hearing is concluded when the relevant parties reach agreement on the compensation package and sign the minutes. The agreement is binding and the procedure for land and assets expropriation and for the determination of the compensation is considered as completed.

If an agreement has not been reached during the hearings, the expropriation body is in charge to decide how the expropriation proposal should be settled. Upon the decision for expropriation (ex officio or with the proposal of the former owner), a procedure for compensation determination of the real estate is initiated by the authorized court. The decision of the authorized court then forms the basis for the execution of payment of the monetary compensation to the former owners.

The expropriation body is responsible for submitting the final agreements as well as the final decisions to the authorized bodies responsible for managing the public records, to ensure that changes of ownership are properly documented. Any arbitration or disputes in relation to expropriation are determined in the courts, this will hold up the expropriation process. The stages of expropriation process are summarised in Figure 13 below:

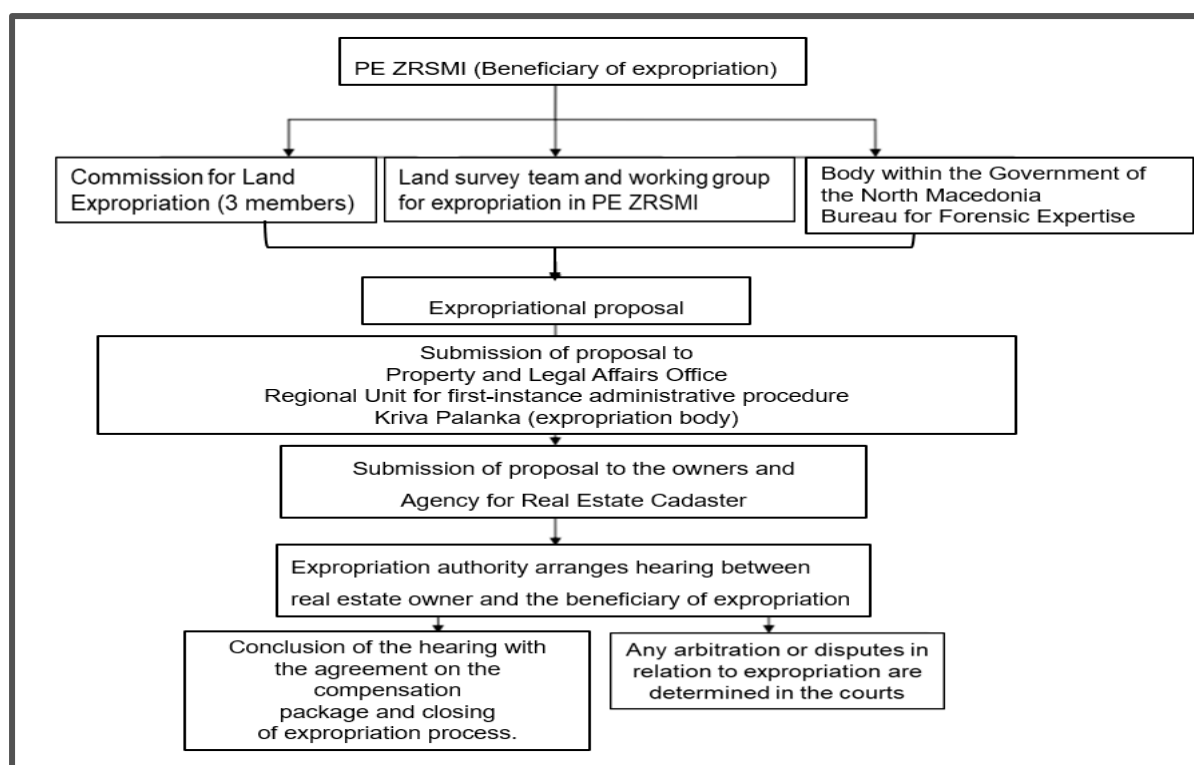


Figure 13 Expropriation Process

5.2 EBRD / EIB Policy

EBRD applies its Environmental and Social Policy¹⁷ to this Project, with land acquisition and resettlement requirements under these policies being defined in Performance Requirement PR5: *Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement*. Application of PR5 is consistent with the observance of human rights and freedoms, specifically the right to private property, adequate housing and the continuous improvement of living conditions.

PR5 addresses impacts of project-related land acquisition, including restrictions on land use and access to assets and natural resources, which may cause physical displacement, and/ or economic displacement. Resettlement is considered involuntary when affected persons do not have the right to refuse land acquisition or restrictions on land use, other assets, and natural resources, even if compulsory acquisition is used after a negotiated process.

According to PR5: The client shall consider feasible alternative project designs and sites to avoid or minimize land acquisition or restrictions on land use, other assets and natural resources while balancing environmental, social, and financial costs and benefits, and paying particular attention to gender impacts and impacts on vulnerable persons. Where it cannot be avoided through design, displacement shall be minimized and appropriate measures to mitigate adverse impacts on affected persons and host communities shall be carefully planned and implemented. The objectives of PR5 are to:

- Avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring feasible alternative project designs and sites and avoid forced eviction.
- Mitigate unavoidable adverse socio-economic impacts from involuntary resettlement by:
 - i. providing timely compensation for loss of assets at full replacement cost; and

¹⁷ European Bank for Reconstruction and Development, Environmental and Social Policy, April 2019.

- ii. ensuring that land acquisition, restrictions on land use, other assets and natural resources and involuntary resettlement activities are implemented with meaningful consultation, participation, and disclosure of information, in accordance with PR 10.
- Improve, or as a minimum restore the livelihoods and standards of living of affected persons compared to pre-displacement levels.
- Improve living conditions of physically displaced persons through provision of adequate housing (including essential services and utilities) with security of tenure at new sites.

EIB has also developed Environmental and Social Standards¹⁸, and its requirements related to land acquisition, expropriation and/or restrictions on land use are defined in the Standard 6 and Standard 7. Standard 6 is focused on the involuntary resettlement and the standard 7 on rights and interests of vulnerable groups. The objectives of Standard 6 are to:

- Avoid or at least minimize, project-induced resettlement whenever feasible by exploring alternative project designs.
- Avoid and/or prevent forced evictions and provide effective remedy to minimize their negative impacts should prevention fail.
- Ensure that any eviction which may be exceptionally required is carried out lawfully, respects the rights to life, dignity, liberty, and security of those affected who must have access to an effective remedy against arbitrary evictions.
- Respect individuals', groups, and communities' right to adequate housing and to an adequate standard of living, as well as other rights impacted by resettlement.
- Respect the right to property of all affected people and communities and mitigate any adverse impacts arising from their loss of assets, or access to assets and/or restrictions of land use, whether temporary or permanent, direct, or indirect, partial or in their totality. Assist all displaced persons to improve, or at least restore, their former livelihoods and living standards and adequately compensate for incurred losses, regardless of the character of existing land tenure arrangements (including title and non-title holders) or income-earning and subsistence strategies.
- Uphold the right to adequate housing and promote security of tenure at sites.
- Ensure that resettlement measures are designed and implemented through the informed and meaningful consultation and participation of the project-affected people throughout the resettlement process and
- Give particular attention to vulnerable groups, including women and minorities, who may require special assistance and whose participation should be promoted.

5.3 Gap analysis table

Resettlement and compensation of affected persons shall be carried out in accordance with the applicable Macedonian legislation and EBRD's PR5 and PR10 and EIB's Environmental and Social Standards: 2, 6 and 7. Below is the comparative analysis between the national legislation and EBRD/EIB safeguards requirements and proposed responses to overcome the gaps. The following table describes the details of comparison. This analysis (including the entitlements matrix and eligibility principles / criteria) contains measures to bridge these gaps.

¹⁸ European Investment Bank, Environmental and Social Standards, 2022.

Table 6 Gap analysis between national legislation and EBRD and EIB requirements – Land acquisition and resettlement issues

Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
<p>Resettlement Instruments: Land Acquisition and Livelihood Restoration Framework and Plan</p>	<p>EBRD and EIB require the preparation of RAP in which the client or other responsible entity specifies the procedures, actions and measures related to the land acquisition, restriction on land use, livelihood restoration.</p> <p>The resettlement framework shall be prepared when the nature or magnitude of impacts associated to land acquisition is unknown due to the project development stage and a detailed census of affected people and assets cannot be conducted for this reason. The purpose of the resettlement framework is to clarify resettlement principles and organizational arrangements. Once the project components are defined in sufficient detail, a detailed resettlement plan proportionate to potential risks and impacts will be prepared in accordance with the requirements of EBRD PR 5 on the basis of the resettlement framework and EIB Standard 6.¹⁹</p>	<p>According to the Law on Expropriation (Article 26), the Geodetic report or Elaborate for Expropriation contains the following data for the list of properties to be expropriated:</p> <p>number of cadastral parcels,</p> <ul style="list-style-type: none"> - the name, surname, and address of the owner (and co-owners), - type of land and land class, - total area of land parcel, and - size of the land which is subject to expropriation. 	<p>There is no provision related to develop RAP under the Macedonian legislative.</p>	<p>RAP will be developed.</p> <p>RAP will be developed based on the data provided by the Elaborate for Expropriation, stakeholder consultations, site visits, conducted socio-economic survey, additional data collected and processed, etc.</p>
<p>Categorization of displaced persons</p>	<p>Displaced persons may be classified as:</p>	<p>The Macedonian Law on Expropriation does not make a strict distinction between the categories of</p>	<p>The category of displaced persons who have no recognizable</p>	<p>Investigate to identify if there are persons who have no recognizable legal right or claim to the land or assets they occupy, or use.</p>

¹⁹ EBRD, Environmental and Social Policy, 2019, Paragraph 43. EIB, Environmental and Social Standards, 2022, Paragraphs 19 and 20 (Standard 6).

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Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
eligible to compensation	<p>(i)Persons who have formal legal rights to the land (including customary and traditional rights recognized under national laws) or assets.</p> <p>(ii)Persons who do not have formal legal rights to land or assets at the time of the census, but who have a claim to land or assets recognized or recognizable under national laws or customary and traditional rights and</p> <p>(iii)Persons who have no recognizable legal right or claim to the land or assets they occupy or use.²⁰</p>	<p>displaced persons. The law identifies the owners of real estate (persons who have formal legal rights to the land) and the holders of other real estate property rights that are subject to expropriation.</p> <p>The law does not recognize persons who have no recognizable legal right or claim to the land or assets they occupy or use.</p>	<p>legal right or claim to the land or assets they occupy, or use are not recognized by the Macedonian law.</p>	<p>If there are such persons, they should be entered in the project database.</p> <p>They must be provided with adequate compensation and assistance as required by EBRD/EIB regulations.</p>
Livelihood Restoration	<p>EBRD and EIB require the client to make the plan for measures to improve, or at least restore, affected persons' incomes or livelihoods. In the RAP will be established the entitlements of affected persons and/or communities. In the plan a particular attention will be paid to gender aspects and the needs of vulnerable groups. In the plan will be incorporated the arrangements to monitor the effectiveness of livelihood measures during implementation. The mitigation of economic displacement shall be considered complete when the completion audit concludes that affected persons or communities have received all of the assistance for</p>	<p>Macedonian law requires compensation for lost profit / income of affected formal economic activities resulting from displacement, this only applies to people with formal land rights.</p>	<p>Neither does Macedonian law require assistance for resettlement or alternative livelihood assistance such as training or provision of favorable loans or employment opportunities.</p>	<p>Livelihood Restoration comprises a set of different measures which will be implemented to address economic displacement – that is, to improve or, at a minimum, restore livelihoods and standards of living of project affected people to pre-displacement levels, in as short as possible a period or time.</p> <p>In case when the loss of land and other assets or access to assets, leads to loss of income sources or means of livelihood (economic displacement) of PAPs, alongside compensation for affected land and assets, PE ZRSMI will create and implement Livelihood Restoration Measures. Depending on the type of impacts, livelihood improvement or restoration measures will include different measures.</p>

²⁰ EBRD, Environmental and Social Policy, 2019, Paragraph 26. EIB, Environmental and Social Standards, 2018, Paragraphs 18 (Standard 6).

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Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
	which they are eligible and have been provided with adequate opportunity to restore their livelihoods. ²¹			Livelihood restoration assistance will be provided to those identified as needing it during the census. PE ZRSMI will cooperate with institutions and organizations that can provide this assistance, such as the municipalities, agricultural development agencies operating in the area, consideration of state subsidies, trainings on increasing their yield and production and similar.
Socio-economic Surveys Census Inventory of Affected Assets Cut-off Date	<p>EBRD and EIB require the client to conduct a socio-economic survey to describe the baseline circumstances of project affected peoples where the project may entail physical or economic displacement.</p> <p>EBRD requires the client to carry out a census of affected people to:</p> <ul style="list-style-type: none"> (i) identify persons who are affected by the project; and (ii) determine who will be eligible for compensation and assistance. <p>EIB requires with census to identify seasonal resource users who are not present at the time of the census but who have a legitimate claim to the land.</p> <p>EBRD requires the client to carry out an inventory of affected assets, including land, structures, crops,</p>	<p>No provision on Socio-economic surveys in Macedonian Law on expropriation.</p> <p>Macedonian law focuses on the development of expropriation studies which represent inventories of affected properties and involve basic information about registered owners of these properties (i.e., names, addresses, ID numbers) so that they can be identified and compensated. Such reports (“studies”) do not apply to people with informal land rights.</p> <p>The date of submission of Expropriation proposal is considered as cut-off date. The owners of the properties which are to be expropriated have no right to compensation to any investments made after that date.</p>	<p>No requirements to conduct socio-economic survey and Livelihood Restoration Framework and no public disclosure of such documents.</p>	<p>Census and Socio-economic survey will be conducted, and the conclusions will be part of project documentation. The Research instruments for the survey are available upon a request..</p> <p>Inventory of all project affected assets regardless title registration</p> <p>Essence and the limitation of the cut-off date will be communicated to project affected persons during the project related surveys.</p> <p>The needs of this part of project documentation will be supplemented in line with EBRD and EIB requirements.</p>

²¹ EBRD, Environmental and Social Policy, 2019, Paragraph 61. EIB, Environmental and Social Standards, 2022, Paragraphs about Compensation and Restoration (Standard 6).

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Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
	<p>communal amenities, and natural resources as basis for further valuation of assets. EBRD and EIB require client to establish a cut-off date for eligibility either:</p> <ul style="list-style-type: none"> - as foreseen in applicable legislation; or - using the end date of the census or of the inventory (whichever is the latest).²² 			
Informal Land Rights	<p>EBRD and EIB also cover compensation, livelihood restoration and consultation for persons with no formal recognizable legal right or claim to land they occupy.²³</p>	<p>Macedonian law focuses on compensation for formal land rights.</p> <p>An important feature of the Macedonian Expropriation Law is that it allows for compensation of structures built informally (i.e., without a valid permit). Compensation for structures without a valid permit are set in the amount that corresponds to their construction value, i.e. market value of materials and costs of labour.</p>	<p>The category of displaced persons who have no recognizable legal right or claim to the land or assets they occupy, or use are not recognized by the Macedonian law.</p>	<p>Displaced persons without formal rights are recognized equally as others, and at the time of the census will be included in the project documentation and their assets compensated / their livelihoods restored.</p> <p>PAPs with informal land rights will be adequately compensated in accordance with accepted EBRD/EIB requirements. In that context, PAPs with informal land rights must be identified and given appropriate compensation and assistance.</p> <p>PAPs with informal land rights must be compensated as it is EBRD/EIB requirements and standards.</p> <p>Therefore, they will be provided with adequate compensation and assistance as required by EBRD and EIB regulations.</p>

²² EBRD, Environmental and Social Policy, 2019, Paragraphs 20-23. EIB, Environmental and Social Standards, 2022, Paragraphs 19-24 (Standard 6).

²³ EBRD, Environmental and Social Policy, 2019, Paragraph 26. EIB, Environmental and Social Standards, 2022, Paragraphs 18 c. (Standard 6).

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Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
Participation and Consultation	EBRD and EIB require meaningful consultation of affected persons and communities, including host communities, to be organised throughout the process of resettlement planning and implementation in accordance with principles and processes outlined in PR 10 (EBRD) and Standard 2 (EIB), and to be supported by disclosure of all relevant information. All groups, including the vulnerable, will be informed of their entitlements, rights, opportunities, and benefits. Consultation will continue during implementation, monitoring, and evaluation of the resettlement process to achieve outcomes consistent with objectives of PR. ²⁴	Under the Law on Environmental Impact Assessment development and approval procedure public hearings are realized. The individual meetings / hearings with project affected people is important during the expropriated process.	However, there are no requirements for public consultations with project affected peoples and communities.	Project affected persons and communities (including vulnerable groups and individuals) will be consulted to facilitate their early and informed participation in decision-making processes related to resettlement and ensure that acquisition and compensation activities are implemented with appropriate disclosure of information and regular public consultations starting from early phase through entire project cycle. This shall be carried out in line with the requirements and standards of EBRD and EIB. SEP and RAP will be developed and disclosed.
Grievance Redress Mechanism	EBRD and EIB require to be established an effective project level grievance mechanism as early as possible in the land acquisition and resettlement process, and at the latest prior to the census taking place in order to address specific concerns about compensation, relocation or livelihood restoration measures raised by displaced persons (or others) in a timely manner. The grievance mechanism shall be consistent with	Macedonian law recognizes rights of project affected people (those with formal land rights) to appeal to Administrative Court.	There are no provisions under national law related to establishing the project specific Grievance Redress Mechanism as it is defined in EBRD and EIB policies and specific requirements and standards.	Grievance Redress Mechanism will be established and implemented as it is defined in EBRD and EIB policies and their requirements and standards. PE ZRSMI will establish a registry / log of grievances and will monitor the resolution of grievances. Each grievance will be recorded in a registry / log with all necessary information.

²⁴ EBRD, Environmental and Social Policy, 2019, Paragraph 37. EIB, Environmental and Social Standards, 2022, Standard 2, Paragraphs 19-24 (Standard 6), Paragraphs 25-27 (Standard 7).

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	<p>the objectives and principles pertaining to grievance management contained in Standard 2 and PR 10. It shall include a recourse mechanism designed to resolve disputes in an impartial manner. The outcomes of the grievance mechanism (including numbers of grievances received, resolved and outstanding) shall be reflected in monitoring reports.²⁵</p>			
<p>Vulnerable Individuals & Groups</p>	<p>EBRD and EIB require project affected vulnerable individuals to be identified, assessed, and addressed in accordance with PR 1 and specifically:</p> <p>(i) carry out, at the time of the socio-economic surveys, an analysis to determine pertinent vulnerability factors in the context of the project area, in cooperation with relevant stakeholders including affected communities;</p> <p>(ii) identify vulnerable groups based on the results of this vulnerability analysis;</p> <p>(iii) conduct specific consultations with vulnerable groups; and</p> <p>(iv) plan assistance measures tailored to the different needs of vulnerable groups, describe these measures in</p>	<p>Macedonian Law on Expropriation does not define vulnerable individuals or groups (people in risk). According to the Law on Social Protection (Закон за социјална заштита) ("Official Gazette of the Republic of North Macedonia" No. 104/19, 146/19, 275/19, 302/20, 311/20, 163/21, 294/21, 99/22, 236/22, 65/23, Article 4), "social risk" is a condition that has the potential to interfere or obstruct the smooth social functioning of individuals, families and certain groups that may need social assistance. The basic social risks to which an individual is exposed in terms of this law are: motherhood, illness, old age, death, injury and disability. In this context, a "single parent" is a parent who exercises parental rights and duties</p>	<p>Macedonian law does not stipulate special measures related to the vulnerable individual and groups.</p>	<p>PE ZRSMI will put special attention to identify vulnerable individuals and groups within the project area.</p> <p>The vulnerability will be analyzed and assessed with a number of indicators (the area of land for expropriation, land-based dependency, the usage of the land, income of household, vulnerable individuals in family, female headed household, education, etc.).</p> <p>Resettlement assistance will be defined based on the outcome of the Census and Socio-economic survey, in accordance with the specific needs of affected people. This assistance is very often provided to vulnerable households which are physically or economically displaced by a project and be presented in the following forms:</p> <ul style="list-style-type: none"> • Tangible support and/or allowance for the persons at social risk / vulnerable persons,

²⁵ EBRD, Environmental and Social Policy, 2019, Paragraph 40 (PR 5) and Paragraph 29 (PR 10). EIB, Environmental and Social Standards, 2022, Paragraphs 21-25 (Standard 2), Paragraphs 46-47 (Standard 6), Paragraphs 55-57 (Standard 7).

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Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
	<p>the resettlement planning document, and provide for their implementation and funding as part of the overall land acquisition and resettlement budget.²⁶</p> <p>Within the context of EIB projects, vulnerable or marginalised persons and groups are those that: (a) are usually exposed to several risks and adverse impacts at once; (b) are more sensitive to those risks and impacts, often having been subject to pre-existing discrimination; and (c) have a weaker adaptive capacity for coping with those risks and recovering from those impacts, due to limited access or rights to required assets and/or resources. As a result, they can be disproportionately affected by project-related risks and impacts.²⁷</p>	<p>for the child himself, because the other parent is unknown, deceased, missing or for justified reasons, temporarily or permanently does not exercise parental rights and duties; while a "person with a disability" means a person who has long-term physical, intellectual, mental or sensory impairments which in interaction with various disabilities, may prevent his or her full and effective participation in society on an equal basis with others; and "old person" is a person over 65 years of age.</p> <p>However, the set of laws on Social Protection can be applied to protect the vulnerable individuals and groups.</p>		<p>PAPs with disabilities who are not actively engaged with land activities.</p> <ul style="list-style-type: none"> • Legal aid. • Assistance in obtaining personal documents, with accessing services available under national legislation. • Transitional allowance • Provision of support to prove ownership status and consequently sign compensation contracts (because of unprocessed inheritance procedures or unregistered sale agreements). • Provision of general information related to legal aid and obtaining personal documents. • Provision of general information related to access social welfare. • Provision of general information related to access to free care and assistance at home by certified caregivers. • Provision of general information related to access to the day care center in Kriva Palanka for persons with disabilities, the centre for persons with cerebral palsy. • Provision of the information related to the activities of the Red Cross Branch in Kriva Palanka.
Monitoring and Evaluation	EBRD and EIB require to be established procedures to monitor and evaluate the implementation of the	Macedonian Law on expropriation does not address the issues related	Macedonian Law on Expropriation does not require monitoring and	PE ZRSMI will carry out the monitoring and evaluation and provide the EBRD and EIB with all necessary information and reports.

²⁶ EBRD, Environmental and Social Policy, 2019, Paragraph 15.

²⁷ EIB, Environmental and Social Standards, 2022, Standard 7, Paragraph 1.

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Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
	<p>resettlement plan. Monitoring of the land acquisition, resettlement and livelihood improvement or restoration process shall be carried out in accordance with PR 1 and Standard 2 and will involve the participation of key stakeholders, including affected communities. The extent of monitoring activities will be proportionate to the project's risks and impacts.</p> <p>The monitoring reports shall include the progress against the key performance indicators specified in the resettlement plan and shall be submitted to the Banks as part of the periodic environmental and social monitoring reports.²⁸</p>	<p>to the monitoring and evaluating the process of expropriation.</p>	<p>evaluation of the process of expropriation.</p>	<p>Monitoring and evaluation arrangements and provisions will be defined, developed, and incorporated in detail in the RAP.</p>
<p>Compensation for expropriated assets</p>	<p>EBRD and EIB prescribe that the client will offer compensation to affected persons at full replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living and livelihoods.²⁹</p> <p>Replacement cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning</p>	<p>According to the Law on expropriation, the compensation for the expropriated real property and the costs of the procedure will be paid by the investor (proposer of expropriation). The compensation for the established right of easement and the costs of the procedure will be paid by the investor of line infrastructure construction.</p> <p>When determining a compensation for some building, which because of its nature is not in circulation on the</p>	<p>Not all segments or costs are included in the Macedonian Law on expropriation.</p>	<p>All affected persons will receive compensation at full replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living and livelihoods.</p> <p>It is important to underline that PE ZRSMI does not possess land to offer as compensation, the only possibility for PE ZRSMI to realise compensation is by paying money.</p>

²⁸ EBRD, Environmental and Social Policy, 2019, Paragraphs 49-54. EIB, Environmental and Social Standards, 2022, Standard 2, Paragraphs 42-44.

²⁹ EBRD, Environmental and Social Policy, 2019, Paragraph 27. EIB, Environmental and Social Standards, 2022, Standard 6, Paragraphs 25-39.

Resettlement Action Plan

Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
	<p>markets exist, replacement cost is the market value as established through independent and competent real estate valuator, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs. In all instances where physical displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety.³⁰</p> <p>EBRD requires valuation to be performed by qualified valuers.³¹</p> <p>EBRD prescribes the cases where livelihoods of displaced persons are land-based or where land is collectively owned, the client shall offer land-based compensation,</p>	<p>market and for which market price is not formed (e.g., wells, irrigation systems, fencing and supporting walls and alike) the amount of compensation shall be determined according to the market value of the material and services necessary for constructing these buildings, decreased for the appropriate amount of depreciation.</p> <p>The procedure of valuation of agricultural land based on current market value has been defined in the Methodology for Assessment of the Market Value of real estate. To determine the market value of real estate (structures) which are subject to expropriation, as well as the compensation of any crops (fertile parcels), the beneficiary of expropriation engages qualified experts from the relevant area.</p> <p>Compensation for the expropriated property is made, in most cases, with payment in cash or with other ways of compensation (e.g., other land parcels).</p>		

³⁰ EBRD, Environmental and Social Policy, 2019, Paragraph 4.

³¹ EBRD, Environmental and Social Policy, 2019, Paragraph 25.

Resettlement Action Plan

Issue	EBRD/ EIB policy requirements and standards	Provisions of Macedonian law	Gap / Comment	Proposed response
	<p>unless proven unfeasible or unacceptable to affected persons.³²</p> <p>Where PAPs' livelihood is land-based or the land is collectively owned, the promoter shall favour land-for-land compensation. If this option is not available, the promoter shall provide sufficient justification to the EIB as to why not feasible, including justification that livelihoods are not affected by not replacing land.³³</p>			
<p>Access to Land/Property Prior to Payment of Compensation</p>	<p>EBRD and EIB requires access to site to be allowed after payment of compensation.</p>	<p>Under the Expropriation Law and the Construction Law access to the land can be allowed to the Contractor prior to payment of compensation.</p>	<p>According to Macedonian law the access to land property prior to payment is possible.</p>	<p>PE ZRSMI will support all relevant institutions responsible for expropriation process in completion of expropriation process prior to the start of construction works. However, having in mind complexity of the process and legal framework it cannot be excluded that owners for some plots will not be compensated prior the start of works. If the affected people dispute the offered compensation amount (or type) and turn to the Courts, and PE ZRSMI takes advantage of legal options for accessing the property before compensation is executed, every effort will be made to pay for all undisputed assets as quickly as possible to minimize impacts on affected people/households³⁴.</p>

³² EBRD, Environmental and Social Policy, 2019, Paragraph 31.

³³ EIB, Environmental and Social Standards, 2022, Standard 6, Paragraphs 26.

³⁴ If a property is to be accessed by the client, after it has become legally binding but before compensation has been accepted, the following will take place: 1. The amount intended as compensation will be placed in an escrow account 2. In the event the land /part thereof is used for agricultural and/or other livelihood purposes, alternative land/property with the same characteristics will be provided or compensation will be provided to cover for the economic loss to be incurred. 4. Other assistance will be provided and determined on a case-by-case basis.

6. SOCIO-ECONOMIC SURVEY

This section presents information on the socio-economic environment of the PAPs. It is based both on census data collected in the Geodetic report / *Elaborate for expropriation* undertaken by Geodetic Company in February 2022, and a broader socio-economic survey (including meetings, questionnaires, and interviews) supported ~~undertaken~~ by PE ZRSMI in May 2022. In addition to providing a baseline for monitoring compensation effectiveness, the key objective of the survey is to assist in identifying appropriate compensation measures in line with Lenders' requirements including compensation for vulnerable persons who may need additional support due to the project's impact. To this end, the socio-economic survey allows compensation measures, in particular livelihood restoration requirements, to be tailored to the specific needs and contextual requirements of those subject to economic and physical displacement.

6.1. Socio-economic Survey Methodology

The socio-economic baseline was prepared in two phases. The first phase involved the collation and analysis of secondary data from the Geodetic report / *Elaborate for expropriation* for the project affected municipality and settlements (maps, plans, statistical data, etc.). The second phase involved the collection and analysis of primary data obtained from 62 households³⁵ (using specially designed questionnaires), 2 business (separate questionnaires designed for businesses), 15 in-depth qualitative interviews and three focus group discussions with PAPs in the Project Area over three weeks in May 2022.

The project area in this socio-economic survey related to the area encompassing directly economically and physically displaced Project Affected People (PAPs) of the settlements impacted by the Project, such as, which include the settlements of T'Iminci, Gradec, Kriva Palanka, Drenje, Kiselica, Trnovo, Zidilovo, Krklja, Uzem and Kostur.

The questionnaires were applied following Project Information Meetings with PAPs between May 9 and May 23, 2022. At the end of the meetings, household heads were asked to complete a questionnaire with the help of two social surveyors for all household members, and PAP contact details were recorded. Later, those who were not present at the meeting were interviewed by phone. The part of the questionnaire that was not filled in was also supplemented with the answers provided over the phone from the respondents. Part of the answers to sensitive questions (such as income) were also later provided via telephone.

Only two potential respondents refused to fill in the questionnaire. One respondent citing their dissatisfaction with the project design and the other simply declined to be interviewed without citing a reason. The number of questionnaires completed in each Project affected municipality is summarized in Table 7 below. The completed questionnaires were entered into a Statistical Package for Social Science. (SPSS) with the consent of the PAPs. All information presented in the questionnaires and interviews were anonymized and adequately protected.

Table 7 Sample of Household Questionnaire

	Cadaster Municipality	Number of questionnaires
1.	T'Iminci	6
2.	Gradec	8
3.	Drenje	9
4.	Kiselica	5

³⁵ It means that 62 respondents are interviewed representing 62 project affected households, cumulating 201 affected persons (members of 62 AHs).

	Cadaster Municipality	Number of questionnaires
5.	Trnovo	1
6.	Skopje	7
7.	Zidilovo	5
8.	Uzem	6
9.	Kostur	2
10.	Kriva Palanka	13
	TOTAL	62 (covering 201 PAP household members)

Source: Socio-Economic Survey, RAP, 2022.

The 15 in-depth qualitative interviews were conducted after the meetings and questionnaires were completed, or later via phone, and lasted between 35 and 60 minutes. Only owners of buildings or houses intended to be demolished were interviewed. Finally, three focus groups were conducted guided by a moderator, and sessions lasted between 60 and 80 minutes. The participants of the first focus group were composed only of female members of the affected households and were conducted on-line due to Covid restrictions. The participants of the second focus group were the owners of houses proposed for demolition.³⁶ And the last focus group was with five owners of the land parcels and one structure on the permanent way.

6.2. Summary of findings

6.2.1. Demography

Households are defined by the fact that members live together at one address, share living space, share meals and combine economic resources. Most families in the project area are households, but not all households are families as some households consist of just one member. The household survey found that in the project affected settlements there are 11 single person households, most households are two person (18), and 12 households are three persons. The medium size of households are the households with four members. The total number of households with four persons per household in the surveyed population is three.

The average household size or the mean number of persons per household in the sample in the Project area is 3,24 persons. Large average household sizes or greater than five persons or member per household are 18. Nine households have five members, five households have six members, two households have seven members, one household has eight and one household has nine members. The following table gives the breakdown of household sizes, as identified by the household survey.

Table 8 Household Members in the Project area

	Household members	Frequency	Total number of members
1.	Single-person household	11	11
2.	Two-persons household	18	36
3.	Three-persons household	12	36
4.	Four-persons household	3	12
5.	Five-persons household	9	45

³⁶ To protect the privacy of focus group participants, I restricted the information about the place where the focus group took place.

Household members		Frequency	Total number of members
6.	Six-persons household	5	30
7.	Seven-persons household	2	14
8.	Eight-persons household	1	8
9.	Nine-persons household	1	9
TOTAL		62	201

Source: Socio-Economic Survey, RAP, 2022.

Regarding the gender structure of the surveyed population³⁷, it is noticeable the bigger number of males than females. In fact, the sample consists of 107 males (or 53,23%), and 94 females (46,77%). Under school age are only five children, and a similar number in age category 80+.

Table 9 Age and Gender Structure of the Members of the Surveyed PAP Households

	Age categories	Gender Structure		Total
		Male	Female	
1.	0-9	5	3	8
2.	10-19	11	8	19
3.	20-29	6	7	13
4.	30-39	11	11	22
5.	40-49	18	15	33
6.	50-59	16	17	33
7.	60-69	18	14	32
8.	70-79	13	15	28
9.	80+	6	3	9
10.	No answer	3	1	4
		107	94	201

Source: Socio-Economic Survey, RAP, 2022.

In terms of education, more than one third of PAP household members (78) have completed secondary education. The total number of household members completing elementary school is 64, or 31,8% of the surveyed sample, and 21 have incomplete primary education, 22 household members have completed higher education. Only six household members have completed vocational education. There were no data for five household members because the respondents did not answer that question.

³⁷ Surveyed population related only to the sample of the socio-economic survey.

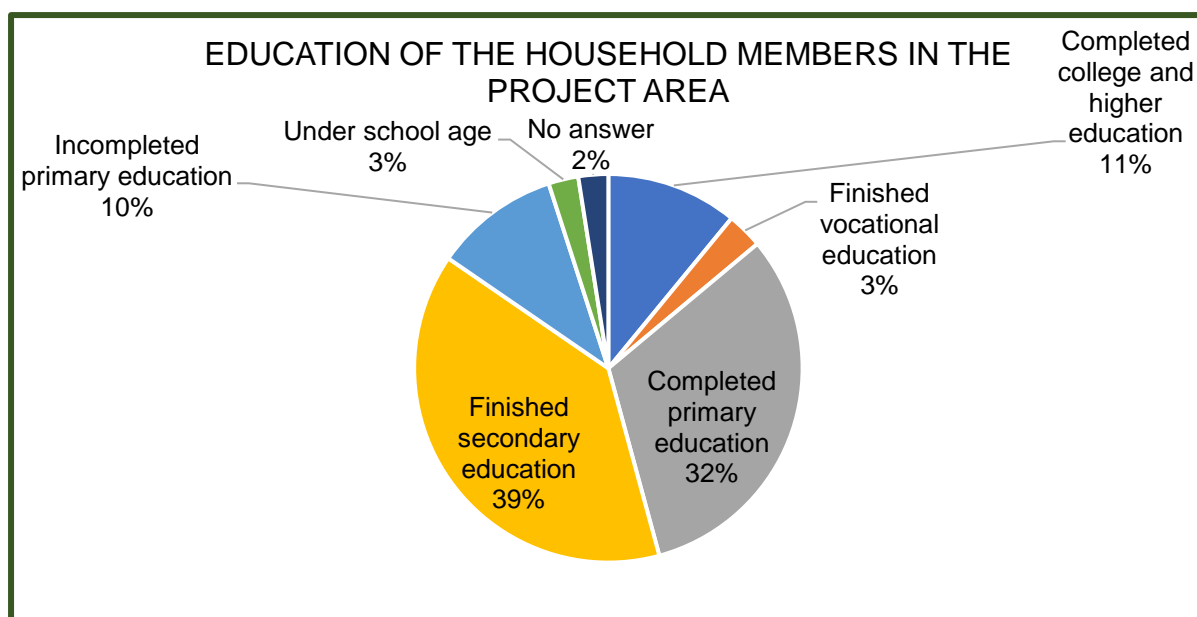


Figure 14 Education of the members of household sample

Source: Socio-Economic Survey, 2022.

Table 10 below shows that 61,69% of the surveyed population stated that they are married while 25,87% or 52 household members, were unmarried. The number of unmarried men is bigger than the number of unmarried women. 16 people of surveyed population are widowed, and the number of widowers is higher than widows.

Table 10 Marital Status and Gender Structure

	Marital status	Number	%	Gender structure	
				Female	Male
1.	Never married	52	25,87%	22	30
2.	Currently married	124	61,69%	62	62
3.	Separated / divorced	4	1,99%	1	3
4.	Widowed	16	7,96%	7	9
5.	No answer	5	2,49%	2	3
	TOTAL	201	100,00%	94	107

Source: Socio-Economic Survey, RAP, 2022.

Within the project area the survey results suggest that Macedonian is the dominant nationality (96,5%) and Macedonian the dominant language. The situation is similar with religious affiliation. The Household Survey revealed that 92,5% of the population are Orthodox, and only five household members identified themselves as Christians and eight as Muslims.

Across the Project Area as a whole, the livelihood activities of the urban population tend to be service based, whereas those living in the rural areas mainly practice agriculture, farming of animals, fruit-farming, apiculture, gathering herbs and forest fruits, and some from salary, pensions, and other social transfers. Trade, however, is the main economic activity, especially in vehicle imports and exports, due to the proximity of the area to the Bulgarian border.

In addition, the Toranica mine operates within the area, and there are small production capacities for plastic, textile, ready-made clothing, shoes, carpets and rugs, wood mass and furniture, pastry products, metal constructions, etc. Also, in the immediate vicinity of the urban area, several sawmills operate,

logging for firewood and furniture wood. The last decade has witnessed greater entrepreneurship and growth in the construction sector, the transportation sector, the storage sector, and retail trade for motor vehicles/motorbikes repair.

Primary occupation data indicated that one-third of the surveyed population is self-identified as full-time employees. Less than one-third of the surveyed population are retired people. Some respondents or household members are employed in local economic enterprises. Kriva Palanka is a city with a tradition in the textile industry and a significant portion of local people is engaged in this sector, especially women. Some of the employees are engaged in service activities and construction.

This area also has a tradition in construction, and 14 respondents stated that they have family members engaged in this sector. Three respondents stated that few male members of their families go to work abroad during the construction season as construction workers and during the winter they are at home. The number of unemployed respondents was 12. Most of the unemployed are men and all unemployed were registered with the Employment Agency.

Table 11 Distribution of households members by primary occupation

	Primary occupation	Frequency	%
1.	Farmer	2	1.00%
2.	Housewife	8	3.98%
3.	Civil servant	9	4.48%
4.	Private firm	7	3.48%
5.	Full time employee	66	32.84%
6.	Part time / Temporary employee	1	0.50%
7.	Retired	62	30.85%
8.	University Student	7	3.48%
9.	Elementary and High School Student	23	11.44%
10.	Other / Bankruptcy	1	0.50%
11.	No occupation	7	3.48%
12.	No answer	8	3.98%
	Total	201	100.00%

Source: Socio-Economic Survey, RAP, 2022.

Regarding secondary occupations, the surveyed population is dominated by farmers, with 45 respondents engaged in farming. 27 respondents noted that they collect mushrooms, and 11 reported that they collected herbs during summer and autumn. One of the respondents stated that he is a mushroom purchaser and three respondents responded that they hunt.

The survey asked respondents about vulnerability within their households. Vulnerable persons refer to people, especially those below the poverty line, the elderly, woman and children and households with no legal rights to land and / or dependent on limited low productivity land, who by virtue or gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by the project implementation.

The socio-economic survey conducted among PAPs revealed that 65 household members were identified as vulnerable according to at least one indicator of vulnerability. The vulnerability component or indicator is mainly consisted of elderly people or people aged 65 and over. Elderly persons or persons aged 65 and older, according to this age indicator are considered vulnerable. However, according to the Macedonian law on social protection, the age over 65 years is considered as an indicator for

vulnerability. It is important to underline that there is the need to combine the other factors with this indicator, like the incomes, ownership of the land, recipients of social welfare, etc. In this context, only the age is not considered as a main indicator to assess the vulnerability. Six households are headed by women. The analyzed answers of vulnerability in the project area are shown in the next tables.

Table 12 Vulnerability of the surveyed population in the Project area

Vulnerability		Number
1.	Handicapped (mobility)	3
2.	Handicapped (learning capacity)	3
3.	Blind	1
4.	Dumb	1
5.	Age (elderly / over 65 years)	51
6.	Woman headed household	6
TOTAL		65

Source: Socio-Economic Survey, RAP, 2022.

Regarding the Social assistance or allowances, the situation is given in the next table.

Table 13 Social Assistance or Allowances

Social Assistance or Allowances		Number
1.	Under poverty line	2 ³⁸
2.	Medical allowances / Chronically ill	3
3.	No assistance	196
TOTAL		201

Source: Socio-Economic Survey, RAP, 2022.

PE ZSRMI in cooperation with the Municipality of Kriva Palanka and Centre for Social Work in Kriva Palanka will identify any additional vulnerable persons in the project affected settlements eligible for assistance, taking into account the results of this socio-economic survey. Accordingly, appropriate assistance shall be provided to these vulnerable persons.

When asked where their family came from, the respondents stated that their families came mostly from the surrounding areas, like Konopnica, Crcorija, Zidilovo, other parts of the wider project area, etc. 12 respondents answered that they still have family members in the place from where they moved. See Figure 15 below.

³⁸ One respondent reported that he has no incomes and he had submitted application for allowances under poverty line.

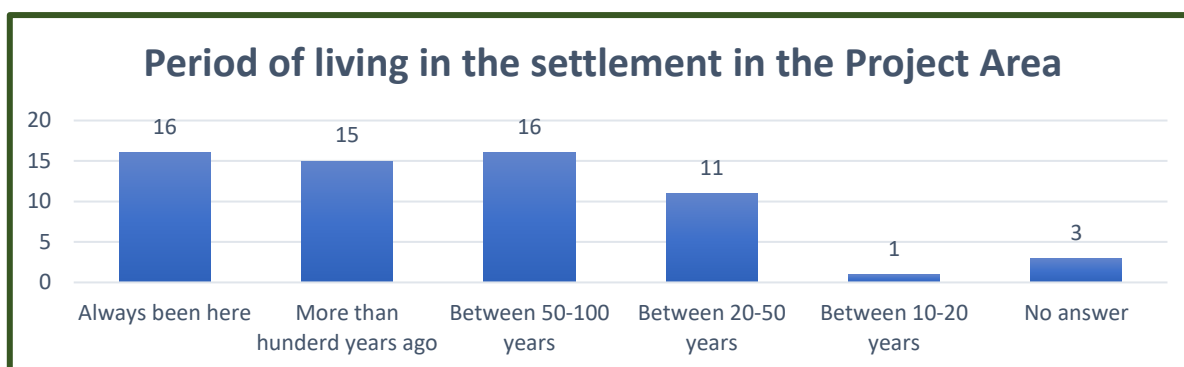


Figure 15 Period of living in the settlement in the Project Area

Source: Socio-Economic Survey, RAP, 2022.

The houses in the rural parts of the project area are mostly older buildings that were built decades ago. In addition to the house, there are other ancillary facilities. Some of the houses have been renovated, but a significant number are ruined or partially ruined. 26 respondents reported that they have houses with an area exceeding 150 m². Some of the rural house owners mentioned that they have also the houses or apartments in the urban area.



Figure 16 Buildings in the project area

The area of arable agricultural land owned by the respondents was on average 0.5 ha. The largest reported area of cultivated arable land was 11 ha, and four respondents had no arable land at all. Regarding other land types, like forests and pastures, owners reported an average of just over 1 ha. The land parcels are on average one or more kilometres from their homes.

A significant number of respondents are co-owners of some cultivated land plots, with many indicating no physical division of the larger parcels with more than five owners, and there are several affected land parcels with more than 10 co-owners. Based on the analysis of the completed questionnaires, there are no households with no legal rights to land.

Only five respondents reported cultivating or using the total area of their land every year. Two respondents indicated that they rent land, while three respondents stated that they tried to rent their land but without success and had no interest in cultivating the land. 31 respondents reported partially cultivating their land. Most respondents reported that the agricultural products produced on their land were intended for consumption by their families.

6.2.2. Household economics (household income sources, expenditures)

The results of the survey show that the respondents and their household members have different income sources (see Table 14 below). Most reported their household as having more than one source of income; most often a combination of income received as salary or as a pension with some additional income or subsistence gained from agricultural activities.

Table 14 Income Source of Households

	Income Sources	Number of reported incomes in 2021
1.	Permanent salary in the public service	9
2.	Salary	75
3.	Pensions / all allowances (including alimony)	66
4.	Agriculture	55
5.	Collecting mushrooms, herbs, spices	15
6.	Hunting and fishery	2
7.	No income	3
8.	No answer	14

Source: Socio-Economic Survey, RAP, 2022.

75 household members indicated a salary as their main source of income. The highest salary was up to 17,000 EUR, while most of the interviewees (52) answered that they earned on average 2,000 to 4,500 EUR annually. 62 householders reported their main source of income to be pensions or allowances. The lowest average pension income was 1000 EUR annually.

Most of the households and their members are engaged in crop production. A small number of households (12) reported having livestock. The lowest average annual income from agriculture was about 500 EUR, and the highest was 2.200 EUR.³⁹ The collection of wild herbs, mushrooms, and spices in local forests in the summer season is a minor income source for 11 household members⁴⁰, as these forest resources are mostly consumed by their household.

Concerning household expenditure, the highest outgoing is on utilities (electricity, water, phone), which represent 30-35% of expenditure. The surveyed households spend less money for food in general, although 21 respondents reported nearly half of their expenditure to be on food. Only three respondents reported that their households experienced food shortages. These respondents are also categorized as vulnerable.

Health expenditure depends on the age of the respondent. In general, health expenditures are higher for the elderly population surveyed. On the scale of expenditures, the expenditures for education, transport and clothes are significantly smaller. Regarding household debt, only seven respondents reported that they had the obligations to repay credits.

³⁹ Respondents generally answered that they produce agricultural products for household consumption and for family members who do not live with them (son or daughter with family). One respondent stated that he produced less than a ton of apples last year and shared them with relatives and friends. Several respondents produce a little more potatoes and other products, but not only for their household members, but also for the families formed by their children. Only seven respondents stated they sell surplus produce at local market. The respondents asked about their annual income from agricultural activities, they were asked how much money they would pay if they bought agricultural products. That amount was included in their incomes. The answers varied between 500-2200 EUR per year. .

⁴⁰ Only one respondent noted that he has earned in total 120 EUR in 2021.

6.2.3. Role of the woman in family affairs

Based on the analysis of the household surveys, the opinion of women was respected and accepted when decisions on key financial issues and issues related to the children. Access to education is almost equal for boys and girls. 52 respondents answered that there is no disparity in accessing and receiving education between male and female household members.

Table 15 Role of the woman in family affairs

	Issues	Frequency		No answer
		Yes	No	
1.	Are the women in your family opinions respected and accepted when decisions on key financial issues are made (such as investing in a family business, buying a car, etc.)?	52	2	8
2.	Are the women in your family accepted when decisions on key issues regarding the children are made (e.g. on education, vocation, etc.)?	48	3	11
3.	Is there any disparity in getting education between male and female members of your family?	3	52	7

Source: Socio-Economic Survey, RAP, 2022.

41 respondents reported that the informal work of women in the household is very important, and 17 respondents indicated that it is extremely important. Four respondents did not answer this question. Regarding the inheritance between female and male family members, the answers of the respondents are shown in the following table.

Table 16 Inheritance between female and male members in family

	Income Sources	Frequency
1.	Woman receives the same share as the man	28
2.	Woman receives a higher share than the man	1
3.	Woman receives a smaller share than the man	23
4.	Woman does not receive any share	7
5.	No answer	3

Source: Socio-Economic Survey, RAP, 2022.

According to the respondents, the property acquired in the marriage in most cases is registered on the name of the husband. 32 respondents reported that the property is registered on the name of the husband. 24 respondents answered that the property purchased with the income of the family is registered of the name of both. Two respondents reported that the property is registered of the name of the wife. Four respondents did not answer this question.

In the all-female focus group discussion, it was noted that while women's role in the household is seen to be extremely important, and while there are instances where women inherit the same proportion as men, the tradition is that the male members of the family are to be privileged. There are often cases where women give up their part of the inheritance in favour of their brothers. Two of the participants in the focus groups mentioned that men are often not sincere when speaking about the role of the woman in the household.

6.2.4. Preference for compensation

Based on the analysis of the answers of the respondents, as well as the thematic analysis of the discussions and answers in focus group and individual interviews, the preferred mode of compensation for the affected houses, ancillary buildings, and land parcels is cash. Moreover, the owners of the houses elaborated that they are aware that to request for the construction of a same object as their houses on a different location, is difficult or impossible. They reported that it is impossible to build the same or similar houses because they know the configuration of the terrain well and there are no such land plots for construction. There are simply not enough land parcels where they can build their houses like theirs that will be demolished.

Respondents further expressed that the whole issue of expropriation and compensation was very stressful, for them and for their families. Some of the owners stated that they cannot manage to watch the demolition of their homes and are also not capable of recovering materials from their homes, like windows and doors, and using them on another house.

Table 17 Compensation modes for expropriated houses, ancillary buildings, and land parcels

Type of loss		Preferred mode of compensation Cash	Preferred mode of compensation In-kind	Relocation of affected assets	Preferential assistance for income rehabilitation	Notes
1.	Affected house	11	2	1	Credit	One owner was not interviewed.
2.	Affected ancillary building	1	1	-	No assistance	One owner did not answer this question.
3.	Affected land parcel	57	2	-	Training	Three owners did not answer this question.

Source: Socio-Economic Survey, RAP, 2022.

During in-depth interviews, some of the respondents stated that they had invested almost everything in their houses, that it was a part of their lives and that the stress related to demolishing houses would have a strong impact on their health and the health of their family. In the qualitative interviews, all respondents expressed a deep emotional attachment to their homes, many emphasizing that their homes represent part of their family history.

All focus group participants expressed preference for cash compensation with exception of two participants who wanted replacement of house and land. Two of the participants were mindful of the experience of undervalued compensation associated with the regional road project and were therefore concerned that the state could not fully compensate for the amount they and others had invested in constructing or improving their homes. As a result, other focus group participants felt they should request PE ZRSMI provide further assurance that they will act as agreed.

The socio-economic survey included questions on alternative livelihoods and livelihood restoration preferences for PAPs. The PAPs in the rural areas emphasized the need for agricultural activity support - a system for irrigation was noted by five respondents, and innovations in crop production were noted by two respondents. Regarding the choice of occupational and livelihood restoration models, 21 respondents reported that they preferred training for livelihood restoration, while three respondents preferred a credit support option.

6.2.5. Project knowledge and perceived benefits

In the answers to the open-ended questions in the household questionnaire, in depth-interviews and focus-group discussions, the theme of railway construction having been announced for such a protracted time dominated. A participant underlined that the construction of the railway had been constantly announced over a long period of time, and when the construction work stopped, he started believing that the railway would never be built. Indeed, many of the inhabitants of the project area are still not convinced the railway will be built.

In terms of where they heard about the project, most of the respondents answered that they had heard from TV, other people, friends, and community meetings. 24 respondents heard about the project from TV, 21 from other people, friends, and ten were informed through community meetings. Six respondents did not answer this question.

52 respondents reported a positive overall attitude toward the Project. In Kriva Palanka, six respondents had a negative attitude toward the project. Two respondents noted that they had a neutral attitude toward the project, and two respondents did not answer. The PAPs indicated that the biggest Project benefit would be the opportunity for local employment and that railway construction would support and accelerate the economic development of the North-East Planning Region, including the impetus it would give to the development of local tourism.

Table 18 Benefits of the railway

Gains of the proposed project		Frequency
1.	Facilitated international trade and transport	11
2.	Economic development in the North-East area of the country	31
3.	Local employment	44
4.	Development of the local tourism	21
5.	Traffic shift from road to rail transport	8
6.	Reduced emissions and improvement of the quality of environment	7
7.	Other (development of the eco-tourism)	1

Source: Socio-Economic Survey, RAP, 2022.

In the focus group discussion and in-depth interviews, participants indicated that during the construction phase, and later during the operational phase of the railway, the local population should be employed. Several participants felt preference should be given to the employment of younger people in the project area, with a suggestion that scholarships could be given to motivate young people to continue to live in Kriva Palanka. While acknowledging that this would not solve the problem of youth emigration, it was felt this could help reduce it.

7. ELIGIBILITIES AND ENTITLEMENTS

7.1. Eligibilities

The date of submission of the Expropriation proposal (07.09.2022⁴¹) is considered as the cut-off date, and there will be no eligibilities or entitlements to compensation recognised after the cut-off date. Those people or groups affected directly by the Project are eligible to receive full replacement cost and rehabilitation assistance for impacts identified as part of the screening and census. Project affected persons (PAP's) may be classified as persons:

- (a) Who have formal legal rights to land or assets.
- (b) Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or
- (c) Who have no recognizable legal right or claim to land or assets they occupy or use.

PAPs with recognizable rights will be provided compensation for the land they lose, and other assistance as required by EBRD Performance Requirement 5. Those without recognizable rights will be provided with resettlement assistance in lieu of compensation for the land they occupy, or other assistance, as necessary, if they occupy the project area prior to the cut-off day, which is established prior to the census which is conducted as a key part of the RAP. All PAPs will be provided compensation for affected assets and livelihoods other than land.

7.1.1. People affected by loss of land (e.g., farmland, grazing, forest land) and cultures

In accordance with EBRD PR5 requirements, all categories of impacted landowners and users (formal and informal, private owners, tenants, customary land users etc) will be included in the eligible for appropriate compensation and/or livelihood restoration support. The total number of Project affected land parcels in private rather than state ownership is 391. The full list of the individual affected landowners is provided in Annex 13.1. The Asset inventory and Valuation will add information about the factual situation of the affected land parcels and cadastre cultures.⁴²

PAPs with formal legal rights to land or assets are those with formal documentation under national law to the land or structure they occupy. They can prove their rights to the land or assets recognized in the national law. They are the registered owners of the land or assets in the Cadastre of Real Estate. To this group are added the persons who have customary and traditional rights to use the land or assets.

There is another group of PAPs who do not have registered formal rights to land or assets, but who have a recognized or recognizable claim under national law. They may have been using the land for generations without formal documentation. Transfer of property rights in Macedonian society is sometimes slow, so frequently the heirs use the land or assets without being formally holders of recognised rights claimable under Macedonian law.

Informal users are PAPs with no recognizable legal right or claim to the land or assets they occupy or use. These can be seasonal resource users, such as herders, grazers, fishers, or hunters. They can also be persons occupying land in violation of applicable laws. Affected persons in these groups are not eligible for compensation for land but are eligible for resettlement and livelihood assistance and compensation for assets.

Due to expropriation of the land, some plantations with wheat, alfalfa, corn, potato, vegetables will be lost. Also, sour cherry, pears, apple trees will be lost.

⁴¹ Proposals have been submitted in batches

⁴² The final census will cover the 100% of PAPs. However, in the Geodetic report / Elaborate for expropriation are covered the greatest portion of PAPs. After Asset inventory and Valuation will be add the other part of the PAPs.

7.1.2. People affected by loss of housing

Based on the analysis of the Geodetic report / Elaborate for expropriation, the number of affected houses was originally identified to be 48. But because all buildings are registered in the cadastre or in the Geodetic report / Elaborate for expropriation as Ground Under Buildings (GUB), subsequent ground truthing established the number of affected houses to be 38, with the other 10 buildings identified as garages or ancillary buildings. The total number of affected structures within this version of the RAP, however, is 18, as most of the affected structures are located on project access roads and slopes subject to further project design changes.

Table 19 below shows the 18 structures proposed for demolition, alongside their legal status. It is significant to note that most structures are illegally constructed. Many of the owners of these structures have submitted requests for legalization. However, PE ZRSMI refused legal permission due to the planned construction of the railway. Displaced persons without formal rights or owners of the illegally constructed structures are recognized as eligible for compensation for loss of their assets and their livelihoods, in accordance with lender's E&S policy as identified in Chapter 5 of this RAP.

Table 19 Privately owned buildings affected by Land Expropriation and their legal status

	Cadastre Municipality	Number of the buildings		Illegally constructed buildings	Legally constructed buildings	No information
		Privately owned	Company owned			
1.	CM Trnovo	-		-	0 ⁴³	-
2.	CM Kiselica	1		1	-	-
3.	CM Kriva Palanka	7 ⁴⁴	3	7	1	1
4.	CM Drenje	1 ⁴⁵		-	-	1
5.	CM Zidilovo	1		1	-	-
6.	CM Uzem	5		3	2	-
	TOTAL	18		12	4	2

The above table includes the three project impacted business structures illegally constructed.

7.1.3. People affected by loss of businesses or commercial premises

Based on the analysis of the Geodetic Report / Elaborate for expropriation there is only one business entity with two parcels for expropriation, one in the CM Kriva Palanka and other in CM Kostur. However, during surveying, it was determined that there are working facilities on the two project affected land plots. A company facility has been built on one plot and a company was registered on this address with two business activities. A company is registered on the address of the second affected land plot with the house yard and a garage used as workspace. When marking the affected land plots, the existence of illegally constructed buildings on two plots were determined. Valuations of the loss of income related to the affected businesses should be conducted additionally. The capital assessment will be conducted following the Law on appraisal. The assessment of the amount of damage suffered as a result of discontinuance of the business activity, as well as the damage caused by the changing of the location, if such occurred, as well as the moving costs will be conducted by an expert witness following the Law on Expertise.

⁴³ The access road in this area will be redesigned with approval from the EBRD. With the redesign of the access road, the demolition of this house will be avoided. The house is given on the Figure no. 4.

⁴⁴ One house for demolition is semi-detached.

⁴⁵ The valuation for this parcel was added later.

7.1.4. People affected by economic loss

Analysis of the Geodetic Report suggests the total number of affected private land parcels is 291. But the total number of economically displaced persons is likely to be higher than the number of affected land parcels as many plots have more than one owner, and also the parcels (owned /used individually or collectively), can be the basis for more wider seasonal agricultural employment.

A specific problem in establishing communication with potentially economically displaced PAPs was that many do not have permanent residence in the cadastral municipality where the expropriated parcel is located. Nevertheless, landowners who had moved to Skopje were consulted after being invited to a hearing in the Skopje as part of the social survey process.

The key information on the private owners or co-owners is given in the next table. In fact, there are mostly private co-owners of the project affected land plots. According to the data obtained from the Geodetic Report / Expropriation Study, there are the land plots that have more than 20 co-owners. Land plots with one owner are mostly in urban areas.

Table 20 Data on PAPs affected by permanent land acquisition (permanent way)

	Description	Land parcels affected by the permanent land acquisition
1.	Total number of private land parcels	293
2.	Total number of one private owner	105
3.	Total number of private co-owners	186
4.	Total number of land parcels with mixed / joint ownership (state/private)	2

7.2. Entitlements

As noted in the introduction to the RAP; *the Asset Inventory and Valuation*, which in-field identified the exact nature of Project affected assets as the basis for valuation and compensation, is the responsibility of the Bureau of Judicial Expertise. The Bureau of Judicial Expertise conducted the Asset Inventory and Valuation. The data are included in the Census, attached in the Annex 13.1.

As such, an Entitlements Matrix has been prepared (Table 21), which proposes entitlement parameters for each category of loss at full replacement cost, which is the market value of the assets plus transaction costs such as taxes, stamp duties, legal and notarisations fees, other costs that may be incurred because of the transaction or transfer of property. Compensation at full replacement costs is sufficient for PAPs to replace project affected land, structures, or other assets to the same or better standard in another location.

As well as compensation for expropriated land, affected landowners will also be entitled to:

- compensation for the crops, seeds, forests on the land and the fruits, if they were not incorporated in the market value of the land.
- compensation for assets or facilities (e.g., wells, irrigation systems, fencing and supporting walls and alike) if not included in the market value of the land.
- compensation for expropriation of land will take into consideration interruption to economic activities associated with land acquisition.
- reimbursement of moving expenses.

Users of land owned by the state will be entitled to compensation for investments made on the land, but neither the owner nor users are entitled to compensation for investments made following the date of submission of the proposal for expropriation (cut-off date).

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Regarding PAPs in Project affected houses and other structures, there are three resettlement options: (i) Monetary compensation; (ii) Relocation and replacement housing; (iii) a combination of monetary and in-kind compensation. In the socio-economic survey relevant PAPs were asked about their preference for monetary, in-kind, or combined compensation for their affected houses, ancillary buildings land parcels or assets.

Table 21 Proposed Entitlements Matrix

Type of loss / impact	Category of PAP	Entitlements
Permanent losses / impacts prior to construction		
Permanent loss of residential / accommodation related losses (Physical displacement)	<u>Owner of house with building permit erected on own registered land plot</u>	Replacement residential structure of equal or higher value (with equivalent or better characteristics and advantages of location) OR Cash compensation at full replacement cost. + Resettlement assistance, including moving allowance or assistance to move. Accommodation of PAP's during the construction of building if necessary. + The right to take away or salvage the building materials without the reduction in the amount of compensation If the owner has no other place of residence and the value of the house is so low that the affected person and his/her household cannot resettle to adequate housing as required by the EBRD, the affected household shall be entitled to a choice of options for adequate housing with secure of tenure (such as social housing).
	<u>Owner of the house without building permit erected on own registered land plot</u>	Subject to successful legalization: Same as formal owner. If legalization is not possible: Compensation for land at replacement value + Provision of cash compensation at replacement value. + The costs of all expenses for moving and any legal documentation shall be covered. + The right to take away or salvage the building materials without the reduction in the amount of compensation.
	<u>Informal user of the house without building permit erected informally on someone else's or state land plot</u>	Cash compensation at replacement value for the private land plot to the owner or he/her successors + Provision of cash compensation at replacement value to structure owner + The costs of all expenses for moving and any legal documentation shall be covered + The right to take away or salvage the building materials without the reduction in the amount of compensation.

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Type of loss / impact	Category of PAP	Entitlements
		<i>Where compensation is provided to users of land owned by the state for investments made on the land, this compensation will be based on the full replacement cost of these investments (depreciation of structures and assets will not be taken into account)</i>
	<i>Formal user of houses or structures</i>	<i>Information about the acquisition of the house at least six months in advance of demolition to enable the tenant to find other accommodation AND Providing compensation for Moving allowance or assistance to move.</i>
	<i>Informal user of house</i>	<i>Resettlement assistance, including moving allowance or assistance to move. AND If the user has no other place of residence, a choice of options for adequate housing with security of tenure (such as housing allowance), as defined in the Law on Social Protection, Article 57. N/A (none identified during the survey)</i>
<i>Permanent loss of construction land, agricultural land, forest land or pastures. For users of land (formal and informal), this refers to access to privately owned land or public land resources.</i>	<i>Owner of land</i>	<i>Cash compensation for affected land at full replacement cost. OR Replacement of agricultural land, forest or pastureland, construction land of a similar quality, size, and location, if such land is available in the area.⁴⁶</i>
	<i>Formal user (tenant) of land</i>	<i>Information and consultation about the land acquisition at least three months in advance of land entry to enable tenant to find equivalent alternative land tenancy valued at market values. Users of land owned by the state to which there is no expropriation right will be entitled to compensation for investments made on the land.</i>
	<i>Informal user of land</i>	<i>Assistance to identify replacement land / resources for use prior to land entry.</i>
<i>Permanent loss of orphan land</i>	<i>Owner of land</i>	<i>In cases where orphan land will remain after expropriation, the owners of land can request expropriation of the entire land plot. Cash compensation for orphan land at full replacement cost.</i>
<i>Loss of annual / perennial crops and trees</i>	<i>Owner of crops and trees (Which could be the landowner or formal or informal user of land.)</i>	<i>Cash compensation for affected crops and trees at full replacement cost (based on type, age, and productive value of affected crops and trees).</i>
<i>Loss of non-residential structures (fences, barns, sheds) and infrastructure (irrigation)</i>	<i>Owner of non-residential structure and infrastructure (Which could be the landowner or formal or informal land user)</i>	<i>Cash compensation for affected structures and infrastructure at full replacement cost AND Moving allowance for moveable assets or assistance to move them.</i>
<i>Loss of business structures</i>	<i>Owner of business structures</i>	<i>Moving allowance for moveable assets or assistance to move them AND EITHER</i>

⁴⁶ It is important to note that **PE ZRSMI** does not possess land to offer as compensation.

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Type of loss / impact	Category of PAP	Entitlements
<i>(Shops, office space, workshops or similar.)</i>		Cash compensation for affected business structures at full replacement cost OR Replacement business structure.
<i>Loss of business income and/or source of livelihood associated with either of the above-mentioned losses and particularly Agricultural Livelihoods</i>	Owner <i>(Formal or informal business or economic activity.)</i>	Cash compensation for lost income during the period of transition (until the re-establishment of business / economic activities in another location) AND Preparation of Livelihood restoration assistance in: <ul style="list-style-type: none"> - providing information and access to jobs related to this project prioritizing affected people by land acquisition and resettlement - providing information on how to access to other locally available employment opportunities (e.g., public works, employment in municipal enterprises, etc.). - Assistance related to access training, skill development, job opportunities, agricultural development support, developed based on consultations with the local population - Provision of general information for procedures of obtaining personal documents, etc. Livelihood restoration assistance will be provided to those identified as needing it during the process of expropriation. PE ZRSMI will cooperate with relevant institutions and organisations that can provide this assistance.
<i>Impact on Vulnerable persons or people</i>	Vulnerable PAPs	Any additional support required for any affected vulnerable person/s or household/s will be determined on case-to-case basis based on the socio-economic survey. These PAP-s will have priority of employment on the project if that is possible. <i>(For this group, they will be given additional assistance to ensure that they will be no worse off after the project and can maintain and restore their livelihoods, including as per the provisions of the Law on Social Protection.)</i>
Temporary losses / impacts during the construction		
<i>Temporary loss of agricultural land, forest land, pastures, or construction land. For users of land (formal and informal), this refers to access to privately owned land or public land resources. Note: For loss of crops / plants / trees, see permanent losses.</i>	Owner of land	Cash compensation at full replacement cost for the right to use land under contract, for the land use period AND Reinstatement of land after use.
	Formal user (tenant) of land	Information and consultation about the temporary land acquisition at least three months in advance of land entry, to enable the tenant to find equivalent alternative land tenancy, valued at market values.
	Informal user of land	Assistance to identify replacement land / resources for use prior to land entry.

8. RESETTLEMENT AND LIVELIHOOD RESTORATION

According to the available information and communication with stakeholders, there are some proposals related to resettlement sites and for a long time, rumours have abounded about the construction of a settlement with standardized houses to be offered to the owners of the demolished properties. In particular, affected owners have been verbally informed of the construction of replacement housing in Drenje, but have expressed dissatisfaction with this proposed location and the lack of specific detail and there has been no written proposal or report concerning relocation sites or structures.

In the very beginning, an idea was considered by PE ZRSMI in consultation with the municipality to offer compensation to the affected persons in apartments on two land parcels / plots near the central city area. However, according to the survey, most of the potential affected house owners preferred cash over in-kind compensation. Further, due to the redesign of the access roads, the number of affected houses has dropped to 18. Thus, this idea was found no longer feasible and omitted.

PE ZRSMI adopted the EBRD performance requirements and EIB Standards according to which the project's impact on the livelihood of the PAPs should be mitigated in line with their standards. Within this document, the scope of the program is the implementation of the measures which will ensure that the PAPs (the owners and users of the land and assets) will have the opportunity to (i) restore their income to the level it was prior to the commencement of the project and (ii) where possible to improve it. The proposed measures are divided in two categories:

1. Livelihood Assistance Measures (in agriculture and non-agricultural businesses) and
2. Additional assistance for Vulnerable PAPs.

All landowners, co-owners, and users⁴⁷ whose land will be acquired for the needs of the railway construction will be targeted beneficiaries of livelihood restoration measures. This includes PAPs who because of the land expropriation or restricted use of natural resources, will experience temporary or permanent loss of income or livelihood. Potential livelihood restoration measures may include but not be limited to the area of:

a) Agriculture

Support for agricultural equipment and agricultural production improvements providing and assistance including:

- Assistance related to access training, skill development, agricultural development support, such as advice on crop production, advice on drying, storage, and transportation, of agricultural products and similar, based on consultations with the local population
- Promotion of the traditional agricultural products of the project affected area.
- Promotion and support for branding the local agricultural products, etc.

b) Non-agricultural businesses

Business support measures proposed for businesses owners include provision of information and assistance including:

- Support to the active business entities to overcome the relocation of the company and in advertising the new location to the customers and suppliers.
- Possibility for temporary employment opportunities created by the project.
- Possibility for permanent employment opportunities during the operational phase of the railway.
- Assistance to access job training and skill development.

⁴⁷ All eligible PAPs will be known once the asset inventory is completed. The PAPs in need for specific assistance will be defined once the individual circumstances of each and every PAP is known.

c) Vulnerable persons or persons in risk

This assistance to this group can be presented in the following forms:

- Provision of tangible support and/or allowance for the persons at social risk / vulnerable persons, PAPs with disabilities who are not actively engaged with land activities.
- Provision of legal aid.
- Provision of assistance in obtaining personal documents, with accessing services available under national legislation.
- Provision of transitional allowance for those who are significantly affected by project implementation.
- Provision of support to prove ownership status and consequently sign compensation contracts (because of unprocessed inheritance procedures or unregistered sale agreements).
- Provision of general information related to legal aid and obtaining personal documents.
- Provision of general information related to access social welfare.
- Provision of general information related to access to free care and assistance at home by certified caregivers.
- Provision of general information related to access to the day care center in Kriva Palanka for persons with disabilities, the centre for persons with cerebral palsy.
- Provision of the information related to the activities of the Red Cross Branch in Kriva Palanka.

9. INSTITUTIONAL ARRANGEMENTS (roles and responsibilities)

Organisational roles and responsibilities in relation the Project's resettlement process are outlined in Table 22 below. PE ZRSMI is fundamentally responsible for implementation of the RAP but is assisted in that task by several ministries, state institutions and agencies.

Table 22 Organizational Arrangements for Project Resettlement

Organisation	Organizational arrangements
PE ZRSMI	As the Project Promoter / Investor: (i) Applies and coordinates resettlement activities under this RAP. (ii) Declaration of the CUT-OFF DATE. (iii) Develops RAP, discloses RAP and all other relevant documents and implements the approved RAP (iv) Organizes and holds public hearings and consultations about the Project during all phases of the Project (v) Engages relevant stakeholders, disseminates the information about the Project and coordinates the land acquisition (vi) Applies resettlement mitigation measures. (vii) Establishes and administrates the grievance mechanism (viii) Monitors the process of temporary land occupation and reinstatement (xi) Monitors and reports to EBRD and EIB (and other institutions) on all issues under this RAP (XII) And settling compensations in line with the RAP in compliance with national laws and EBRD requirements.
Government of Republic of North Macedonia	Adopts the Initiative for realization of public interest (Construction of the railway Kriva Palanka – Border with Republic of Bulgaria). The government also covers all costs related to expropriation, resettlement and associated costs.
State Attorney's Office	Submission of the Initiative for the realization of public interest (Construction of the railway Kriva Palanka – Border with Republic of Bulgaria) on behalf of PE ZRSMI. The State Attorney's Offices in Kumanovo prepares the Expropriation proposals and submits to the Sector for Administrative Procedures in Kriva Palanka.
Ministry of Finance	Ministry of Finance of the RNM, through the Department for Normative Property and Legal Affairs, deals with the property and legal relations (preparation and proposal of legal regulations and bylaws), where the state appears as one of the parties (expropriation, privatization of building land). The Sector for Administrative Procedure performs the activities related to the coordination of the affairs and tasks with the regional departments for administrative procedure from the property-legal affairs, supervision over the application of the regulations in administrative procedure, submission of directions and instructions for equal application of regulations in the regional departments, as well as monitoring work of the regional departments for implementation of the first instance procedure. The Sectors for Administrative procedures in Kriva Palanka coordinate the land acquisition process.
State Bureau of Judicial Expertise	State Bureau of Judicial Expertise will conduct an assessment to determine compensation for property (land plots, houses, assets, crops, and plantations). The assessments will be submitted to PE ZRSMI.
The Kriva Palanka Local Self-Government	Supports the expropriation process through information provision and engagement.
Administrative Court	The Administrative Court has jurisdiction over expropriation disputes.
Kriva Palanka Municipal Centre for Social Welfare	Municipal Centre for Social Welfare in Kriva Palanka can provide support and assistance under the Law on Social Welfare and can provide information about the vulnerable persons and households and support assistance to them
Ministry for Agriculture, Forestry and Water	Provide the information about the agricultural land and executes the conversion of agricultural land into building land.

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Organisation	Organizational arrangements
Agency for Real Estate Cadastre	The Geodetic Report / Elaborate for expropriation is prepared using the database of the Agency for Real Estate Cadastre. Also executes legal title changes of immovable property owners after land acquisition.

10. CONSULTATION AND GRIEVANCE REDRESS

This RAP is prepared based on the requirements of the laws and regulations of the RNM, which refer to consultation with the stakeholders and the concerned Project parties, as well as the applicable policies and standards of the EBRD and EIB, including EBRD PR10⁴⁸ - Disclosure of information and engagement of stakeholders – and EIB’s Environmental and Social Standard 2 on Stakeholder Engagement⁴⁹. EBRD and EIB recommendations for the safe involvement of stakeholders in the context of COVID-19 are also considered.

PE ZRSMI has designated the following contact person and working group person for communication with these stakeholders and PAPs.

The contact person for stakeholder engagement in PE ZRSMI:
<p>Mr. Aleksandar Ravnjashki Mob: + 389 078 246 749 Email: a.ravnjaski@mzi.mk Address: PE ZRSMI, Jordan Mijalkov 50b, 1000 Skopje, Republic of North Macedonia</p>

Responsible working group for expropriation in PE ZRSMI:
<p>Trajche Milanov, Surveyor Mob: + 389 71 265 259 Email: <u>t.milanov@mzi.mk</u> Address: PE ZRSMI, Jordan Mijalkov 50b, 1000 Skopje, Republic North Macedonia</p>
<p>Vjosa Miftari, Bachelor of Laws Address: PE ZRSMI, Jordan Mijalkov 50b, 1000 Skopje, Republic North Macedonia</p>
<p>Bujamin Fazliu, Master of Laws, Head of the Legal Affairs Department Mob: + 389 72 605 686 Email: <u>b.fazliu@mzi.mk</u> Address: PE ZRSMI, Jordan Mijalkov 50b, 1000 Skopje, Republic North Macedonia</p>

10.1. Stakeholder consultation

The following key Project stakeholder groups have been identified⁵⁰:

- Government ministries: Ministry of Transport and Communication, Ministry of Environment and Physical Planning, Ministry of Agriculture, Forestry and Water Economy, Ministry of Culture, Cultural Heritage Protection Office, Ministry of Labour and Social Policy of the Republic of North Macedonia.
- Project affected local authorities.

⁴⁸ EBRD Environmental and Social Policy, 2019.

⁴⁹ EIB Environmental and Social Standards, 2022.

⁵⁰ The stakeholders are identified as part of the SEP.

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- Residents of T'Iminci, Gradec, Drenje, Lozanovo, Kiselica, Trnovo, Kriva Palanka, Zidilovo, Krklja, Uzem and Kostur.
- Project affected local businesses.
- Construction and haulage companies.
- Non-government organisations.

Consultation with these Project stakeholders has been integral to project development. With respect to resettlement planning, consultation has mainly taken the form of public meetings to disseminate project information and engage stakeholders and interested parties in project design and implementation. In general, the frequency of engagement reflects the nature of the activity and the level of stakeholder interest and concern in different Project affected areas.

All forms of subsequent engagement with PAPs have been preceded by a series of public project information disclosure meetings in affected areas to inform PAPs about the planned project and resettlement. All people attending the meetings were informed about the proposed project activities, aims and objectives, and informed about the expropriation procedure.

All proposed engagement was widely publicised in a culturally sensitive manner at least ten days in advance of being undertaken, and efforts were made to ensure that stakeholders were appropriately represented - with particular attention paid to reaching potentially marginalized or vulnerable persons and groups. During each engagement, information was made available to participants on project plans and objectives (Annex 13.5). Minutes of consultation meetings were taken by PE ZSRMI.

The following table details the consultations held in relation to the preparation of this RAP.

Table 23 Recent Project Resettlement Consultation

	Target group / attendees	Consultation	Period	Notes
1.	<ul style="list-style-type: none"> Director, management, and PEZRSMI officials. E&S CONNECTA Team. The representatives from the Ministry of Transport and Communications of the Republic of North Macedonia. 	A kick-off meeting to discuss the topic of resettlement and the formation of a working group (in PE ZRSMI), as well as the meeting with a responsible person in PE ZRSMI for cooperation E&S CONNECTA Team. There is also a need to open a PIU office in Kriva Palanka.	December 24, 2021	PE ZRSMI Management provided overall information about the Project, project sections (S1, S2 and S3), expected impacts and their considerations on the possible solutions related to mitigation the resettlement.
2,	<ul style="list-style-type: none"> Director, management, and PE ZRSMI officials. E&S CONNECTA Team. The representatives from the Ministry of Transport and Communications of the Republic of North Macedonia. The Mayor of the Municipality of Kriva Palanka and public officers. 	Informative consultative hybrid meeting to consider possible steps and solutions, to offer to the owners of the houses in Kriva Palanka whose houses should be demolished, and they should be dislocated.	January 10, 2022	<p>Hybrid meeting.</p> <p>Director, management, and PE ZRSMI officials and E&S CONNECTA Team were physically present at the meeting. The representatives from the Ministry of Transport joined the meeting via zoom link.</p> <p>The Director of PE ZRSMI and employees are introduced the attendees with the project and open the discussion related to the resettlement procedure and possible strategies to address it.</p>
3.	<ul style="list-style-type: none"> Director, management, and PE ZRSMI officials. Social experts from CONNECTA Team. The representatives from the Ministry of Transport and Communications of the Republic of North Macedonia. 	Informative consultative meeting to consider possible steps and solutions, to offer to the owners of the houses in Kriva Palanka whose houses should be demolished, and they	February 25, 2022	<p>The PE ZRSMI representatives introduced the attendees with the project and invited them to undertake the project documentation related to the cadastre parcels for expropriation.</p> <p>The present presidents of the local communities and the inhabitants of the affected settlements were asked to distribute announcements to the project affected settlements. The aim of this meeting was to disseminate the information among PAPs about the geodetic survey and demarcation of the project affected land parcels and buildings.</p>

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	Target group / attendees	Consultation	Period	Notes
	<ul style="list-style-type: none"> Officials from the municipality of Kriva Palanka. 	should be physically dislocated.		
4.	<ul style="list-style-type: none"> PE ZRSMI officials.E&S Connecta Team, PAPs from Kriva Palanka, Public officials from the Municipality of Kriva Palanka 	Informative consultative meetings with PAPs in the city in order to get acquired with the project details regarding their land parcels and buildings.	March 10-11, 2022	<p>The PAPs are informed via municipality website (https://www.krivapalanka.gov.mk/novosti/27733).</p> <p>About 50 residents of Kriva Palanka came to get the insight into the project documentation and have a talk with PE ZRSMI officials.</p>
5.	<ul style="list-style-type: none"> PE ZRSMI officials; PAPs from Kriva Palanka who signed the petition, The mayor and public officials from the Municipality of Kriva Palanka 	Consultative meeting about the access roads and slopes	April 04, 2022	<p>The PAPs provided PE ZRSMI with information and suggestions to solve the problems with access roads and slopes. The result of that activity will significantly decrease the total number of houses to demolish.</p> <p>The attendees of the meeting agreed to form four working groups who will be consulted about the redesigning of the problematic sections of the access roads and slopes in the CM Kriva Palanka.</p>
5.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; The representatives from the Municipality of Kriva Palanka. PAPs from T`Iminci and Gradec 	Public Informative Meeting with PAPs in T`Iminci and Gradec	May 09, 2022	<p>In the settlement T`Iminci, only 45 plots are owned by natural persons. The total number of private owned land parcels in Gradec is 25.</p> <p>The attendees were informed about the planned project activities, expropriation procedure and were asked to complete the Household Questionnaire. The social experts helped some of the attendees to fill in the questionnaires. Some of the attendees were later interviewed by phone.</p>
6.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; 	Public Informative Meeting with PAPs in	May 10, 2022	The total number of the project affected land parcels of the individual owners in Drenje, Kiselica and Trnovo is 27.

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	Target group / attendees	Consultation	Period	Notes
	<ul style="list-style-type: none"> The representatives from the Municipality of Kriva Palanka. PAPs from Drenje, Kiselica and Trnovo 	Drenje, Kiselica, Trnovo.		The attendees were informed about the planned project activities, expropriation procedure and were asked to complete the Household Questionnaire. The social experts helped some of the attendees to fill in the questionnaires. Some of the attendees were later interviewed by phone.
7.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; The representatives from the Municipality of Kriva Palanka. PAPs who had residence address in Skopje. 	Public Informative Meeting with PAPs in Skopje	May 11, 2022	<p>All PAPs who in the Geodetic Report / Expropriation Report had a residence address in Skopje, were invited to an informative meeting at the premises of PE ZRSMI in Skopje.</p> <p>The attendees were informed about the planned project activities, expropriation procedure and were asked to complete the Household Questionnaire. The social experts helped some of the attendees to fill in the questionnaires. Some of the attendees were later interviewed by phone.</p>
8.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; The representatives from the Municipality of Kriva Palanka. PAPs from Zidilovo and Krklja. 	Public Informative Meeting with PAPs in Zidilovo and Krklja.	May 12, 2022	<p>The total number of the project affected land parcels of the individual owners in Zidilovo and Krklja is 11. Only residents of Zidilovo were present at the meeting. The project affected persons from CM Drenje were contacted by phone later.</p> <p>The attendees were informed about the planned project activities, expropriation procedure and were asked to complete the Household Questionnaire. The social experts helped some of the attendees to fill in the questionnaires. Some of the attendees were later interviewed by phone.</p>
9.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; The representatives from the Municipality of Kriva Palanka. PAPs from Uzem and Kostur. 	Public Informative Meeting with PAPs in Uzem and Kostur.	May 13, 2022	<p>The total number of the project affected land parcels of the individual owners in Uzem, and Kostur is 151.</p> <p>The attendees were informed about the planned project activities, expropriation procedure and were asked to complete the Household Questionnaire. The social experts helped some of the attendees to fill in the questionnaires. Some of the attendees were later interviewed by phone.</p> <p>In Uzem, after the information meeting, a focus group was held with the owners of the houses in Uzem, which are to be demolished.</p>
10.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; 	Public Informative Meeting with PAPs in	May 16, 2022	The total number of the project affected land parcels of the individual owners in Kriva Palanka is 134.

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	Target group / attendees	Consultation	Period	Notes
	<ul style="list-style-type: none"> The representatives from the Municipality of Kriva Palanka. PAPs from Kriva Palanka (the owners of the land parcels and assets located on the permanent way in CM Kriva Palanka). 	Kriva Palanka		The attendees were informed about the planned project activities, expropriation procedure and were asked to complete the Household Questionnaire. The social experts helped some of the attendees to fill in the questionnaires. Some of the attendees were later interviewed by phone.
11.	<ul style="list-style-type: none"> PE ZRSMI officials; Social experts from CONNECTA Team; The representatives from the Municipality of Kriva Palanka. PAPs from Kriva Palanka (the owners of the land parcels and assets located on the permanent way in CM Kriva Palanka). 	Public Informative Meeting with PAPs in Kriva Palanka	May 23 2022	The second informative meeting in Kriva Palanka.
12.	<ul style="list-style-type: none"> Social experts from CONNECTA Team PAPs. 	Conducting the Interviews and focus group discussions with homeowners whose homes need to be demolished.	May 2022	<p>In depth discussions with the PAPs to be physically displaced about the offered solutions and restoration livelihoods.</p> <p>In depth discussions with the vulnerable households about the offered solutions and restoration livelihoods.</p> <p>Individual interviews with PAPs in Kriva Palanka</p>
13.	<ul style="list-style-type: none"> Social experts from CONNECTA Team PAPs 	Conducting the Interviews with homeowners whose homes need to be demolished.	May 2022	<p>In depth discussions with the households to be physically displaced about the offered solutions and restoration livelihoods.</p> <p>In depth discussions with the vulnerable households about the offered solutions and restoration livelihoods.</p> <p>Individual interviews with PAPs in Uzem.</p>

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	Target group / attendees	Consultation	Period	Notes
14.	<ul style="list-style-type: none"> Social experts from CONNECTA Team PAPs. 	Conducting the online focus group with PAPs.	May 2022	The focus group was held with five individual landowners.
15.	<ul style="list-style-type: none"> Social experts from CONNECTA Team PEZRSMI officials PAPs. 	Public Informative Meeting with PAPs in CM Kriva Palanka (owners of land plots and assets on the access roads and slopes)	October 14, 2022	Conducting the socio-economic survey with PAPs related to access roads and discussions about the original project design.
16.	<ul style="list-style-type: none"> Social experts from CONNECTA Team PEZRSMI officials PAPs. 	Public Informative Meeting with PAPs in CM Kriva Palanka (owners of land plots and assets on the access roads and slopes)	January 23, 2023	Presentation of the key points related to the redesign of the access roads and slopes in CM Kriva Palanka.

10.2. Grievance redress procedures

The grievance mechanism is established and is presented in the Project SEP. The following principles will apply to grievance management:

- Any grievance related to land acquisition or to any other matter will be registered, acknowledged within three working days, and tracked until it is closed;
- The grievance management system will include at least one level of review/appeal, with the aim to reach an amicable settlement wherever possible without resorting to a judicial review;
- Grievances will be processed and responded to within 30 working days.

PE ZRSMI is committed to receiving and responding to all complains, either verbally or in writing in relation to the resettlement impact and compensation segments of the project⁵¹ and recognizes that consultation is an ongoing process and different concerns may arise as the Project moves into the land acquisition and construction phases. Therefore, within the project framework, a Grievance Redress Mechanism (GRM) was established for Section 3 to receive and address any Project related concerns or complaints, including those related to land acquisition and resettlement. PE ZRSMI will maintain mechanism (Grievance Mechanism) The following principles will apply to grievance management:

- Any grievance related to land acquisition or to any other matter will be registered, acknowledged within three working days, and tracked until it is closed.
- The grievance management system will include at least one level of review/appeal, with the aim to reach an amicable settlement wherever possible without resorting to a judicial review.
- Grievances will be processed and responded to within 30 working days.

Grievance Mechanism is going to be managed and implemented by PE ZRSMI, whereby all the interested stakeholders are going to be provided with means for lodging their official comments and/or complaints during all the project phases. Namely, PE ZRSMI is going to provide a fully operational grievance mechanism during pre-construction, construction, and post-construction/operation phase. The grievance form has been prepared and it is provided in Annex 13.6.

In addition, environmental and social complaints can be submitted through either EBRD IPAM with email to Independent Project Accountability Mechanism⁵² and/or to the EIB Complaint Mechanism⁵³. The grievance form (in Macedonian and English language) is going to be available on the official website of PE ZRSMI (www.mzi.mk) as well as on the concerned municipality web site (www.krivapalanka.gov.mk). (internal comment: link to be provided before disclosure) The concerned municipality will have also available hard copies of the grievance forms, so that the public may have direct access to them. A worker`s Grievance Mechanism will also be established for the employees of construction companies (as a separate system). Additionally, during the construction phase, the grievance forms are going to be provided at the construction site, in hard copy. These on-site grievance forms are going to be available and accessible to the local communities and any other interested stakeholders who wish to file their grievances on site. Grievance forms are going to be available at the construction camp, whereby this location shall be clearly marked so as to say, "Grievance Forms available here", whereby a grievance form box is going to be provided next to the copies of the grievance forms so that all the stakeholders may submit their grievances accordingly. The contractor shall be obliged to put up the corresponding grievance box and signs on the construction site. Finally, all the interested stakeholders shall be duly informed about the availability of the grievance mechanism, whereby the Investor shall put up announcements along the project road section (e.g., local community notice boards), whereby these announcements are going to provide all the relevant information necessary for submission of grievances, i.e., available resources, contact information, etc. PE ZRSMI

⁵¹ The grievance mechanism includes the different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site.

⁵² <https://www.ebrd.com/project-finance/independent-project-accountability-mechanism/ipam-policies.html>

⁵³ <https://www.eib.org/en/about/accountability/complaints/submit/index.htm>

shall also provide an official announcement about the grievance mechanism on their website and make additional announcements in the local media (e.g., local newspaper, online new portals, radio, etc.).

A grievance mechanism will be adopted and implemented as shown below on the figure.

- All comments and complaints will be received and forwarded by the responsible person of the PE ZRSMI.
- Grievances will be received by the responsible person of the PE ZRSMI and recorded at Grievance register. Based on the character and type of the grievances the responsible person will process the grievance to relevant department within PE ZRSMI.
- All grievances will be acknowledged within three working days and responded within 30 working days.
- The department will act to investigate and analyse the grievance and will act to satisfy the complaint. Furthermore, will implement the solution and inform the complainant on the solution and will close the case. In a situation when the grievance cannot be solved, the responsible employee will act to identify long term action and will inform the complainant on the correction action that needs to be taken. After implementation of the corrective action, the grievance will be logged into the Grievance register with description of the outcome and action taken.

Individuals can request the right to have their name kept confidential.

Where required or requested by the complainant in the event that a response to a complaint is not accepted, investigations will be escalated to PE ZRSMI's second tier grievance mechanism for resolution consisted of PE ZRSMI Senior Management representative, , civic representative, such as a Mayor of Municipality or his representative and representative of Minsitry of Transport and Communications.

This mechanism does not preclude the right for stakeholders to process grievances through other judicial means. Macedonian law establishes rights of affected citizens to appeal to Courts during the expropriation process. This mechanism shall not prevent access to judicial or administrative remedies and if not satisfied with the outcome, stakeholders may proceed further using other available legal remedies.

All comments and complaints will be received by the responsible person of the PE ZRSMI, as shown in the following box.

Public Enterprise for Railway Infrastructure Railways of Republic of North Macedonia – Skopje
Address: JPZI” Zeleznici na Republika Severna Makedonija” Jordan Mijalkov no. 50, 1000 Skopje, Republic of North Macedonia Web: www.mzi.mk E-mail: info@mzi.mk
Contact person for Grievance mechanism
Mr. Aleksandar Ravnjashki Tel: ++ 389 078 246 749 E-mail: a.ravnjaski@mzi.mk

PE ZRSMI will establish a registry of grievances and will monitor the resolution of grievances, which should be on a timely basis. Each grievance will be recorded in the registry (Annex 13.6.) with the following information:

- Description of grievance;
- Date of receipt acknowledgement returned to the complainant;

- Description of actions taken (investigation, corrective measures); and
- Date of resolution and closure / provision of feedback to the complainant

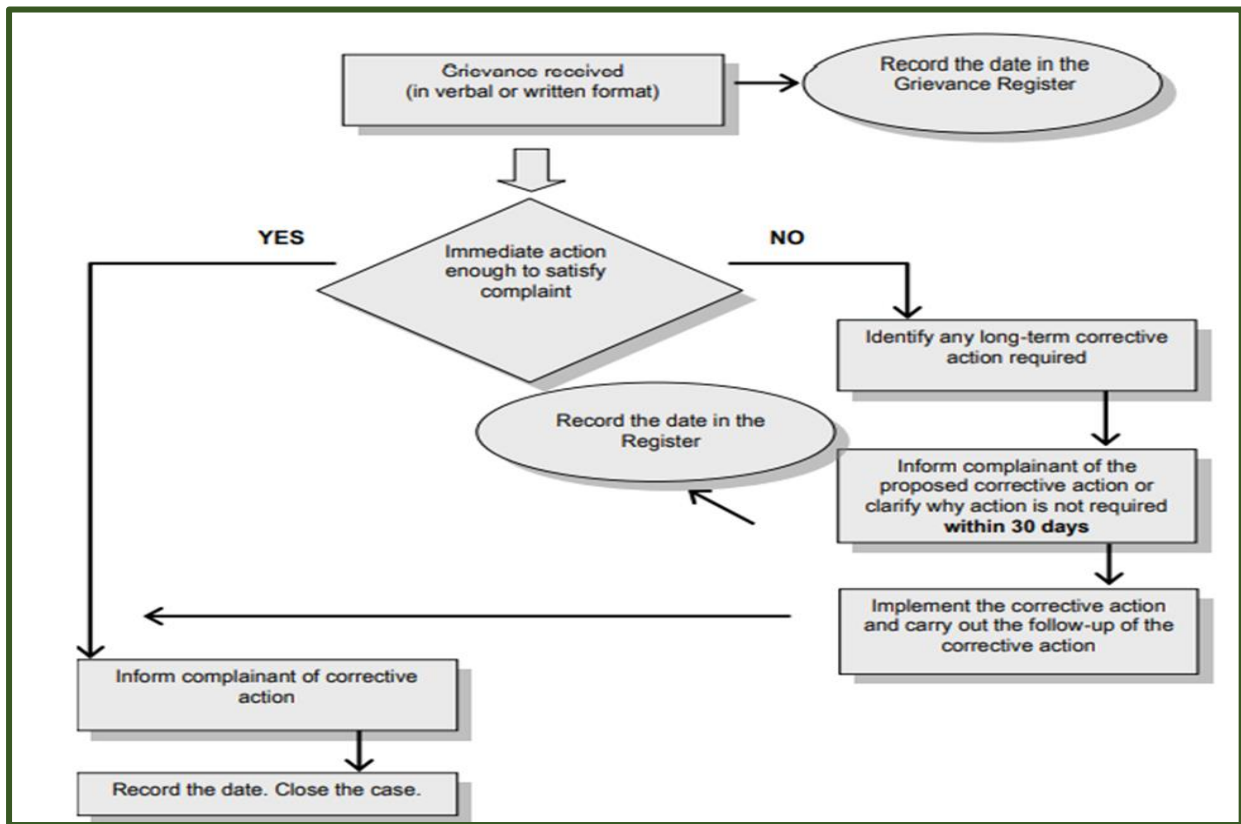


Figure 17 Grievance procedure

Comments on the Project, and complaints, can also be submitted to the **responsible contact persons in the project affected municipality of Kriva Palanka.**

Contact details of the contractor’s project office will also be made publicly available, one known.

PE ZRSMI will monitor the entire process of comments and complaints and the information will be transposed in the corresponding reports, which will be prepared and posted on its website. PE ZRSMI is obliged to respond to all complaints within 30 days. Summaries of complaints and the measures taken to resolve them will be made public on a regular basis. In their complaints, stakeholders may also use legal assistance provided by the Macedonian legal system.

11. TIMETABLE AND BUDGET

All activities related to the land acquisition and resettlement will be planned to ensure that compensation is paid prior to expropriation and commencement of Project construction. Public consultations, internal monitoring and grievance mechanism will be undertaken intermittently throughout the project duration. However, the implementation schedule is subject to modification depending on the progress of the project activities. The following table shows the indicative time frame for key resettlement tasks.

Table 24 Organizational responsibilities and implementation schedule

Task	Responsible Entity	Indicative Timeframe
Information disclosure to all PAPs (Land acquisition information, 200 copies)	PE ZRSMI, Project CLO	Upon disclosure
Direct communication with, and visits to, owners and occupants	PE ZRSMI, Project CLO	Upon disclosure
Update of the Geodetic report / Expropriation elaborate for access roads affected area	PE ZRSMI	As soon as the infrastructure project is updated
Update of RAP once the Geodetic report / Expropriation elaborate for access roads and additional valuations are available	PE ZRSMI	As soon as the infrastructure project is updated
Negotiations and expropriation activities, prior to construction commencement	PE ZRSMI / State Attorney	Upon disclosure
Provision of assistance to vulnerable persons / households	PE ZRSMI / Contractors / Local Authorities (Centers for Social Care)	Construction period
Payment / provision of compensation packages	PE ZRSMI	Before commencement of construction
Monitoring and reporting with respect to expropriation	PE ZRSMI	May – December 2023
Establish first and second tier grievance mechanism	PE ZRSMI	May – December 2023

In terms of budget, based on the analysis of the Geodetic report / Elaborate for expropriation, the land acquisition and resettlement cost will include the following elements:

- Compensation for permanent loss of land.
- Compensation for permanent loss of buildings.
- Compensation for loss of annual / perennial crops and trees.
- Compensation for loss of non-residential structures (fences, barns, sheds) and infrastructure (irrigation).
- Compensation for loss of business structures.
- Compensation for loss of income and / or source of livelihood.
- Compensation for assistance for vulnerable PAPs.
- Compensation for absentee owners.
- Cost for implementation of RAP.

The financial costs for expropriation will be fully covered by the Government of RNM. The key document for calculation of the compensation is the “*Overview⁵⁴ by zones for determining the real estate market value – for business, buildings, premises, development building land and undeveloped building land with such purposes, in the municipality of Kriva Palanka*”, adopted by the Municipal Council (Annex 13.3). The Government of RNM, at the session held on November 12, 2019, adopted the Program for amendment of the annual program for financing the railway infrastructure for 2019. The funds are intended for the needs of expropriation, to realize the projects for rehabilitation, reconstruction, and construction of Corridor VIII. The funds from the Program will be transferred by a one-time transfer to a dedicated account of PE ZRSMI opened in a commercial bank and they will be used continuously over the years until they are completely realized. The total cost is estimated at around 150 million MKD. The Program is attached in Annex no. 13.4.

Following table gives an overview of the total costs for compensation of land and assets for construction of permanent way based on the Asset Inventory and Valuations.

Table 25 Overview of total cost for compensation of land and assets for construction of permanent way

Compensation for permanent land expropriation by individual owners for construction of the permanent way			
Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	SUBTOTAL (MKD)
10,406,148	12,056,424	40,475,640	62,938,362
Compensation for structure on state owned land by land acquisition for construction of the permanent way			
			5,710,595
Compensation for land parcels in joint ownership affected by land acquisition for construction of the permanent way			
			9,900,710
Compensation for permanent Land Expropriation of land parcels in religious community ownership			
			2,345,611
Compensation for permanent Land Expropriation of land parcels in company ownership			
			25
TOTAL (MKD)			80,895,303

These costs do not include the following compensations:

- Assistance for vulnerable PAPs,
- Loss of annual / perennial crops and trees in Kriva Palanka and Trnovo,
- Loss of business income (profit) and other relevant costs (i.e moving costs),
- Resettlement assistance,
- Permanent loss of land, buildings and annual / perennial crops and trees related to access road subject to redesign.

⁵⁴ This Overview is part of the Decision on the assessment of the market value by zone of real estate, construction-built, unbuilt, and agricultural land in the Municipality of Kriva Palanka (No.09-1111/13, 28.02.2023)

- Loss of crops and trees in Kriva Palanka and Trnovo, loss of land, building and crops related to the redesign and loss of income will be subject to a separate valuation and any costs associated with various types of assistance will also be estimated in accordance with the timeline established in Table 24.

Upon completion of the final design, approval of the construction permit and preparation of the Geodetic report / Elaborate for Expropriation for the access roads, valuation will be conducted for permanent loss of land, buildings and annual / perennial crops and trees related to access roads and compensation subsequently provided in accordance with the timeline in Table 24.

12. MONITORING, REPORTING AND AUDIT

12.1. Monitoring and Reporting

PE ZRSMI's legal department will regularly monitor land acquisition and RAP implementation against the indicators listed in the table below. A land acquisition database on the individuals / households whose properties have been affected by the Project, compensation and livelihood restoration measures that have been implemented will be developed and regularly updated. All information on individuals / families, their properties and their compensation payments will be kept confidential.

PE ZRSMI will establish appropriate procedures to monitor and evaluate their responsibilities in the implementation of the RAP, and corrective actions will be taken as necessary. All transactions to acquire land rights, as well as compensation measures, relocation activities and resettlement assistance will be documented.

The working group designated by PE ZRSMI management and supported by the Legal department will regularly monitor and inform about the implementation of the RAP. A Project Implementation Unit (PIU) will be established, and part of their remit will be to support and monitor implementation of relevant provisions of the RAP.

Internal monitoring will be conducted by PE ZRSMI to look at progress against inputs and commitments of the expropriation, compensation, and livelihood restoration process, and at specific situations of economic or social difficulties arising from the implementation of this segment. Internal monitoring in the context of this RAP is the ongoing, methodical data gathering and analysis of resettlement mitigation and development activities which provides the Project with necessary indicators of progress and goal achievement. This ongoing monitoring process will allow PE ZRSMI to design additional mitigation measures if expropriation or livelihood restoration commitments or goals are not being met.

The internal monitoring system of PE ZRSMI will follow the steps defined in the RAP:

- Progress monitoring of inputs and outputs which measures whether inputs are delivered on schedule and as defined in the RAP; and
- Periodic measurement of outcome indicators against baseline conditions, obtained through the socio-economic survey.

Internal monitoring will take place against the activities, entitlements, time frame and budget set out in this document. The monitoring process will check the progress against established indicators and expected short-term results and will report the data.

The internal monitoring process that will be implemented by PE ZRSMI will focus on the preparation of the final report, the monitoring report. A monitoring report on key inputs will be conducted. The monitoring exercise will be led by PE ZRSMI team.

According to the available database on PAP's the following is emphasized:

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- The realization of the planned project requires acquisition of 522 land parcels which are owned by the state, natural persons, company, joint ownership (between individual owner and state), municipality and religious community.
- The process of land expropriation is at the beginning. The prepared project documentation refers to the projected route of the railway, but the orphan land is not included therein. The additional expropriation of those parts of the parcels is performed after the expropriation of the land directly encompassed by the route is completed. The financial resources for the compensation of the remained land, plantations, trees, livelihood restoration should be also calculated, as well as the costs related to the administration and monitoring and notification on the expropriation process.
- Regarding the monitoring report, that is, the report on implementation of RAP document, database for expropriation will be completed by adding data on expropriation of the remained parcels; all of this is in accordance with the relevant procedures that will be carried out by PE ZRSMI, as well as the local and national institution. In fact, the internal monitoring report will include monitoring and keeping track of the entire process of expropriation and accordingly, database will be updated.
- Database for this project contains precise records of all aspects of the project that are monitored, including: grievances, compensation, land acquisition, livelihood improvement parts implemented, consultation and regular meetings, etc. The data gathered will be checked against commitments made in this RAP. The following table provides an indicative list of indicators which will be used for monitoring.

Table 26 Indicative list of the monitoring Indicators

Indicator	Source of Information	Frequency of Measurement
Input indicators		
Number of informative consultation meetings, and results of consultation activities.	Meeting minutes Meeting Attendance Lists Most frequent questions	Biannually
Number of PAPs, by category (formal or informal, owners, vulnerable groups) and types of impacts (temporary or permanent economic displacement, other).	PE ZRSMI resettlement database and grievance management records	Biannually
Number and type of affected land and assets (land, crops, trees, etc.).	PE ZRSMI resettlement database	Biannually
Number and type of affected buildings (houses, ancillary buildings, garages).	PE ZRSMI resettlement database	Biannually
Overall spending on compensation, resettlement, and livelihood restoration.	PE ZRSMI financial records	Biannually
Number of staff dedicated to expropriation and compensation.	PE ZRSMI Legal Department	Annually
Reinstatement of land – number of plots complete.	Construction contractors' reports and grievance management records	Annually
Timing of implemented activities in comparison to the RAP implementation schedule.	The implemented activities or phases of RAP implementation schedule	Biannually

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Indicator	Source of Information	Frequency of Measurement
Output indicators		
No. of compensation contracts signed Number and % of compensation payments completed	PE ZRSMI resettlement data base and financial records	Biannually
Physical Displacement – number of people/households resettled; type of resettlement assistance provided	PE ZRSMI resettlement database	Annually
Livelihood restoration measures – types of measures implemented, implementation progress, number of beneficiaries	PE ZRSMI resettlement database	Annually
Outcome indicators		
Number and type of outstanding or unresolved grievances and trends	Grievance management records	Biannually
Average time for payment of compensation	Measure time between processing (signing) compensation agreement and actual payment	Annually
Does compensation represent full replacement cost?	Investigate whether recipients of cash compensation were able to purchase a similar property	Annually
Use of compensation	PE ZRSMI resettlement database	Annually
Income / livelihoods: <ul style="list-style-type: none"> Changes in income level (maintained, increased, decreased) Reinvestment in livelihood activities (purchase of land, equipment, skill training, etc.) 	Individual meetings with people/households PE ZRSMI resettlement database	Annually

PE ZRSMI will produce biannual reports on the progress achieved with the implementation of the RAP. These reports will consolidate the information on compensation and resettlement/livelihood restoration measures, consultations, information on negotiations and results, provision of assistance to vulnerable groups, grievance management, etc. PE ZRSMI will document all meetings and consultations with minutes and photographs, and will submit these to EBRD and EIB, together with progress reports.

Information from these reports will be summarised and included in the PE ZRSMI Annual Environmental and Social Reports, distributed to relevant stakeholders, including Lenders (EBRD and EIB).

12.2. Completion Audit

A key objective of the RAP is that resettlement actions and mitigation measures should lead to sustainable restoration or enhancement of PAPs pre-Project living standards and income levels. At such time as PAPs quality of life and livelihood can be demonstrated to have been sustainably restored to pre-Project levels, the resettlement process can be deemed “complete”.

Resettlement planning for the Project assumes that livelihood restoration of affected landowners will be completely restored through replacement land or other measures and all those physically displaced are living in residential housing to the same or higher quality.

A two-stage resettlement completion audit will be conducted by an independent consultant:

- On substantial completion of land acquisition, compensation and physical resettlement of all affected households (estimated Q2 2024)
- upon substantial completion of the RAP⁵⁵ (estimated Q4 2024)

The audit will determine if affected peoples' living standards and income levels have been fully restored.

13. ANNEXES

13.1. Census

13.1.1. Impact related to the permanent way

Affected land parcels, assets, businesses on the permanent way and access roads in the CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Zidilovo, CM Krklja, CM Kostur, CM Uzem and permanent way in CM Kriva Palanka

The Census was informed by Geodetic Elaborate / Elaborate for expropriation. The census will be supplemented by the data and information obtained by the Asset Inventory and Valuation, Socio-economic survey, as well as data shared with PAPs. It is important to note that while the database is known to PE ZRSMI and Lenders (EBRD & EIB), due to the protection of personal data, they have been anonymized and their data have been withdrawn from the documents that will be disclosed.

⁵⁵ "Substantial completion of the RAP" means that as a minimum all land is acquired, compensation is fully paid to entitled landowners and formal/informal users, livelihood restoration measures are applied (all measures being complete or near completion), preferably land exit protocols are completed and that regular internal RAP monitoring continues for outstanding tasks.

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Table 27 Permanent Land Expropriation by individual owners by cadaster municipality for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka⁵⁶

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
CM TLMINCI												
1.	Landowner	Pasture	5	20	1,515	1.32%			200	10	-	210
2.	Landowner	Pasture	5	491	2,163	22.70%			4,910	18,945	-	23,855
3.	Landowners	Pasture	5	15	792	1.89%			150	1,878	-	2,028
4.	Landowners	Orchard	5	160	498	32.13%			5,120	5,690	-	10,810
5.	Landowners	Pasture	5	88	842	10.45%			880	1,914	-	2,794
6.	Landowners	Pasture	5	428	1,696	25.24%			4,280	16,109	-	20,389
7.	Landowners	Orchard	5	101	2,480	4.07%			3,232	4,429	-	7,661
8.	Landowners	Pasture	5	38	2,047	1.86%			380	19	-	399
9.	Landowner	Pasture	5	610	734	83.11%			6,100	28,355	-	28,355
10.	Landowners	Pasture	5	1,115	31,978	3.49%			11,150	56,983	-	68,133
11.	Landowner	Pasture	5	693	1,127	61.49%			6,930	39,616	-	46,518
12.	Landowners	Pasture	5	874	2,108	41.46%			8,740	24,747	-	33,487
13.	Landowner	Pasture	5	265	3,415	7.76%			2,650	14,960	-	17,610
14.	Landowner	Al/Field	6	666	677	98.38%			4,662	11,553	-	16,215
15.	Landowner	Al/Field	6	686	1,009	67.99%			4,802	35,858	-	40,660
16.	Landowner	Al/Field	6	485	775	62.58%			3,395	35,773	-	40,660
17.	Landowner	Forest	5	19	1,772	1.07%			665	1,870	-	665
18.	Landowner	Meadow	7	737	1,823	40.43%			3,685	7,356	-	11,041
19.	Landowner	Pasture	5	416	503	82.70%			4,160	3,948	-	8,108

⁵⁶ AL/Field – Arable land - Field; Intensive Vineyard; GUB – Ground under Building; DBL - Developed Building Land; UBL - Undeveloped Building Land; UBL - Other Natural Unfertile Land.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
20.	Landowner	Pasture	6	1,697	1,719	98.72%			11,879	4,589	-	16,468
21.	Landowners	Pasture	6	1,641	10,688	15.35%			11,487	17,650	-	29,137
22.	Landowner	Meadow	7	448	554	80.87%			3,136	2,094	-	5,230
23.	Landowners	Pasture	5	538	989	54.40%			5,380	2,139	-	7,519
24.	Landowners	Meadow	7	201	282	71.28%			1,407	1,971	-	3,378
25.	Landowners	Forest	4	164	700	23.43%			6,560	19,151	-	25,711
26.	Landowners	Meadow	4	14	2,156	0.65%			280	8,310	-	8,590
27.	Landowner	Meadow	4	6	534	1.12%			120	7,217	-	7,337
28.	Landowner	Meadow	4	134	227	59.03%			2,680	22,505	-	25,185
29.	Landowner	Meadow	4	192	233	82.40%			3,840	29,648	-	33,488
30.	Landowner	Meadow	3	157	183	85.79%			3,140	57,440	-	60,580
31.	Landowners	Meadow	3	57	217	26.27%			1,140	22,327	-	23,467
32.	Landowners	Meadow	3	64	418	15.31%			1,280	20,559	-	21,839
33.	Landowners	AI/Field	3	339	611	55.48%			8,475	30,572	-	39,047
34.	Landowners	Forest	6	739	18,724	3.95%			25,865	43,010	-	68,875
35.	Landowners	Forest	6	208	502	41.43%			7,280	11,200	-	18,480
36.	Landowners	Pasture	6	280	987	28.37%			2,800	16,830	-	19,630
37.	Landowners	Pasture	5	250	568	44.01%			2,500	14,960	-	17,460
38.	Landowner	Pasture	5	289	676	42.75%			2,890	16,830	-	19,720
39.	Landowners	Forest	6	150	286	52.45%			5,250	8,415	-	13,665
40.	Landowners	Pasture	5	300	355	84.51%			3,000	16,830	-	19,830
41.	Landowners	Pasture	6	2,768	7,746	35.73%			27,680	155,210	-	182,890
42.	Landowners	Forest	5	1,699	24,581	6.91%			59,465	72,890	-	132,355
43.	Landowners	AI/Field	5	4	4,669	0.00%			40	-	-	40
TOTAL CM TLMINCI in m²				20,246					273.665	912,360		1,186,025

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
CM GRADEC												
1.	Landowners	Forest	5	2,449	8,631	28.37%			85,715	91,630		177,345
2.	Landowner	Forest	4	639	1,463	43.68%			25,560	47,685		73,245
3.	Landowners	Forest	8	119	560	21.25%			3,570	-		3,570
4.	Landowners	Forest	8	138	552	25.00%			4,140	-		4,140
5.	Landowners	Field	8	20	9,120	0.22%			100	1,870		1,970
6.	Landowners	Field	8	547	547	100.00%			2,735	20,570		23,305
7.	Landowners	Forest	5	1,418	15,873	8.93%			17,465	145,860		163,325
8.	Landowners	Field	8	702	702	100.00%			3,510	52,360		55,870
9.	Landowners	Orchard	5	299	1,469	20.35%			9,568	3,740		13,308
10.	Landowners	Pasture	4	1	1,789	0.06%			20	1,870		1,890
11.	Landowners	Vineyard	3	114	3,538	3.22%			4,218	7,480		11,698
12.	Landowners	Orchard	6	137	2,342	5.85%			45,300	7,480		52,780
13.	Landowners	Orchard	6	220	375	58.67%			6,600	7,480		14,080
14.	Landowners	Pasture	4	160	7,796	2.05%			3,200	9,350		12,550
15.	Landowners	Forest	4	3,261	8,052	3.20%			130,440	-		130,440
16.	Landowners	Field	8	163	5,101	3.20%			815	82		897
17.	Landowners	Forest	5	1,812	2,636	68.74%			63,420	100,980		164,400
18.	Landowner	Orchard	5	102	344	29.65%			3,264	5,610		8,874
19.	Landowners	Pasture	4	2,829	15,086	18.75%			56,580	11,220		67,800
20.	Landowner	Field	7	486	5,333	9.11%			3,402	32,276		35,678
		GUB		-	33	-			-	-		
21.	Landowners	Forest	5	347	1,064	32.61%			12,100	20,254		32,354
22.	Landowners	Pasture	4	1,944	3,270	59.45%			38,880	12,192		51,072

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
23.	Landowners	Forest	4	729	2,201	33.12%			29,160	40,205		69,365
24.	Landowners	Orchard	7	754	1,928	39,11%			22,620	18,961	-	41,581
		GUB 2 ⁵⁷	0	34	34	100,00%			6,800	-		6,800
25.	Landowners	Pasture	4	2,454	8,288	29.61%			49,080	16,494	-	65,574
TOTAL CM GRADEC in m²				21,878					628,262	655,649		1,283,911
CM KRIVA PALANKA⁵⁸												
1.	Landowner	Pasture	4	431	431	100.00%			265,065	-		265,065
2.	Landowner	AL/Field	3	416	416	100.00%			255,840	-		255,840
3.	Landowners	Meadow	5	1,125	1,125	100.00%			691,875	-		691,875
4.	Landowner	Pasture	5	16	194	8.25%			9,840	-		9,840
5.	Landowner	Forest	4	26	266	9.77%			15,990	-		15,990
6.	Landowners	Forest	4	45	406	11.08%			27,675	-		27,675
7.	Landowner	DBL	0	46	423	10.87%			28,290	-		28,290
		GUB 1	0	-	57	-			-	-		-
		GUB 2	0	-	18	-			-	-		-
8.	Landowners	Yard	0	19	539	3.53%			11,685	-		11,685
		GUB 1	0	-	109	-			-	-		-
9.	Landowner	Orchard	5	380	380	100.00%			116,850	-		116,850
10.	Landowners	Pasture	7	6,333	9,654	65.60%			1,947,397	-		1,947,397
11.	Landowners	DBL	0	337	874	38.56%			103,627	-		103,627
		GUB 1	0	-	104	-			-	-		-

⁵⁷ The valuation of this ancillary structure will be added later. The valuation is in a phase of additional analysis / check in PE ZSRMI.

⁵⁸ The assets valuation in CM Kriva Palanka will be added after the redesign of the access roads in that municipality. The expropriation line will be changed due to that redesign. The land and asset valuation will be entered after the redesign.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
		GUB 2	0	-	20	-			-	-		-
12.	Landowner	Yard	0	255	972	26.23%			78,412	-	-	78,412
		GUB 1	0	-	122	-			-	-	-	-
13.	Landowner	Yard	0	81	560	14.46%			24,907	-	-	24,907
		GUB 1	0	-	169	-			-	-	-	-
14.	Landowners	Pasture	6	790	1420	55.63%			242,925	-	-	242,925
15.	Landowner	Yard	0	60	257	23.35%			18,450	-	-	18,450
		GUB 1	0	-	74	-			3,075	-	-	3,075
		GUB 2	0	10	29	34.48%			-	-	-	-
16.	Landowner	Pasture	5	1,201	1,292	92.96%			369,307	-	-	369,307
17.	Landowner	Forest	5	98	293	33.45%			30,135	-	-	30,135
		GUB 1	0	-	3	-			-	-	-	-
18.	Landowner	Orchard	5	34	201	16.92%			10,455	-	-	10,455
19.	Landowners	Pasture	4	34	174	19.54%			10,455	-	-	10,455
20.	Landowner	DBL	0	217	324	66.98%			70,110	-	-	70,110
		GUB 1	0	11	35	31.43%			-	-	613,463	613,463
21.	Landowner	DBL	0	83	520	15.96%			25,522	-	-	25,522
		GUB 1	0	-	12	-			-	-	-	-
22.	Landowners	DBL	0	63	1,003	6.28%			-	-	-	-
		GUB 1	0	-	88	-			-	-	-	-
		GUB 2	0	-	15	-			-	-	-	-
		GUB 3	0	-	61	-			-	-	-	-
23.	Landowners ⁵⁹	DBL	0	178	276	64.49%			54,735	-	-	54,735

⁵⁹ Valuation is divided on the two owners. One part of the house is valued at 1,677,905 MKD and the other part of the house is valued at 2,465,535 MKD. The total is 4,143,440 MKD.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
		GUB 1	0	17	71	23.94%			5,227	-	4,143,440	4,148,667
		GUB 2	0	-	28	-			-	-	-	-
24.	Landowner	Orchard	2	290	565	51.33%			-	-	-	-
25.	Landowner ⁶⁰	Orchard	2	387	1,542	25.10%			-	-	2,374,208	2,374,208
26.	Landowner	DBL	0	71	219	32.42%			-	-	-	-
		GUB 1	0	-	72	-			-	-	5,309,541 ⁶¹	5,309,541
27.	Landowner	DBL	0	200	208	96.15%			-	-	-	-
		GUB 1	0	67	72	93.06%			-	-	5,772,267 ⁶²	5,772,267
28.	Landowner	DBL	0	91	388	23.45%			-	-	-	-
		GUB 1	0	48	110	43.64%			-	-	9,244,803	9,244,803
29.	Landowners	DBL		745	1,596	46.68%			229,088	-	-	229,088
30.	Landowners	Pasture		158	328	48.17%			48,585	-	-	48,585
31.	Landowners	AI/Field	6	658	1,467	44.85%			202,335	-	-	202,335
32.	Landowners	Orchard	5	400	970	41.24%			123,000	-	-	123,000
		GUB 1	0	-	19	-			-	-	-	-
33.	Landowners	Pasture	6	1,552	2,210	70.23%			477,240	-	-	477,240
34.	Landowner	Forest	4	130	525	24.76%			39,975	-	-	39,975
35.	Landowners	DBL	0	214	284	75.35%			65,805	-	-	65,805
		GUB 1	0	68	68	100.00%			20,910	-	-	20,910

⁶⁰ The land parcel with property list no. 10773 is registered as a private owned land parcel with cadaster culture orchard, but during the socio-economic survey was discovered that on this land parcel are registered two companies and the businesses structures are constructed.

⁶¹ This house for demolition is semi-detached house (house on left side).

⁶² This house is semi-detached house (another house on right side).

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
		GUB 2	0	26	26	100.00%			7,995	-	-	7,995
		GUB 3	0	22	22	100.00%			6,765	-	262,285	269,050
36.		Yard	0	124	385	32.21%			38,130	-	-	38,130
		GUB 1	0	-	30	-		-	-	-	844,507	844,507
TOTAL CM KRIVA PALANKA in m²				17,557				5.677.677	-	28.564.514	34.242.191	
CM DRENJE												
1.	Landowners	Pasture	4	1,296	2,663	48.67%			10,368	75,118	2,902,969 ⁶³	85,486
2.	Landowner	Pasture	4	15	312	4.81%			120	26,172	-	26,292
3.	Landowners	Forest	6	4,752	55,698	8.53%			166,320	3,662	-	169,982
4.	Landowners	Public road	0	109	702	15.53%			33,518	3,663	-	37,181
5.	Landowners	Forest	5	502	6,396	7.85%			17,570	16,867	-	34,437
6.	Landowners	Pasture	6	4,603	32,335	14.24%			27,618	154,661	-	182,279
7.	Landowners	Pasture	6	8,160	46,400	17.59%			48,960	274,176	-	323,136
8.	Landowners	Public road	0	251	1016	24.70%			77,183	8,434	-	85,617
9.	Landowners	Pasture	6	3,017	98,628	3.06%			18,102	128,826	-	146,928
10.	Landowners	Forest	5	427	4,257	10.03%			14,945	14,347	-	29,292
11.	Landowners	Forest	6	9	22,839	0.04%			315	2,224	-	2,539
12.	Landowners	AI/Field	4	1,016	8,603	11.81%			8,128	40,068	-	48,196
13.	Landowners	Pasture	7	2,613	67,357	3.88%			15,678	87,797	-	103,475
14.	Landowner	Forest	5	115	430	26.74%			-	4,910	-	4,910

⁶³ The valuation for this parcel was added later.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
15.	Landowner	Forest	5	7	331	2.11%			245	2,124	-	2,369
		GUB 1	0	-	102	-			-	-	-	622,957
16.	Landowners	Pasture	6	19,093	167,646	11.39%			152,744	470,213	-	64,356
17.	Landowner	Yard	0	243	536	45.34%			48,600	15,756	-	4,200
		GUB ₁ ⁶⁴	0	21	100	21.00%			4,200	-	-	28,671
18.	Landowners	Forest	6	369	16,191	2.28%			12,915	15,756	-	85,486
TOTAL CM DRENJE in m²				46,618					657,529	1,344,774	2,902,969	4,905,272
CM KISELICA												
1.	Landowners	Forest	2	7,917	187,132	4.23%			253,344	266,011	-	519.355
2.	Landowners	Orchard	5	504	6,500	7.75%			8,658	53,826	-	62.484
3.	Landowners	Forest	5	5,459	18,302	29.83%			81,885	183,422	-	265.307
4.	Landowners	Stones	0	147	963	15.26%			735	4,939	-	5674
5.	Landowners	Forest	7	8,383	30,241	27.72%			142,511	281,669	-	424.180
6.	Landowner	River	0	642	890	72.13%			6,420	13,464	-	19.884
7.	Landowners	Forest	6	1,178	78,988	1.49%			17,670	42,704	-	60.374
		Forest	5	-	47,074	-			-	-	-	
		Forest	4	-	65,357	-			-	-	-	
		GUB 1	0	57	57	100.00%			11,400	-	1.272,743	1.284.143
8.	Landowners	AI/Field	4	2	776	0.26%			16	-	-	16
TOTAL CM KISELICA in m²				23,111					522,639	846,035	1.272,743	2,641,417

⁶⁴ In the original project this house was targeted for demolition, but with new conducted analysis of the project, it was established that the demolition could be avoided. This demand will be included in the tender as the constructor's responsibility.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
CM TRNOVO												
1.	Landowner	GUB 1	0	-	55	-			-	-	-	1,634
		GUB 2 ⁶⁵	0	8	23	34.78%			-	-		
		Pasture	7	297	458	64.85%			1,485	149	-	
	TOTAL CM TRNOVO in m²			305					1,485	149	-	1,634
CM ZIDILOVO												
1.	Landowners	Forest	4	373	6,993	5.33%			14,920	33,248	-	48,168
2.	Landowners	Forest	4	2,683	11,732	22.87%			107,320	96,176 ⁶⁶	-	203,496
3.	Landowner	AI/Field	4	374	1,038	36.03%			3,366	19,764	-	23,130
4.	Landowner	AI/Field	4	723	982	73.63%			6,507	204,998	-	211,505
5.	Landowner	Meadow	3	234	253	92.49%			8,658	2,250	-	10,908
6.	Landowner	Yard	0	6	415	1.45%			1,200	-	759,033	760,233
		GUB 1	0	-	94	-			-	-	-	
7.	Landowner	Stones	0	46	1,089	4.22%			230	14,594	-	14,824
8.	Landowner	Pasture	5	141	462	30.52%			1,128	-	-	1,128
9.	Landowner	DBL	0	70	986	7.10%			21,000	3,885	-	24,885
	TOTAL CM ZIDILOVO in m²			4,650					164,329	374,915	759,033	1,298,227
CM KRKLJA												
1.	Landowners	Forest ⁶⁷	4	192	1,671	11.49%			7,680	8,640	-	16,320

⁶⁵ The access road will be redesigned with approval from the EBRD. With the redesign of the access road, the demolition of this house will be avoided.

⁶⁶ Valuation of the parcel which is out of the expropriation line (4679/4 with total area of 1,071 m²). There is the need to value the cadastral parcel 4679/5 with total area of 2,683 m².

⁶⁷ River is added. Valuation is related on forest.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
2	Landowners	River ⁶⁸	0	254	926	27.43%			-	11,430	-	11,430
	TOTAL CM KRKLJA in m²			446					7,680	20,070	-	27,750
CM KOSTUR												
1.	Landowners	Forest	2	2,273	10,640	21.36%			72,736	143,199	-	215,935
2.	Landowner	Pasture	4	114	324	35.19%			1,026	7,182	-	8,208
3.	Landowner	Pasture	4	28	309	9.06%			252	1,764	-	2,016
4.	Landowners	River	0	2	846	0.24%			10	-	-	10
5.	Landowner	Meadow	3	412	519	79.38%			3,708	989	-	4,697
6.	Landowners	Meadow	5	796	951	83.70%			5,572	13,676	-	19,248
7.	Landowners	Meadow	3	155	2484	6.24%			3,565	10,438	-	14,003
8.	Landowners	Meadow	5	119	248	47.98%			833	1,371	-	2,204
9.	Landowners	AI/Field	5	182	248	73.39%			1,274	437	-	1,711
10.	Landowners	AI/Field	5	144	197	73.10%			1,008	3,360	-	4,368
11.	Landowner	Meadow	5	4	784	0.51%			92	10	-	102
12.	Landowners	Meadow	3	91	1,092	8.33%			2,093	218	-	2,311
13.	Landowners	AI/Field	5	184	226	81.42%			1,288	1,527	-	2,815
14.	Landowners	Meadow	3	225	522	43.10%			5,175	4,950	-	10,125
15.	Landowners	AI/Field	4	275	306	89.87%			2,200	660	-	2,860
16.	Landowner	Orchard	4	604	733	82.40%			12,080	6,875	-	18,955
17.	Landowners	Meadow	3	1,847	3,228	57.22%			42,481	6,386	-	48,867
18.	Landowners	Meadow	5	350	673	52.01%			2,450	840	-	3,290

⁶⁸ Forest is added in Valuation.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
19.	Landowner	Meadow	5	183	629	29.09%			1,281	-	-	1,281
20.	Landowners	Meadow	5	273	718	38.02%			1,911	23,055	-	24,966
21.	Landowner	Meadow	4	8	1,961	0.41%			160	21	-	181
22.	Landowner	AI/Field	4	872	909	95.93%			6,976	78,306	-	85,282
23.	Landowners	Forest	3	2,077	5,206	39.90%			51,925	186,514	-	238,439
24.	Landowners	Pasture	5	923	1,797	51.36%			6,461	82,885	-	89,346
25.	Landowners	Forest	3	1,734	3,336	22.00%			55,488	155,713	-	211,201
26.	Landowner	Forest	2	306	2,924	10.47%			-	-	-	-
27.	Landowners	Forest	3	434	40,225	1.08%			13,888	35,381	-	49,269
28.	Landowners	AI/Field	4	359	359	100.00%			2,872	862	-	3,734
TOTAL CM KOSTUR in m²				14,974					298,805	766,619	-	1,065,424
CM UZEM												
1.	Landowners	Forest	3	19,416	75,274	25.79%			873,720	2,135,760	-	3,009,480
2.	Landowner	Forest	4	52	368	14.13%			2,340	5,720	-	8,060
3.	Landowner	AI/Field	4	50	781	6.40%			450	5,500	-	5,950
4.	Landowners	AI/Field	7	1,119	2,180	51.33%			6,714	123,090	-	129,804
5.	Landowner	Forest	4	323	919	35.15%			14,535	4,180	-	18,715
6.	Landowners	AI/Field	4	113	2,108	5.36%			1,017	3,772	-	4,789
7.	Landowner	Orchard	5	2	2,214	0.09%			70	2	-	72
8.	Landowners	Forest	3	2,909	10,979	26.50%			130,905	319,990	-	450,895
9.	Landowners	AI/Field	5	38	105	36.19%			342	4,180	-	4,522
10.	Landowner	AI/Field	5	62	168	36.90%			558	6,820	-	7,378

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
11.	Landowner	AI/Field	5	179	319	56.11%			1,611	19,690	-	21.301
12.	Landowners	Meadow	3	4	498	0.80%			148	40	-	188
13.	Landowners	Meadow	3	4	301	1.33%			36	2,460	-	2.496
14.	Landowners	AI/Field	3	16	168	9.52%			144	4,920	-	5.064
15.	Landowners	Meadow	3	15	416	3.61%			135	150	-	285
16.	Landowners	Forest	4	333	398	83.67%			14,985	21,844	-	36.829
17.	Landowner	AI/Field	4	310	562	55.16%			2,790	-	1.362,348 ⁶⁹	1.365.138
18.	Landowner	DBL	0	50	510	9.80%			7,500	-	-	7.500
		GUB 1	0	43	46	93.48%			10,750	-	689,969	700.719
		GUB 2	0	-	18	-			-	-	-	-
19.	Landowners	GUB1 ⁷⁰	0	44	44	100.00%			11,000	-	-	11.000
20.	Landowner	AI/Field	4	150	150	100.00%			1,350	-	-	1.350
21.	Landowner	AI/Field	4	27	230	11.74%			243	5,000	-	5.243
22.	Landowner	AI/Field	4	4	311	1.29%			36	2,500	-	2,536
23.	Landowner	AI/Field	4	166	219	75.80%			1,494	-	-	1,494
24.	Landowners	River	0	14	187	7.49%			70	-	-	70
25.	Landowners	AI/Field	4	273	273	100.00%			2,457	-	1.720.709	1,723,166
26.	Landowners	AI/Field	5	104	786	13.23%			728	9,076	-	9,804
27.	Landowner	Meadow	3	71	124	57.26%			2,272	12,772	-	15,044
28.	Landowners	AI/Field	4	-	196	-			-	-	-	-
		DBL	0	466	597	91.91%			69,900	-	-	69,900
		GUB 1	0	42	48	87.50%			10,500	-	-	10,500

⁶⁹ Asset Inventory – Illegal house

⁷⁰ Due to a technical error, this valuation of this structure will be additionally corrected.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
		GUB 3	0	15	24	62.50%			3,750	-	2,046,294	2,050,044
29.	Landowners	Meadow	3	95	199	47.74%			3,040	-	1,157,061 ⁷¹	1,160,997
30.	Landowners	Meadow	3	28	540	5.19%			896	-		
31.	Landowner	Meadow	3	59	224	26.34%			531	142	-	673
32.	Landowner	Orchard	4	287	520	55.19%			10,619	5,014	-	15,633
33.	Landowner	Meadow	3	8	256	3.13%			256	1,349	-	1,605
34.	Landowners	Orchard	4	343	475	72.21%			12,691	4,539	-	17,230
35.	Landowners	Orchard	4	6	142	4.23%			222	-	-	222
36.	Landowner	Orchard	4	22	138	15.94%			814	-	-	814
37.	Landowner	Orchard	4	131	150	87.33%			4,847	2,875	-	7,722
38.	Landowners	Meadow	3	5	2,010	0.25%			185	-	-	185
39.	Landowners	AI/Field	7	83	3,963	2.09%			498	7,453	-	7,951
40.	Landowner	AI/Field	6	102	402	25.37%			714	9,160	-	9,874
41.	Landowners	AI/Field	8	2,224	4,033	55.15%			13,344	199,715	-	213,059
42.	Landowner	AI/Field	6	485	3,203	15.14%			3,395	43,553	-	46,948
43.	Landowner	AI/Field	6	4	787	0.51%			28	1,120	-	1,148
44.	Landowner	AI/Field	6	136	635	21.42%			952	12,090	-	13,042
45.	Landowners	AI/Field	8	2,177	3,743	58.16%			13,062	195,495	-	208,557
46.	Landowners	AI/Field	8	85	3,494	2.43%			510	7,633	-	8,143
47.	Landowner	AI/Field	7	2	84	2.38%			14	2,240	-	2,254
48.	Landowner	AI/Field	6	241	244	98.77%			1,687	21,642	-	23,329

⁷¹ The Valuation is conducted on these two land parcels. The owners of the land parcel CP 1479/2 are also the owners of another land plot, which is CP 1480/2.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
49.	Landowner	AI/Field	7	630	3,007	20.95%			4,410	56,574	-	60,984
50.	Landowner	Forest	3	167	2,816	5.93%			7,515	14,997	-	22,512
51.	Landowners	Pasture	5	226	3,639	6.21%			2,034	20,295	-	22,329
52.	Landowners	Pasture	5	568	5,204	10.91%			5,112	51,006	-	56,118
53.	Landowners	Forest	5	1,099	3,792	28.98%			49,455	97,792	-	147,247
54.	Landowner	AI/Field	8	811	3,846	21.09%			4,866	72,828	-	77,694
55.	Landowners	AI/Field	7	2,801	3,673	76.26%			19,607	251,530	-	271,137
56.	Landowners	AI/Field	7	156	605	25.79%			1,092	14,009	-	15,101
57.	Landowners	AI/Field	7	268	516	51.94%			1,876	24,006	-	25,882
58.	Landowners	AI/Field	7	363	788	46.07%			2,541	32,597	-	35,138
59.	Landowner	AI/Field	7	299	758	39.45%			2,093	26,850	-	28,943
60.	Landowners	AI/Field	7	212	4,790	4.43%			1,484	7,805	-	9,289
61.	Landowners	Pasture	4	103	450	22.89%			927	17,547	-	18,474
62.	Landowner	AI/Field	8	372	1,860	20.00%			2,232	39,801	-	42,033
63.	Landowners	AI/Field	7	606	1,030	58.83%			4,242	10,379	-	14,621
64.	Landowners	Meadow	0	892	1,630	55%			28,544	91,692	-	120,236
		GUB 1	0	-	34	-			-		-	
65.	Landowner	GUB ⁷²	0	26	26	100.00%			6,500	31,455	-	45,905
		AI/Field	6	1,136	2,159	52.62%			7,952		-	
66.	Landowners	Meadow	5	219	523	41.87%			1,533	10,328	-	11,861

⁷² This structure does not exist, except in the cadastral records, which are necessary to be updated. It is assumed that it is a long ago ruined auxiliary building.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
67.	Landowners	Forest	4	156	529	29.49%			7,020	32,550	-	39,570
68.	Landowners ⁷³	Orchard	5	604	679	88.95%			19,328		-	19,328
		GUB 2	0	36	36	100.00%			9,000		-	9,000
		GUB 1	0	-	64	-			-		-	-
		DBL	0	-	499	-			-		-	-
69.	Landowners	Forest	4	37	503	7.36%			1,480	-	-	1,480
70.	Landowners	Meadow	5	294	312	94.23%			9,408	14,865	-	24,273
71.	Landowner	Meadow	5	185	337	54.90%			1,925	5,425	-	7,350
72.	Landowners	Forest	4	942	21,277	4.43%			37,680	36,504	-	74,184
73.	Landowners	Meadow	5	340	713	47.69%			2,380	9,065	-	11,445
74.	Landowners	AI/Field	7	645	910	70.88%			4,515	57,921	-	62,436
75.	Landowners	Forest	4	1,841	17,396	10.58%			73,640	166,082	-	239,722
76.	Landowners	AI/Field	7	18	1005	1.79%			126	1,120	-	1,246
77.	Landowners	Forest	4	527	650	81.08%			21,080	47,325	-	68,405
78.	Landowners	Pasture	4	61	535	11.40%			549	6,418	-	6,967
79.	Landowners	Pasture	5	773	961	80.44%			5,411	69,415	-	74,826
80.	Landowners	Pasture	5	272	640	42.50%			1,904	24,426	-	26,330
81.	Landowners	Forest	4	1,199	7,934	15.11%			47,960	108,701	-	156,661
82.	Landowners	Forest	4	49	9,622	0.51%			1,960	4,400	-	6,360
83.	Landowners	Pasture	4	895	4,862	18.41%			8,055	80,371	-	88,426
84.	Landowners	Forest	4	1,272	11,114	11.45%			50,880	114,226	-	165,106

⁷³ It is being further checked due to a technical error, and it will be added to the list later.

Resettlement Action Plan

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	Total (MKD)
85.	Landowners	Forest	4	236	2,559	9.22%			9,440	21,193	-	30,633
86.	Landowners	Forest	5	1,993	8,703	22.90%			79,720	178,981	-	258,701
87.	Landowners	Forest	4	2,618	16,671	15.70%			104,720	235,097	-	339,817
88.	Landowners	Forest	4	647	8,975	7.21%			25,880	58,101	-	83,981
89.	Landowners	AI/Field	8	3,004	8,566	35.07%			18,024	269,759	-	287,783
90.	Landowners	Forest	4	289	14,246	2.03%			11,560	25,952	-	37,512
91.	Landowners	Pasture	4	3,266	16,147	20.23%			29,394	293,287	-	322,681
92.	Landowners	AI/Field	8	2,952	4,373	67.51%			17,712	265,090	-	282,802
93.	Landowners	Pasture	4	550	1,177	46.73%			4,950	49,390	-	54,340
94.	Landowner	AI/Field	8	133	1,201	11.07%			798	35,829	-	36,627
95.	Landowner	AI/Field	8	2,212	2,368	93.41%			13,272	1,120	-	14,392
96.	Landowner	AI/Field	8	166	862	19.26%			996	1,120	-	2,116
97.	Landowner	AI/Field	8	29	3,778	0.77%			174	1,120	-	1,294
98.	Landowner	AI/Field	8	18	530	3.40%			108	1,120	-	1,228
99.	Landowners	AI/Field	8	1,952	3,234	60.36%			11,712	175,290	-	187,002
100.	Landowners	Forest	6	1,197	5,209	22.98%			38,304	107,491	-	145,795
101.	Landowner	AI/Field	8	995	1,025	97.07%			5,970	89,351	-	95,321
102.	Landowners	AI/Field	8	139	619	22.46%			834	12,482	-	13,316
103.	Landowners	Forest	4	309	1,227	25.18%			12,360	27,748	-	40,108
104.	Landowners	Forest	4	970	1,971	49.21%			38,800	87,106	-	125,906
105.	Landowners	Forest	6	298	2,441	12.21%			9,536	26,760	-	36,296
106.	Landowners	Pasture	5	94	3,074	3.06%			752	8,441	-	9,193

Resettlement Action Plan

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107.	Landowner	Stones	0	109	109	100.00%			-	252	-	252
108.	Landowner	Meadow	6	173	730	23.70%			1,211	15,535	-	16,746
109.	Landowner	Meadow	5	758	851	89.07%			5,306	68,068	-	73,374
110.	Landowners	Orchard	5	113	632	17.88%			3,616	4,340	-	7,956
111.	Landowner	AI/Field	6	86	811	10.60%			602	4,604	-	5,206
112.	Landowners	AI/Field	5	5	110	4.55%			35	-	-	35
113.	Landowners	AI/Field	5	67	164	40.85%			469	2,379	-	2,848
114.	Landowners	AI/Field	5	36	116	31.03%			252	4,887	-	5,139
115.	Landowners	Meadow	5	379	379	100.00%			2,653	18,082	-	20,735
116.	Landowners	Meadow	5	522	677	77.10%			3,654	72,730	-	76,384
117.	Landowners	Meadow	5	261	261	100.00%			1,827	2,796	-	4,623
118.	Landowner	Meadow	5	390	537	72.63%			2,730	4,604	-	7,334
119.	Landowners	AI/Field	6	666	1,849	36.02%			4,662	101,300	-	105,962
		DBL	0	-	488	-			-		-	
		GUB 1	0	-	57	-			-		-	
120.	Landowners	Forest	5	116	17,080	0.68%			4,060	10,417	-	14,477
121.	Landowners	AI/Field	7	5	725	0.69%			35	2,240	-	2,275
122.	Landowners	AI/Field	7	4	3,025	0.13%			28	-	-	28
123.	Landowners	GUB ₁ ⁷⁴	0	35	35	100.00%			8,750	-	-	8,750
TOTAL CM UZEM in m²				81,829					2.174.077	7,135,853	6,976,381	16,286,311

⁷⁴ An additional valuation has been requested for one auxiliary facility. The valuation will be added to the list later.

Table 28 Permanent Land Expropriation by individual owners by cadaster municipality for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

Cadastre Municipality		Permanent Land Expropriation			COMPENSATION			TOTAL (MKD)
		Number of parcels	Area In m ²	%	Compensation for land (MKD)	Compensation for cultures (MKD)	Compensation for structures (MKD)	
1.	CM TIminci	43	20,246	8.70%	273.665	912,360	0	1,186,025
2.	CM Gradec ⁷⁵	25	21,878	9.40%	628,262	655,649	0	1,283,911
3.	CM Kriva Palanka ⁷⁶	36	17,557	7.54%	5.677.677	0	28,564,514	34,242,191
4.	CM Drenje ⁷⁷	18	46,618	20.03%	657,529	1,344,774	2,902,969	4,905,272
5.	CM Kiselica	8	24,289	10.43%	522,639	846,035	1.272,743	2,641,417
6.	CM Trnovo	1	305	0.13%	1,485	149	0	1,634
7.	CM Zidilovo	9	4,650	2.00%	164,329	374,915	759,033	1,298,227
8.	CM Krklja	2	446	0.19%	7,680	20,070	0	27,750
9.	CM Kostur	28	14,974	6.43%	298,805	766,619	0	1,065,424
10.	CM Uzem	123	81,829	35.15%	2,174,077	7,135,853	6,976,381	16,286,311
	TOTAL	293	232,792	100.00%	10,406,148	12,056,424	40,475,640	62,938,362

⁷⁵ The valuation of this ancillary structure will be added later. The valuation is in a phase of additional analysis / check in PE ZSRMI.

⁷⁶ The assets valuation in CM Kriva Palanka will be added after the redesign of the access roads in that municipality. The expropriation line will be changed due to that redesign. The land and asset valuation will be entered after the redesign. A part of the valuations of the land are entered, as well as the valuations of the houses proposed for demolition, located on a permanent road.

⁷⁷ The valuation for the structure on this parcel was added later.

Resettlement Action Plan

Table 29 List of state-owned land affected by Land Acquisition for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka⁷⁸

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropr iation part (in %)	Property list	Cadastral Parcel
CM TLMINCI								
1.	RM	Pasture	5	464	464	100.00%		
2.	RM	Pasture	5	316	316	100.00%		
3.	RM	Pasture	5	1,148	1,148	100.00%		
4.	RM	Pasture	5	1050	1,714	61.26%		
5.	RM	Pasture	5	398	1,227	32.44%		
6.	RM	Forest	5	88	404	21.78%		
7.	RM	Pasture	5	1,571	3,224	48.73%		
8.	RM	Pasture	5	645	1,112	58.00%		
9.	RM	Pasture	5	359	805	44.60%		
10.	RM	Pasture	5	345	672	51.34%		
11.	RM	AL/Field	6	110	458	24.02%		
12.	RM	AL/Field	6	142	1,299	10.93%		
13.	RM	AL/Field	6	6	385	1.56%		
14.	RM	Meadow	7	37	404	9.16%		
15.	RM	Pasture	5	29	293	9.90%		
16.	RM	Pasture	6	8	761	1.05%		
17.	RM	Pasture	6	215	1,620	13.27%		
18.	RM	Pasture	5	85	10,524	0.81%		
19.	RM	AL/Field	6	17	844	2.01%		
20.	RM	Pasture	5	852	3,866	22.04%		

⁷⁸ AL/Field – Arable land - Field; Intensive Vineyard; GUB – Ground under Building; DBL - Developed Building Land; UBL - Undeveloped Building Land; UBL - Other Natural Unfertile Land.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
21.	RM	Pasture	5	2,304	46,562	4.95%		
22.	RM	Pasture	5	2,173	7,383	29.43%		
23.	RM	Uncategorized road	0	89	1,129	7.88%		
24.	RM	Uncategorized road	0	45	557	8.08%		
25.	RM	Uncategorized road	0	41	1,100	3.73%		
26.	RM	River	0	180	72,009	0.25%		
27.	RM	Meadow	4	60	356	16.85%		
28.	RM	Meadow	3	2	543	0.37%		
29.	RM	Pasture	6	1,063	87,654	1.21%		
30.	RM	Forest	6	1,110	1,388	79.97%		
31.	RM	Pasture	6	1,078	1,099	98.09%		
32.	RM	Forest	5	342	447	76.51%		
33.	RM	Pasture	5	125	252	49.60%		
34.	RM	Pasture	5	39	639	56.52%		
35.	RM	Forest	6	49	599	8.18%		
36.	RM	Forest	5	87	493	17.65%		
37.	RM	Pasture	5	182	618	29.45%		
38.	RM	Pasture	6	2,154	3,503	61.49%		
TOTAL CM TLMINCI in m²				19,008				
CM GRADEC								
1.	RM	Forest	5	385	3,154	12.21%		
2.	RM	Streams	0	386	126,969	0.30%		
3.	RM	Forest	5	538	20,310	2.65%		
4.	RM	Forest	5	3,437	99,118	3.47%		
		GUB 1	0	-	9	-		

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
		GUB 2		-	8	-		
5.	RM	Forest	6	159	2,886	5.51%		
6.	RM	Forest	8	263	1,283	20.50%		
7.	RM	Streams	0	120	30,494	0.39%		
8.	RM	AL/Field	8	1,191	2,224	53.55%		
9.	RM	Forest	5	33,127	227,272	14.58%		
10.	RM	AL/Field	8	1,445	1,545	93.53%		
11.	RM	Pasture	4	464	24,873	1.87%		
12.	RM	Forest	4	2,137	25,404	8.41%		
13.	RM	Orchard	6	2	197	1.02%		
14.	RM	Forest	5	19,359	88,737	21.82%		
15.	RM	Forest	5	10,935	73,747	14.83%		
16.	RM	Pasture	4	9,201	61,730	14.91%		
17.	RM	Forest	4	4,080	368,796	1.11%		
18.	RM	Forest	3	70	2,106	3.32%		
TOTAL CM GRADEC in m²				87,299				
CM LOZANOVO								
1.	RM	Forest	5	125	34,665	0.36%		
2.	RM	Pasture	5	2,664	71,096	3.75%		
3.	RM	Forest	5	2,689	121,216	2.22%		
4.	RM	Pasture	5	11,326	130,714	8.66%		
TOTAL CM LOZANOVO in m²				16,804				
CM KRIVA PALANKA								
1.	RM	Pasture	5	12,131	34,928	34.73%		
2.	RM	Forest	4	1,043	1,141	91.41%		
3.	RM	Forest	5	11,028	28,398	38.83%		
4.	RM	UBL	0	7	380	1.84%		

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
5.	RM	DBL	0	19	32	59.38%		
6.	RM	Uncategorized road	0	1,097	3,179	34.51%		
		GUB 1	0	-	1	-		
7.	RM	River	0	205	146,166	0.14%		
8.	RM	Pasture	1	773	73,968	1.05%		
9.	RM	Uncategorized road	0	288	2,932	9.82%		
10.	RM	Uncategorized road	0	3	266	1.13%		
11.	RM	Pasture	4	478	478	100.00%		
12.	RM	DBL	0	286	733	39.02%		
		GUB 1	0	-	108	-		
		GUB 2	0	-	3	-		
		GUB 3	0	-	1	-		
		GUB 4	0	-	2	-		
13.	RM	Orchards	5	3,549	3,549	100.00%		
14.	RM	Pasture	4	475	475	100.00%		
15.	RM	Pasture	5	29	248	11.69%		
16.	RM	GUO ⁷⁹	0	917	4,326	21.20%		
		GUB 1	0	-	1	-		
17.	RM	Uncategorized road	0	284	284	100.00%		
18.	RM	Uncategorized road	0	380	437	86.96%		

⁷⁹ Ground Under Objects (GUO) – Artificial Infertile Lands.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
19.	RM	GUIF ⁸⁰	0	66	1,668	3.96%		
		GUB 1	0	-	1	-		
		GUB 2	0	-	2	-		
20.	RM	Uncategorized road	0	86	401	21.45%		
21.	RM	Pasture	5	308	3,856	7.99%		
22.	RM	Uncategorized road	0	501	593	84.49%		
23.	RM	Dales ⁸¹	0	298	5,185	5.75%		
24.	RM	Pasture	6	68	567	11.99%		
25.	RM	Pasture	6	418	418	100.0%		
26.	RM	Pasture	6	2	580	0.34%		
27.	RM	Uncategorized road	0	421	1,538	27.37%		
28.	RM	Pasture	5	3,793	4,614	82.21%		
29.	RM	Cannel	0	14	145	9.66%		
		GUB 1	0	-	9	-		
30.	RM	GUIF	0	95	3,249	2.92%		
		GUB 1	0	-	2	-		
31.	RM	Pasture	6	18	548	3.28%		
32.	RM	Uncategorized road	0	2	448	0.45%		
33.	RNM	Pasture	6	5	134	3.73%		
34.	RM	Public road	0	48	263	18.25%		
35.	RM	Pasture	6	369	525	70.28%		
36.	RM	Yard	0	240	307	78.18%		

⁸⁰ Ground Under Infrastructure Facilities (GUIF) - Artificial Infertile Lands.

⁸¹ Dales Natural Baren Lands.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel		
		GUB 1	0	15	22	68.18%				
37.	RM	Forest	4	75	86	87.21%				
38.	RM	Forest	4	34	75	45.33%				
39.	RM	Forest	4	30	79	37.97%				
40.	RM	AL/Field	6	3	88	3.41%				
41.	RM	Streets	0	22	2,839	0.77%				
42.	RM	DBL	0	21	125	16.80%				
		GUB 2	0	-	21	-				
43.	RM	Uncategorized road	0	617	850	72.59%				
44.	RM	DBL	0	48	447	10.74%			Compensation for structures (MKD)	TOTAL (MKD)
		GUB 1	0	-	72	-			1,927,176	5,710,595
		GUB 2	0	-	22	-				
		GUB 3	0	-	7	-			3,783,419 ⁸²	
45.	RM	Dale	0	364	364	100.00 %				
46.	RNM	Forest	4	137	153	89.54%				
47.	RM	Uncategorized road	0	51	457	11.16%				
48.	RM	DBL	0	43	643	6.69%				
		GUB 1	0	-	66	-				
		GUB 2	0	-	23	-				
49.	RM	DBL	0	2	248	0.81%				
		GUB 1	0	-	82	-				-

⁸² The land is state-owned, however, in the Asset inventory and Valuation, these structures are registered as privately owned property. The valuation / compensation for structures was added to this table and it is coloured in green.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
		GUB 2	0	-	10	-		-
50.	RM	Yard	0	26	280	9.29%		
		GUB 1	0	-	66	-		
		GUB 2	0	-	22	-		
51.	RM	Forest	3	3,068	87,235	3.52%		
52.	RM	DBL		166	284	58.45%		
		GUB 1		30	30	100.00%		
53.	RM	Uncategorized road	0	143	5788	2.47%		
54.	RM	Orchard	2	12	339	3.54%		
55.	RM	Dales ⁸³	0	87	16,683	0.52%		
		GUB 1	0	-	5	-		
56.	RM	GUO ⁸⁴	0	38	546	6.96%		
		GUB 1	0	-	4	-		
57.	RM	GUO ⁸⁵	0	106	13,738	0.77%		
		GUB 1	0	-	20	-		
		GUB 2	0	-	5	-		
58.	RM	DBL	0	21	22	95.45%		
59.	RM	Forest	4	4,959	283,416	1.75%		
		GUB 1	0	-	32	-		
		GUB 2	0	-	13	-		
		GUB 3	0	-	32	-		
60.	RM	Pasture	7	202	202	100.0%		

⁸³ Dales – Fertile lands.

⁸⁴ Ground Under Objects (GUO) – Artificial Infertile Lands.

⁸⁵ Ground Under Objects (GUO) – Artificial Infertile Lands.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
61.	RM	Yard	0	14	41	34.15%		
62.	RM	Pasture	4	780	891	87.54%		
63.	RM	Pasture	6	35	457	7.66%		
64.	RM	Pasture	4	7,514	166,520	4.51%		
		GUB 1	0	-	537	-		
		GUB 2	0	-	47	-		
		GUB 3		-	1	-		
65.	RM	Streams	0	169	1,130	14.96%		
		GUB 1	0	-	40	-		
		GUB 2	0	-	28	-		
		GUB 3		-	1	-		
TOTAL CM KRIVA PALANKA in m²				58,576				
CM DRENJE								
1.	RM	River	0	4	12,914	0.03%		
2.	RM	River	0	806	42,107	1.91%		
3.	RM	River	0	658	9,692	6.79%		
TOTAL CM DRENJE in m²				1,468				
CM KISELICA								
1.	RM	River	0	697	137,311	0.51%		
		GUB 1	0	-	1	-		
		GUB 2	0	-	30	-		
2.	RM	Forest	4	360	9,660	3.73%		
		GUB 1	0	-	107	-		
		GUB 2	0	-	18	-		
3.	RM	Public road	0	145	4,475	3.24%		
4.	RM	Pasture	5	8,998	207,168	4.34%		

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
5.	RM	River	0	651	30,022	2.17%		
6.	RM	River	0	914	13,991	6.53%		
7.	RM	Forest	5	695	30,094	2.31%		
TOTAL CM KISELICA in m²				12,460				
CM TRNOVO								
1.	RM	Pasture	7	6,530	400,376	1.63%		
2.	RM	Public road	0	4	12,219	0.03%		
3.	RM	Forest	8	8,866	374,996	2.36%		
		GUB 1	0	-	35	-		
		GUB 2	0	-	29	-		-
TOTAL CM TRNOVO in m²				15,400				
CM ZIDILOVO								
1.	RM	River	0	327	71,926	0.45%		
2.	RM	Forest	5	2,114	83,726	2.52%		
3.	RM	Pasture	7	6,465	72,849	8.87%		
4.	RM	Stones	0	901	21,249	4.24%		
5.	RM	River	0	510	3,505	14.55%		
6.	RM	Forest	4	17,794	129,957	13.69%		
7.	RM	River	0	702	16,135	4.35%		
8.	RM	AL/Field	5	19,025	91,418	20.81%		
9.	RM	River	0	458	1,871	24.48%		
10.	RM	Forest	6	7,722	102,742	7.52%		
11.	RM	River	0	675	13,640	4.95%		
12.	RM	River	0	232	1,101	21.07%		
13.	RM	River	0	396	4512	8.78%		
14.	RM	Forest	3	45	394	11.42%		

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
15.	RM	UBL	0	37	315	11.75%		
16.	RM	Forest	3	8,389	209,881	4.00%		
		GUB 1	0	-	13	-		
		GUB 2	0	-	26	-		
		GUB 3	0	-	8	-		
		GUB 4	0	-	25	-		
17.	RM	GUO ⁸⁶	0	171	20,314	0.84%		
18.	RM	River	0	9	125	7.20%		
19.	RM	River	0	186	26,043	0.71%		
20.	RM	AL/Field	4	1,367	9,682	14.12%		
		GUB 1	0	-	14	-		
21.	RM	GUO ⁸⁷	0	977	25,820	3.78%		
22.	RM	GUO ⁸⁸	0	19	2,234	0.85%		
23.	RM	River	0	200	18,999	1.05%		
TOTAL CM ZIDILOVO in m²				68,721				
CM KRKLJA								
1.	RM	Pasture	4	387	80,989	0.48%		
2.	RM	River	0	1,236	22,744	5.43%		
3.	RM	Pasture	4	1,386	2,698	51.37%		
4.	RM	Forest	5	14,539	31,724	45.83%		
		Forest	6	9,346	38,178	24.48%		
5.	RM	Pasture	5	1,254	2,928	42.83%		
6.	RM	River	0	1	28,009	0.00%		
7.	RM	River	0	1,373	8,000	17.16%		

⁸⁶ Ground Under Objects (GUO) – Artificial Infertile Lands.

⁸⁷ Ground Under Objects (GUO) – Artificial Infertile Lands.

⁸⁸ Ground Under Objects (GUO) – Artificial Infertile Lands.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
8.	RM	River	0	552	8,092	6.82%		
9.	RM	Orchard	6	16,029	48,115	33.31%		
10.	RM	Orchard	6	7,855	30,409	25.83%		
11.	RM	Stones	0	24	224	10.71%		
12.	RM	AI/Field	0	220	235	93.62%		
13.	RM	AI/Field	4	889	3,314	26.82%		
		GUB 1	0	-	13	-		
		GUB 2	0	24	24	100.0%		
TOTAL CM KRKLJA in m²				55,115				
CM UZEM								
1.	RM	River	0	2,621	21,864	11.99%		
2.	RM	Forest	4	1,533	1,692	90.60%		
3.	RM	Pasture	4	22	1,051	2.09%		
4.	RM	Forest	4	1,449	3,078	47.08%		
5.	RM	Public road	0	242	2,629	9.21%		
6.	RM	River	0	1,960	56,045	3.50%		
7.	RM	Pasture	4	987	1,005	98.21%		
8.	RM	River	0	1,076	1,958	54.95%		
9.	RM	Pasture	4	338	1,194	28.31%		
10.	RM	Pasture	4	1,019	1,723	59.14%		
11.	RM	AI/Field	0	896	1,278	70.11%		
12.	RM	Public road	0	76	8,813	0.86%		
13.	RM	River	0	2,288	3,040	75.26%		
14.	RM	Pasture	4	661	2,820	23.44%		
		DBL	0	-	498	-		
		GUB 1	0	-	45	-		
		GUB 2	0	-	17	-		

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
15.	RM	Forest	3	29,838	189,459	15.75%		
16.	RM	GUO ⁸⁹	0	2,318	112,110	2.07%		
17.	RM	Public road	0	16	129	12.40%		
18.	RM	Forest	4	514	3,333	15.42%		
19.	RM	Public road	0	87	178	48.88%		
20.	RM	AL/Field	5	165	196	84.18%		
21.	RM	River	0	524	17,405	3.01%		
22.	RM	Stones	0	297	3,310	8.97%		
23.	RM	Pasture	4	84	711	11.81%		
24.	RM	Meadow	5	134	999	13.41%		
25.	RM	Stones	0	274	341	80.35%		
26.	RM	AL/Field	5	175	177	98.87%		
27.	RM	AL/Field	5	120	121	99.17%		
28.	RM	Meadow	5	1,227	1,308	93.81%		
29.	RM	Pasture	6	248	441	56.24%		
30.	RM	Meadow	5	466	477	97.69%		
31.	RM	Pasture	6	258	258	100.0%		
32.	RM	Meadow	6	406	536	75.75%		
33.	RM	Meadow	6	253	253	100.0%		
34.	RM	Meadow	6	247	247	100.0%		
35.	RM	Meadow	5	252	252	100.0%		
36.	RM	Public road	0	196	1,664	11.78%		
37.	RM	Meadow	5	716	885	80.90%		
38.	RM	Meadow	5	364	400	91.00%		
39.	RM	Meadow	5	434	495	87.68%		

⁸⁹ Ground Under Objects (GUO) – Artificial Infertile Lands.

Resettlement Action Plan

No	Landowner	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastral Parcel
40.	RM	Meadow	5	466	550	84.73%		
41.	RM	Meadow	5	338	419	80.67%		
42.	RM	Meadow	5	333	415	80.24%		
43.	RM	Meadow	5	282	334	84.43%		
TOTAL CM UZEM in m²				56,200				

Table 30 Permanent Land Acquisition of State-owned land for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

Cadastre Municipality	Permanent Land Acquisition		
	Number of parcels	Area in m ²	%
1. CM TIminci	38	19,008	4.86%
2. CM Gradec	18	87,299	22.32%
3. CM Lozanovo	4	16,804	4.30%
4. CM Kriva Palanka	65	58,576	14.98%
5. CM Drenje	3	1,468	0.38%
6. CM Kiselica	7	12,460	3.19%
7. CM Trnovo	3	15,400	3.94%
8. CM Zidilovo	23	68,721	17.57%
9. CM Krklja	13	55,115	14.09%
10. CM Uzem	43	56,200	14.37%
TOTAL	217	391,051	100.00%

Table 31 List of land parcels in joint ownership affected by Land Acquisition for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka⁹⁰

No.	Landowners (names withheld from this document, but available to PE ZRSMI).	Type of land	Land class	Area for expropriation in m ²	Parcel in m ²	Expropriation part (in %)	Property list	Cadastre Parcel	Compensation for land (in MKD)	Compensation for cultures (in MKD)	Compensation for structures (in MKD)	TOTAL (MKD)
CM KRIVA PALANKA												
1.	Landowner / RM	Pasture	4	690	808	85.40%			212,175	-		212,175
		GUB 1	0	26	26	100.00%			7,995	-	9.513,927 ⁹¹	9,521,922
TOTAL CM KRIVA PALANKA in m²				716					220,170	-		9,734,097
CM UZEM												
1.	Landowners / RM	Forest	3	1,236	21,167	5.84%			55,620	110,993	-	166,613
TOTAL CM UZEM in m²				1,236								166,613

Table 32 Permanent Land Expropriation of land parcels in joint owners for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

	Cadastre Municipality	Permanent Land Expropriation			Type of land					Total
		Number of land parcels	Area In m ²	%	Pasture	Forest	GUB	UBL	Yard	
1.	CM Kriva Palanka	5	716	36.68%	690		26	140	17	716
2.	CM Uzem	1	1,236	63.32%	-	1,236	-	-	-	1,236
	TOTAL	6	1,952	100.0%	690	1,236	26	140	17	1,952

⁹⁰ AL/Field – Arable land - Field; GUB – Ground under Building; UBL - Undeveloped Building Land.⁹¹ The land of this structure is registered as joint ownership.

Table 33 Permanent Land Expropriation of land parcels in religious community ownership for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka⁹²

Project affected CM	Total m ²	Number of parcels	Type of land Forest	Cadastral Parcel	Compensation for land (in MKD)
CM KRIVA PALANKA Macedonian Orthodox Church - Ohrid Archbishopric	7,628	1	7,628	66/7	726,008 1,619,603
Total	7,628	1	7,628		2,345,611

Table 34 Permanent Land Expropriation of land parcels in company ownership for construction of the permanent way and access roads in CM T'Iminci, CM Gradec, CM Lozanovo, CM Drenje, CM Kiselica, CM Trnovo, CM Krklja, CM Zidilovo, CM Kostur and the permanent way in CM Kriva Palanka

	Project affected CM	Total in m ²	Number of parcels	Type of land Meadow in m ²	Cadastral Parcel	Compensation for land (in MKD)	Compensation for cultures (MKD)	TOTAL (MKD)
1.	CM Kostur	1	1	1			2,4	25,4
	Total in m²	1	1	1				25,4

⁹² Monastery St. Joakim Osogovski – Kriva Palanka.

13.1.2. Impacts related to access roads

This Annex is based on the obtained initial information related to the redesign of the access roads in CM Kriva Palanka and Trnovo.

Table Initial information related to the proposed land for acquisition for construction of the access road above the Makpetrol petrol station in CM Kriva Palanka

Cadastral Parcel	Ownership	Cadastral culture	Notes
3732	RNM	Pasture	There is a privately owned structure constructed on the state-owned land.
3733	RNM	Forest	
3677/1	RNM	Pasture	
3744/2	RNM	Pasture	
3744/1	Individual owner	Orchard	
3731	RNM	Forest	-
Total in m²		10,696 m ²	Based on the initial information related to the redesign of the access road above the Makpetrol petrol station in CM Kriva Palanka, it will be needed to acquire in total 10,696 m² . The total number of affected land parcels will be six (6).

Table Initial information related to the proposed land for acquisition for construction of the access road in CM Trnovo

Cadastral Parcel	Ownership	Cadastral culture	Notes
6864/1	RNM	Pasture	
5302/1	RNM	River	
Total in m²		2,682 m ²	Based on the initial information related to the redesign of the access road in CM Trnovo, it will be needed to acquire in total 2,682 m² , state-owned land. The total number of affected land parcels will be six (2).

13.2 The Appeal Procedure on Expropriation

Appeal Procedure to the Administrative Court and High Administrative Court	
<i>A lawsuit against the expropriation decision may be filed with the Administrative Court within 15 days from the day of the delivery of the decision.</i>	1
<i>Upon receipt of the lawsuit, the Administrative Court is obliged to submit a transcript of the lawsuit within three days to the respondent body, which is obliged to submit a response to the Administrative Court within eight days with all documents related to the case.</i>	2
<i>After receiving the files, the council that decides on the lawsuit is obliged to decide within 30 days from the receipt of the case files.</i>	3
<i>The Administrative Court is obliged to submit the appeal against the decision together with the files, to the Macedonian High Administrative Court, without any delay, or at the latest, within three days from the date of the receipt of the complaint.</i>	4
<i>The Council in the Macedonian High Administrative Court that decides on the appeal is obliged to decide within 30 days from the receipt of the files on the subject.</i>	5
The Appeal Procedure on Expropriation	

13.3 Overview by zones for determining the real estate market value – for business buildings, premises, developed building land and undeveloped building land with such purposes, in the municipality of Kriva Palanka

OVERVIEW BY ZONES FOR DETERMINING THE REAL ESTATE MARKET VALUE – FOR BUSINESS BUILDINGS, PREMISES, DEVELOPED BUILDING LAND AND UNDEVELOPED BUILDING LAND WITH SUCH PURPOSE, IN THE MUNICIPALITY OF KRIVA PALANKA

14th zone

Str. Saint Joakim Osogovski (locality from the House of Culture to the junction of street Saint Joakim Osogovski, junction of old and new branch at the old bakery)

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 50 points / m²

14.1 - Subzone

Str. Saint Joakim Osogovski (locality from the House of Culture to Osicki Bridge and from the junction of Str. Saint Joakim Osogovski - junction of old and new branch at old bakery to the entrance for a new green market below Malesh Bakery and the area at the old green market).

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 45 points / m²

15-th zone

Str. St. Joakim Osogovski (from the entrance of the new green market, and bellow the bakery Malesh, to the junction with the M2 intersection in Gramagje settlement).

Str. 8-mi Oktomvri

Str. Partizanska (to the bridge at the Dabo Bakery)

Str. Nikola Tesla (without the new branch)

Str. Ilindenska (without facility at the old green market)

Str. Jane Sandanski

Str. Heroj Karposh

Str. Goce Delchev

Str. Boris Trajkovski

Str. Orce Nikolov

Str. Jane Jakimovski

Resettlement Action Plan

Str. Prohor Pchinski

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 40 points / m²

15.1 - Subzone

Str. Mosha Pijade – asphalted area

Str. 3-ta Makedonska Udarna Brigada

Str. Makedonska

Str. 17-ta Makedonska Udarna Brigada

Str. Nasko Tamburkov

Str. Dimitar Arsov

Str. Chupino Brdo

Settlement Gorni Bavchalak

Str. Baglachka (asphalted area)

Str. Gjorche Petrov

Str. Ratko Minev (asphalted area)

Str. Joakim Krchovski

Str. 11-ti Oktomvri

Str. Pirinska (asphalted area)

Str. All other asphalted streets in the area of Kriva Palanka Municipality (higher areas)

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 35 points / m²

16-th zone

Begovi bavchi Settlement

Str. Edinstvo (to the bridge at the junction with str. Joakim Osogovski)

Str. 8 September

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 30 points / m²

16.1 - Subzone

Str. 4-ti July

Resettlement Action Plan

Str. Koce Metalec

Gramagje Settlement

Str. Partizanska (from the bridge at the Bakery Dabo, to the end of Domachki Dol)

Str. Moshja Pijade, from the asphalted area to the Str. Heroj Karposh

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 25 points / m²

16.2 - Subzone

Str. Nikola Tesla (new branch)

Str. Nikola Tesla

Village Gradec – Mizovski livadi

Village Konopnica and Mozdivnjak

Settlement Lozanovo

All unpaved streets for CM Kriva Palanka

Settlement Conev Rid

Settlement Skrljava

Settlement Trshten Dol

The other streets in the settlement Badlak

Settlement Koshari

Str. Goce Delchev – unpaved area

Str. Baglachka - unpaved area

CM Drenje and CM Varovishte, near the regional road in the belt of 200m

Types of facilities: business premises and shops, business buildings (manufacturing unit, warehouses, halls, storehouses) hotels, motels, leisure and recreation facilities, gas stations, restaurants, pubs, and cafes and building land.

Value: 20 points / m²

The value of calculated point is 1 Euro in Denar equivalents.

When determining the market value of the developed building land, undeveloped land, having the purpose of business premises, with the surface area larger than 1000 m², decreases by 5 points for m² accordingly to a zone.

**OVERVIEW BY ZONES FOR DETERMINING THE REAL ESTATE MARKET VALUE – FOR
RESIDENTIAL BUILDINGS, HOUSES, OTHER CONSTRUCTION FACILITIES, ANCILLARY
OBJECTS, AND DEVELOPED BUILDING LAND AND UNDEVELOPED BUILDING LAND WITH
SUCH PURPOSE, IN THE MUNICIPALITY OF KRIVA PALANKA**

16-th zone

Str. Saint Joakim Osogovski (locality from the House of Culture to the junction of street Saint Joakim Osogovski - junction of old and new branch at the old bakery)

Types of facilities: individual residential buildings (houses), apartments in collective residential buildings, garages, and ancillary objects (sheds, stables, storehouses, barns, etc.) and building land.

Value: 30 points / m²

16.1 – Subzone

Str. Saint Joakim Osogovski (locality from the House of Culture to Osicki Bridge and from the junction of Str. Saint Joakim Osogovski - junction of old and new branch at old bakery to the entrance for a new green market below Malesh Bakery and the area at the old green market).

Types of facilities: individual residential buildings (houses), apartments in collective residential buildings, garages, and ancillary objects (sheds, stables, storehouses, barns, etc.) and building land.

Value: 25 points / m²

16.2 Subzone

Str. St. Joakim Osogovski (from the entrance of the new green market, and below the bakery Malesh, to the junction with the M2 intersection in Gramagje settlement).

Str. 8-mi Oktomvri

Str. Partizanska (to the bridge at the Dabo Bakery)

Str. Nikola Tesla (without the new branch)

Str. Ilindenska (without facility at the old green market)

Str. Jane Sandanski

Str. Heroj Karposh

Str. Goce Delchev

Str. Boris Trajkovski

Str. Orce Nikolov

Str. Jane Jakimovski

Str. Prohor Pchinski

Types of facilities: individual residential buildings (houses), apartments in collective residential buildings, garages, and ancillary objects (sheds, stables, storehouses, barns, etc.) and building land.

Value: 20 points / m²

17th zone

Str. Mosha Pijade – asphalted area

Str. 3-ta Makedonska Udarna Brigada

Str. Makedonska

Str. 17-ta Makedonska Udarna Brigada

Str. Nasko Tamburkov

Resettlement Action Plan

Str. Dimitar Arsov

Str. Chupino Brdo

Settlement Gorni Bavchalak

Str. Baglachka (asphalted area)

Str. Gjorche Petrov

Str. Ratko Minev (asphalted area)

Str. Joakim Krchovski

Str. 11-ti Oktomvri

Str. Pirinska (asphalted area)

Str. All other asphalted streets in the area of Kriva Palanka Municipality (higher areas)

Types of facilities: individual residential buildings (houses), apartments in collective residential buildings, garages, and ancillary objects (sheds, stables, storehouses, barns, etc.) and building land.

Value: 15 points / m²

17.1 Subzone

Begovi bavchi Settlement

Str. Edinstvo (to the bridge at the junction with str. Joakim Osogovski)

Str. 8 September

Types of facilities: individual residential buildings (houses), apartments in collective residential buildings, garages, and ancillary objects (sheds, stables, storehouses, barns, etc.) and building land.

Value: 10 points / m²

18th zone

Str. 4-ti July

Str. Koce Metalec

Gramagje Settlement

Str. Partizanska (from the bridge at the Bakery Dabo, to the end of Domachki Dol)

Str. Mosha Pijade, from the asphalted area to the Str. Heroj Karposh

Str. Heroj Karposh (from the bridge to the Str. Mosha Pijade)

Str. Nikola Tesla (new branch)

Village Gradec – Mizovski livadi

Village Konopnica and Mozdivnjak

Settlement Lozanovo

All unpaved streets for CM Kriva Palanka

Settlement Conev Rid

Settlement Skrljava

Settlement Trshten Dol

The other streets in the settlement Badlak

Settlement Koshari

Str. Goce Delchev – unpaved area

Str. Baglachka - unpaved area

Types of facilities: individual residential buildings (houses), apartments in collective residential buildings, garages, and ancillary objects (sheds, stables, storehouses, barns, etc.) and building land.

Value: 5 points / m²

The agricultural land in the area of General Urban Plan Kriva Palanka will be treated as building land in the Overview by zones, for determining the market value of real estate property – business premises and developed building built and undeveloped building land, agricultural land, with such purpose in the Municipality of Kriva Palanka, and the Overview by zones, for determining of the market value of real estate- residential buildings, houses, and other construction objects, ancillary objects, and developed building land and undeveloped building land with such purpose in the Municipality of Kriva Palanka.

OVERVIEW FOR THE ESTIMATION OF THE MARKET VALUE OF AGRICULTURAL LAND IN THE MUNICIPALITY OF KRIVA PALANKA FROM THE PERFORMED TRADE OF AGRICULTURAL LAND, FORM THE PREVIOUS YEAR, CALCULATED BY THE AVERAGE PRICE

Agricultural land suitable for yard is considered the land which is in circulation and with a surface of 1000 m².

Agricultural land suitable for construction lots and weekend zone is considered the land which is in circulation and with a surface from 300-1000 m², and for which there is urban planning documentation available.

Cadaster Municipality	Fields, meadows, and pastures		Gardens, orchards, and vineyards		Forest		Yard	Land convenient for plot and weekend zones
	Classes		Classes		Classes			
	I, II, III, IV	V, VI, VII, VIII	I, II, III, IV	V, VI, VII, VIII	I, II, III, IV	V, VI, VII, VIII	To 1000 m ²	From 500-1000 m ²
B`S	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,70,100	130,150,180
BASHTEVO	10,9,8	7,6,5	17,16,15	14,13,12	20,19,18	17,16,15	14,15,16	17,18,20
BOROVO	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	35,37,40	45,47,50
VAROVISHTE	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	70,150,180	200,300,400
GABAR	10,9,8	7,6,5	23,20,19	17,16,15	32,25,20	20,17,15	22,23,24	25,27,30
G. CRCORIJA	10,9,8	7,6,5	10,19,18	17,16,15	25,23,20	17,16,15	30,35,40	40,47,50
GRADEC	28,25,20	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,150,180	200,300,400
DLABOCHICA	28,25,20	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	180,200,250
DRENAK	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	35,37,40	45,47,50

Resettlement Action Plan

DRENJE	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	200,300,400
DOBROVNICA	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	70,80,100	150,170,200
DURACHA REKA	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	70,80,100	200,300,400
ZIDILOVO	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	200,300,400
KISELICA	10,9,8	7,6,5	25,23,20	17,16,15	35,32,20	15,16,17	50,70,80	100,150,180
KONOPNICA	28,25,20	10,7,5	40,37,35	32,30,25	50,45,40	30,32,35	100,150,180	200,300,400
KOSTUR	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	100,150,180
KOSHARI	20,17,15	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,150,180	200,300,350
KRKLJA	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	200,300,400
KRSTOV DOL	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	30,35,40	45,47,50
LOZANOVO	28,25,20	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,150,180	200,300,350
LUKE	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	80,90,100
M. CRCORIJA	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	30,35,40	45,47,50
MARTINICA	20,17,15	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	200,300,400
METEZHEVO	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	80,90,100
MOZDIVNJAK	28,25,20	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	200,300,400
NERAV	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	80,90,100
OGUT	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	50,60,70	120,130,150
OSICHE	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	80,90,100
PODRZHUKONJ	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	80,90,100
STANCI	10,9,8	7,6,5	25,23,20	17,16,15	32,25,20	17,16,15	50,60,70	80,90,100
TLMINCI	28,25,20	10,7,5	40,37,35	32,30,25	50,45,40	35,32,30	100,130,150	170,200,250
TRNOVO	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	70,80,100	150,200,300
UZEM	10,9,8	7,6,5	40,37,35	32,30,25	50,45,40	35,32,30	70,80,100	150,250,400

13.4. Copy of Program for Amendment of the annual program for financing the railway infrastructure for 2019

Pursuant to Article 26 paragraph (5) of the Law on the Railway System ("Official Gazette of the Republic of Macedonia" No. 48/10, 23/11, 80/12, 155/12, 163/13, 42 / 14, 130/14, 152/15, 31/16, 178/16 and 64/18), the Government of the Republic of North Macedonia, at the session held

on November 12, 2019, adopted

PROGRAM

FOR AMENDMENT OF THE ANNUAL PROGRAM FOR FINANCING THE RAILWAY INFRASTRUCTURE FOR 2019

1. In the Annual Railway Infrastructure Financing Program for 2019 ("Official Gazette of the Republic of Macedonia" no. 5/2019 and "Official Gazette of the Republic of North Macedonia" no. 114/2019), in item 1 the amount "448,479,532" is replaced with the amount "552,688,858".

2. In item 2, sub-item 2 the amount "78,353,278" is replaced by the amount "93,353,278".

Sub-item 10 is deleted.

Sub-items 11 and 12 become sub-items 10 and 11.

Sub-item 13 which becomes sub-item 12 is changed:

"Expropriation of Corridor VIII 152,688,858 denars.

The funds are intended for the needs of expropriation, in order to realize the projects for rehabilitation, reconstruction and construction of Corridor VIII.

The funds from the program will be transferred by a one-time transfer to a dedicated account of **PE ZRSMI** opened in a commercial bank and they will be used continuously over the years until they are completely realized."

3. This program takes effect the day after the day of its publication in the "Official Gazette of the Republic of North Macedonia".

No. 45-8338 / 1

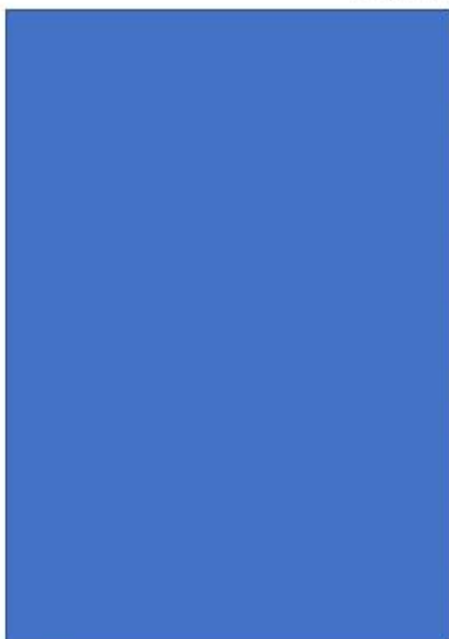
November 12, 2019,

Skopje

Prime Minister

of the Republic of North Macedonia

Zoran Zaev, Personal Signature



Потточката 13 која станува потточка 12 се менува и гласи:

„Експропријација на Коридор VIII 152.688.858 денари

Средствата се наменети за потребите за експропријација, а со цел реализација на проектите за рехабилитација, реконструкција и изградба на Коридор VIII.

Средствата од програмата еднократно ќе бидат префрлени на наменска сметка на ЈП МЖ Инфраструктура отворена во деловна банка и истите ќе се користат континуирано во текот на годините се додека целосно не се реализираат“.

3. Оваа програма влегува во сила наредниот ден од денот на објавувањето во „Службен весник на Република Северна Македонија“.

Бр. 45-8338/1
12 ноември 2019 година
Скопје

Претседател на Владата
на Република Северна Македонија,
Зоран Заев, с.р.

3687.

Врз основа на член 26 став (5) од Законот за железничкиот систем („Службен весник на Република Македонија“ бр. 48/10, 23/11, 80/12, 155/12, 163/13, 42/14, 130/14, 152/15, 31/16, 178/16 и 64/18), Владата на Република Северна Македонија, на седницата, одржана на 12 ноември 2019 година, донесе

**ПРОГРАМА
ЗА ИЗМЕНУВАЊЕ НА ГОДИШНАТА ПРОГРАМА
ЗА ФИНАНСИРАЊЕ НА ЖЕЛЕЗНИЧКАТА
ИНФРАСТРУКТУРА ЗА 2019 ГОДИНА**

1. Во Годишната програма за финансирање на железничката инфраструктура за 2019 година („Службен весник на Република Македонија“ бр. 5/2019 и „Службен весник на Република Северна Македонија“ бр. 114/2019), во точката 1 износот „448.479.532“ се заменува со износот „552.688.858“.

2. Во точката 2, потточка 2 износот „78.353.278“ се заменува со износот „93.353.278“.

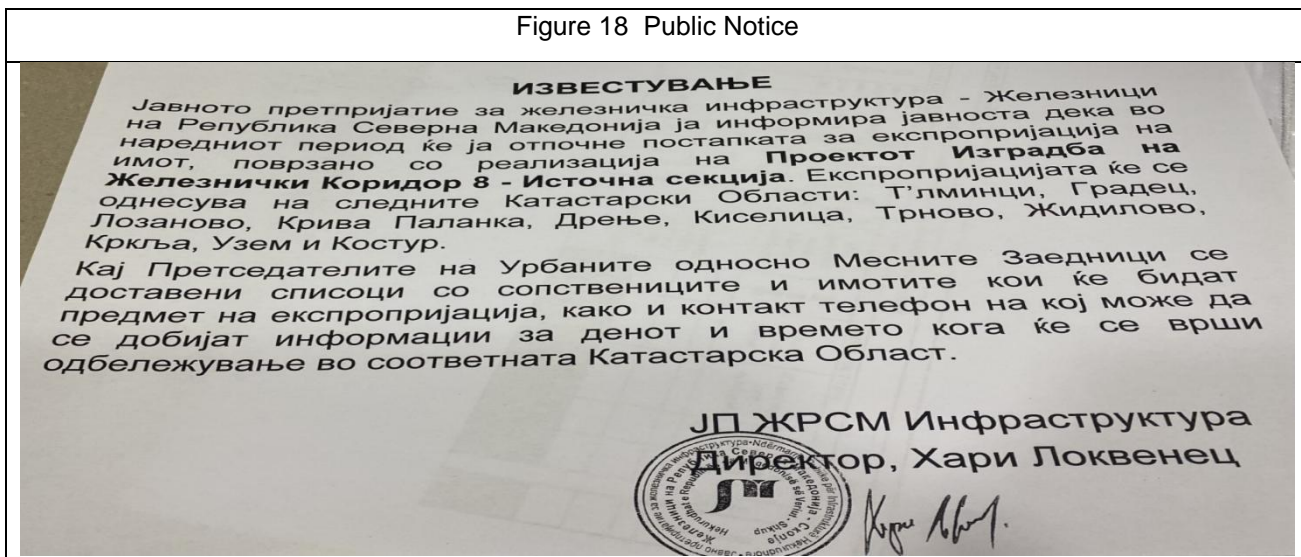
Потточката 10 се брише.

Потточките 11 и 12 стануваат потточка 10 и 11.



13.5. Information on public consultations

Figure 18 Public Notice



Public Notice that **PE ZRSMI** will start the Expropriation procedure related to the implementation of the Project for Construction of the Railway Corridor VIII - East Section. The expropriation will refer to the following project affected settlements: T'Iminci, Gradec, Lozanovo, Kriva Palanka, Drenje, Kiselica, Trnovo, Zidilovo, Krklja, Uzem and Kostur.

The presidents of the local communities have been provided with the lists of property owners that will be subject to expropriation, as well as the contact phone number of a surveyor from **PE ZRSMI**, who will give them information about the day and time when the cadastral parcels on their territory will be marked.



NOTICE on Initiating the Expropriation Procedure, Related to the Implementation of the Project for Construction of Railway Corridor VIII – Eastern Section, published on the web-site on the Municipality of Kriva Palanka, <https://www.krivapalanka.gov.mk/novosti/27733>, accessed on March 17-th, 2022.

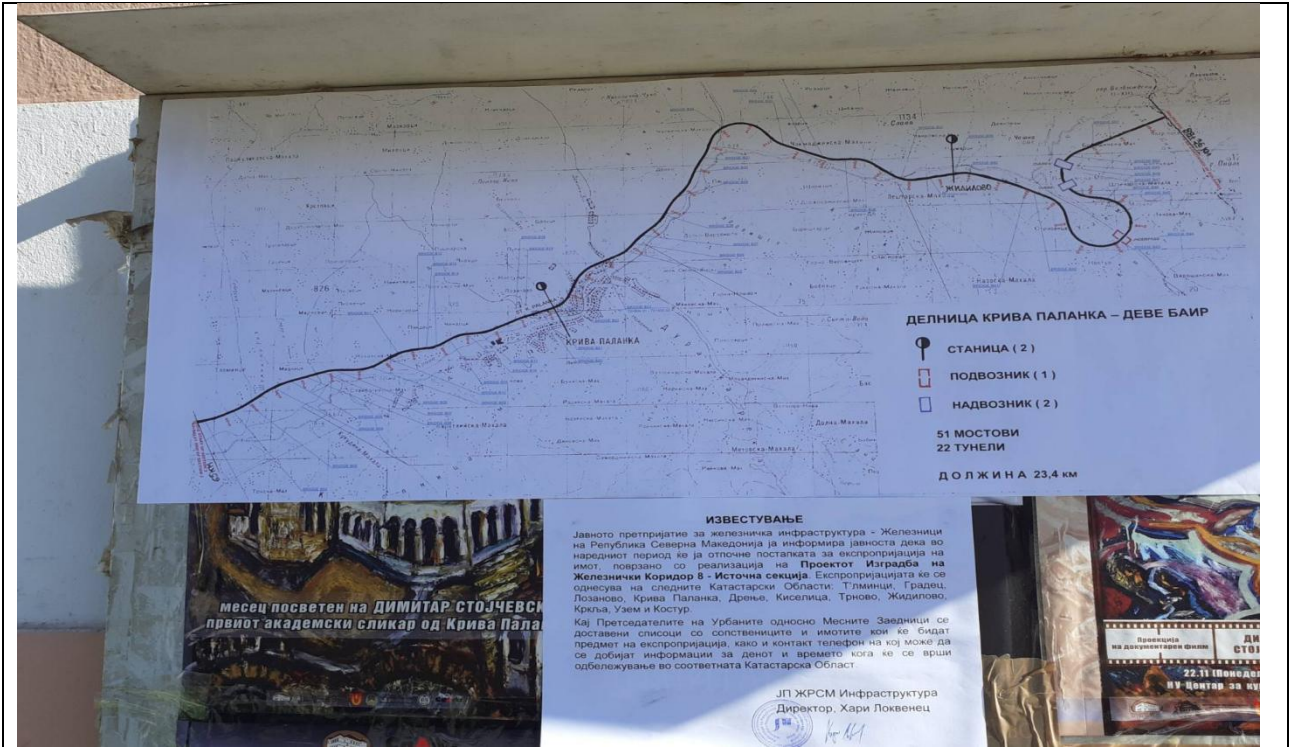


Figure 19 Design of the section 3 placed at a frequent place in the city (near the City Museum) and a public notice to inform the locals that in the next period will begin expropriation of property

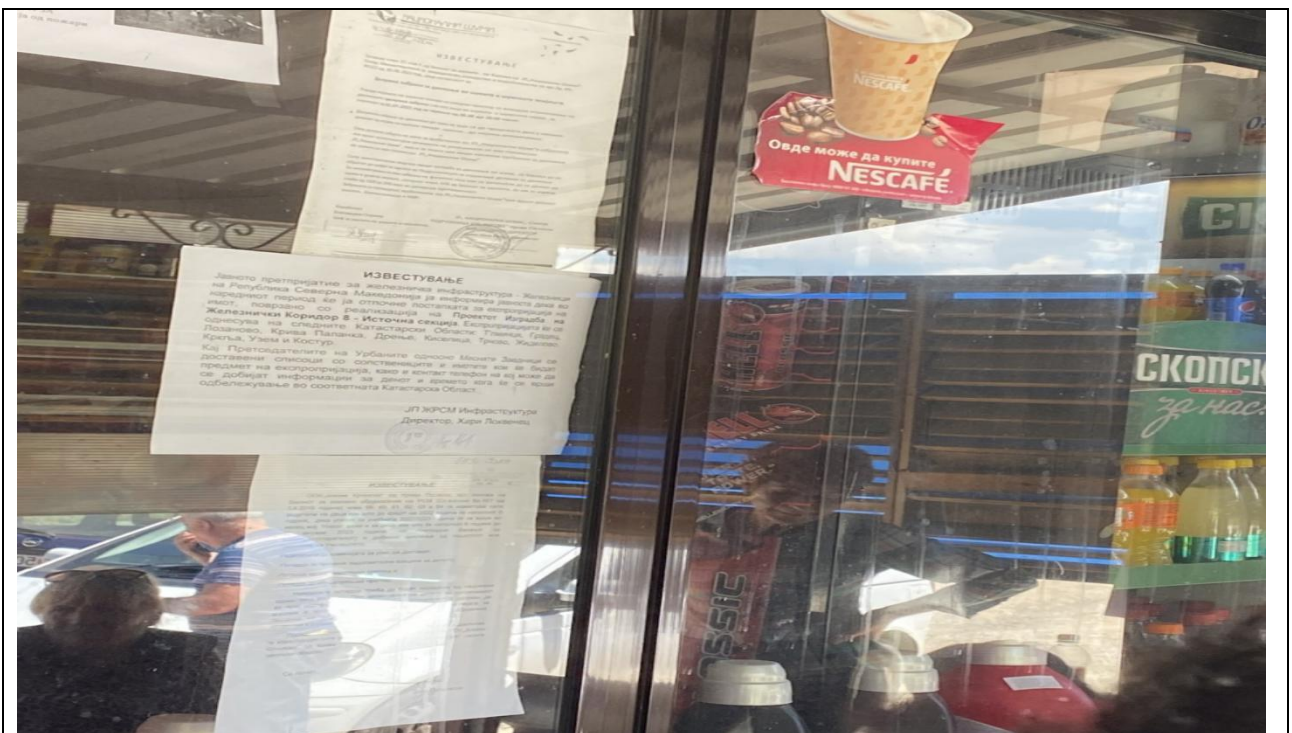


Figure 20 Public notice for the start of the Expropriation procedure on the window of the local market in Uzem

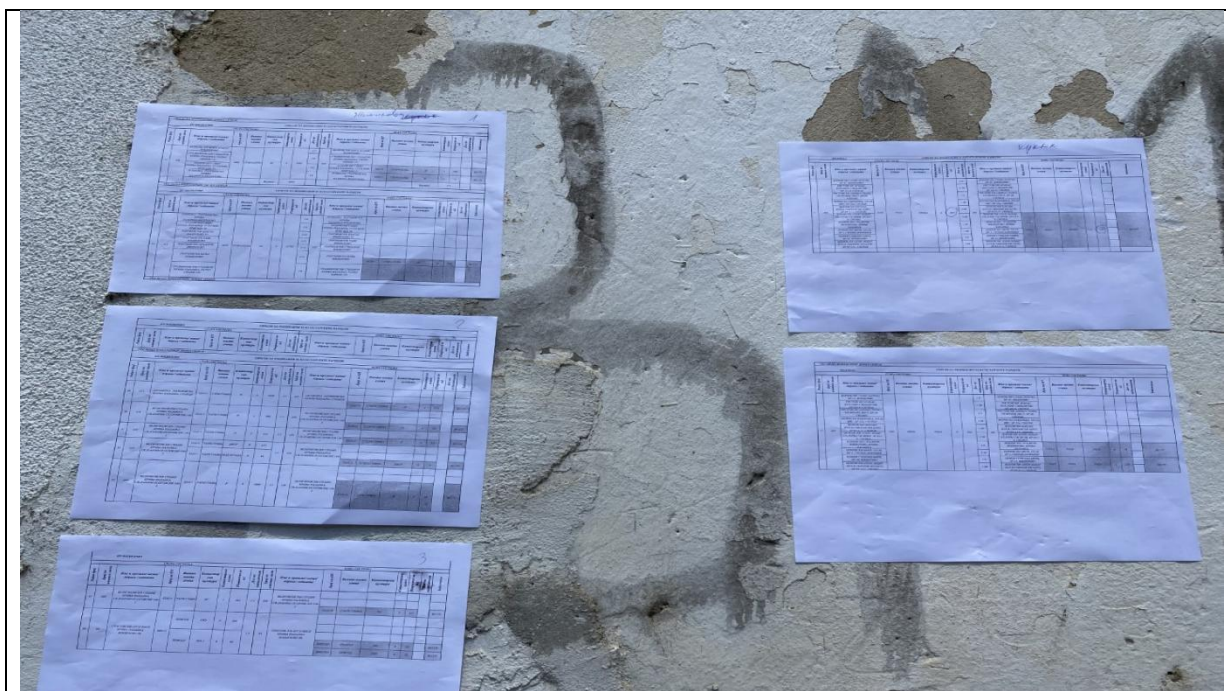
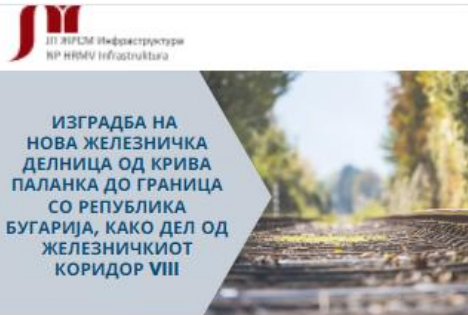


Figure 21 List of the property owners on the wall on the local market in Zidilovo



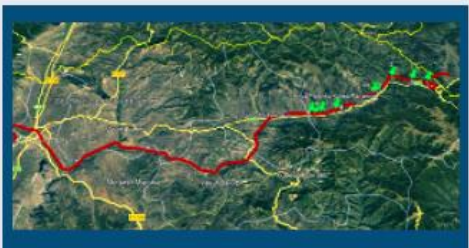
Изградба на нова железничка делница од Крива Паланка до граница со Република Бугарија, како дел од железничкиот коридор VIII

Јавното претпријатие за железничка инфраструктура „Железници на Република Северна Македонија“ - Скопје во текот на 2022 година ќе започне со подготвителни активности поврзани со изградбата на третата делница од железничката пруга кон Република Бугарија.

Проектот опфаќа изградба на:

- 23,4 км железничка пруга со максимална проектирана брзина од 160км/час,
- станица во Крива Паланка,
- станица во Жидилово,
- граничен тунел на Деве Баир,
- 22 тунели со вкупна должина од 9км,
- 52 мостови со вкупна должина од околу 5 км.

Предвидено е пругата да биде целосно електрифицирана, а се очекува изградбата да започне кон средината на 2023 година и да заврши во 2027 година.



НАСЕЛЕНИ МЕСТА НИЗ КОИ ЌЕ МИНУВА ПРУГАТА

За последната делница (третата), пругата ќе поминува низ следните населени места Т'лминци, Градска, Лозаново, Крива Паланка, Дрење, Киселица, Тривоно, Жидилово, Крпа, Узем и Костур.

СОЦИО-ЕКОНОМСКИ ПРИДОБИВКИ ОД ИЗГРАДБАТА НА ПРУГАТА

Изградбата на пругата ќе има важна улога во економскиот и социјалниот развој на регионот пред сè поради можноста за подобро поврзување на земјите од регионот и транспорт на големи количини на стоки и значителен број на луѓе на долги растојанија и за кратко време. Тоа е високо конкурентен енергетски ефикасен вид за копен транспорт и има важна улога во намалување на емисиите на CO2 од секторот транспорт

Контакт информации: **ЈП ЖРСМ Инфраструктура-Скопје**
Трајана Раченска, Тел: 389 2 3227 903
E-mail: trajana.rachenska@mti.mk
www.mti.mk

Figure 22 Leaflet with project main information

13.6. Grievance Form and Grievance Log

<p>Data lodged:</p> <hr/> <p>Remarks:</p> <hr/> <hr/>	<p>GRIEVANCE FORM</p>
<p>Information about the person submitting the grievance</p>	<p>If you do not want to provide the information from 1-3, simply move on to the subject and explanation of the grievance</p>
<p>1. Name</p>	
<p>2. Date, place, and manner of receipt</p>	
<p>3. E-mail and other contact data</p>	
<p>4. Scope of the grievance</p>	
<p>5. Detailed explanation of the subject of grievance (Traffic, Dust, Waste, Pollution, Land access, Working conditions, Contractor activities, Security, Damaged assets, crops, infrastructure, Land acquisition, other.)</p>	
<p>6. Detailed information</p>	
<p>Manner of responding to your grievance</p> <hr/> <p>Date _____</p> <p>Remarks _____</p>	<p>Please specify how you would like to be informed about the further course of the Project:</p>
<p>Processing of the grievance</p>	
<p>Administrative records</p>	
<p>Reviewed (date, responsible party/person)</p>	
<p>Answered (date, responsible party/person, and archive number)</p>	

Template for recording comments, complaints, and grievances

The following template will assist in recording comments, complaints, and grievances for monitoring purposes.

Name/Contact details	Date received	Details of complaint/comment	Responsibility	Actions taken	Date resolved