**ANNEX**

**Comments & Responses on the draft Multiannual Operational Programme “JOBS AND OPPORTUNITIES” 2024-2027**

**for the Republic of North Macedonia**

| **Page number & Paragraph** | **Comment EU DG NEAR** | **Accepted/Not Accepter/Partially Accepted** | **MKD MLSP response on comments** |
| --- | --- | --- | --- |
| General comments referring to all three OPs | In view of the serious concerns regarding the significant delays in the implementation of ongoing IPA II operational programmes, we urge you to take urgent and determined actions to strengthen the administrative capacities, to avoid further decommitments under IPA II and to avoid potentially negative effects on the establishment of the structures for managing funds under IPA III, in particular those related to the Operational Programmes. | Accepted | MLSP has prepared workload analysis and recruitment plan for 2024-2026 period in which the implementation of forthcoming IPA III and current IPA II are foreseen. Based on these documents, restructuring of IPA structure in MLSP and new employments and promotions would be requested. |
| General comments referring to all three OPs | In this regard, the support to Human resources should follow the guidance contained in my letter on “Retention and motivation of staff under IPA III programmes” sent on 17 July 2023 ([[1]](#footnote-1)). This specific support needs to be taken into account in the budget “Other area of support”. | Accepted | Under the OP “Other Area of Support”, the intervention is foreseen in regard to obtaining the retention and motivation measures of staff salaries under IPA III OP. |
| General comments referring to all three OPs | There is the need to apply a holistic approach in the Operational Programmes, including a mix of investments and activities to strengthen capacities, improving legal and regulatory frameworks, and fostering sector reforms. | N/A | This OP envisages all types of investments and activities that are focused to support the capacity building, implementation of regulatory and strategic framework and supporting the reforms in areas of employment and social policies. |
| General comments referring to all three OPs | Update the budget and EU contribution per year in the Operational Programmes, in line with the final budget allocations of the Commission, in year 2024. | Accepted | The budget and EU contribution per year under section 7 of OP has been revised in line with the final budget allocations of the Commission, in year 2024. |
| General comments referring to all three OPs | When appropriate, consider adding Twinning as a possible implementation modality. Please note that no budget support is possible under Operational Programmes. | Accepted | Twinning contract, as modality is envisaged under Areas of Support 1 and 2 of the OP. |
| General comments referring to all three OPs | Please add indicative list of major projects for the whole duration of the Operational Programme, when relevant. | N/A | There are no major projects under this SOP. |
| General comments referring to all three OPs | Please make sure that the terminologies are in line with the Prespa agreement. | Accepted | The terminology has been re-checked and where needed; changes are made in OP document in line with the Prespa agreement terminologies. |
| General comments referring to all three OPs | Please make sure that references to the European Commission’s Report on North Macedonia are accurate, and update as necessary in line with the 2023 Commission Report when available.  | Accepted | It is noted that references to the latest European Commission’s Report on North Macedonia have been integrated within the OP (accurate and updated) and when 2023 Commission Report is available, it will have included accordingly.  |
| General comments referring to all three OPs | Please update the references to bilateral actions that are being programmed under IPA 2024 in line with the Commission’s outcome of the maturity assessment and quality review. | Accepted | It is noted that references to bilateral actions that are being programmed under IPA 2024 in line with the Commission’s outcome of the maturity assessment and quality review have been integrated under section 4.1. of the OP.  |
| General comments referring to all three OPs | Please refer to ‘alignment’ or ‘harmonisation’ instead of ‘transposition’, which is used for EU member states. | Accepted | It is noted that the OP has been revised accordingly and where necessary the terms ‘alignment’ or ‘harmonisation’ have been used instead of ‘transposition’.  |
| General comments to the OP | Considering the broad scope of the proposed Programme (which entails promotion of active labour markets measures, social inclusion and poverty reduction actions, as well as a strong focus on alignment with EU acquis and related enhancement of administrative capacities), and while confirming that the concept of Youth Guarantee remains essential, we propose to look carefully at the different components of the Programme and in particular at the outputs under the Area of Support “Employment and Labor Mobility” with the aim of balancing more the focus between the different categories (young people, long-term unemployed, Roma and women), also by revising the proposed budget allocated if needed. | Accepted | Different components of the Programme and in particular at the outputs under the Area of Support “Employment and Labour Mobility” were considered while finalizing the OP document. More thorough attention was put during preparation of OIS and development of grant action application by ESARM, in which the support of the different categories (young people, long-term unemployed, Roma and women), will be elaborated. Thus, the provision of active labour market programme and measures and employment services to the different categories will be ensured. |
| General comments to the OP | Please integrate environment and climate change aspects to align with the European Green Deal. Include sustainable, promising and growing sectors such as environment jobs linked to sustainable infrastructure, digital and green, renewable energy and energy efficiency, smart agriculture etc.  | Accepted | Comments in regard to environment and climate change aspects are integrated throughout the OP document. |
| General comments to the OP | Please reduce the number of indicators to retain only the most appropriate ones and make sure they are clear.  | Accepted | Comments were accepted and indicators are reduced under Area of Support 1.  |
| Page 31.1. Programme Summary- DAC code(s) | Please add percentage share per sub-code | Accepted | The percentages to sub-codes have been inserted to the OP |
| Page 41.1 Programme Summary- Markers (from DAC form) | It is understood that the programme is fully targeting social benefits and as such will not claim for any environmental marker. However, we still see an opportunity to integrate environment and climate change as themes in discussions and activities. Some suggestions will be introduced in the text below. To be noted that, in a neighbouring country (BiH), the results of a survey show the youth would like to get insights, trainings and capacity building in the green digital field, it is relevant to consider this is a subject of interest and promise for jobs for youngsters.  | Accepted | Revised. Considering the adjustments made within the OP it can be stated that OP will contribute to a significant objective of climate change adaptation through promotion of green jobs and digitalisation. |
| Page 41.1 Programme Summary- Internal markers and Tags | Please tick one of the options/tags | Accepted | Revised. Connectivity is marked as principal objective. |
| Page 51.1 Programme Summary- Amounts concerned | Please revise in line with the updated EU contribution allocation for year 2024. | Accepted | Revised based on revised table under section 7. |
| Page 61.2 Summary of the programme – subparagraph 3 | Please take note that facilitating employment access requires, among other tasks, to bring orientation to the youth about accurate and promising sectors; it is therefore recommended to include sectoral guidance on environment jobs linked to sustainable infrastructure, digital & green, clean energy, smart agriculture, etc. | Accepted | Adjustments in the OP are made so they highlight more promotion of green jobs and digitalisation. The adjustments are made further in the text of the OP. |
| Page 72.1 National sectoral policies and context - IPA III Strategic Response, subparagraph 3 | Please note suggested text inserted. | Accepted | Inserted.  |
| Page 112.1 National sectoral policies and context - Institutional framework for the employment sector, subparagraph 3 | Please take note that it may be beneficial to liaise also with private sector partners, confederations, chamber of commerce and other bodies which enable identifying the growing sectors with need for competencies (including new trends such as green economy) | Accepted  | Integrated in the text.  |
| Page 152.7 Socio-economic analysis (including SWOT analysis) - Labour Market developments | Please add if possible sectoral information, such as on the identification of recruiting sectors, new trends (e.g. Digital & green). | Accepted | Added according to the comment. Recruiting sectors and new trends particularly green jobs and digitalisation are elaborated in the paragraph Employment. |
| Page 162.7 Socio-economic analysis (including SWOT analysis) - Labour market activity rate, subparagraph 8 | Please review this reference, as currently the author of the report is not indicated. If published, the link can be inserted in the footnote. | Accepted | Link to the report published on State Statistical Office of North Macedonia is inserted. |
| Page 172.7 Socio-economic analysis (including SWOT analysis) – Employment, subparagraph 7 | Please see same comment on previous page. | Accepted | Link to the report published on State Statistical Office of North Macedonia is inserted. |
| Page 262.7 Socio-economic analysis (including SWOT analysis) – Standard of living, subparagraph 5 | Please also consider programmes to improve access to green energy and energy efficiency, as they also improve the standard of living and reach a combined social and environmental impact | Partially Accepted | Under section Intervention Logic, aspects of combined social and environmental impact of actions are addressed. |
| Page 282.7 Socio-economic analysis (including SWOT analysis) – Social entrepreneurship | Please consider that many social entrepreneurs often target combined sustainability goals (environmental & social together) | Accepted | The output 1.3. that relates to boosting social entrepreneurship is revised to highlight also activities related to sustainable development and circular economy. |
| Page 343.1 Coherence with the IPA III Programming Framework and with the specific policy instruments of the enlargement process – subparagraph 8 | You may add some sectoral information on the growing sectors, such as Renewable Energy and Energy Efficiency, sustainable housing, mobility and infrastructure, smart cities & agriculture, etc.Please make sure this is reflected concretely in the intervention logic, as a pragmatic outcome and outputs. | Accepted | Comment addressed. The changes in the OP have been made in order to highlight more contribution to green transition and sustainable development. |
| Page 364.1 Interaction of the programme with IPA III annual action plans or measures and interventions from other donors/International Financial Institutions – subparagraph 5 | Please review, so that it is in line with the information in the adopted Action Document. | Accepted | Comment accepted and paragraph revised. |
| Page 364.1 Interaction of the programme with IPA III annual action plans or measures and interventions from other donors/International Financial Institutions – subparagraph 6 | Please revise this paragraph in line with the updated IPA 2024 action document following the Commission's maturity assessment and quality review. | Accepted | Comment accepted and paragraph revised. |
| Page 384.2.1 Intervention Logic | Please make sure that the alignment to the Green Deal and the orientation to green jobs and new sustainable sectors / transition, which is one of the objectives, is preserved in the intervention logic. | Accepted | Comment accepted as the output 1.3. Boosted development of social and micro-enterprises for (self)employment among vulnerable groups was revised to highlight focus on green and circular economy. In addition, within the description of activities it was emphasized that part of the ALMPs will focus on gaining skills for green and digital transition as well it will support green and digital jobs. |
| Page 394.2.1 Intervention Logic – subparagraph 6 | Please consider reformulating this paragraph to make it clearer. | Accepted | Comment accepted and paragraph revised. |
| Page 394.2.1 Intervention Logic – subparagraph 9 | Please note, it is key to flow the youth to growing and promising sectors of interest. Please add some guidance on green economy and insert key words into the framework | Accepted | Revision has been done within the description of activities where it was emphasized that part of the ALMPs will focus on gaining skills for green and digital transition as well it will support green and digital jobs. |
| Page 404.2.1 Intervention Logic – outputs | Better to use improve as the situation on the youth employment is not good at the start so as to enhance it | Accepted | Revised as suggested. |
| Page 404.2.1 Intervention Logic – outputs | Please keep in mind that there is a need for sectoral orientation to adjust to labour market needs and demand and focus the youth on sectors that will employ in the future. | Accepted | Added according to the comment. Recruiting sectors and new trends particularly green jobs and digitalisation are elaborated in the paragraph Employment. |
| Page 424.2.2 Detailed description of each area of support AoS 1- Impact, outcome, and output indicators | This indicator is not clear. Please clarify. | Accepted | Revised in line with YG indicators.  |
| Page 424.2.2 Detailed description of each area of support AoS 1- Impact, outcome, and output indicators | Please take note that there are too many indicators. It is therefore suggested to eliminate some and retain only the most appropriate ones. | Accepted | The output indicators have been revised (4 indicators removed) and most appropriate were retained. |
| Page 424.2.2 Detailed description of each area of support AoS 1 - Impact, outcome, and output indicators | Please add some features about sustainable / green / circular economy and adjustment of available labour force with needs of the growing sectors. | Not Accepted  | Although OP will indeed result with some indicators on the level of creating green jobs and/or training for green and digital transition, as it was suggested in previous comment to decrease the number of output indicators, it was decided not to propose such additional indicators in the OP. |
| Page 444.2.2 Detailed description of each area of support Output 1.1. - Delivery methods | Neither in this area of support or in the following ones, twinning is considered as a possible implementation modality, while twinning offers valuable support for aligning with EU acquis and increase institutional capacity. Twinning could be particularly useful also for the third area of support (other support). Therefore, we suggest including grant (e.g. twinning) among the delivery methods. | Accepted | The delivery methods in AoS 1 and AoS 2 have been revised to include twinning possibility as well. |
| Page 454.2.2 Detailed description of each area of support Output 1.1. - End recipients and target groups | Recommend to include the Ministry of Environment | Not Accepted | The role of Ministry of Environment isn't recognized as relevant in the case of this output so they are not added. |
| Page 454.2.2 Detailed description of each area of support Output 1.1. - Conditions | More involvement of ESA at this stage would be beneficial (i.e MA or IBPM). | Not Accepted | In the process of development of this OP and establishment of the operating structure for OP it was discussed to introduce ESA as Intermediate Body however due to current lack of capacities withing the ESA it was decided that they should be beneficiaries of the OP in order to focus better on provision of the YG and ALMPMSs planned within OP.  |
| Page 474.2.2 Detailed description of each area of support Output 1.3. - Description of eligible activities, including major projects | Please provide an open view of the possibilities for social entrepreneurship, including environmental, biodiversity and climate change features | Accepted | Adjustment of this output was made to enhance focus on social enterprises in green and circular economy. Through the activity 2 within this output a opportunity for green enterprises to be developed will be provided. |
| Page 474.2.2 Detailed description of each area of support Output 1.3. - End recipients and target groups | Recommend to include the Ministry of Environment | Not Accepted | The role of Ministry of Environment isn't recognized as relevant in the case of this output so they are not added. |
| Page 504.2.2 Detailed description of each area of support Output 1.4. - Delivery methods | Please take note that explanation on the delivery methods under output 1.4 should be more generic, even though ILO is the natural implementing partner when it comes to support social dialogue | Accepted | The paragraph on delivery method has been revised to be more generic, as suggested. |
| Page 514.2.2 Detailed description of each area of support Output 1.3. - End recipients and target groups | Recommend to include the Ministry of Environment | Not Accepted | The role of Ministry of Environment isn't recognized as relevant in the case of this output so they are not added. |
| Page 524.2.2 Detailed description of each area of support AoS 2- Impact, outcome, and output indicators | It is very good that an OPSYS indicator is used, thus the OP will contribute to corporate reporting. It is suggested to use more OPSYS indicators, where possible | Accepted | The indicator in overall OP have been revised in line with OPSYS where it was possible.  |
| Page 544.2.2 Detailed description of each area of support Output 2.2. - Delivery methods | Please update in line with the updated IPA 2024 action document following the Commission's maturity assessment and quality review. | Accepted | Updated with Commission's maturity assessment and quality review. |
| Page 574.2.2 Detailed description of each area of support Output 3.1. - End recipients and target groups | Recommend including the Ministry of Environment | Not Accepted | The role of Ministry of Environment isn't recognized as relevant in the case of this output so they are not added. |
| Page 574.2.3 Indicative List of major projects per each area of support  | Please include under this section, your indicative list of major projects, if any (> 15mln)..The IPA III implementing regulation requires to have a list of major projects (if relevant) for the whole duration of the OP and not only for year 1 - 2024. | Accepted | OP in whole programming period does not contain major project as it is defined within IPA III implementing regulation.  |
| Page 574.3 Mainstreaming | The initial text submitted only refers generally to the Green deal but the intervention logic loses the details. When adding additional details concerning Green Deal, please reflect them in the intervention logic. | Accepted | Adjustment above in the OP were made to highlight additionally contribution to climate change and environmental protection through promotion of green jobs and digitalisation. |
| Page 574.3 Mainstreaming | We are glad environment aims to be mainstreamed in this Programme. We would like to see it concretely in the outputs, please add reference to green elements as suggested or other items when relevant | Accepted | Adjustment above in the OP were made to highlight additionally contribution to climate change and environmental protection through promotion of green jobs and digitalisation. |
| Page 574.3.1. Environmental Protection, Climate Change and Biodiversity | Please consider also provision of sectoral orientation on labour market opportunities, sensitisation on circular economy, environment, biodiversity and climate change | Accepted | Included in the description of activities under the Area of Support 1. |
| Page 614.4 Risks and Assumptions | Please add the risk of missing the green transition and not preparing for the jobs of the future. | Accepted | Added as suggested in the table. |
| Page 657. Financial tables by areas of support and by year (including co-financing rates) | Please review and update this table in line with the updated EU contribution allocation for year 2024. | Accepted | Revised with latest allocations.  |
| Page 689. Strategic communication and public diplomacy | Please refer to the new 2022 Guidelines and use the correct template text | Accepted | Revised according to the new 2022 Guidelines and new template text. |

**EC comments on the outcomes of the relevance assessment for North Macedonia Operational Programmes 2024-2027 proposals and responses of the national authorities**

As a result of the assessment, the proposed actions were assigned a colour code according to three categories as follows:

1. green: the action is considered relevant and can be developed into an action document taking into account minor modifications/recommendations;
2. yellow: the action is considered relevant and can be developed into an action document subject to significant modifications, mainly concerning the purpose, the budget, or the implementation modality;
3. red: the action is not relevant vis-à-vis the EU policy framework or proposed implementation timeframe.

**Window 4**

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| Operational Programme in the Social Sectors (Jobs and Opportunities) | 40 000 000  | Green | **EC comments from relevance assessment** | **MKD MLSP response on comments** |
| The areas of employment and social protection/assistance are aligned with the IPA III Programming Framework and with both EU and national policy priorities, focusing on recommendations from the Enlargement Package and ERP. It could be useful to also add a reference to the Youth Action Plan in EU external action. | Comment was accepted and a reference was added for the Youth Action Plan in EU External Action. |
| Although one of the three objectives of the OP is focused on Education, little intervention is expected in this sector (mainly early childhood education and in relation with the Youth Guarantee, inclusion of Validation of non-formal and informal learning by Employment Services Agency, expansion of second chance programme to offer return to formal education as part of the Youth Guarantee offer). | Following the instructions during initial preparation activities of programming, the education as area of support has not been noted by EUD/ EC services. The instructions have been based on sector readiness to those sectors that could deliver and implement the operational programmes, among which the sectors of employment and social policies have been identified. The interventions under this OP foresee those actions that fall under the competences of MLSP and the institutions under its scope of actions. |
| The proposal does not refer to the Green Agenda/green mainstreaming. This should be reinforced (i.e. by promoting actions on green jobs creation and social economy).  | Comments in regard to Green Agenda / green mainstreaming (environment and climate change aspects) are integrated throughout the OP document. |
| The proposal does not refer explicitly to regional programmes with which complementarity is needed (i.e. ESAP, Multi country action on the EU ILO facility for the Youth Guarantee, relevant TA actions implemented by SOCIEUX+).  | Update of information integrated under section 4.1 |
| On Gender, the document is well linked to the National Strategy for gender equality and Strategy for development of Women’s Entrepreneurship 2019-2023 as well as to the forthcoming regional action (IPA 2024) EU4 Gender equality – Women’s Economic empowerment and Safety. It would be useful to include specific language on how Objectives 1.1 and 1.3 will address gender inequality more in detail. | Comment was accepted and gender sensitive language is used through the OP document, while it will also be considered during the implementation of OP actions. |
| Regarding the budget, the amount allocated to Social Dialogue although relatively smaller than for other areas, seems a bit excessive (EUR 2.5 million). It would be good to understand which activities are planned more in detail. The Youth Guarantee will receive almost half of the total funds (EUR 22 million). According to the Youth Guarantee Implementation Plan (YGIP) for 2023-2026, the funding required for the implementation is EUR 55, 710, 570 million of which 89% is funded by the national budget of North Macedonia. Since the OP will cover the period 2024-2027, it seems there is not full correspondence in terms of timing with the YGIP. The amount for which the YGIP refers directly to funding from the OP is around EUR 3.7 million (1.355.118.303,15 denar (MKD) for concrete measures. There are also additional enabling measures, which are not costed in the YGIP. Based on the level of detail of the information available in the fully-fledged OP document, there is the need to check in detail how the budget is planned over the period 2024-2027 and ensure it corresponds with the YGIP 2023-2026.  | The budget foreseen for social dialogue activities has been estimated, as per the sectoral needs in the country, to the amount of EUR 2.1 million as direct award contract to ILO for provision of specific expertise in this area and an amount of EUR 0.72 million as a grant scheme foreseen to be implemented by social partners.During the preparation of OP document, it was elaborated that current YGIP 2023-2026 is a strategic frame that envisions all programmes and measures. The IPA III SOP funds would support those ALM programmes and measures and employment services of YGIP 2023-2026 that would support the youth in NEET at labour market. This completely means those ALMPMESs would be considered as inputs during preparation and implementation of Annual Operational Plans for ALMPMESs. |
| Roma Integration constitutes a specific area of support in the operational programme. It is suggested to mainstream Roma inclusion beyond its specific area of support by adding Roma wording when relevant. For instance, Area of support 1) Youth Guarantee and 2) Employment among vulnerable groups - could specifically mention young Roma and Roma women, as school drop-off and unemployment rates are higher as regards those groups.  | The issues related to Roma integration are considered throughout the OP document as cross-cutting issue, especially under Area of Support 1. |
| In the section related to Coherence and complementary with main Enlargement policy documents, it is suggested to refer to the Poznan Commitments as they are the main roadmap for Roma integration in the enlargement process of the Western Balkans. | Comment was accepted and text was revised under section 4.1. |
| To improve complementary with other IPA programmes, it is suggested to mention specifically other Roma inclusion actions, such as ROMACTED programme, which aims at involving municipalities in North Macedonia in producing innovative urban plans and legalising dwellings.  | Comment was accepted and text was revised under section 4.1. |
| Welcome that explicit reference is made to the Green Deal and the need in helping Europe’s workforce to acquire the new skills they need. However, missed opportunity to further elaborate on (or even mention) the green agenda:* There are no further references to national or international environmental transition policies or initiatives that can be linked to the social and education agenda.
* Education needs for a green transition are significant (see [QuickTips on INTEGRATING CLIMATE CHANGE AND ENVIRONMENT IN THE EDUCATION SECTOR](https://europa.eu/capacity4dev/public-environment-climate/documents/quick-tips-integrating-climate-change-and-environment-education-sector)).
 | Comments in regard to Green Agenda / green mainstreaming (environment and climate change aspects) are integrated throughout the OP document. More attention will be placed during preparation of project documents. |
| The green transition will lead to opportunities for new types of jobs and enterprises in virtually all sectors (see for example [QuickTips on Integrating the environment and climate change in and by digitalisation](https://europa.eu/capacity4dev/public-environment-climate/documents/quick-tips-integrating-environment-and-climate-change-and-digitalisation)).  | Comments in regard to the Green Agenda / green mainstreaming (environment and climate change aspects) are integrated throughout the OP document. More attention will be placed during preparation of project documents. |

1. () Ares(2023)4949678 of July 2023 [↑](#footnote-ref-1)