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LIVELIHOOD RESTORATION PLAN (LRP)

Gas Interconnector between North Macedonia and Greece

COUNTRY:
NORTH MACEDONIA

Date:
April 2026

PREPARED BY:
NORTH MACEDONIA

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Executive Summary

This Livelihood Restoration Plan (LRP) has been prepared for the Gas Interconnector between North Macedonia and Greece in accordance with the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (ESP) and Performance Requirements (PRs) 2019, specifically PR5 on land acquisition, restrictions on land use and involuntary resettlement.

The Project requires temporary and permanent land acquisition for pipeline construction, above-ground installations (AGIs), block valve stations, access roads, and associated infrastructure. This LRP outlines the principles, eligibility criteria, entitlements, livelihood restoration measures, grievance mechanisms, institutional responsibilities, monitoring framework, and budget necessary to ensure that affected persons are compensated at replacement cost and that livelihoods are restored to at least pre-project levels.

The Plan applies to privately owned land, government-owned land and mixed (state and private) owned land subject to temporary occupation, easement establishment, or permanent acquisition. Special consideration is given to vulnerable households, women, elderly persons, and economically affected farmers.

1. Introduction

The purpose of this LRP is to ensure that Project Affected Persons (PAPs) are not worse off as a result of the Project and that livelihoods are restored in line with the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (ESP) and Performance Requirements (PRs) 2019, specifically PR5 on land acquisition, restrictions on land use and involuntary resettlement. The Plan sets out mitigation measures for economic displacement resulting from land acquisition.

Belnigo Consulting ("Service provider") has been engaged by TSG Industry Service LLC Skopje ("The Company") to prepare a Livelihood Restoration Plan (LRP), in accordance with the terms, conditions and requirements of the EBRD, for Gas Interconnector between North Macedonia and Greece (the Project), on the territory of North Macedonia.

The pipeline will extend from the border between North Macedonia and Greece in the vicinity of the village of Idomeni and the town of Gevgelija to the existing valve station BS8 located near the town of Negotino. The total length of the pipeline within the territory of North Macedonia will be approximately 66.7 km.

The total project footprint is approximately 174 hectares, with the majority (around 75 %) situated on government-owned land. Land acquisition impacts will be either permanent or temporary. Further details on project land requirements are provided in section 2.6 Project Land Rights and Land Requirements. The project could lawfully resort to requesting the Government of the Republic of North Macedonia (GoNM) to declare the land to be of public interest and initiate the process of expropriation on behalf of the project. Resettlement refers to both physical displacement (relocation or loss of shelter) and economic displacement (loss of assets and/or loss of access to assets resulting in loss of income sources or other means of livelihood), arising from project-related land acquisition or restrictions on land use. In the context of this LRP, particular attention is given to economic displacement and the requirement to restore or, where possible, improve affected persons' livelihoods and living standards in accordance with EBRD PR5. Resettlement[1]. It is considered involuntary when affected individuals or communities do not have the legal right to refuse project-related land acquisition or restrictions on land use. This situation may arise where land is acquired through compulsory procedures, or through negotiated settlements in which the acquiring party can ultimately resort to lawful expropriation if negotiations fail.

As part of the ESIA process, a Land Acquisition and Resettlement Policy Framework (LARPF) was prepared in 2022. A resettlement framework establishes the overarching principles and approach for managing land acquisition, resettlement and livelihood restoration in situations where the

[1] Involuntary resettlement refers to physical displacement (relocation or loss of shelter) and economic displacement (loss of assets or loss of access to assets that leads to loss of income sources or other means of livelihood) resulting from project-related land acquisition or restrictions on land use.

precise scope, scale or timing of land acquisition or restrictions on land use cannot yet be determined due to the stage of project development.

In December 2025, following the availability of more detailed project information, the preparation of this Livelihood Restoration Plan (LRP) was initiated. The purpose of the LRP is to document the land acquisition and resettlement process and to demonstrate the Project Proponent's commitment to addressing impacts on project-affected persons (PAPs) in accordance with applicable national legislation and Good International Industry Practice (GIIP) on involuntary resettlement. The LRP covers privately owned plots affected by the Project and government-owned plots.

This LRP focuses on addressing impacts related to **economic displacement** resulting from the Project. The Project does not envisage physical resettlement, and a large part of the expropriation has already been performed. Relocation will be avoided wherever feasible. Where avoidance is not possible, appropriate provisions for physically displaced households will be incorporated into the relevant resettlement planning instruments in accordance with applicable standards.

The primary objective of this LRP is to restore, and where possible improve, the livelihoods and standards of living of PAPs to pre-project levels and, where feasible, to improve their socioeconomic conditions. For this LRP, PAPs are individuals or entities experiencing economic displacement, meaning they will incur full or partial loss of income sources, livelihood activities, assets, or access to assets as a direct result of the Project.

In accordance with the methodology outlined in Section 4, and based on the information available at the time of reporting, the LRP applies to the following categories of PAPs:

- Private landowners of land parcels subject to economic displacement.
- Tenants with recognized rights (established through written or verbal agreements with landowners) occupying privately owned land parcels affected by the Project.
- Informal users of privately owned land parcels affected by the Project.
- Concession holders of state-owned land parcels affected by the Project.
- Informal users of state-owned land parcels affected by the Project.

This LRP is a living document and will be reviewed and updated as necessary throughout Project development and implementation.

The structure of the LRP is as follows:

- Legal and policy framework, including applicable standards
- Scope and identification of PAPs
- Livelihood baseline conditions
- Livelihood restoration measures and entitlement framework
- Implementation arrangements, monitoring and reporting

2. Project Description

The Project involves the construction of a cross-border natural gas interconnector between North Macedonia and Greece.

The pipeline will traverse agricultural land, pastures, and selected private and state-owned parcels. Temporary impacts are expected during construction, while permanent impacts relate primarily to easement restrictions.

2.1 Project Overview

The **Gas Interconnector North Macedonia – Greece** is a cross-border natural gas transmission pipeline developed by the Government of the Republic of North Macedonia as part of the national strategy for the development of the **National Gasification System**.

The project aims to establish a new natural gas interconnection between North Macedonia and Greece, thereby improving security of supply, diversifying gas import routes, and facilitating integration into regional and European energy markets.

North Macedonia has limited domestic energy resources and relies heavily on imported energy, with an estimated import dependence of approximately 67%. The national energy balance is currently dominated by petroleum products and solid fuels, while natural gas represents a relatively small share of total final energy consumption.

According to the National Energy Strategy (2020–2025), the role of natural gas is expected to increase in the medium term as the country gradually reduces the use of lignite and increases the share of renewable energy sources, particularly wind and solar power. Natural gas is expected to serve as a transitional fuel supporting the decarbonisation of the energy sector until 2050, including the provision of flexible generation capacity to balance intermittent renewable energy production and supply energy to industrial and commercial consumers.

The existing gas transmission system in North Macedonia consists primarily of a single import route from Bulgaria and approximately 98 km of transmission pipeline supplying gas to Skopje. Although expansion of the national transmission and distribution networks is ongoing, the country currently relies on a single supply corridor.

The proposed interconnector will connect the Macedonian gas transmission system to the Greek gas network, enabling access to additional gas supply sources and routes, including regional transmission systems and liquefied natural gas (LNG) import infrastructure. The project will form an integral component of the National Gasification System.

2.2 Project Location

The pipeline will extend from the border between North Macedonia and Greece in the vicinity of the village of Idomeni and the town of Gevgelija to the existing valve station BS8 located near the town of Negotino.

The total length of the pipeline within the territory of North Macedonia will be approximately **66.7 km**. The pipeline route has been selected to follow technically feasible corridors while avoiding environmentally and socially sensitive areas where possible.

The Project is located in the south-eastern part of North Macedonia and traverses four municipalities:

- Gevgelija
- Bogdanci
- Demir Kapija
- Negotino

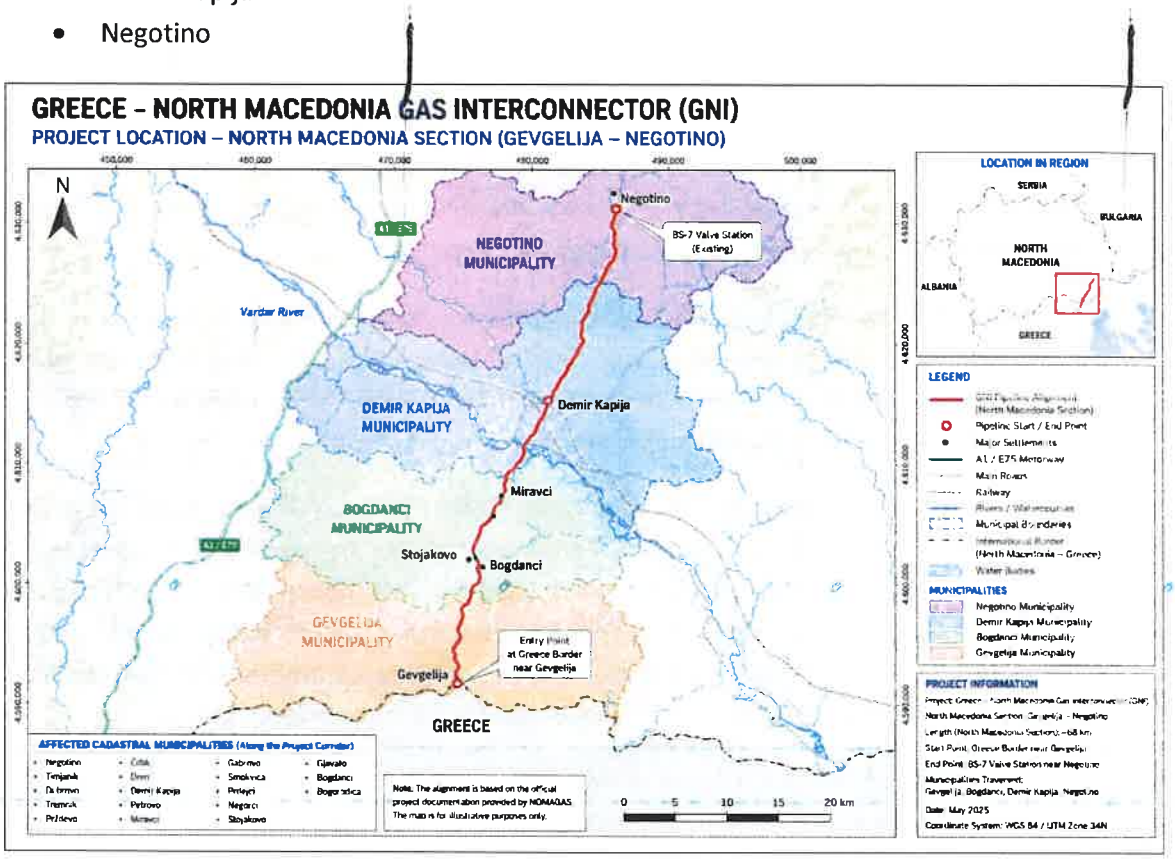


Figure 2-1 Location of the North Macedonian section of the Greece–North Macedonia Gas Interconnector. The approximately 67 km pipeline extends from the Greece–North Macedonia border near Gevgelija to the existing BS-7 valve station near Negotino, traversing the municipalities of Gevgelija, Bogdanci, Demir Kapija and Negotino. The figure also indicates the principal settlements, transport infrastructure and administrative boundaries relevant to the Project Area and Livelihood Restoration Plan.

The alignment generally follows the Vardar Valley corridor and passes through predominantly agricultural landscapes characterized by arable land, vineyards, orchards, pastureland and rural settlements. The Project corridor intersects a number of cadastral municipalities and agricultural areas where land acquisition and temporary land occupation are required for construction and operation of the pipeline.

Table 2-1 Key Features of the Project Location

Map Feature	Description
Project Alignment	Approximate route of the North Macedonian section of the Greece–North Macedonia Gas Interconnector extending from the Greece–North Macedonia border near Gevgelija to the BS-7 valve station near Negotino.
Municipal Boundaries	Municipalities traversed by the Project corridor, including Gevgelija, Bogdanci, Demir Kapija and Negotino.
Affected Cadastral Municipalities	Cadastral municipalities located within the land acquisition and construction corridor, where Project-related impacts on land and livelihoods have been identified.
Settlements	Principal settlements located within or adjacent to the Project corridor, including Gevgelija, Bogdanci, Stojakovo, Miravci, Demir Kapija, Negotino and other affected communities.
Transport Infrastructure	Major transportation infrastructure within the Project Area, including the A1/E75 motorway, regional road network and the international railway corridor.
Hydrology	The Vardar River and associated tributaries characterise the Project landscape and influence local agricultural activities and land use patterns.
International Boundary	State border between North Macedonia and Greece marking the southern entry point of the interconnector.
Agricultural Areas	Predominantly agricultural land comprising arable fields, vineyards, orchards, pastureland and other productive rural land uses relevant to the livelihood assessment.
LRP Area of Influence	Geographic area considered for livelihood restoration planning, including land acquisition areas, temporary construction zones, access routes and adjacent areas where livelihood impacts may occur.

2.3 Technical Characteristics

The project consists of the construction and operation of a **DN700 (28-inch) high-pressure natural gas transmission pipeline.** The pipeline will be installed at a minimum cover depth of approximately 1 m along the entire route, except at crossings and other locations where greater burial depths may be required in accordance with engineering and safety requirements.

An optical cable conduit will be installed alongside the pipeline to enable communication, monitoring and operational control.

The main technical characteristics of the pipeline are:

- Pipeline diameter: DN700 (28")
- Pipeline length: approximately 66.7 km
- Installation type: underground
- Pipeline material: high-strength steel
- Communication infrastructure: optical cable conduit

Project Components

The Project will include the following main components:

- Underground gas transmission pipeline
- Optical cable conduit installed along the pipeline route
- Cleaning stations (pig launcher and pig receiver)
- Pressure reducing station
- Pipeline isolating block stations
- Cathodic protection system

Above-ground installations will be limited to operational facilities required for safe and reliable functioning of the pipeline.

The main above-ground facilities and their approximate chainages are presented in Table 2-2.

The facilities will be designed in accordance with applicable national legislation and relevant European and international standards for gas transmission infrastructure.

General description of the route

The gas pipeline will start at the border with Greece in the vicinity of Idomeni village and the town of Gevgelija. The endpoint will be at the existing valve station (block station BS8) in the vicinity of the town of Negotino – see route map on **Error! Reference source not found.**

The project comprises an underground gas pipeline, cleaning stations (pig launcher and receiver), a pressure reducing station, pipeline section isolating block stations, and cathodic protection units, as shown in the table below.

Table 2-2 Project Underground and Aboveground Facilities

Description	Length or Chainage
Gas Pipeline, DN700 (28"), optical cable conduit	Length: 66.7km
Cleaning Station (pig launcher/receiver)	6+735km
Cleaning Station (pig receiver)	66+055km
Pressure Reducing Station	66+275km
Block Station I1	6+860km
Block Station I2	28+730km
Block Station I3	51+160km
Block Station I4/I5	66+440km
Cathodic Protection Unit 1	6+860km
Cathodic Protection Unit 2	27+830km
Cathodic Protection Unit 3	51+060km

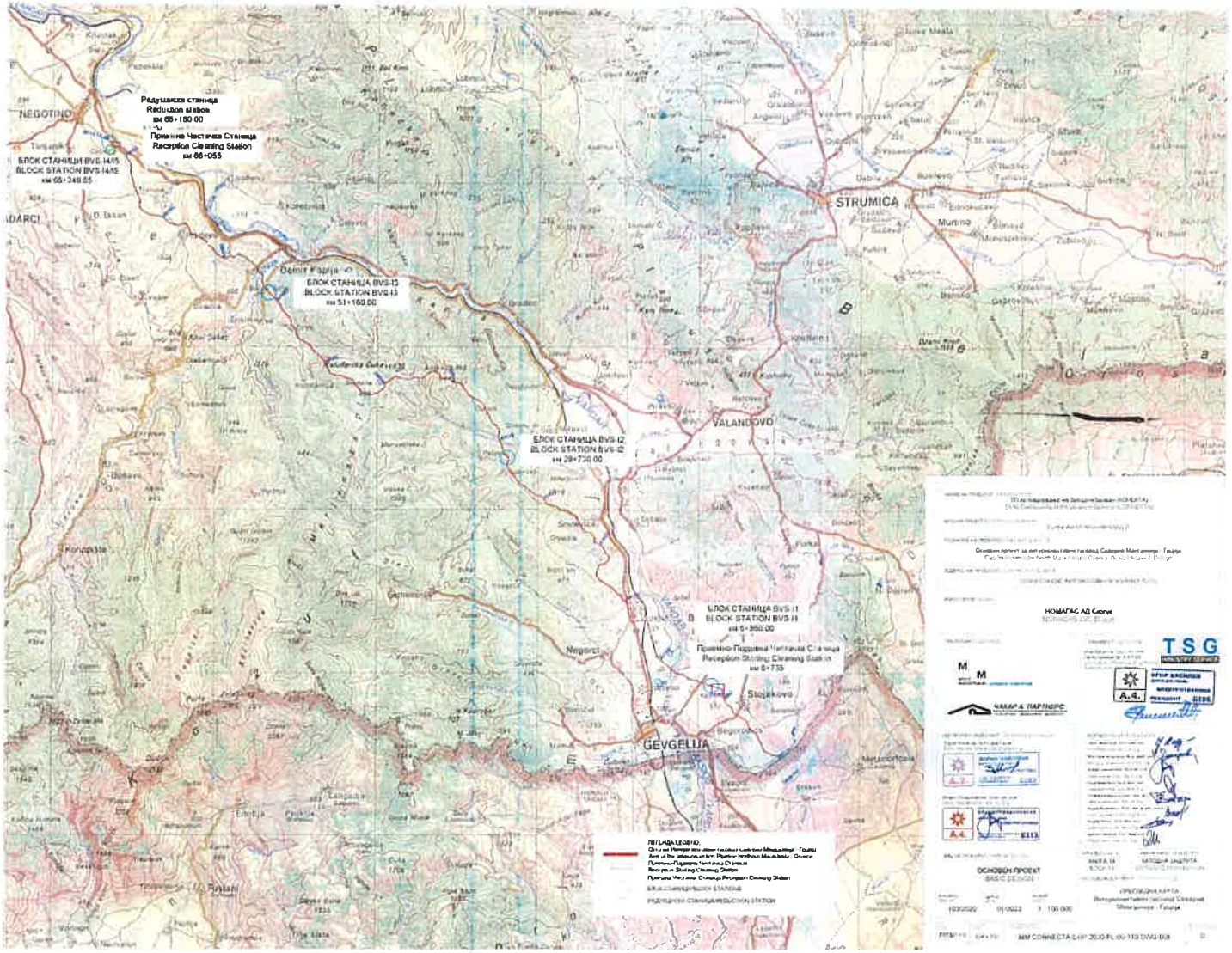


Figure 2-2 Pipeline Route Map

Along its entire route the pipeline intersects with above-ground and underground infrastructure and water bodies as outlined in Table 2-3 below:

Table 2-3 Summary of pipeline crossings along the route

#	Type of crossing	Quantity
1	**Railway**	1
2	**Roads**	
	Local roads	7
	Regional roads	4
	Highway	4
	Unpaved roads	141
3	**Water bodies**	
	Rivers	18
	Canals	26
4	**Underground infrastructure**	
	Oil pipeline	6
	Telecommunication cables	12
	Water supply pipes	42
	Sewage pipes	2
	Irrigation pipes	5
	Underground power cable	2
5	**Overhead transmission lines**	
	0.4kV	2
	10kV	10
	35kV	6
	110kV	6
	4000kV	7

2.4 Assessment of Project Alternatives to Avoid or Minimise Involuntary Resettlement Impacts

The objective of this subchapter is to demonstrate compliance with the EBRD mitigation hierarchy, whereby projects must avoid and when avoidance is not possible, minimize and mitigate project impacts and show that resettlement impacts were not incidental but carefully considered during project development.

2.4.1 Avoidance and Minimization of Resettlement Impacts

The project design process prioritised avoiding and minimising land acquisition and resettlement impacts wherever technically and economically feasible. Avoidance of physical displacement constituted one of the primary criteria applied during the routing and siting of the pipeline and its associated facilities.

During the route selection and engineering design process, several additional principles were applied. These included maximizing the use of state-owned land wherever possible, minimizing the need for acquisition of privately owned land and land used by tenants, and avoiding environmentally and socially sensitive receptors. Particular attention was given to reducing

potential impacts on perennial agricultural plantations, biodiversity-sensitive areas, residential zones and settlements, as well as sites of cultural heritage significance.

An analysis of project alternatives was undertaken during the Feasibility Study prepared by Nomagas in January 2019, to identify the technically feasible, environmentally sound, and socially acceptable pipeline alignment. The alternatives assessment considered multiple routing options and evaluated them against a range of criteria including technical feasibility, safety requirements, environmental constraints, social sensitivities, and land acquisition implications.

The outcomes of this assessment informed the selection of the preferred pipeline route and the siting of associated facilities. Nevertheless, certain technical, safety, regulatory, and environmental constraints limited the extent to which further avoidance of land acquisition could be achieved.

All relevant documentation, supporting data, and the detailed analysis of alternatives are presented within the Environmental and Social Impact Assessment (ESIA) and associated Project design documentation.

2.4.2 "Do Nothing" Alternative

As described above, the Greece–North Macedonia Gas Interconnector will connect the national gas transmission network of North Macedonia with the Greek gas network, enabling diversification of natural gas supply sources and improving the security of energy supply. The project is also expected to support economic development and contribute to improved air quality through increased availability of natural gas.

The "Do Nothing" alternative assumes that the proposed project would not be implemented. Under this scenario:

- The diversification of natural gas supply sources and overall security of supply in the national gas system would remain limited.
- National strategic objectives in the energy sector and planned investments would be negatively affected.
- Implementation of the EU Economic and Investment Plan for the Western Balkans would be constrained.
- Opportunities for regional and national economic development associated with increased natural gas availability would not be realized.
- Potential improvements in air quality through substitution of more polluting fuels and future development of combined heat and power (CHP) facilities would be reduced.
- No employment opportunities would be generated during project construction or operation.
- No environmental or social impacts associated with the project would occur, including impacts related to land acquisition.

While the "Do Nothing" alternative would avoid project-related environmental and social impacts, it would also prevent the realization of significant strategic, economic, and

environmental benefits. Given that the anticipated project impacts are limited and can be effectively mitigated, the "Do Nothing" alternative is not considered a viable option.

2.4.3 Adopted Alternative

The pipeline route was selected following an extensive alternatives assessment undertaken during the feasibility stage. Initial route selection focused on identification of potential macro-corridors, with key criteria including minimization of pipeline length and alignment with existing infrastructure corridors where feasible.

During the detailed design phase for the North Macedonian section, alternative route alignments were further assessed to optimize the pipeline route while addressing environmental, social, and cultural constraints and ensuring technical feasibility and safety. The design process involved close coordination between Nomagas, the ESIA team, and the engineering design team to ensure early integration of environmental and social mitigation measures and good international construction practices.

Route selection prioritized minimizing impacts on settlements, infrastructure, and land users. Residential and urban areas were avoided where possible to eliminate the need for physical displacement. For example, significant sections of the pipeline are located several hundred meters from the urban areas of Gevgelija, Bogdanci, Demir Kapija, and Negotino. In addition, the alignment prioritized state-owned land over privately owned land to the maximum extent feasible (see Table).

Table 2-4 Land Parcels Affected by Permanent and Temporary Land Acquisition

Ownership	Number of parcels affected by permanent land acquisition				Number of parcels affected by temporary land acquisition			
	No. of parcels	% per parcel	Area m2	% by area	No. of parcels	% per parcel	Area m2	% by area
Private owned	394	40	88,873	17	841	44	225,634	18
State owned	582	58	370,548	73	1,048	54	938,491	76
Co-owned state / private	11	1	14,145	3	17	1	34,059	3
Companies	18	1	37,621	7	26	1	31,124	3
TOTAL	**1005**	**100**	**511,187**	**100**	**1,932**	**100**	**1,229,308**	**100**

Breakdown in detail per cadastral municipality, temporary vs permanent in m^2 and % was provided by the project proponent and presented in **Appendix 1.**

Additional efforts were made to minimize impacts on the recreational area near Demir Kapija, including the **Akvatika campsite and adjacent fishponds** located at chainage Km 52+490. To avoid potential impacts on the campsite and adjacent fishponds at **Akvatika Fishpond**, the Project design incorporates a trenchless crossing method, whereby the pipeline will be installed beneath both the river and the fishpond area. This measure has been specifically selected to minimise disturbance to existing land uses, aquatic resources, and associated economic activities.

Additional site-specific mitigation measures will be implemented during construction, as required, to ensure the continued functioning of the fishpond and related facilities.

Several route adjustments were also introduced during the design phase in response to urban planning requirements through the e-Urbanizam system and recommendations from the Environmental and Social Impact Assessment (ESIA) and the Ministry of Environment and Physical Planning (MoEPP).

Table 2-5 Route Modifications during Design

Chainage	Reason for modification	Influence	Comment
4.5-5.0km	Overlap with urban plans	Social	Houses near Rudina
12.5 - 14.0km	Overlap with urban plans	Social	Houses in v.Prdejtsi
15.0 - 17.0km	Avoidance of archaeological site	Social, Cultural	archaeological site at 15+500
27.0 - 29.5km	Avoidance of archaeological site	Social, Cultural	archaeological site at 28+000
33.5 - 42.0km	Overlap with urban plans	Social, Biodiversity	Important Bird Area Demir Kapija
50.0 - 52.5km	River crossing; avoid existing infrastructure	Social, Biodiversity	Recreational and bike trails, fishponds and campsite Akvatika
55.0 - 60.0km	Avoidance of archaeological site	Social, Cultural	Houses in v.Przdevo and archaeological site
64.0 - 67.4km	Overlap with urban plans	Social	Private investment

2.5 Residual Land Acquisition Impacts

Despite the application of avoidance and minimization measures during the project design and route selection process, certain land acquisition and temporary land use impacts were unavoidable due to the linear nature of the pipeline and associated safety and engineering requirements. The construction of the underground high-pressure gas transmission pipeline required the establishment of a permanent Right-of-Way (RoW), temporary construction working areas along the pipeline corridor, and land for above-ground installations and ancillary facilities.

As a result, the Project required the acquisition of privately owned land parcels and the temporary use of agricultural land during construction activities, affecting landowners and land users within the Project Area of Influence.

At the time of preparation of this Livelihood Restoration Plan (LRP), the land acquisition process is largely finalized or in its final stages. The purpose of the LRP is therefore to assess the impacts resulting from land acquisition, verify if the compensation has been provided in accordance with applicable national legislation, and identify any additional measures required to restore or improve the livelihoods of affected persons, where necessary, in accordance with the requirements of EBRD PR5.

2.6 Project Land Rights and Land Requirements

The Project requires different types of land rights depending on the infrastructure component. Land required for Above-Ground Installations (AGIs), including valve stations and associated operational facilities, is generally subject to permanent acquisition due to operational, safety and

access requirements. These areas remain under the control of the Project throughout its operational life and are no longer available for previous land uses.

In contrast, the underground pipeline corridor is typically secured through a permanent easement. Under this arrangement, ownership remains with the affected landowner, while restrictions are imposed on certain activities such as construction of permanent structures, deep excavation and tree planting. Following reinstatement, agricultural activities may generally continue within the easement area subject to these restrictions.

In addition, temporary occupation of land is required during construction for the working strip, equipment access, material storage and other construction-related activities. These areas are expected to be reinstated following completion of construction. Figure 2-3 presents a schematic illustration of the different land rights and land requirements associated with the Project.

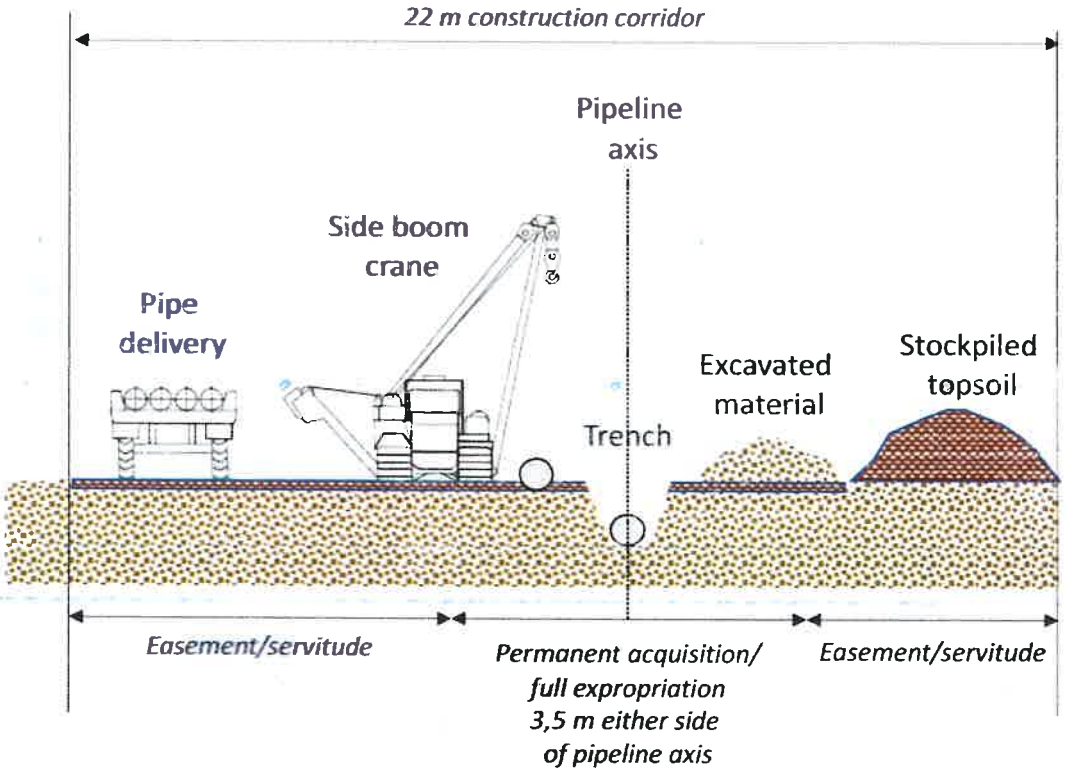


Figure 2-3 Land rights and land requirements associated with the Project

Table 2-6 Project Land Needs Identified – Interconnector Route

Category	Number of Parcels	Area (m²)	% of Total Area
Total Project Footprint	1.128	1.740.495	100
State-owned parcels	566	1.306.895	75,09
Privately owned parcels	531	367.399	21,11
Mixed ownership parcels (state/private)	9	48.204	2,77
Parcels with no registered ownership	22	17.997	1,03
Private Land Acquisition Status (as of 01.12.2025)			
Total privately owned parcels	531	367.399	100
Fully acquired parcels	499	297.506	80,98
Pending acquisition parcels	32	69.893	19,02
Remaining private owners / co-owners	41	N/A	N/A
Leased State Land (Ministry of Agriculture, Forestry and Water Economy)			
Previously leased parcels	99	179.215	100
Status	All lease agreements formally terminated	—	—

Table 2-7 Project Features and Summary of Land Acquisition and Land Use Impacts

Features	Description / Observation	Type of Land Agreement	Land Use Restrictions	Permanent or Temporary Land Use Effect
Gas transmission pipeline	Underground DN700 (28-inch) high-pressure natural gas transmission pipeline, approximately 66.7 km in length, installed beneath the surface along the entire route	Expropriation (private land), administrative allocation (state land), easement[2] where applicable	Operational and safety buffer zones; restrictions on construction of permanent structures within the corridor	Permanent land use effect within designated pipeline corridor and safety zones
Optical cable conduit	Underground communication and monitoring conduit installed alongside the pipeline for operational control	Included within pipeline easement / expropriation arrangements	No separate surface restrictions beyond pipeline safety zone	Permanent installation with no additional surface land impact
Pipeline corridor ownership structure	1,128 cadastral parcels: 566 state-owned, 531 privately owned, 9 mixed ownership, 22 parcels without registered ownership	Expropriation or easement	Use restrictions defined by easement agreements and safety requirements	Permanent or partial restrictions depending on parcel status
Private land acquisition status	499 of 531 privately owned parcels fully acquired; 32 parcels pending; 41 remaining affected owners/co-owners	Expropriation process ongoing for remaining parcels	Pending parcels subject to acquisition and compensation procedures	Permanent land transfer upon completion of acquisition
Mixed ownership parcels	9 parcels [3] with combined state and private interests -mixed ownership	Split agreements or cadastral resolution procedures[4]	Use rights defined by agreements	Permanent land use arrangement
State-owned land	566 parcels	Administrative allocation for project use	Operational restrictions within pipeline safety zone	Permanent allocation for project operations
Parcels without registered ownership	22 parcels	Legal regularisation prior to project use	Use subject to cadastral confirmation	Pending resolution
Leased[5] land under concession	99 parcels previously leased ~~from~~by the Ministry of Agriculture and Water Economy (agreements terminated) (clarified in following 2.8.1 chapter	Lease termination completed	No remaining contractual restrictions	Land available for project use

[2] According to Article 9 of the Law on Expropriation, a complete expropriation is carried out, which means that the ownership is taken away and the right of ownership of the Republic of Macedonia is established. According to Articles 10 and 11 of the Law on Expropriation, an incomplete expropriation is carried out, i.e. the right of servitude (easement) for a fixed period is established. The establishment of the right of servitude for a fixed period limits the right of ownership.

[3] A cadastral parcel may have multiple private owners, and may be partly private and partly state-owned. "Cadastral parcel" is a basic cadastral unit that is a piece of land not smaller than 1 m², defined by boundaries, located in a cadastral municipality and belonging to a specific holder(s) of ownership.

[4] Some of these plots are owned by the state, while others are owned by private owners. Since there is no physical division, it is not known which part of the plot belongs to whom, but the property deed contains information about who has what ideal share.

[5] According to the Law on Agricultural Land, the lease agreement is concluded between the MAFWE as the lessor and the lessee, who can be a legal entity or a natural person.

Above-ground installations	Cleaning stations (pig launcher/receiver), pressure reducing station, isolating block stations, cathodic protection system	Expropriation or allocation of small operational plots	Operational safety zones around facilities	Permanent land use for operational infrastructure
Land use restrictions	Pipeline safety and operational buffer zones; easements where applicable	Easement agreements or regulatory restrictions	No permanent structures within safety zones; limited land use permitted (e.g., agriculture where compatible)	Permanent restrictions within designated zones
Temporary land occupation	Construction areas and access routes	Temporary occupation agreements	Restoration obligations after construction	

Note: With regard to cadastral parcels where the registered owner is deceased, relocated, or otherwise unavailable, and in accordance with Article 29-a of the Law on Expropriation, the expropriation authority appoints a temporary representative designated by the Bar Association of the Republic of North Macedonia. The temporary representative safeguards the rights and interests of legal heirs identified under applicable inheritance rules, as well as owners whose residence or whereabouts are unknown, until the adoption of the expropriation decision. The costs of the temporary representative are borne by NOMAGAS JSC Skopje. To date, 35 cadastral parcels have been processed under this procedure. No compensation payments are currently made in such cases due to the absence of identified eligible recipients; however, budget provisions for expropriation are secured annually within the financial plan of NOMAGAS JSC Skopje. Upon identification of legal heirs or re-establishment of contact with relocated or absent owners, expropriation compensation procedures are resumed and due payments are made accordingly. Pursuant to Article 18 of the Law on Expropriation, the right to claim compensation for expropriated immovable property is not subject to limitation periods.

2.7 Lease Beneficiaries under Agreements Administered by the Ministry of Agriculture, Forestry and Water Economy (MAFWE)

The Project traverses state-owned agricultural land leased by the Ministry of Agriculture, Forestry and Water Economy (MAFWE) to individual and corporate users for agricultural production and other economic activities. Lease beneficiaries and concessionaires whose land use rights, agricultural production, income generation, or access to livelihood resources may be affected by the Project are considered Project Affected Persons (PAPs) under this Livelihood Restoration Plan (LRP).

For this LRP, the terms "concessionaire", "lease beneficiary" and "leaseholder" refer to the same category of PAPs, namely individuals or legal entities holding rights to use state-owned agricultural land under agreements administered by MAFWE. While MAFWE and related administrative procedures commonly use the term "concessionaire", the legal relationship is established through lease agreements. Accordingly, the terms are used interchangeably throughout this LRP.

Information obtained from MAFWE identified lease agreements on 99 cadastral parcels located within the Project corridor, covering a total area of approximately 2,568,167 m². Following verification of the affected areas and review of the legal status of individual agreements, it was determined that formal lease termination procedures were required for 69 cadastral parcels. For the remaining parcels, either the leased area did not overlap with the portion affected by the Project or the lease agreement had already expired or otherwise ceased to be valid.

In accordance with the Law on Agricultural Land, different legal procedures apply depending on the nature and duration of the Project impact. For land permanently required for the pipeline corridor and associated facilities, lease agreements are terminated for the affected portion of the parcel. For land temporarily required during construction, a right of real easement is established while the lease agreement remains in force.

The legal basis for these procedures is established under Articles 35 and 13-a of the Law on Agricultural Land. Article 35 provides for partial termination of lease agreements where state-owned agricultural land is permanently converted for infrastructure or facilities of public interest, while Article 13-a provides for the establishment of easement rights on state-owned agricultural land. Lease agreements concluded between MAFWE and lease beneficiaries explicitly provide that the lease may cease to be valid for land that permanently loses its agricultural status due to construction of infrastructure or facilities of public interest.

For affected parcels, the competent authorities issue Decisions on Partial Lease Termination and/or Decisions Establishing Easement Rights, as applicable. These decisions define the affected area and specify the compensation payable to lease beneficiaries.

Where lease agreements are partially terminated, compensation funds are deposited by NOMAGAS JSC Skopje with MAFWE, which subsequently transfers the compensation to the

affected lease beneficiaries. Where easement rights are established, compensation is paid directly by NOMAGAS JSC Skopje to the lease beneficiary. In cases involving temporary easements, the lease agreement remains in force and only temporary restrictions on land use apply during the construction period.

Table 2-8 Overview of State-Owned Agricultural Land under Lease Affected by the Project

Category: identified	Number / Area	% of Total Parcel Area
Total number of concession parcels	99	–
Total concession land area (state-owned)	2,568,167 m²	100%
Total affected area (temporary + permanent)	179,215 m²	6.98%
Permanently affected area	54,159 m²	2.11%
Temporarily affected area	125,056 m²	4.87%
Category: determined	**Number / Area**	**% of Total Parcel Area**
Total number of concession parcels	69	–
Total concession land area (state-owned)	2,066,246 m²	100%
Total affected area (temporary + permanent)	148,066 m²	7.16%
Permanently affected area	44,757 m²	2.16%
Temporarily affected area	103,309 m²	4.99%

The affected area represents a relatively small proportion of the total leased land area. In most cases, lease beneficiaries retain access to and use of the unaffected portions of their leased parcels. Lease beneficiaries were informed during the implementation of lease termination and easement procedures, and no significant concerns regarding continued use of the remaining unaffected portions of leased land have been identified to date.

To support the assessment of potential livelihood impacts, the Project reviewed available information on lease beneficiaries occupying state-owned agricultural land affected by the Project. The review identified a range of agricultural activities, including vineyards, cereal production, wheat cultivation, olive plantations, apricot production and aquaculture facilities. In one case, although a lease agreement remains in force, field verification confirmed that the plantation is abandoned and no active cultivation is taking place.

Table 2-9 Overview of Lease Beneficiaries (Concessionaires) on State-Owned Agricultural Land

Concessionaires	Cadastral Parcels	Crop Type (if informed)
Concessionaire 1	CP 1890/5; CP 1890/10; CP 1890/11; CP 1890/6; CP 1890/12 CM Tremnik CP 878/1; CP 1031/1 CM Przdevo CP 465/1; CP 431/1; CP 464/1; CP 460; CP 461; CP 457; CP 459; CP 456; CP 431/3; CP 448; CP 445/1; CP 444; CP 440; CP 462; CP 454; CP 455; CP 452; CP 453; CP 449 CM Dubrovo	Although there is a lease, the plantation is abandoned, and the land is not cultivated
Concessionaire 2	CP 471/3 CM Dubrovo	Vineyard plantation
Concessionaire 3	CP 1205/2 CM Demir Kapija	Vineyard plantation
Concessionaire 4	CP 1357 CM Demir Kapija	Fish pond/Fish farm
Concessionaire 5	CP 439/2 CM Dren	Vineyard plantation

Concessionaires	Cadastral Parcels	Crop Type (if informed)
Concessionaire 6	CP 362 CM Chiflik	Vineyard plantation
Concessionaire 7	CP 1887 CM Tremnik	Vineyard plantation
Concessionaire 8	CP 854 CM Tremnik	Vineyard plantation
Concessionaire 9	CP 854 CM Tremnik	Vineyard plantation
Concessionaire 10	CP 1274 CM Demir Kapija	Vineyard plantation
Concessionaire 11	CP 1254/1; CP 2158/10 CM Prdejtsi	Vineyard plantation
Concessionaire 12	CP 2163/1 CM Prdejtsi	Vineyard plantation
Concessionaire 13	CP 1559/12; CP 1559/19 CP 1559/23 CM Negorci	cereal plantation
Concessionaire 14	CP 3661/2; CP 3661/4; CP 3682/35; 3682/37 CM Bogorodica	Vineyard plantation
Concessionaire 15	CP 2057 CM Prdejtsi	wheat plantation
Concessionaire 16	CP 636/8; CP 638/1 CM Prdejtsi	Vineyard plantation
Concessionaire 17	CP 3659 CM Bogorodica	olive plantation
Concessionaire 18	CP 1570/2; CP 1570/3 CM Bogorodica	Vineyard plantation
Concessionaire 19	CP 866; CP 926 CM Petrovo	Vineyard plantation
Concessionaire 20	CP 867; CP 927 CM Petrovo	Vineyard plantation
Concessionaire 21	CP 900; CP 896; CP 874/2; CP 880; CP 1097; CP 1075; CP 1074; CP 1072; CP 1118; CP 1126; CP 1125; CP 1124; CP 1135; CP 1139/1 CM Tremnik	Vineyard plantation/apricots

The valuation of crops, plantations and agricultural production losses was undertaken in accordance with the Methodology for Valuation of Assets in Agriculture (Official Gazette of the Republic of Macedonia No. 171/11). The methodology applies standardized approaches for determining the value of agricultural assets and production losses using official market price data, average crop yields and agricultural production cost calculations. Input parameters included official announcements of agricultural product prices from green markets, wholesale markets and livestock markets, statistical data on crop and plantation yields by municipality, and production cost calculations prepared by the Institute of Agroeconomics at the Faculty of Agricultural Sciences and Food, Ss. Cyril and Methodius University in Skopje.

The affected lease beneficiaries were informed of Project activities and construction works through a combination of written notifications, direct communication by the Project Proponent, and engagement undertaken by the Contractor prior to commencement of works.

Table 2-10 Notification of Affected Lease Beneficiaries

Method of Notification	Number of Lease Beneficiaries
Written notification	1
Telephone notification by the Project Proponent	5
Notification by the Contractor	15
Total	21

Affected lease beneficiaries have the right to challenge decisions relating to lease termination, easement establishment, or compensation through the competent judicial authorities. Where no legal challenge is submitted within the prescribed period, the decisions become final and legally binding.

In addition to statutory administrative and judicial remedies, all affected lease beneficiaries have access to the Project Grievance Mechanism. The mechanism provides an accessible and transparent process for raising concerns, seeking clarification and obtaining resolution of Project-related grievances. Access to the Project Grievance Mechanism does not prejudice the right of affected persons to pursue remedies through administrative or judicial procedures at any stage of the process.

The assessment undertaken for this LRP indicates that the majority of affected lease beneficiaries are engaged in commercial agricultural production, with vineyards representing the dominant land use. The proportion of leased land affected by the Project is relatively limited and the majority of impacts are temporary in nature. Compensation provided under the national framework addresses losses associated with lease termination, temporary land-use restrictions, crop losses and affected agricultural assets. Furthermore, lease beneficiaries generally retain access to the unaffected portions of their leased parcels and may continue agricultural activities within easement areas following completion of construction and reinstatement of the land.

Based on the information available during preparation of this LRP, no significant residual livelihood impacts have been identified that would require dedicated livelihood restoration measures beyond compensation and the monitoring commitments described in this Plan. Nevertheless, affected lease beneficiaries remain eligible to access the livelihood restoration measures, stakeholder engagement processes and grievance mechanisms established under this LRP should unforeseen livelihood impacts arise during construction, reinstatement or operation of the Project.

3. Legal and Policy Framework

This LRP complies with:

- Law on Expropriation of the Republic of North Macedonia[3]
- Law on Property and Other Real Rights
- EBRD Environmental and Social Policy (2019)[5]
- EBRD Environmental and Social Requirement 5 (October 2024)

A gap analysis has been conducted to ensure that where Macedonian law differs from ESR5, the higher standard shall apply.

3.1 Applicable Laws and Regulations of North Macedonia

3.1.1 Land Ownership Rights and Land Classification in North Macedonia

In North Macedonia land can be owned by the State (the Republic of North Macedonia (RNM)), municipalities or the city of Skopje, or legal and natural persons. The sub-forms of ownership right include co-ownership and joint ownership. Other land tenure rights include the right of easement, right of long-term lease, collateral right, and real encumbrance right[6].

Land is classified into i) fertile land, ii) infertile land, and iii) land under water[7]. Each of these is further categorised by 'cadastral culture' in terms of methods and possibilities for use of land for production purposes.

Fertile land refers to fields, rice fields, gardens, orchards, vineyards, meadows, pastures, forests, giant reeds and marshlands.

Infertile land includes naturally infertile land (e.g., rocks, stone heathland, etc.), and artificially infertile land, which refers to 'land for construction' for which an urban/spatial planning documentation or an infrastructure design project has been adopted[8]. Land for construction splits into built and unbuilt land. Built land comprises land under buildings, yards, roads, railroads and other linear infrastructure facilities, graveyards, religious objects, etc.

Land under water includes land under both running waters (streams and rivers) and standing waters (natural and artificial lakes and swamps).

3.1.2 Summary of Key Laws and Regulations

The RNM legislation comprises a number of legal acts to regulate land use, land acquisition/land ownership rights transfer, land use restrictions, and related compensations for affected parties. The key applicable laws and regulations are briefly reviewed in the table below.

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[6] Law on Property and Other Real Property Rights ("Official Gazette of the Republic of Macedonia" 18/01, 31/08), 92/08, 139/09 and 35/10), Article 170.

[7] Ibid, Article 76.

[8] Law on Land for Construction ("Official Gazette of the Republic of Macedonia" No. 15/15, 98/15, 193/15, 226/15, 31/16, 142/16, and 190/16, and "Official Gazette of the Republic of North Macedonia" No. 275/19), Article 2.

Table 3-1 Key Laws and Regulations of North Macedonia on Land Acquisition and Physical and Economic Displacement

Legal Acts	Key Issues Related to Land Acquisition and Displacement
Constitution of the Republic of North Macedonia (RNM)	The Constitution guarantees legal protection of the ownership rights, protection of land and natural resources by the State, and gender equality in the context of property rights.
Law on Property and Other Real Property Rights ("Official Gazette of the Republic of Macedonia" 18/01, 31/08), 92/08, 139/09 and 35/10)	The law regulates the right of ownership and other real rights (the right of easement, the right to a real burden, etc.).
Law on Real Estate Cadastre ("Official Gazette of the Republic of Macedonia" 55/13, 41/14), 115/14, 116/15, 153/15, 192/15, 61/16, 172/16 ,64/18, 124/19,71/20 and 155/24)	The law regulates the establishment and maintenance of real estate cadastre (registration of ownership and other real estate rights, real estate data and other rights and facts whose registration is stipulated by law). It stipulates principles of cadastral classification of land (by 'cadastral culture'). It also includes provisions on management of geodetic works, real property surveys performed in service of the real estate cadastre, property valuation, supervision over geodetic works performed by authorized surveyors and companies for, as well as the status, organization, functioning and authorizations of the Agency for Real Estate Cadastre.
Rulebook of the Method of Cadastral Classification and Determination and Registration of the Change of Cadastral Culture and Land Class ("Official Gazette of RM 144/13, 95/15, 149/17, 128/15 and 95/15)	The rulebook defines methods for cadastral classification of land and provisions on change of a cadastral culture, as well as change of a land class (for agricultural land only).
Law on Agricultural Land ("Official Gazette of the Republic of Macedonia" 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 "Official Gazette of RNM" 181/19, 161/19, 80/20, 178/21, 91/23, 218/24 and 235/24)	The law regulates the use, disposal, protection, and conversion for agricultural land (i.e., a change of the cadastral culture and land class).
Law on Land for Construction ("Official Gazette of Republic of Macedonia" 15/15, 98/15), 193/15, 226/15, 31/16, 142/16, 190/16 and "Official Gazette of RNM" 275/19, 90/20, 101/21, 153/23, 61/24, 224/24, 233/24 and 87/25)	The law regulates the rights and obligations related to land for construction (land designated for construction of residential, industrial, commercial or infrastructure development per the spatial/urban planning or infrastructure design documentation). The law elaborates on the structure of this land category, conditions for use of such land, provisions on land management, as well as other issues related to this land category.
Law on Expropriation ("Official Gazette of Republic of Macedonia" 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16, 178/16 and "Official Gazette of RNM" 122/21, 111/23, 208/24 and 258/25)	The law regulates the procedure for acquisition (which is referred to as 'expropriation') of land and assets (e.g., structures) for projects that are of public interest and the associated rights for immovable properties. It specifies the purposes for which the land / asset can be expropriated or restricted in use. Projects of public interest are those covered by various planning documents and deemed to be of strategic and public interest for the country. The law provides a list of projects of public interest, and pipeline construction projects fall under this category. The law determines procedures for full expropriation (permanent acquisition), establishing an easement (incomplete expropriation) and temporarily occupying (leasing) land/assets. It also states that compensation for the acquired land and assets should be provided in the form of either a replacement property or in cash. Cash compensation cannot be lower than the market value of the affected properties. The market value of the expropriated immovable property is determined by an authorised property valuator / surveyor in accordance with the Law on Appraisal. Where another immovable property is offered as compensation for the expropriated asset, it should be close to the value of this asset.
Law on Obligations ("Official Gazette of Republic of Macedonia" 18/01, 78/01, 04/02, 59/02, 05/03, 84/08, 81/09, 161/09, 23/13, 123/13 with later amendments, 89/20, 215/21, 154/23 and 220/23)	The law requires provision of compensation in cash to formal legal owners of land and assets (or those whose rights are recognisable under national laws) for damages or losses incurred as a result of investors/contractors (or others) accessing

Legal Acts	Key Issues Related to Land Acquisition and Displacement
	land or preventing access to land and/or assets. Compensation is provided after the damages and/or losses have already occurred.
Law on Appraisal ("Official Gazette of Republic of Macedonia" 115/10, 158/11, 185/11, 64/12, 188/141, 104/15, 153/15, 192/15, 30/16, 71/20 and 86/25)	The law regulates the areas, conditions and methods for performing appraisal, subjects to appraisal; the procedures of taking a professional exam, issuing or revoking the appraisal license, awarding appraisal tasks, and reimbursing costs of performed appraisal, the competence, organization and operation of the Chamber of Valuers of the RNM, as well as other issues related to appraisal.
Methodology for Assessment of the Market Value of Real Estate ("Official Gazette of Republic of Macedonia" 54/12, 17/13, 21/13 and 142/14)	The regulation defines the procedure of valuation of agricultural land when there is a need for estimating the market value of affected land and assets within the expropriation procedure.
The Law on Expert Review ("Official Gazette of Republic of Macedonia" 115/10, 149/12, 12/14, 43/14, 104/15, 148/15, 192/15 and 64/18)	The law regulates the procedure for expert reviews, and the areas, conditions and manner of performing expert reviews. It contains qualifications of entities performing such reviews, provisions for renumeration, etc.
The Law on Administrative Disputes ("Official Gazette of Republic of Macedonia" 62/06, 150/10 and "Official Gazette of RNM" 96/19, 150/24 and 220/24)	The law stipulates on procedures for ensuring judicial protection of the rights and legal interests of individuals and legal entities in the court via administrative disputes.
Law on Social Welfare ("Official Gazette of Republic of Macedonia" 79/09, 51/10, 36/11, 51/11, 166/12, 15/13, 79/13, 148/13, 164/13, 187/ 13, 38/14, 44/14, 116/14, 180/14, 33/15, 72/15, 104/15, 150/15, 173/15, 192/15, 30/16, 163/17 and 51/18)	The law includes provisions on social welfare payments and services to vulnerable residents under different circumstances.
Law on Spatial and Urban Planning ("Official Gazette of the RNM" 32/2020, 111/23, 73/24, 171/24, 224/24, 40/25, 101/25 and 127/25)	The law determines aims of such planning which includes among others ensuring organised and rational use of space, as well as improving living and working conditions for citizens.
Law on Construction ("Official Gazette of the Republic of Macedonia" 130/09, 124/10, 18/11, 36/11, 49/11, 54/11, 59/11, 13/12, 39/12, 144/12, 25/13, 70/13, 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, and 168/18, and "Official Gazette of the RNM 244/19, 18/20, 89/20, 279/20, 96/21, 227/22, 111/23, 115/23, 72/24, 224/24, 225/24, 3/25, 17/25, 87/25, 101/25, 250/25 and 269/25)	The law introduced general requirements to the construction works including required studies and surveys and site preparation works, the necessary project documentation for obtaining a construction permit, the rights and the obligations of the participants in the construction as well as other important issues related to construction works.
The Rulebook on Technical Conditions and Norms for Safe Transport of Liquid and Gaseous Hydrocarbons with Main Oil and Gas Pipelines and with Oil and Gas Pipelines for International Transport (Official Gazette 26/1985)	The regulation determines zones of restricted land use along the operational gas pipelines.

3.1.3 Land and Other Asset Acquisition Procedure

The land acquisition process for the projects of public interest is regulated by the Law on Expropriation. The law distinguishes the following types of land acquisition processes applicable to infrastructure projects of public interest at the national level:

- **Complete expropriation** is when ownership rights on land and assets of previous owners are obtained by the State (RNM), i.e., permanent land acquisition (Art. 9);

- **Incomplete expropriation** (Art. 10) when the right of ownership or other property rights to land of the previous land owners are restricted for a defined period of time or on a permanent basis; incomplete expropriation includes, inter alia:
    1. **Establishment the right of easement** to ensure the construction of a facility of public interest or operation of the built facility (Art. 10);
    2. **Temporary occupation of land** of project sites/routes to conduct geological, geotechnical, hydrological and other necessary studies and surveys (Art. 15);
    3. **Temporary occupation of land** that is adjacent to project sites/routes (Art. 17) to meet specific construction needs (placing the construction machinery, temporary storage of structures and materials, etc.); land next to construction sites may be temporarily occupied for a period of up to two years.

The land acquisition procedure comprises the following steps that are detailed further:

1. Preparation of the Expropriation Proposal;
2. Land and assets inventory and valuation;
3. Notification of affected owners & invitation to hearing;
4. Expropriation Decision, including judicial appeal(s) (if needed);
5. Hearing on the Expropriation Decision;
6. Payment of compensation.

Preparation of the Expropriation Proposal relies on information from various studies, including e.g., an Expropriation Study/Geodetic Report, which provides a list of all the affected land plots, registered assets (i.e., structures) and their owners/right-holders, as recorded in the real estate cadastre. The Expropriation Proposal shall be submitted to the 'Expropriation Authority' that is the municipal office of the Department for Property & Legal Issues of the Ministry of Finance[9] or to the RNM State Attorney.

The proposal is supported by the following documents (Art. 26, Law on Expropriation):

(i) an extract of the spatial planning act or approved infrastructure development project;
(ii) a geodetic report with data on properties to be expropriated;
(iii) an offer for compensation equivalent to the market value of the affected property determined by a qualified appraiser per the Law on Appraisal;
(iv) title deed for the property being expropriated;
(v) a proof that the compensation fund is available for the property to be expropriated; and
(vi) other data related to the real estate and to the owner.

[9] Ministry of Finance is in charge of implementing land acquisition by the Republic of Macedonia (for projects of public interest).

After the municipal bodies accept the Expropriation Proposal, they request its submitter to transfer funds in the amount of the estimated value of the real estate to be expropriated, on a deposit account.

A **land and assets inventory and a valuation** are completed by certified evaluators from the *Bureau for Assessment and Valuation*. The inventory will provide basic information on affected land plots (i.e., total area and area to be acquired, land use and land category) and all assets located on them (structures, crops, trees, orchards, businesses, etc.). The inventory covers assets both registered in the real estate cadastre and not registered. Valuation determines the market value of assets, and this information should be part of the Expropriation Proposal. More details about the Land Valuation Process are given in Appendix 2.

Notification of affected owners & invitation to hearings: within five days of receiving the Expropriation Proposal, the Expropriation Authority sends the individual Expropriation Proposals to affected asset owners/right-holders. Thereby, the owners/right-holders are informed about the compensation amount and are individually invited to a *hearing* (i.e., an individual meeting). The meeting is to occur within 15 days of receiving the Expropriation Proposal by asset owners/right-holders. The meeting is attended by the expropriation initiator (i.e., NER) as well. During the meeting, an amicable **compensation agreement**[10] can be reached. The expropriation initiator acquires ownership of the expropriated property within eight days from the date of reaching the agreement.

However, if the agreement is not reached, while all documents are in due order, the Expropriation Authority adopts an **Expropriation Decision**, within 30 days of receiving the Expropriation Proposal from the initiator. A property right-holder can appeal against this Decision to the Administrative Court[11] within 15 days of receipt of the Decision. If there is no appeal, the Expropriation Decision becomes legally binding.

When the Expropriation Decision becomes final, **a second hearing on Expropriation Decision** must to be held by the Expropriation Authority within eight days to again discuss and determine the level of compensation for each affected owner. If the agreement is reached, the expropriation procedure is finalised. If no agreement is reached on the amount of compensation, the case is submitted by the Expropriation Authority to the courts to decide. The court may commission a separate valuation of the property that will be proposed to the asset owner/right-holder.

Payment of compensation: the expropriation initiator (i.e., Nomagas) shall pay the compensation or provide replacement properties, within 30 days a) of signing a compensation agreement, b) after the court decision relating to the compensation becomes valid, or c) after the Expropriation

[10] This agreement for *payment of compensation* shall be documented in the Minutes of Meeting and include the amount of compensation, deadline for payment, and all data necessary for fulfilling the obligations of the expropriation initiator and the former asset owner/right-holder. The agreement is considered concluded when both parties sign the Minutes. The agreement is the basis for registering the property right to the expropriation initiator and is an executive document.

[11] An affected owner can also choose to file a lawsuit with the relevant administrative court (including a second court appeal to the Higher Administrative Court). The Law on Expropriation sets deadlines for administrative courts to decide on appeals and provides for penalties for non-compliance with these deadlines.

Decision becomes legally binding. For delays in payment, interest rates will apply. Payments to natural and legal persons are made through bank accounts only. Compensation for all expropriated assets and the costs of the procedure are borne by the party initiating the expropriation process

3.1.4 Compensation Related to Acquisition of Land and Other Assets

According to the provisions of the Law on Expropriation, in case of **full expropriation** (Art. 37-44), those who have formal legal rights over properties are entitled to compensation at their market value; this includes land, structures and any other immovable assets. The owner of the asset that is being expropriated has the right to compensation for all plants/crops, sown fields, forests on the land and the orchards, provided that they are not included in the market value of the land.

The law also allows for compensation of lost profit/income of affected formal economic activities resulting from displacement; economic displacement (loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of project-related land acquisition or restriction of access to natural resources.

Compensation cannot be lower than the market value of the affected properties and is estimated based on recent market transactions in neighbouring areas. The market value of the expropriated immovable property is determined by an authorised property valuator in accordance with the Law on Appraisal. Compensation can be provided in the form of either a replacement property or in cash.

Where another immovable property is offered as compensation for the expropriated asset, it should be close to the value of the expropriated asset. National law allows compensation for the loss of profit/income through affected businesses activities, where such scenario was caused by the expropriation process.

The owner of the asset being expropriated is not entitled to compensation for investments made after the **Expropriation Proposal** was delivered to the owner (Art. 40). If the remaining (non-affected) part of the affected land plot becomes inaccessible, unviable for cultivation or economic interest of the owner (so-called 'orphan land'), the owner can request for the entire plot to be expropriated and compensated in full. This request may be submitted **before** the agreement is reached and the **Expropriation Decision** becomes final.

The **compensation for the establishment of the right of easement** includes compensation for the reduced market value of affected land/asset and for damage occurred due to easement right establishment. The compensation is determined on a case-by-case basis by a certified property valuator in accordance with the Law on Appraisal (Art. 45).

The **compensation for the temporary occupation of land** is determined according to the market lease rate for the similar asset and duration of lease. If any damage is caused to the owner of the asset through restriction of his/her land ownership right, the owner has the right to be

compensated. The damage compensation in such cases is determined on a case-by-case basis by a certified expert.

3.1.5 Assistance to Vulnerable People

The legislation of North Macedonia does not envision special measures related to vulnerable groups during land acquisition. Municipal Centres for Social Welfare can provide some assistance, under the Law on Social Welfare. This law enables provision of social welfare payments and services to vulnerable residents. One of the important aspects of social welfare payments under the law stipulates a person's right to be rewarded a one-off financial payment where such person find themselves in a situation of sudden and temporary need, including the provision of housing where the residential property is lost.

Assistance from social welfare authorities can be used to address the needs of persons with disabilities, single headed households, households with low incomes, etc. The national legislation comprises a set of laws under which affected people can be assisted to improve their living standards (access to health care, education, personal documentation, social housing, etc.) and these laws can be used as a basis for developing future livelihood restoration actions, particularly for vulnerable groups.

Legal assistance can be provided to vulnerable people under the Law on Free Legal Assistance[12] by lawyers from the Ministry for Justice and selected citizens' associations.

3.1.6 Land Use Restrictions During Operations

The Rulebook on Technical Conditions and Norms for Safe Transport of Liquid and Gaseous Hydrocarbons with Main Oil and Gas Pipelines and with Oil and Gas Pipelines for International Transport (Official Gazette 26/1985) imposes the following restriction (buffer) zones along the operational pipelines where various land use restrictions are applied.

- Restriction Zone 1 – a land corridor of 5m on both sides of the pipeline axis where it is forbidden to grow plants with roots deeper than 1m and to plough the land for deeper than 0.5m (Art. 8);
- Restriction Zone 2 – a land corridor of 30m on both sides of the pipeline axis where it is forbidden to construct residential buildings (Art. 9)[13];
- Restriction Zone 3 – a land corridor of 200m on both sides of the pipeline axis where population density limits should be adhered to (Art. 10).

[12] Law on Free Legal Assistance ("Official Gazette of the Republic of Macedonia" 161/09, 185/11, 27/14),

[13] As an exception to this provision, residential buildings may be built in a zone narrower than 30 m if their construction was already envisioned by the urban plan before the design of the pipeline and if special protection measures are applied. Thereby the smallest distance between the residential building and the pipeline can be: a) 10 m for a 125 mm diameter pipeline; b) 15 m for a 125 mm to 300 mm diameter pipeline; c) 20 m for a 300 mm to 500 mm diameter pipeline, and d) 30 m for pipelines with diameter larger than 500mm (Art. 9 of the Rulebook).

3.2 EBRD Requirements

The EBRD requires this Project to comply with the EBRD Environmental and Social Policy (2019) and a set of specific Performance Requirements (PRs) covering key environmental and social issues. The LRF considers the requirements of the following EBRD PRs:

- PR1: Assessment and Management of Environmental and Social Risks and Impacts;
- PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement; and
- PR10: Information Disclosure and Stakeholder Engagement.

The EBRD PR1 requires assessing social, including land acquisition-related, risks and impact and developing and delivering the relevant mitigation measures.

The key requirements of the EBRD's PR5 are to:

- avoid or, when unavoidable, minimize involuntary resettlement by exploring alternative project designs;
- mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land by: (i) providing compensation for loss of assets at replacement cost; and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of those affected;
- restore or, where possible, improve the livelihoods and standards of living of displaced persons to pre-displacement levels; and
- improve living conditions among physically displaced persons through the provision of adequate housing, including security of tenure at resettlement sites.

PR5 is applied when resettlement is considered *involuntary*, that is, when affected individuals or communities do not have the right to refuse land acquisition resulting in displacement. EBRD interprets *involuntary resettlement* as referring to both physical displacement (relocation or loss of shelter) and economic displacement (loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of project-related land acquisition or restriction on land use/access to natural resources.

Key PR10 requirements pertaining to stakeholder engagement in the context of land acquisition/resettlement are as follows:

- give affected persons the opportunity to participate in the eligibility requirements, negotiation of the compensation packages, resettlement assistance, suitability of proposed resettlement sites and proposed timing;
- continue consultation during the implementation, monitoring and evaluation of compensation payment and resettlement to achieve outcomes that are consistent with the objectives of PR5; and

- ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

3.3 EIB Requirements

The EIB requires its clients to comply with its Environmental and Social Standards (ESSs) (2018)[14]. This LRF considers the requirements of the following EIB's ESSs:

- Standard 1: Assessment and Management of Environmental and Social Impacts and Risks;
- Standard 6: Involuntary Resettlement;
- Standard 7: Rights and Interests of Vulnerable Groups; and
- Standard 10: Stakeholder Engagement.

The EIB's key requirements are similar to those of the EBRD.

3.4 Gap Analysis

This section reviews the national legislation, which regulates land acquisition for public needs (expropriation legislation) and livelihood restoration issues against the relevant EBRD and EIB requirements. The detailed analysis as well as suggested measures to address the gaps are provided in **Table 3-2**.

[14] EIB Environmental and Social Standards, Version 10.0 of 08/10/2018 https://www.eib.org/attachments/strategies/environmental_and_social_practices_handbook_en.pdf

Table 3-2 Resettlement Gap Analysis: North Macedonian Legislation vs. EBRD and EIB Land Acquisition Requirements

Issue	EBRD's and EIB's Requirements	North Macedonian Legal Requirements	Gaps / Comments	Proposed Actions to Bridge the Gaps
Avoidance or Minimisation of Displacement	The client shall consider feasible alternative project designs and locations to avoid or at least minimise physical and/or economic displacement.	The Law on Spatial and Urban Planning states that such planning aims to improve living and working conditions for citizens. The Constitution of RNM guarantees legal protection of ownership - the deprivation of property rights and displacement is an exception - in cases of public interest determined by law. The national legislation stipulates the need for considering alternatives, including siting options within the EIA procedure. The proposed industrial facilities should be sited in a way to avoid or minimize impacts on 'valuable lands' (e.g., on perennial croplands, forests) and to use state-owned land in order to minimise land acquisition from private land-owners/leasers.	**Compliance** The Project will trigger economic displacement as arable land, pastures and vineyards are the key categories of land acquired for the Project When siting the pipeline routes, efforts were made to minimise land acquisition from private land-owners/leasers and to avoid impact on residential areas / settlements, orchards and vineyards, and forests.	None.
Avoidance of Forced Eviction	The client shall not resort to forced eviction[15]. The exercise of eminent domain, expropriation, or similar powers by a client is not considered to be forced eviction if it complies with the national law and the provisions of this PR and is conducted in a manner consistent with basic principles of due process (e.g., provision of advance notice, meaningful opportunities to lodge grievances and appeals, and avoidance of the use of unnecessary, disproportionate or excessive force).	The Law on Expropriation does not use the term 'involuntary resettlement' or 'forced eviction', instead it uses the term "expropriation" which is based on the Government's eminent domain power. The expropriation authority is obliged to schedule and conduct a hearing (individual meeting) on the Expropriation Proposal. The hearing may end with a settlement agreement. Compulsory expropriation is used as a last resort after a negotiated process has failed. The party with legal interest has appropriate forms of legal and other protection if no agreement is reached.	**Compliance** No forced eviction is expected to take place for the Project.	Pursuant to Article 47 of the Expropriation Law, if the owners do not agree with the offered compensation, the competent expropriation authority shall submit the case to the competent court for determination of the compensation. In the court proceedings, pursuant to Article 245 of the Law on Civil Procedure, the court may also order a new appraisal (expert valuation). If the owners do not agree with the expropriation, pursuant to Article 33 of the Expropriation Law and Article 30 of the Constitution of the Republic of North Macedonia, ownership may be taken away or restricted when it concerns a public interest established

[15] As per the EBRD PR5, forced eviction refers to the acts and/or omissions involving the coerced or permanent or temporary involuntary displacement of individuals, groups and communities from homes and/or lands and common property resources which they occupy or depend on, thus eliminating or limiting the ability of an individual, group or community to reside or work in a particular dwelling, residence or location, without the provision of, and access to, appropriate forms of legal or other protection.

				by law. The construction of the interconnector gas pipeline, pursuant to Article 6 of the Expropriation Law, is a public interest of importance to the state. Pursuant to Article 18 of the Expropriation Law and Article 30 of the Constitution of the Republic of North Macedonia, in the case of expropriation of ownership or in the case of restriction of ownership, fair compensation is guaranteed which may not be lower than the market value.
Negotiated Settlements	The client shall seek to acquire land rights through negotiated settlements even if it has the legal means to gain access to the land without the consent of the seller. Negotiated settlements help avoiding or minimising expropriation and administrative or judicial delays associated with formal expropriation, and to the extent possible to reduce the impacts on affected persons associated with formal expropriation. Negotiated settlements can usually be achieved by providing fair and appropriate compensation to affected persons or communities.	Land ownership rights or land use rights may be acquired or restricted through negotiated settlements with property owners / right-holders. Negotiated settlements are required by the Law on Expropriation and the last instance in which they can be concluded is after the final Expropriation Decision has been issued. The affected property owners are individually invited to discuss a compensation proposal for the assets and are beforehand provided with the Expropriation Proposal, including the proposed amount of compensation. The expropriation authorities are obliged to facilitate negotiations and to encourage the conclusion of a compensation agreement. Negotiations of land compensation rely on the asset valuation results and land prices determined by decisions of those Municipal Councils where the land to be acquired is located.	**Compliance**	None
Consideration of Vulnerable Groups	The client shall identify, assess and address impacts on vulnerable groups and specifically: - carry out, at the time of the socio- economic surveys, an analysis to determine pertinent vulnerability factors in the context of the project area - identify vulnerable groups based on the results of this vulnerability analysis; - conduct specific consultations with vulnerable	There are social protection laws (e.g., Law on Social Welfare (2009)) that envision financial aid / state allowances for various categories of socially vulnerable people. The national laws do not call for specific consideration of vulnerable groups or provision of specific support to them during the land acquisition process.	**Non-compliance** No specific provisions on consideration of vulnerable groups and special support actions within the land acquisition process.	• Livelihood Restoration Plan (LRP) considered vulnerability: 1. Based on the vulnerability factors valid for the project area and based was identified affected groups / persons that are considered vulnerable in the context of Project activities; 2. Specific actions were develop to support the affected vulnerable

	groups; and - plan assistance measures tailored to the different needs of vulnerable groups			groups and are included into the LRPs.
Consideration of Gender Aspects	Gender dimensions shall be considered throughout the baseline surveys, impact assessment, mitigation and monitoring processes. The Project proponent shall ensure meaningful participation of women and men in any consultations about land acquisition and displacement.	North Macedonia has adopted a set of legislation regulating economic and proprietary relations and housing, as well as ownership rights and entitlements for men and women equally, regardless of gender (e.g., the Constitution, the Family Law, the Law on Equal Opportunities, and others). The national laws do not call for specific consideration of gender issues during the EIA procedure or land acquisition processes.	**Non-compliance** No specific provisions on consideration of gender dimensions of environmental and social impacts and including impacts resulting from land acquisition.	Gender section-specific is prepared LRPs, • using the outcomes of specific socio-economic surveys based on gender disaggregated data; • the gender dimensions are considered for land acquisition-related impacts; • Compensation entitlement and delivery take account of gender aspects.
Socio-economic Surveys, Census, Inventory of Affected Assets and Cut-off Date	The client shall carry out socio-economic surveys to describe the baseline circumstances of PAPs. Such surveys will use a combination of quantitative and qualitative methods. The client shall carry out a census of PAPs and an inventory of affected assets, including land, structures, crops, communal amenities and natural resources. The client shall establish a cut-off date for eligibility (the date after which assets are not eligible to compensation). It is determined either by law or the end date of the census or inventory (whichever is the latest).	The national legislation does not require a socio-economic survey as part of the land acquisition process. The North Macedonia's law requires to prepare expropriation documents (Geodetic Report and Expropriation Proposal) which represent inventories of affected properties and cover basic information about registered owners of these properties (i.e., names, addresses, ID numbers) so that they can be identified and compensated. Such studies do not cover informal users. The day of issuing Expropriation Proposals to PAPs is considered a cut-off date.	**Partial compliance** • valuation methodologies are not fully aligned and specific socio-economic studies are not required; • the land users that are not right-holders are not required to be notified about the cut-off date.	• Disclose a cut-off date as part of the overall schedule of the socio-economic survey (to be available to informal users as well); • methodologies for the socio-economic survey and census per the EBRD requirements is developed and applied; • Specific socio-economic surveys and censuses are preformed to inform the LRPs. • Cut-off date described in chapter 6.3 for the landowners is period when owners were invited for consultation meetings by NOMAGAS during preparation for construction June 2025. • For informal users is period from June 2025 preconstruction consultation with municipalities and communities till June 2026 (one year).
Valuation of Affected Lands and Assets	The loss of land, property and assets shall be valuated using the replacement cost method. Replacement cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement.	The Law on Expropriation states that compensation for expropriated property (agricultural, pasture and forest land; residential land; residential and business structures) which may not be less than the market value of the property. The market value is determined by an authorized and licenced valuator -	**Partial Compliance** Valuation of affected lands and assets is envisioned but the valuation methods defined by the national law (based on the market value) are not in line with the Lenders' requirement on applying	• Valuation methodology for determining compensation cost is applied according to national legislation; the methodology envisages valuation for both property and assets but also

		Bureau of Judicial Expertise - using methods established by the Law on Appraisal (based on European valuation standards).	replacement cost methods. In addition, Bank requires assessment of economic losses of both formal and informal land users and lost profits for business	economic losses / lost profit for businesses. • Bureau of Judicial Expertise and other certified valuator to assess economic and business losses related to the Project are contracted.
Eligibility Classification	Displaced persons may be classified as persons: (i) who have formal legal rights to the land; (ii) who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under national laws; or (iii) who have no recognisable legal right or claim to the land they occupy	The Law on Expropriation does not distinguish between the categories of 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. The law does not recognize persons who have no legalizable legal right or claim to the land or assets they occupy or use. Only those with formal legal rights are informed about the land acquisition (expropriation) process and have the right to appeal; other categories of affected people are not required to be informed/consulted.	**Partial Compliance** The national law does not recognize persons who have no legalizable legal right or claim to the land or assets they occupy or use, while the EBRD PR5 and EIB ESS6 consider both formal and informal land/property owners and users.	• Affected persons not having formal legal rights to the acquired land plots are considered. • These people will be ongoing identified, from June 2025 to June 2026 and their land acquisition-related losses are and will be valuated so appropriate compensations/solutions are and will be implemented.
Compensation and Benefits for Affected Persons	The client shall offer all displaced persons and communities' compensation for loss of assets at full replacement cost and other assistance to restore, and potentially improve, their standards of living and/or livelihoods of displaced persons to pre-displacement levels. Land-for-land to be preferred in land-based economies. Cash compensation is acceptable if land-for-land is not feasible and if loss of land does not undermine the livelihoods of PAPs. The client should compensate economically displaced persons for loss of assets or access to assets (or provide an alternative access) prior to displacement. Crop losses compensation provided to landowners, share-crop/lease tenants, and informal users whether registered or not.	The Law on Expropriation contains provisions to compensate for land, crops, and other assets including unauthorised structures, as well as for economic losses of affected households. Only formal land users (land owners and leaseholders) are eligible for compensation of crop losses. Compensation shall be provided at market value or can be in the form of a replacement land/asset. According to the Law on Expropriation and the Law on Construction, the Construction Contractor may receive permission to work on the acquired land access prior to payment of compensation to the PAPs. The legislation does not include provisions to improve or restore standard of living and livelihoods of people affected by land acquisition.	**Partial compliance** There are a number of gaps between the national legislation and EBRD requirements, such as: • Compensation to be provided at full replacement cost for land and other assets, rather than be calculated at market value as legally required; • Taxes and land registration fees are to be included in the calculation of compensation (which is not the legal provision). • Assistance to improve or restore standard of living and livelihoods is not envisioned in the national legal framework.	• Appropriate compensation measures in line with the EBRD PR5 and EIB ESS6 into the LRP are identified and presented in the LRP. • Alternative compensation and alternative access options are considered and discussed with PAPs. - monetary compensation to be provided; - compensation for assets required to be transferred to the Project prior to construction to be agreed and paid prior to handover of assets and commencement of civil works on site; - crop loss compensations to be provided to land users irrespective of the land tenure status; - compensation for land /assets

				located within the buffer zones to be provided before completion of construction works. • Support all relevant institutions responsible for expropriation process to ensure expropriation process is completed prior to the start of construction works. • Benefits or additional compensation packages to be negotiated after the start of the construction and applied within required period
Loss of Community Facilities, Utilities and Public Amenities	The loss of community facilities, utilities or public amenities, or access thereto shall be replaced.	The national legislation requires the Construction Contractor to preserve and restore the community facilities affected as a result of construction works.	**Compliance** Note: the enforcement can be an issue and thus actions are proposed.	• Performance of the Construction Contractor is monitored in terms of impacts on land and assets and the Construction Contractor remediates any damage in line with the LRF and LRP provisions.
Stakeholder Engagement	The client shall conduct meaningful and continuous consultations with affected people and communities throughout resettlement planning and implementation in line with EBRD PR10 / EIB ESS 10 requirements. Consultations shall be supported by the disclosure of resettlement documentation. From earliest stages and through all activities the client shall involve affected men and women, host communities and vulnerable groups.	Public hearings on the planned activities shall be conducted as part of the EIA procedure. As per the national laws, the land acquisition process is accompanied by the required engagement run by the relevant state authorities. The affected people are required to be individually notified about the planned land acquisition (expropriation) and invited to the 'hearings'/individual meetings with the client. There are no requirements on disclosure of the other land acquisition/resettlement documents. There is no requirement to identify and specifically engage with vulnerable persons / groups.	**Partial Compliance** The gaps include the absence of requirements on: • Holding consultations with PAPs at all stages of the resettlement planning and implementation; • Development and disclosure of resettlement planning documentation; • Focused specifically engagement with vulnerable persons / groups. Note: Consultations / public hearings during the EIA and Supplementary ESIA for the Interconnector and the ESIA for Sveti Nikole-Veles covered land acquisition issues to some extent.	• Consultations are ongoing conducting with all PAPs per the EBRD PR5 and 10 and EIB ESS 6, 7 and 10 requirements during the preparation and implementation of the LRPs • Project's Stakeholder Engagement Plan (SEP) is updated, Implemented with continuous engagement with affected stakeholder groups, including vulnerable groups, and with PAPs within the LRP preparation, implementation and monitoring. • Implementation of LRP: Consultations are held with PAPs within preparation of the LRPs, with maps and technical documentation. LRPs upon the completion will be disclosed as well as their non-technical summaries.

Grievance Mechanism	A free, independent, and widely publicised grievance mechanism, which consists of both formal and informal channels, should be developed per the relevant PR10/ESS10 requirements and made accessible to the PAPs. The mechanism should be established 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, resettlement or livelihood restoration measures raised by the affected persons/other parties.	Complaints related to land exportation can be submitted during the expropriation procedure after the infrastructure design has been approved. Grievances by the affected parties related to land expropriation within a specific project (e.g., in case of disagreement on the fact of expropriation or on the proposed compensation) are filed via the Ministry of Finance (its Department for Property and Legal Affairs) to the Administrative Court. The decisions of the court are then followed. The affected parties can appeal to the relevant administrative court for protection of their rights.	**Non-compliance** No requirement to establish a Project-specific grievance mechanism for persons / businesses affected by land acquisition and displacement.	• A Project-specific grievance mechanism for external stakeholders per the EBRD PR10 (including systematic monitoring/evaluation of grievances is developed and implementing ongoingly. • The general external grievance mechanism comprise specific actions to collect and address concerns about compensation, relocation or livelihood restoration measures raised by displaced persons
Land acquisition and resettlement planning and Implementation Resettlement and livelihood restoration plan and framework	The client shall prepare a resettlement and/or livelihood restoration plan proportionate to the risks and impacts associated with the project and is responsible for implementing this plan. In the stage of project development prevents the preparation of a full resettlement/livelihood restoration plan, a resettlement/ livelihooc restoration framework shall be prepared as is prepared as a first step.	As per Art. 26 of the Law on Expropriation, a Geodetic Report (Expropriation Elaborate) and or Expropriation Proposal prepared to substantiate the land/property expropriation for the project shall contain the following information: number of cadastral parcels, title holder names, type and class of land, total area, area to be expropriated.	**Non-compliance** No specific requirement to develop a resettlement/livelihood restoration plan or framework addressing physical and/or economic displacement related to the planned activities	The Project does not trigger physical displacement but result in economic displacement. For this reason, LRP is developed. • LRP is prepared based on principles and requirements stipulated in the Project LRF, agreed with EBRD, and implemented ; LRP rely on data of the performed socio-economic survey, consultations with the PAPs and census.
Organisational Capacity and Commitment	The client shall designate specific personnel, including management representative(s), with a clear allocation of responsibility and authority to plan and implement land acquisition and resettlement activities. The client shall provide adequate support and human and financial resources to achieve effective and continuous delivery of land acquisition and resettlement commitments.	-	**Non-compliance** No specific requirement on special organisation structure, personnel and resources to tackle land acquisition-related impacts of the planned activities	NOMAGAS has established an Environmental and Social (E&S) Department with dedicated capacity to support the Interconnector Project through the Project Implementation Unit (PIU).
Monitoring and Evaluation	The Client shall establish procedures to monitor and evaluate the implementation of the resettlement plan. Monitoring shall involve the participation of key stakeholders, including affected communities. For projects with significant displacement impacts the client may decide to commission	The national legislation does not include specific procedures for monitoring and evaluation of the land expropriation process.	**Non-compliance** No specific provisions to monitor the implementation of land acquisition and related compensation measures internally and externally, and to evaluate their effectiveness	• Monitoring and evaluation provisions are incorporated in the Project LRP; • Implementation of LRP during the Project implementation is monitored and will be evaluated via internal monitoring and

	competent resettlement professionals to monitor the implementation of resettlement plans, design corrective actions and produce periodic internal monitoring reports. For such projects the Lenders may require: i) periodic external compliance reviews and/or ii) an external completion audit by independent experts.			evaluation procedures; external land consultants are engaged • Lenders will be provided the with monitoring reports on LRP implementation; • EBRD and EIB will be supported the in case they decide to commission external Resettlement Completion Audits.

4. Methodology for LRP preparation

4.1 Overview

The Livelihood Restoration Plan (LRP) methodology is based on requirements of EBRD and good international practice. It follows a data-driven and participatory approach to identify impacts, assess vulnerabilities, and define appropriate livelihood restoration measures. The methodology includes socioeconomic data collection, impact assessment, stakeholder engagement, entitlement definition, and monitoring of outcomes to ensure affected persons are supported and livelihoods are restored or improved. Further details will be elaborated in subsequent sections.

4.2 Land Acquisition Process

Land acquisition should be carried out in a fair and transparent manner in line with the requirements of EBRD and national legislation. The process aims to minimise impacts, provide compensation at replacement cost, and ensure affected persons are properly informed and consulted.

Key elements:

- Land will be acquired only where necessary.
- Affected persons will receive fair compensation before land entry.
- Stakeholder consultations will be conducted.
- A grievance mechanism will be available.
- Livelihood impacts will be addressed

4.3 LRP data collection

This section describes the methodology applied for the collection of socio-economic baseline data for Project Affected Persons (PAPs) in support of the Livelihood Restoration Plan (LRP) for the Gas Interconnector North Macedonia – Greece Project.

A mixed-methods approach was applied, combining a structured socio-economic household survey with qualitative stakeholder engagement. A total of eleven (11) stakeholder engagement activities were conducted, including Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs). These qualitative methods were used to complement the household survey through triangulation of findings, validation of quantitative data, and collection of additional contextual information. FGDs provided group-level insights on community priorities and perceived impacts, while KIIs enabled in-depth input from key stakeholders and supported the inclusion of potentially affected and hard-to-reach groups.

The socio-economic survey was conducted using a structured and adaptive methodology aligned with EBRD Performance Requirement 5 (PR5). Following limited participation in initial community-based consultations (described in more detail below), the approach was adjusted to include

telephone-based interviews, which improved response rates and ensured broader coverage, particularly among working-age PAPs.

The questionnaire used for data collection is provided in Appendix 3. It consists of 59 structured questions covering demographic characteristics, land ownership and use, income sources, agricultural production, vulnerability indicators, and perceived project impacts. Data collection and analysis were conducted using the Smart Survey digital platform, supported by validation checks and consistency controls to ensure data quality.

A stratified sampling approach was applied, taking into account the advanced stage of land acquisition through expropriation under national legislation and the need to prioritize PAPs with potentially higher livelihood impacts. The survey target was set at a minimum of 20% of all private PAPs. To ensure adequate representation of potentially vulnerable households, all (100%) landowners whose affected land represented more than 30% of their total landholding were included in the survey. For landowners whose affected land represented less than 30% of their total landholding, a representative sample of at least 20% was selected from areas where expropriation procedures had been completed. This stratification ensured comprehensive coverage of PAPs facing potentially significant land-based impacts while maintaining representative coverage of PAPs experiencing less substantial impacts. In total, 163 PAPs were contacted, including all PAPs in the higher-impact category and a representative sample of PAPs in the lower-impact category.

The 30% threshold was applied as an indicator of impact severity, recognizing that higher levels of land loss are more likely to result in significant livelihood disruption and increased vulnerability, and therefore require full coverage to inform appropriate livelihood restoration measures. For landowners affected below this threshold, a representative sampling approach was considered sufficient to establish baseline conditions and support proportionate mitigation measures, in line with the principle of proportionality under lender requirements.

A total of 163 contacts were established, with a target of 120 completed surveys. The adopted approach ensured adequate stakeholder coverage and the development of a robust socio-economic baseline dataset to support the preparation of the LRP.

The survey further captured information on formal and informal land users, tenants, vulnerable groups, and other potentially affected persons along the Interconnector corridor and associated access routes.

Limitations and Data Quality Assurance

Certain limitations were encountered during data collection, including limited participation in initial community-based consultations and partial reliance on telephone-based interviews. These limitations were addressed through methodological adjustment and do not materially affect the overall reliability of the dataset. Non-response was recorded for a limited number of contacted

individuals and was mitigated through repeated contact attempts and triangulation with qualitative data collected through FGDs and KIIs.

Data quality was ensured through the use of a standardized questionnaire, digital data capture via the Smart Survey platform, embedded validation rules, and systematic consistency checks during data processing. The combination of quantitative and qualitative methods enabled triangulation and cross-verification of findings, thereby strengthening the reliability and completeness of the baseline in line with PR5 and PR10 requirements.

4.3.1 Data Source and Sampling Framework

The Investor, Nomagas, provided the dataset containing PAP contact details. The dataset included 163 contacts and contained the following information:

- Name of landowner
- Cadastre municipality
- Cadastre parcel number
- Telephone number

The PAPs were located within the following cadastre municipalities: Bogorodica, Gabrovo, Demir Kapija, Dren, Negorci, Negotino, Petrovo, Prdejci, Przhdevo, Stojakovo, Tremnik and Chiflik.

Given the relatively limited size of the contact list (163 PAPs), a census approach was adopted rather than statistical sampling. All provided contacts were approached with the objective of achieving broad coverage of the affected population.

The target set for the survey was 120 completed interviews, representing a substantial proportion of the total identified PAPs and ensuring adequate representation for livelihood analysis.

4.3.2 Survey Design and Methodology

A mixed-method approach was applied combining:

- Face-to-face interviews conducted during field visits
- Telephone interviews

The fieldwork period lasted from 20 January 2026 to 13 February 2026.

The methodology was structured to ensure:

- Inclusive participation of economically active and vulnerable groups
- Voluntary and informed participation
- Accurate digital recording of responses
- Alignment with EBRD stakeholder engagement principles

Initial Approach – Community Meeting Method

The initial strategy involved organizing meetings with PAPs in local community offices. The procedure included:

1. Telephone contact with PAPs prior to field visits;
2. Introduction of the project and explanation of the survey purpose;
3. Scheduling a specific date and time for attending the meeting at the local community office;
4. Conducting face-to-face interviews with attendees.

Field visits were conducted in the villages of:

- Stojakovo
- Prdejci
- Negorci
- Petrovo
- Dren

Although most PAPs confirmed attendance during telephone calls, approximately half of the invited respondents attended the scheduled meetings. It was observed that attendance was largely limited to retirees and elderly residents, while economically active individuals were frequently unable to participate due to work commitments.

Adapted Approach – Telephone Survey Method

Following initial field visits and respondent feedback, the methodology was adjusted to prioritize telephone interviews in order to enhance inclusiveness and improve response rates.

The telephone methodology proved more effective because:

- Respondents were reachable regardless of physical location;
- interviews could be conducted immediately upon contact;
- Interviews could be rescheduled at convenient times during the day;
- Participation of working-age PAPs increased.

Telephone interviews, therefore, became the primary data collection method, while face-to-face interviews remained supplementary when necessary.

Summary of Survey Methodology

Table 4-1 Summary of Survey Methodology

Phase	Activity	Objective	Method Applied
Preparation	Obtain PAP's dataset from Nomagas	Define survey universe	Full coverage approach
Preparation	Questionnaire development (59 questions)	Establish socio-economic baseline	Structured questionnaire

Phase	Activity	Objective	Method Applied
Notification	Initial phone contact	Inform PAPs and invite participation	Direct calling
Field Visits	Community office meetings	In-person participation	Face-to-face interviews
Method Adaptation	Switch to telephone interviews	Increase participation	Remote interviewing
Interviewing	Conduct a structured survey	Collect livelihood data	Smart Survey digital entry
Quality Control	Logical checks and follow-ups	Ensure accuracy	Digital validation + callbacks
Data Analysis	Aggregate and analyze responses	Support LRP design	Smart Survey analytics

4.3.3 Survey Implementation Procedure

For each PAP, the following standardised procedure was applied:

1. Initial phone contact and introduction of the survey and its purpose;
2. Explanation of the voluntary nature of participation;
3. Explanation of confidentiality and data protection measures;
4. Obtaining verbal informed consent;
5. Conducting the 59-question structured interview;
6. Recording responses directly into the Smart Survey application;
7. Reviewing responses for completeness before submission.

The use of digital data entry reduced transcription errors and enabled real-time monitoring of survey progress and response rates.

Ethical Considerations and Compliance with EBRD Requirements

All respondents were informed about:

- The purpose of the survey;
- The link between the survey and preparation of the Livelihood Restoration Plan;
- The voluntary nature of participation;
- The confidentiality of personal data;
- The use of information exclusively for project-related livelihood assessment.

Verbal informed consent was obtained before each interview. No coercion or undue influence was applied.

4.3.4 Data Management and Quality Assurance

To ensure reliability, transparency, and compliance with EBRD standards, the following measures were implemented:

- Use of a standardized structured questionnaire;
- Digital data entry during interviews;
- Built-in logical validation checks within the Smart Survey platform;
- Monitoring of completed interviews against the target of 120 surveys;

- Follow-up calls in cases of incomplete or unclear responses;
- Secure storage of personal data in line with applicable data protection requirements.

The Smart Survey platform enabled automated aggregation of responses and preliminary statistical analysis to support the LRP design process.

4.4 LRP data analysis

LRP data analysis combines quantitative and qualitative evidence to support impact assessment and livelihood planning in line with the requirements of EBRD. Quantitative analysis identifies affected households, income dependencies, and statistical patterns, while qualitative methods capture contextual insights and stakeholder perspectives. Quantitative data collected through Smart Survey platform and household surveys provide statistical insights on affected populations, vulnerability patterns, and income structures. Qualitative inputs from **Focus Group Discussions (FGDs)** and **Key Informant Interviews (KIIs)** complement this by capturing stakeholder perspectives and contextual information that cannot be reflected in numerical data alone. The integrated analysis translates these findings into evidence-based recommendations for entitlement design, livelihood restoration measures, and monitoring indicators, ensuring a comprehensive and data-driven LRP approach and compliance with international good practice and EBRD requirements.

4.4.1 Overview of Stakeholder Engagement Activities (FGDs and KIIs)

A total of eleven (11) stakeholder engagement activities were conducted, including Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs), to ensure inclusive, meaningful, and gender-sensitive consultation with affected stakeholders.

Table 4-2 Overview of Stakeholder Engagement Activities

No.	Type	Location / Municipality	Stakeholder Group	Key Notes
1	KII	Multiple Municipalities	Land users, village representatives, NGOs (incl. women NGOs)	Municipal-level consultation
2	KII	Multiple Municipalities	Land users, village representatives, NGOs (incl. women NGOs)	Municipal-level consultation
3	KII	Multiple Municipalities	Land users, village representatives, NGOs (incl. women NGOs)	Municipal-level consultation
4	KII	Multiple Municipalities	Land users, village representatives, NGOs (incl. women NGOs)	Municipal-level consultation
5	FGD	Gevgelija Municipality	NGOs (incl. women organizations)	Targeted civil society group
6	FGD	Gevgelija Municipality	Hunting associations ("Orel", "Inter Guma Trejd DOO")	Livelihood-related stakeholders
7	FGD	Gevgelija Municipality	Sports and recreation associations	Community land users
8	FGD	Gevgelija Municipality	Beekeepers	Informal land/resource users
9	FGD	Tremnik (Negotino Municipality)	Local community / land users	Village-level consultation

10	FGD	Miravci (Gevgelija Municipality)	Local community / land users	Village-level consultation
11	FGD	Demir Kapija	NGOs	Civil society consultation

Stakeholder Engagement Approach and Inclusiveness

The stakeholder engagement process was designed and implemented in line with **EBRD Performance Requirement 10 (PR10)** principles of meaningful consultation, inclusiveness, and transparency. A combination of KIIs and FGDs enabled both broad outreach and in-depth discussions with specific stakeholder groups.

The approach ensured representation of:

- Formal landowners and land users
- Informal land and resource users (e.g. beekeepers, recreational users)
- Civil society organizations, including women-led NGOs
- Community representatives at village level

Targeted focus group discussions were particularly effective in engaging stakeholders whose livelihoods depend on natural resources (e.g. beekeepers, hunting associations), as well as groups that may otherwise be underrepresented in general consultations.

Efforts were made to promote gender inclusion through:

- Engagement with women's NGOs
- Encouraging participation of women in mixed stakeholder groups
- Creating space for women's perspectives in FGDs

4.4.2 Survey Outcomes and Response Rates

The outcomes of the survey implementation are summarized below:

- Total contacts provided: 163
- Completed surveys: 114
- Refusals: 27
- Wrong telephone numbers: 5
- No response: 19

Response Rate Calculations

The survey performance indicators demonstrate a strong level of engagement and data collection efficiency. The **gross response rate of approximately 70%** indicates that a majority of contacted respondents completed the survey. The **contact rate of 85.3%** reflects successful outreach, excluding wrong numbers and non-responsive contacts. The **cooperation rate of 80.9%** shows

that most eligible and contacted respondents agreed to participate, which is a positive indicator of data reliability and stakeholder willingness to engage.

Table 4-3 Summary of Response Rate Calculations

Indicator	Calculation	Result
Gross Response Rate	Completed surveys / Total contacts = 114 / 163	69.9% (~70%)
Contact Rate	Successfully contacted persons / Total contacts = 139 / 163	85.3%
Cooperation Rate	Completed surveys / (Completed + Refusals) = 114 / 141	80.9%

These indicators demonstrate a high level of engagement for a rural landowner survey and confirm adequate representativeness for Livelihood Restoration Plan preparation.

From an LRP perspective, these indicators suggest:

- Adequate representativeness of the sample.
- Minimal risk of non-response bias.
- Strong stakeholder willingness to engage.
- Data quality sufficient for impact and vulnerability analysis.

4.4.3 Privately owned land

Data analysis for privately owned land followed a structured approach. Multiple datasets – including socioeconomic survey results, land valuation reports, information on land areas affected (provided by the project proponent based on signed land agreements), and other supporting documentation – were compiled and reviewed. The analysis enabled identification of project-affected persons (PAPs), including landowners and land users, eligible for livelihood restoration measures. Impacts from all project components, including access road upgrading and widening, were assessed to evaluate land-use changes and potential disturbances to livelihoods. The assessment methodology for impact severity, livelihood loss, and vulnerability in line with standards of EBRD is described in the following section.

4.4.4 Government-owned land

Field data from government-owned land was analysed using spatial and thematic methods to assess existing land use and potential livelihood interactions. Observations and photographic documentation were reviewed to identify activities such as grazing or resource use and to evaluate impacts from pipeline construction and access road works. Areas with significant livelihood use were flagged for possible micro-siting or design adjustments to reduce disruption.

Qualitative inputs from Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) were analysed to understand dependency on local resources, vulnerability factors, and community perceptions. Findings were triangulated with site observations and concession data provided by the project proponent to map land users and inform livelihood mitigation measures.

The assessment supports compliance with standards of EBRD and provides an evidence base for livelihood restoration planning on government-owned land within the interconnector pipeline corridor.

4.5 Limitations Encountered

During the survey process, the following limitations were identified:

- Low attendance at scheduled community meetings due to working hours;
- Initial over-reliance on in-person methodology;
- Variability in respondent availability during agricultural work periods;
- Limited number of contacts provided by Nomagas (163 PAPs), which constrained the overall survey universe.

Given the total number of 163 contacts and a target of 120 completed surveys, achieving a high response rate was essential to ensure representativeness for LRP preparation.

These limitations were mitigated through the transition to telephone-based interviewing, flexible scheduling of interviews, and repeated follow-up contact attempts.

5. Socioeconomic Baseline

5.1 Overview

The socioeconomic baseline provides a structured understanding of existing social and economic conditions within the project area before implementation. Data were collected through a combination of desktop review, household surveys, field observations, and qualitative methods (FGDs and KIIs), and supplemented with project-specific data provided by the project proponent and relevant authorities.

The baseline covers population characteristics, livelihood patterns, income sources, and access to services, forming the evidence base for impact assessment and livelihood restoration planning. It enables identification of vulnerable groups and potential project impacts, ensuring that mitigation measures are targeted and data-driven.

The socioeconomic survey was conducted among affected landowners and users. The baseline identifies primary income sources, including crop production, livestock grazing, and small-scale agricultural trade. Vulnerable households were identified based on income levels, age, health status, and dependency ratios.

This baseline, including the socioeconomic profiling of PAPs, has informed the development of targeted livelihood restoration strategies by identifying key vulnerabilities, income sources, and land-use dependencies. These insights enable the proposed interventions to be tailored to the specific needs and capacities of affected households.

Further details of demographic structure, economic activities, and service access are presented in subsequent sub-sections.

5.2 Socio-Economic Analysis – Desktop review

The desktop review of socioeconomic conditions was conducted using available secondary data and documentation to establish an initial understanding of population characteristics, livelihood patterns, and potential project interactions. Sources included existing reports, statistical data, and project-related documentation. The analysis supports the LRP by providing background information for impact assessment and identification of areas requiring further field verification. Findings were complemented by primary data and stakeholder inputs to ensure a comprehensive evidence base. Project-related data are provided in Appendix 1

This chapter provides the demographic, economic, and social context relevant for assessing potential impacts and defining measures within the Livelihood Restoration Plan (LRP).

5.2.1 Demographics

The Project area includes urban centers and several rural settlements along the route. All four municipalities demonstrate similar demographic trends:

- population decline over recent decades;
- ageing population;
- outmigration of the young working-age population;
- low population density in rural areas.

Rural households are often multi-generational and significantly dependent on agriculture as either a supplementary or primary source of income.

Municipality of Negotino

According to the 2021 Census, the Municipality of Negotino has approximately 18,194 inhabitants and comprises 19 settlements, with the town of Negotino serving as the administrative and economic center. The municipality is part of the Vardar Planning Region and is strongly oriented toward viticulture and wine production.

Settlement affected by the Project:

Tremnik – A rural settlement with approximately 766 inhabitants according to the 2021 Census. The village is predominantly agriculturally oriented, with viticulture as the dominant economic activity. Agriculture typically represents supplementary income, while the primary economic activity of part of the population is linked to the urban center of Negotino or seasonal employment.

Municipality of Demir Kapija

According to the 2021 Census, the Municipality of Demir Kapija has approximately 3,777 inhabitants and is one of the smaller municipalities in the Vardar Region. It is characterized by low population density and pronounced ageing. The economic structure is predominantly agricultural, with significant viticulture and wine production.

Villages affected by the Project:

Dren – A village with approximately 33 inhabitants (2021 Census). Rural environment with limited economic activity and pronounced ageing.

Chiflik – A village with approximately 76 inhabitants (2021 Census). A rural settlement through which the Doshnica River flows, significant for local water supply.

Przhdevo – A small rural settlement with low population density and limited economic activity, with approximately 120 inhabitants (2021 Census). Demographic trends indicate population decline.

Municipality of Bogdanci

According to the 2021 Census, the Municipality of Bogdanci has approximately 7,339 inhabitants and includes four settlements: Bogdanci (urban center), Stojakovo, Gjavato, and Selemli. The

municipality is part of the Southeast Planning Region and has favorable climatic conditions for agricultural production.

Settlement affected by the Project:

Stojakovo – The largest rural settlement in the municipality, with approximately 1,451 inhabitants (2021 Census). Agriculture (viticulture and horticulture) plays a significant role and, in certain households, may account for up to 50% of total income.

Rural settlements in the municipality are predominantly agriculturally oriented, with moderate economic dependence on seasonal production.

Municipality of Gevgelija

The Municipality of Gevgelija has approximately 21,582 inhabitants according to the 2021 Census and represents a regional economic center with developed trade, services, and cross-border activities. However, rural settlements remain predominantly agriculturally oriented.

Settlements affected by the Project:

Mrzenci – A village with approximately 525 inhabitants (2021 Census). Agriculture is the dominant activity, with gradual population decline.

Prdejci – A village with approximately 462 inhabitants (2021 Census). Agriculture represents a supplementary source of income.

Smokvica – A village with approximately 190 inhabitants (2021 Census). Known for traditional vegetable and fruit production.

Gabrovo – A small rural settlement with approximately 5 inhabitants (2021 Census), characterized by pronounced ageing and low population density.

Petrovo – A village with approximately 121 inhabitants (2021 Census). Agriculture and seasonal activities represent the main sources of income.

Rural settlements in the Municipality of Gevgelija are demographically vulnerable due to ageing and migration, while the urban center provides additional economic opportunities.

5.2.2 Economic Structure

The economy of the Project area is predominantly agricultural, with strong representation of:

- viticulture;
- fruit growing;
- vegetable production;
- limited livestock breeding;
- beekeeping.

Urban centers also include:

- public sector employment;
- trade and services;
- small and medium-sized enterprises;
- cross-border economic activities (particularly in Gevgelija).

Agricultural income is seasonal and dependent on climatic conditions and market prices.

5.2.3 Land Use and Ownership

The Land along the route is predominantly privately owned agricultural land. Main categories include:

- vineyards (permanent crops);
- orchards;
- arable land with seasonal crops;
- limited pasture areas.

Parcels are fragmented and owned by individuals or families. In certain cases, informal use agreements exist.

The Project foresees:

- permanent acquisition of a limited number of areas;
- establishment of easements with land-use restrictions (prohibition of deep-rooted crops and construction within the safety corridor).

Any intervention affecting land has direct economic implications for affected households.

5.2.4 Livelihoods and Sources of Income

Main sources of income include:

- sale of grapes and agricultural products;
- livestock breeding (in a limited number of households);
- beekeeping;
- seasonal employment;
- employment in the public and private sectors.

Permanent crops have a multi-year production cycle, meaning that their loss may cause medium-term economic consequences.

5.2.5 Services and Infrastructure

Urban centers are equipped with basic public infrastructure:

- water supply and sewerage systems;
- electricity distribution network;
- health and educational institutions;
- administrative services.

Rural settlements have basic infrastructure, but access roads to agricultural parcels are critical for economic activity.

5.2.6 Vulnerability

Identified potentially vulnerable categories include:

- elderly persons and households with limited working capacity;
- social assistance beneficiaries;
- farmers dependent on permanent crops;
- households with a single source of income from affected land.

Given demographic trends and limited economic diversification, certain rural households have reduced capacity to absorb economic shocks.

5.3 Findings from the Socioeconomic Survey of Affected Landowners

5.3.1 Socioeconomic Survey – Demographic Profile of Respondents

Methodology Note: The socioeconomic data presented in this section are based on a structured household survey conducted among **111 project-affected households** within the project area of influence. The survey collected information on household composition, demographic structure, ethnic affiliation, health status, and vulnerability indicators. The findings provide a baseline for livelihood restoration planning under the LRP.

Household Size Distribution

The socioeconomic household survey conducted as part of the Livelihood Restoration Plan (LRP) covered a total of **111 households comprising 367 individuals**, resulting in an average household size of approximately **3.3 persons per household**. The distribution of household sizes indicates a predominance of small to medium-sized households within the project-affected population.

The results show that the largest share of households consists of two members (35.14%), followed by three-member (18.02%) and four-member (17.12%) households. Single-person households account for 7.21% of the sample, while larger households of five or more members collectively represent a smaller proportion of the surveyed population. Overall, the results indicate a relatively stable household structure with moderate variation in household size.

Table 5-1 Household Size Distribution

Household Size (persons)	Number of Households (n)	Share of Total (%)
1	8	7.21
2	39	35.14
3	20	18.02
4	19	17.12
5	12	10.81
6	8	7.21
7	3	2.70
8	2	1.80
Total	**111**	**100.00**

Geographic Distribution of Survey Respondents

The socioeconomic survey conducted as part of the LRP covered respondents across multiple settlements within the project area of influence. The distribution of respondents reflects the **place of residence of surveyed households rather than the exact location of affected land plots**. In most cases, the residential location and land ownership coincide, however, in some instances, they differ due to ongoing **rural–urban migration trends**, where household members have relocated from villages to nearby towns and cities while retaining ownership of agricultural land in their place of origin.

The highest share of respondents originates from Stojakovo (20.0%), followed by Negorci (15.32%) and Negotino (13.51%), which together account for nearly half of all surveyed households. Additional notable representation includes Prdejci (8.11%), Demir Kapija (7.21%), Tremnik (6.31%), and Dren (6.31%).

Moderate representation was recorded in Gevgelija (5.41%) and Petrovo (4.50%), while smaller shares were observed in Čiflik (2.70%), Kavadarci (2.70%), and Skopje (2.70%). The lowest representation was recorded in Bogorodica (1.80%), Bogdanci (1.80%), and Petrovec (0.90%).

Overall, the survey results confirm that project-affected respondents are primarily concentrated in rural settlements along the project corridor, with limited representation from urban centers such as Skopje. This distribution is consistent with the predominantly rural character of the project-affected area and provides a representative basis for assessing livelihood impacts and designing targeted restoration measures.

Table 5-2 Geographic Distribution of Respondents

No.	Settlement	Number of Households (n)	Share of Total (%)
1	Stojakovo	22	19.82
2	Negorci	17	15.32
3	Negotino	15	13.51
4	Prdejci	9	8.11
5	Demir Kapija	8	7.21

No.	Settlement	Number of Households (n)	Share of Total (%)
6	Tremnik	7	6.31
7	Dren	7	6.31
8	Gevgelija	6	5.41
9	Petrovo	5	4.50
10	Čiflik	3	2.70
11	Kavadarci	3	2.70
12	Skopje	3	2.70
13	Bogorodica	2	1.80
14	Bogdanci	2	1.80
15	Petrovec	1	0.90
Total		**111**	**100.00**

Ethnic Composition

All surveyed households identified as **ethnic Macedonians**, with no Roma or other ethnic minority households recorded within the sample. This indicates a homogeneous ethnic composition among surveyed private landowners in the project-affected area.

From a vulnerability perspective, no ethnic differentiation was identified within the dataset. Accordingly, ethnicity does not represent a distinct vulnerability factor among surveyed households, and LRP impacts are assessed as ethnically neutral for the population included in the survey.

Gender Composition of Household Members

The survey covered **367 household members**, with a slightly higher proportion of male members (53.72%) compared to female members (46.28%), indicating a broadly balanced gender structure with a mild male predominance.

Additionally, the majority of households include both male and female members, with 98.2% of households reporting at least one male member and 85.6% reporting at least one female member. This confirms that most households are mixed-gender units, which is relevant for understanding intra-household roles and labor availability.

Table 5-3 Gender Distribution of Household Members

Gender	Number of Members	Share of Total (%)
Male	195	53.72
Female	172	46.28
Total	**367**	**100.00**

Age Structure of Household Members

The age structure of the surveyed population indicates a predominance of working-age individuals, followed by a significant share of elderly members and a smaller proportion of children.

The majority of household members belong to the 18–64 age group (59.95%), followed by individuals aged 65 and above (27.52%), while children aged 0–17 years account for 12.53% of the population. This distribution indicates a relatively high proportion of non-working-age population, primarily driven by the elderly segment, which may contribute to increased dependency within certain households.

Overall, the age structure is relevant for vulnerability assessment under the LRP, as households with higher shares of elderly or dependent members may have reduced adaptive capacity and greater sensitivity to livelihood disruptions.

Table 5-4 Age Distribution of Household Members

Age Group	Number of Persons	Share of Total (%)
0–17 years	46	12.53
18–64 years	220	59.95
65+ years	101	27.52
Total	**367**	**100.00**

Chronic Illness and Vulnerability

Out of the total surveyed households, 28 households (25.23%) reported at least one member with a chronic illness or long-term health condition. These include cardiovascular diseases, diabetes, musculoskeletal disorders, respiratory illnesses, neurological and developmental conditions, cancer-related conditions, and other chronic impairments.

The most frequently reported category is cardiovascular disease, followed by diabetes and musculoskeletal conditions. A smaller number of households reported general or unspecified chronic conditions, reflecting additional vulnerability within the sample.

Table 5-5 Frequency of Reported Chronic Health Conditions (n = 28 households)

Chronic Condition Category	Number of Households
Cardiovascular diseases	9
Diabetes	4
Musculoskeletal disorders	3
Respiratory diseases	2
Neurological/developmental conditions	3
Cancer-related condition	1
Rare metabolic disorder	1
General/unspecified chronic condition	5
Total	**28**

5.3.2 Gender Roles and Intra-Household Decision-Making

The socioeconomic survey assessed gender roles and intra-household decision-making dynamics as key indicators of household structure, economic control, and potential vulnerability. The analysis focuses on three interrelated dimensions: household leadership, decision-making over land and income, and women's participation in compensation-related decisions, complemented by perceptions of gender equality in access to resources.

Head of Household

Out of 111 surveyed households, 109 responded to the question on household headship, while 2 households (1.8%) did not provide an answer. The results indicate a predominantly male-headed household structure, with 54.1% of households identifying a male head of household. Female-headed households account for 11.0%, while 33.9% report joint household leadership ("both"), and 0.9% report other arrangements.

Overall, the findings suggest that while male household leadership remains dominant, a significant share of households is characterized by shared decision-making structures, indicating the presence of more participatory intra-household arrangements.

Decision-Making on Land Use and Household Income Management

Out of 111 households, 107 responded to the question on decision-making related to land use and household income, while 4 households (3.6%) did not respond. The results show that 46.7% of households report joint decision-making, indicating that land use and income management are most commonly shared between household members.

Male-led decision-making accounts for 36.4% of households, while female-led decision-making remains limited at 8.4%. In 8.4% of households, another household member outside the primary couple is responsible for these decisions.

Table 5-6 Decision-Making on Land Use and Income

Category	Frequency	Percentage (of 107)
Male	39	36.4%
Female	9	8.4%
Both	50	46.7%
Other household member	9	8.4%
Total	**107**	**100.00**

These findings indicate a mixed decision-making structure with a strong tendency toward joint household management; however, gender asymmetry remains present, with men continuing to play a more dominant role in economic decision-making in a significant share of households.

Women's Participation in Decision-Making on Land and/or Compensation

Out of 111 households, 100 provided valid responses, while 11 households (9.9%) did not respond. The results indicate that 74.0% of households report women's participation in decision-making related to land and/or compensation, suggesting a generally inclusive approach in most households. However, 15.0% of households report no female participation, while 11.0% indicate partial participation. Although the majority of households report inclusion of women in compensation-related decisions, a notable minority still experience limited or no female involvement in these processes.

Perception of Gender Differences in Access to Land and Other Resources

Out of 111 households, 103 provided valid responses, while 8 households (7.2%) did not respond. The majority of respondents (79.6%) do not perceive gender differences in access to land and other household resources. A smaller proportion (12.6%) believe that such differences exist, while 7.8% were uncertain. These findings indicate that gender-based disparities in access to productive resources are largely not perceived within the surveyed population. However, the presence of a minority of responses acknowledging inequality suggests that gender disparities may still exist in certain households, even if not widely recognized at community level.

Gender Roles summary: Overall, the findings indicate a mixed but moderately inclusive gender structure within households. Male-headed households remain predominant; however, a significant proportion of households report joint leadership and shared decision-making in both general household management and economic activities.

Women's participation in land-, income-, and compensation-related decision-making is relatively widespread, although a minority of households still report limited or no involvement. At the same time, most respondents do not perceive gender-based differences in access to household resources, despite evidence of differentiated roles in decision-making across several indicators.

Overall, the results point to a generally participatory intra-household structure with persistent but non-uniform gender disparities, primarily related to decision-making authority rather than exclusion

5.3.3 Land Ownership and Land Use

The socioeconomic survey assessed land ownership and land use patterns among project-affected households, as key indicators of livelihood dependence and potential vulnerability.

The results indicate that **100% of surveyed households report ownership of the affected land**, confirming that all respondents are private landowners.

In terms of land use, approximately **15–20% of landowners reported that their land is not currently in use**, while the majority of households actively utilize their land for **agricultural purposes**, indicating a strong reliance on land-based livelihoods.

In addition, approximately **13% of households reported access to additional land through lease agreements**, suggesting that a subset of households expands their agricultural activities beyond owned land.

Table 5-7 Land Ownership and Use Characteristics

Category	Share of Households (%)
Households owning affected land	100%
Land not in use	15–20%
Land used for agricultural activities	80–85%
Households with additional leased land	13%

Overall, the findings indicate a predominantly land-owning population with a high level of engagement in agricultural land use, while a smaller proportion of households maintain unused land or supplement their activities through leased land.

Extent of Land Affected by the Project

The socioeconomic survey assessed the extent to which surveyed households expect their land to be affected by the project.

A total of **108 households provided responses** to this question, while 3 responses were recorded as missing. The findings indicate that the vast majority of households anticipate that their land will be affected, predominantly in a partial manner.

Specifically, **94.4% of respondents reported that their land will be partially affected**, while **1.9% indicated that their land will be completely affected**. A small proportion of households reported that their land will not be affected (2.8%), while **0.9% expressed uncertainty**.

Table 5-8 Perceived Extent of Land Affected by the Project

Response	Frequency	Percentage (of 108)
Yes, completely	2	1.9%
Yes, partially	102	94.4%
No	3	2.8%
I'm not sure	1	0.9%
Total	**108**	**100.00**
Skipped	**3**	**—**

Overall, the results suggest that anticipated project impacts are largely limited in scale at the individual household level, with most households expecting partial rather than complete effects on their land. This indicates that impacts are likely to involve limited land acquisition or temporary restrictions, rather than full loss of land assets.

This is further supported by plot-level data on permanent land impact, which shows that the majority of affected plots fall within lower impact categories. Most plots (**250 out of 397**) are affected by less than 10%, while a significant share (**139 plots**) fall within the 10–30% impact range. Only a very limited number of plots (**8 in total**) experience higher levels of permanent impact exceeding 30%, indicating that more significant impacts are exceptional. These data have been provided by Noma Gas.

Table 5-9 Distribution of Permanent Land Impact by Plot

Permanent Impact on Plot	Number of Plots	Share (%)
<10%	250	63.0%
10–30%	139	35.0%
30–50%	4	1.0%
>50%	4	1.0%
Total	**397**	**100.00**

These findings confirm that while the overall impact profile is limited, a small number of cases may experience more substantial land loss and should be considered in the design of mitigation and compensation measures.

Access to Additional Land

The survey also assessed whether households own or use land other than the plot affected by the project.

Out of **111 households**, **110 responded** to this question, while 1 household (0.9%) did not provide an answer. The results indicate that the majority of households have access to additional land.

Specifically, **82 households (74.5%) reported owning or using additional land**, while **28 households (25.5%) reported no access to other land.**

Table 5-10 Access to Additional Land Beyond Affected Plot

Response	Frequency	Percentage (of 108)
Yes	82	74.5%
No	28	25.5%
Total	**110**	**100.00**
Skipped	**1**	—

The findings indicate that while most households have access to additional land, a notable share does not, which may have implications for their ability to absorb or mitigate the effects of land-related impacts.

5.3.4 Livelihoods and income sources

Livelihoods and Main Sources of Household Income

The socioeconomic survey assessed the main source of income for surveyed households in order to understand livelihood structures and potential sensitivity to project-related impacts.

A total of **110 households provided valid responses**, while **1 household response was recorded as missing (skipped)**.

The results indicate a diverse income structure, with wage-based employment and pensions representing the dominant livelihood sources, alongside a smaller share of agriculture-dependent households.

The largest share of households reported **salary-based employment (43.6%)**, followed closely by **pensions (40.9%)**, indicating that a significant proportion of households include retired members who also contribute to household income structures.

Agriculture accounts for **13.6% of households**, while smaller shares are reported for **self-employment/small business (4.5%)**, **physical labour (1.8%)**, and **other sources (4.5%)**. No households reported trade/services/transport or social assistance as their main income source.

It should be noted that some households reported more than one income-generating activity. This overlap is primarily associated with households reporting **pension income in combination with other income sources**, particularly wage employment.

As a result, certain categories may reflect multiple responses per household, and figures are based on household-level reporting rather than mutually exclusive categories. The findings indicate that the surveyed population is primarily dependent on non-agricultural income sources, particularly wage employment and pensions, which together represent the dominant livelihood base.

While agriculture remains important for a smaller share of households, the results suggest that land-based activities are generally supplementary rather than primary income sources for most households.

The presence of overlapping income sources, particularly involving pension income combined with wages or other activities, indicates diversified livelihood strategies within a subset of households, which may enhance income stability but also reflects mixed dependency structures.

Secondary Sources of Household Income

The socioeconomic survey assessed secondary (additional) sources of household income in order to understand livelihood diversification and household coping capacity in relation to economic and land-related shocks.

A total of **111 households provided valid responses** to this question.

The results indicate that **agriculture and livestock-related activities represent the most common secondary income source**, reported by **43 households (38.7%)**, confirming that land-based activities remain an important supplementary livelihood component.

A further **12 households (10.8%) reported no secondary income source**, indicating a segment of households with limited livelihood diversification.

Additionally, **19.2% of households reported pensions or social assistance**, while **8.1% reported wage employment** and **4.0% reported income from land or property rental**. Smaller shares reported **physical labour (2.0%)** and **other sources (5.1%)**.

The findings indicate a mixed level of livelihood diversification among surveyed households. A significant proportion of households rely on agriculture or livestock as a secondary income source, confirming the continued importance of land-based activities in household livelihood strategies.

At the same time, a notable share of households reports no secondary income source, indicating limited diversification and potentially reduced resilience to economic or land-related shocks.

The presence of pension-related and wage-based secondary income sources reflects a diversified livelihood structure for a portion of households, combining both productive and non-productive income streams.

Overall, the results suggest differentiated coping capacities across the surveyed population, with a subset of households demonstrating limited income diversification.

Household Monthly Income Distribution

The socioeconomic survey assessed the approximate total monthly household income in order to understand the overall economic capacity of surveyed households.

A total of **110 households provided responses**, while **1 household did not respond** to this question.

The results indicate that household income levels are generally moderate to relatively high within the surveyed population, with the largest share of households reporting incomes above the national lower-income bands.

Specifically, **50.9% of households reported a monthly income above 45,000 MKD**, while **19.1% reported incomes between 25,000 and 45,000 MKD**. A further **16.4% of households reported incomes between 18,000 and 24,999 MKD**, and **1.8% reported incomes below 18,000 MKD**. In addition, **11.8% of respondents preferred not to disclose their income level**.

Table 5-11 Monthly Household Income

Monthly Income (MKD)	Number of Households	Share (%)
Up to 18,000	2	1.8%
18,000 – 24,999	18	16.4%
25,000 – 45,000	21	19.1%
Above 45,000	56	50.9%
Did not disclose	13	11.8%
Total	**110**	**100.00**
Skipped	**1**	**—**

The findings indicate that the surveyed population generally falls within **moderate to higher household income categories**, with more than half of households reporting incomes above 45,000 MKD per month.

Only a small proportion of households fall within lower-income brackets (below 18,000 MKD), suggesting that extreme income deprivation is limited within the surveyed sample. However, a noticeable share of households remains within lower-to-middle income ranges or chose not to disclose income levels, indicating variability in economic capacity.

In the context of national economic indicators in North Macedonia, the reported income distribution suggests that a significant proportion of households are positioned above the statutory minimum wage level, while a subset of households remains closer to lower-income thresholds. This comparison is used only as a contextual reference for understanding relative income positioning and not as a measure of welfare classification.

At the same time, pension-based households (38.4% as primary income source) should be interpreted with caution, as pension levels typically represent a more stable but often limited income stream compared to wage employment. This may influence household resilience, particularly where combined with limited secondary income sources or partial dependence on land-based livelihoods.

Household Dependence on Land-Based Income Sources

The socioeconomic survey assessed the share of household income derived from land-based activities, distinguishing between land affected by the project and other land assets, in order to understand livelihood dependence and potential exposure to land-related impacts.

Responses indicate varying levels of dependence on both project-affected land and other land owned or used by households.

Income Derived from Project-Affected Land

A total of **107 valid responses** were recorded for this question, while non-numeric responses (including "don't know", unclear responses, and skips) were excluded from numerical analysis.

The results indicate that **a significant proportion of households (36.4%) report no income dependence on project-affected land**. A further substantial share reports **low to moderate dependence (1–10%)**, while a smaller proportion reports higher dependence levels above 20%. Only isolated cases report full dependence (100%).

Table 5-12 Household Income Share from Project-Affected Land

Income share from affected land	Number of Households	Share (%)
0%	39	36.4%
1–5%	22	20.6%
6–10%	18	16.8%
11–20%	10	9.3%
21–30%	9	8.4%

Income share from affected land	Number of Households	Share (%)
30–40%	1	0.9%
41–50%	4	3.7%
51–80%	2	1.9%
100%	1	0.9%
Don't know / non-response	5	4.7%
Total valid responses	**107**	**100.00**

Income Derived from Other (Non-Affected) Land

A total of **107 valid responses** were also recorded regarding income derived from other land holdings not affected by the project.

The findings show that **a lower proportion of households (approximately 20%) report no income from other land**, while the majority report some level of income contribution. A significant share of households reports **moderate dependence (10–40%)**, and a smaller subset reports **high dependence (50–100%)**, indicating that other land plays an important role in livelihood diversification for many households.

Table 5-13 Household Income Share from Other Land

Income share from affected land	Number of Households	Share (%)
0%	21	19.6%
<10%	5	4.7%
10%	17	15.9%
15%	1	0.9%
20%	12	11.2%
25%	5	4.7%
30%	12	11.2%
40%	2	1.9%
50%	6	5.6%
60%	6	5.6%
70%	1	0.9%
80%	2	1.9%
100%	2	1.9%
Don't know / non-response	15	14.0%
Total valid responses	**107**	**100.00**

Comparative Interpretation (Land-Based Livelihood Structure)

The combined results indicate a **dual-structure land dependency pattern** within the surveyed population.

Dependence on **project-affected land is generally low**, with over one-third of households reporting no income contribution from the affected land and the majority reporting only minor contributions. This suggests that for most households, the affected land does not represent the primary livelihood base.

In contrast, **other land holdings play a more significant role in household livelihoods**, with a larger proportion of households reporting moderate to high income contributions. This indicates that many households maintain diversified land use strategies, where non-affected land acts as an important livelihood buffer.

However, a smaller subset of households shows higher dependence on land-based income sources overall, indicating potential vulnerability where both affected and non-affected land contribute significantly to household income.

Overall, the findings suggest **heterogeneous livelihood dependence on land**, with varying levels of exposure and adaptive capacity across the surveyed population.

Livestock-Based Livelihood Activities

The socioeconomic survey also assessed household engagement in livestock-related activities in order to determine the extent of dependence on animal husbandry as a source of income or subsistence.

The findings indicate that the vast majority of households (approximately 98%) reported that they do not generate income from livestock activities. A smaller proportion of households (approximately 15%) reported that they keep livestock for household consumption purposes.

It is important to note that livestock reported by households is predominantly kept in sheltered or non-pasture-based conditions, and is primarily intended for subsistence use rather than commercial production. As such, this activity does not constitute a primary or significant income-generating source for the surveyed households.

Based on the survey responses, the potential loss of access to pasture land is not expected to result in measurable livelihood impacts related to livestock production, as household animal husbandry activities are not dependent on the affected land and are not market-oriented in nature.

Livelihood Dependence on Land-Based Resources

The socioeconomic survey assessed the extent to which households depend on land-based resources for their livelihoods, in order to better understand potential sensitivity to land-related project impacts.

The findings indicate that agriculture is not the primary income source for the majority of households, as wage employment and pensions represent the dominant livelihood categories. Specifically, agriculture accounts for 13.6% of households as the main income source, while the remainder rely primarily on non-land-based income sources such as salaries and pensions.

However, land remains an important supplementary resource for a broader share of households. Survey results on land use indicate that most households actively engage in agricultural production, while a smaller proportion (approximately 15–20%) reported that their land is

currently not in use. In addition, 13% of households reported access to additional land through lease arrangements, suggesting diversification of land-based activities beyond owned plots.

It should also be noted that agricultural activities in the area are partially supported through national government agricultural support measures, which may contribute to the sustainability of farming activities for a subset of households engaged in land-based production.

Taken together, these findings indicate varying degrees of dependence on land-based resources across the surveyed population, ranging from primary dependence (agriculture-dependent households) to secondary or supplementary use among wage- and pension-dependent households.

Table 5-14 Indicators of Land Dependence

Indicator	Result
Households with agriculture as the main income source	13.6%
Households with non-agricultural main income sources	86.4%
Households with unused land	15–20%
Households using land for agriculture	80–85%
Households with additional leased land	13%

Land Dependence Profile: The results indicate a mixed but generally low-to-moderate dependence on land as a primary livelihood source. While a small share of households relies directly on agriculture for income, most households depend primarily on wage employment or pensions, with land serving a supplementary or subsistence function.

Nevertheless, land remains broadly utilized across the majority of households, indicating its continued importance as a productive asset. The presence of households with unused land and those relying on leased land further reflects differentiated land-use strategies and varying levels of livelihood reliance.

The existence of government-supported agricultural measures provides an additional contextual factor influencing the sustainability of land-based livelihoods, particularly for households engaged in farming activities. However, dependence patterns remain primarily determined by household income structure rather than agricultural support mechanisms. Overall, the findings suggest that sensitivity to land-related impacts is not uniform, with a subset of households potentially more exposed due to higher reliance on agricultural activities, while the majority exhibit diversified livelihood structures that may enhance resilience.

5.3.5 Household Living Conditions and Access to Basic Services

The socioeconomic survey assessed household living conditions and access to basic services in order to understand overall welfare conditions and potential vulnerability factors beyond income and land dependence.

Housing Conditions and Basic Infrastructure

The survey results indicate that the majority of households live in **detached houses (104 households)**, while a smaller proportion (**6 households**) reside in apartments, all of which are privately owned.

All surveyed households reported access to **basic utility services**, including:

- water supply
- electricity
- sewerage system
- internet connectivity
- communal waste collection services
- asphalted road access
- landline telephony

The main source of water for all households is the **public municipal water supply network**, indicating full coverage of basic water infrastructure within the surveyed settlements.

Energy Use and Household Assets

Approximately **70% of households reported using wood as the main heating source**, indicating continued reliance on solid fuel heating, particularly during winter periods.

In terms of productive and household assets, approximately **95% of households reported ownership or access to basic agricultural and household production equipment**, including:

- agricultural machinery (e.g., tractors, motor cultivators)
- hand tools for agricultural work
- garden plots for fruit and vegetable production
- auxiliary/storage facilities
- processing equipment for agricultural products (milk, fruit, vegetables)
- transport assets (cars, vans, bicycles, motorcycles, horse carts)

These findings indicate a relatively high level of asset ownership and self-sufficiency in household-level production activities.

Access to Services and Reported Difficulties

When asked about difficulties in accessing basic services, the majority of households (**approximately 74%**) reported **no significant constraints** in access.

However:

- **20% of households reported transportation-related difficulties**, primarily linked to mobility and access to services outside the settlement
- **6% of households reported high cost of living as a constraint**

These results suggest that while physical access to services is generally adequate, affordability and transport accessibility represent key limiting factors for a minority of households.

Household Demographic Dependency

The survey also identified that **32% of households include children or students**, indicating a moderate dependency ratio and the presence of education-related service needs within the population.

Living Conditions and Service Access

Overall, the findings indicate that households in the surveyed area benefit from **relatively good access to basic infrastructure and services**, including water, electricity, sanitation, and transport connectivity.

Housing conditions are predominantly stable, with the vast majority of households residing in individual houses with access to essential utilities. In addition, household asset ownership suggests a relatively high level of self-sufficiency in agricultural and domestic production activities.

However, certain vulnerability factors remain present. These include transport limitations affecting a subset of households, cost-related constraints for basic living expenses, and the presence of dependent populations such as children and students in approximately one-third of households.

Overall, the results suggest **generally adequate living conditions with localized accessibility and affordability constraints**, which should be considered in the broader vulnerability assessment.

5.3.6 Summary of Landowner Survey Findings on Perceptions, Expectations and Priorities

Community Perceptions

The socioeconomic survey assessed household and community perceptions of the project in order to understand general attitudes, acceptance levels, and potential social risk factors associated with project implementation.

A total of 109 households responded, while 2 households did not respond to this question.

The results indicate a predominantly positive perception of the project among the surveyed population. The majority of respondents (77 households, 70.6%) expressed a positive attitude toward the project. A smaller proportion reported a neutral position (12 households, 11.0%), while 6 households (5.5%) expressed a negative perception of the project. In addition, 14 households (12.8%) reported that they do not know or do not have an opinion regarding the project.

Table 5-15 Household Perception of the Project

Perception	Number of Households	Share (%)
Positive	77	70.6%
Negative	6	5.5%
Neutral	12	11.0%
Don't know / no opinion	14	12.8%
Total responses	**109**	**100.00**
Skipped	**2**	**—**

Community Attitudes and Social Acceptance: The findings indicate a **generally favorable perception of the project** among the surveyed households, with a clear majority expressing positive attitudes. This suggests a relatively high level of social acceptance within the project-affected communities.

A smaller proportion of respondents expressed negative or neutral views, while a notable share of households reported uncertainty or lack of opinion. This may indicate limited access to information or varying levels of awareness regarding project details.

Overall, the results suggest that while the project is broadly accepted, continued engagement and communication with stakeholders remains important, particularly to address concerns among negatively oriented or uninformed households and to maintain inclusive consultation processes.

Community Expectations from the Project

The socioeconomic survey assessed household expectations regarding potential benefits from the project in order to understand perceived development priorities and anticipated socioeconomic outcomes.

A total of **159 responses were recorded**, as respondents were allowed to indicate more than one expected benefit. As a result, percentages reflect multiple responses rather than mutually exclusive categories.

Table 5-16 Expected Benefits from the Project

Expected Benefit	Number of Responses	Share (%)
Modernization of energy/natural gas supply	45	28.3%
No expectations / no benefits expected	39	24.5%
Employment/job opportunities	26	16.4%
Infrastructure improvement	22	13.8%
Economic improvement / increased income	20	12.6%
Support for vulnerable groups	7	4.4%
Total responses	**159**	**100.00 ***

*Multiple responses allowed; percentages exceed 100% in household terms.

Community Expectations: The findings indicate that community expectations are primarily focused on **system-level and economic development benefits**, rather than direct household-level gains.

The most frequently cited expectation relates to the **modernization of energy and natural gas supply (28.3%)**, reflecting anticipated improvements in energy infrastructure and service reliability.

A significant proportion of responses (**24.5%**) indicated **no expectations or no perceived benefits**, suggesting a segment of the population that is either uncertain about project outcomes or does not anticipate direct personal or community-level benefits.

Employment opportunities (16.4%), infrastructure improvements (13.8%), and increased income or economic benefits (12.6%) were also commonly mentioned, indicating expectations of indirect socioeconomic gains from project implementation.

A smaller share of responses (4.4%) highlighted expectations related to **support for vulnerable groups**, indicating limited but present awareness of targeted social benefits.

Overall, the results suggest that while the project is associated with expectations of broader infrastructure and economic development, a notable proportion of respondents either do not anticipate direct benefits or remain uncertain, highlighting the importance of continued stakeholder engagement and communication throughout project implementation.

Community Priorities

The socioeconomic survey assessed community priorities in order to identify key development needs as perceived by affected households and to inform potential complementary measures relevant to livelihood restoration and community development planning.

A total of **207 responses were recorded**, as respondents were allowed to select multiple priority areas. As a result, percentages reflect multiple responses and not mutually exclusive household categories.

Table 5-17 Community Development Priorities

Priority Area	Number of Responses	Share (%)
Road rehabilitation and improvement	49	23.7%
Job creation	38	18.4%
Support for farmers/agriculture	36	17.4%
Improvement of public services (health, education, energy)	36	17.4%
Water and sanitation improvements	30	14.5%
Youth activities and development	18	8.7%
Total responses	**207**	**100.00 ***

*Multiple responses allowed; percentages exceed 100% in household terms.

Community Needs and Priorities: The findings indicate that community priorities are primarily focused on **basic infrastructure and economic development needs**.

The most frequently identified priority is **road rehabilitation and improvement (23.7%)**, reflecting the importance of transport connectivity and local accessibility for the surveyed population.

Economic priorities are also prominent, with **job creation (18.4%)** representing a key expectation for improving household livelihoods. In addition, **support to agriculture (17.4%)** highlights the continued importance of land-based activities for a portion of the population.

Improvement of public services (17.4%) and water and sanitation infrastructure (14.5%) were also widely reported, indicating continued needs in essential service delivery systems.

A smaller share of responses (8.7%) highlighted **youth-related activities and development**, suggesting that while social development priorities are present, they are less prominent compared to infrastructure and economic needs.

Overall, the results suggest that community priorities are primarily centered on **infrastructure upgrading, employment creation, and agricultural support**, reflecting both immediate livelihood concerns and longer-term development aspirations within the surveyed area.

5.4 Vulnerability Classification Matrix

Approach and Methodology: The vulnerability classification was developed based on a multi-criteria analysis of socioeconomic survey results, including:

- Household income level
- Dependence on land-based income (affected and non-affected land)
- Availability of secondary income sources
- Livelihood diversification
- Demographic structure (elderly, children, dependency ratio)
- Presence of chronic illness
- Access to basic services and reported constraints

Each household was assessed qualitatively against these indicators and grouped into **Low, Medium, or High vulnerability categories** reflecting overall sensitivity to livelihood impacts.

5.4.1 Vulnerability Classification Criteria

Table 5-18 Vulnerability Classification Framework

Criteria	Low Vulnerability	Medium Vulnerability	High Vulnerability
Income level	Above 45,000 MKD, stable wage/pension	25,000–45,000 MKD or mixed income	Below 25,000 MKD or unstable income
Land dependence	No or minimal dependence (<10%)	Moderate dependence (10–30%)	High dependence (>30%) or primary reliance
Secondary income	Multiple sources available	One secondary source	No secondary income
Livelihood type	Diversified (salary + pension + other)	Mixed (limited diversification)	Agriculture-dependent or single source
Demographics	No dependency burden	Some children/elderly	High dependency ratio (elderly/children)
Health status	No chronic illness	Some chronic cases in household	Severe chronic illness affecting labour capacity
Access to services	No constraints	Minor constraints (transport/cost)	Multiple access constraints

5.4.2 Household Vulnerability Distribution (Estimated Classification)

The following table presents the estimated classification of the household vulnerability distribution based on the combined socioeconomic indicators:

Table 5-19 Household Vulnerability Distribution (Estimated Classification)

Vulnerability Level	Estimated Share of Households	Key Characteristics
Low Vulnerability	~45–50%	Stable income (salary/pension), low land dependence, diversified livelihoods, adequate services
Medium Vulnerability	~35–40%	Mixed income sources, moderate land dependence, some constraints or dependency factors
High Vulnerability	~10–15%	Low income or single income source, high land dependence, limited diversification, health or dependency burdens

High Vulnerability Profile

High vulnerability households are characterized by one or more of the following:

- High dependence on agricultural land or land-based income
- Lack of secondary income sources
- Low household income (below 25,000 MKD)
- Presence of chronic illness affecting labour capacity
- High dependency ratios (elderly or children-dominated households)
- Reported transport or affordability constraints

These households represent the most sensitive group to potential livelihood disruption and may require targeted mitigation and livelihood restoration support.

Medium Vulnerability Profile

Medium vulnerability households typically exhibit:

- Mixed income structure (wage + pension + small agriculture)
- Moderate land dependence (often supplementary use)
- Some livelihood diversification but not fully stable
- Occasional constraints in service access or costs
- Moderate demographic dependency burden

These households may experience partial sensitivity to project impacts but generally retain adaptive capacity.

Low Vulnerability Profile

Low vulnerability households generally demonstrate:

- Stable wage or pension-based income above average levels

- Minimal reliance on land-based income
- Diversified livelihood strategies or secure employment
- Full access to services and infrastructure
- No significant health or dependency constraints

These households are expected to have **high resilience to land-related impacts**.

5.4.3 Vulnerability Structure

The vulnerability analysis indicates that the surveyed population is not uniformly vulnerable but instead reflects a **stratified socioeconomic structure**.

Approximately half of households fall within the low vulnerability category, supported by stable income sources and limited dependence on land-based livelihoods. A significant proportion falls within the medium category, characterised by mixed income structures and moderate exposure to livelihood risks.

A smaller but important subset of households falls within the high vulnerability category, where limited income diversification, higher land dependence, health conditions, or demographic pressures increase sensitivity to project-related impacts.

Overall Conclusion

The vulnerability classification confirms that potential project impacts are **not evenly distributed**, but are instead concentrated among a limited subset of households with higher dependence on land, lower income diversification, and reduced adaptive capacity.

This classification provides the basis for **targeted livelihood restoration measures**, ensuring that support is directed toward households most at risk of adverse socioeconomic impacts.

5.5 Land use based on the project site visit survey

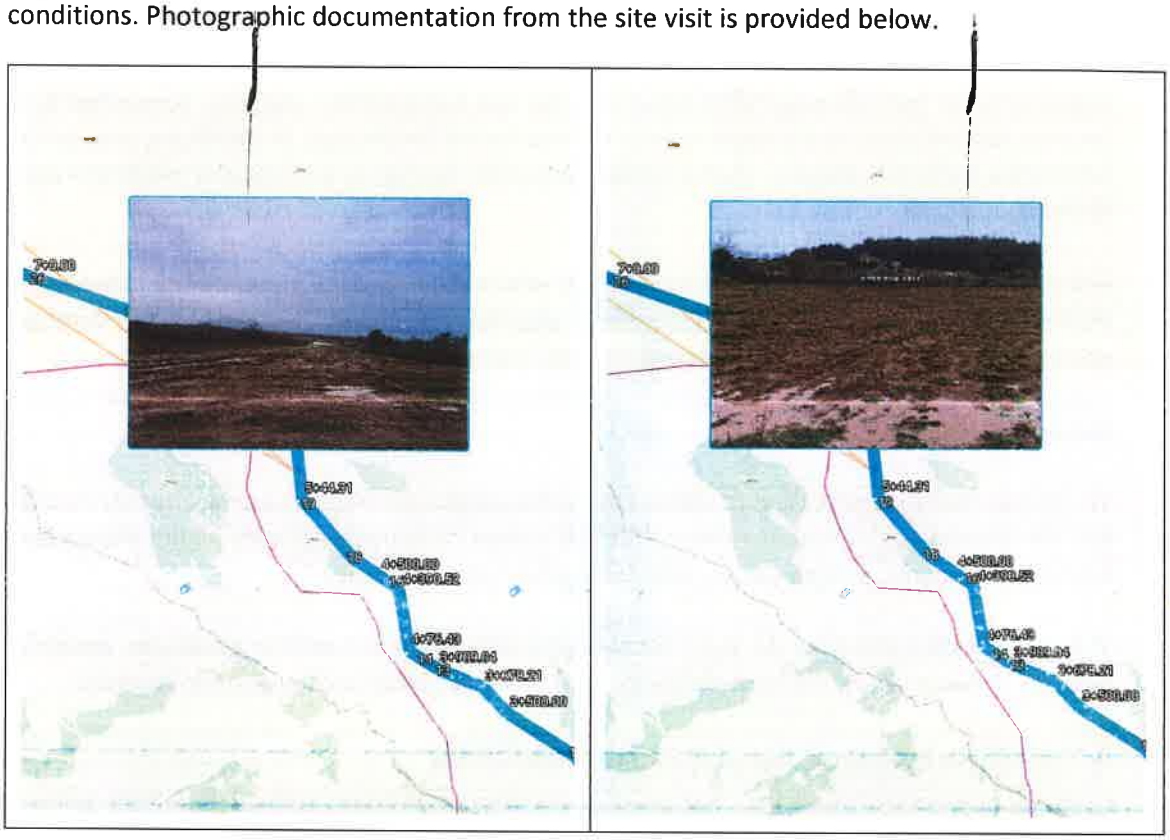
Land use within the Project area has been assessed through triangulation of multiple primary and secondary data sources to ensure robustness, accuracy, and traceability of findings. A review of the Project's environmental and social (E&S) documentation confirmed that detailed habitat and land use mapping ("Map of habitats along the pipeline route") was developed as part of the Environmental Impact Assessment (EIA) Study for the Interconnector Gas Pipeline North Macedonia – Greece (2020). These baseline maps are provided in Appendix 4 and represent the primary reference for pre-project land use conditions along the Project alignment.

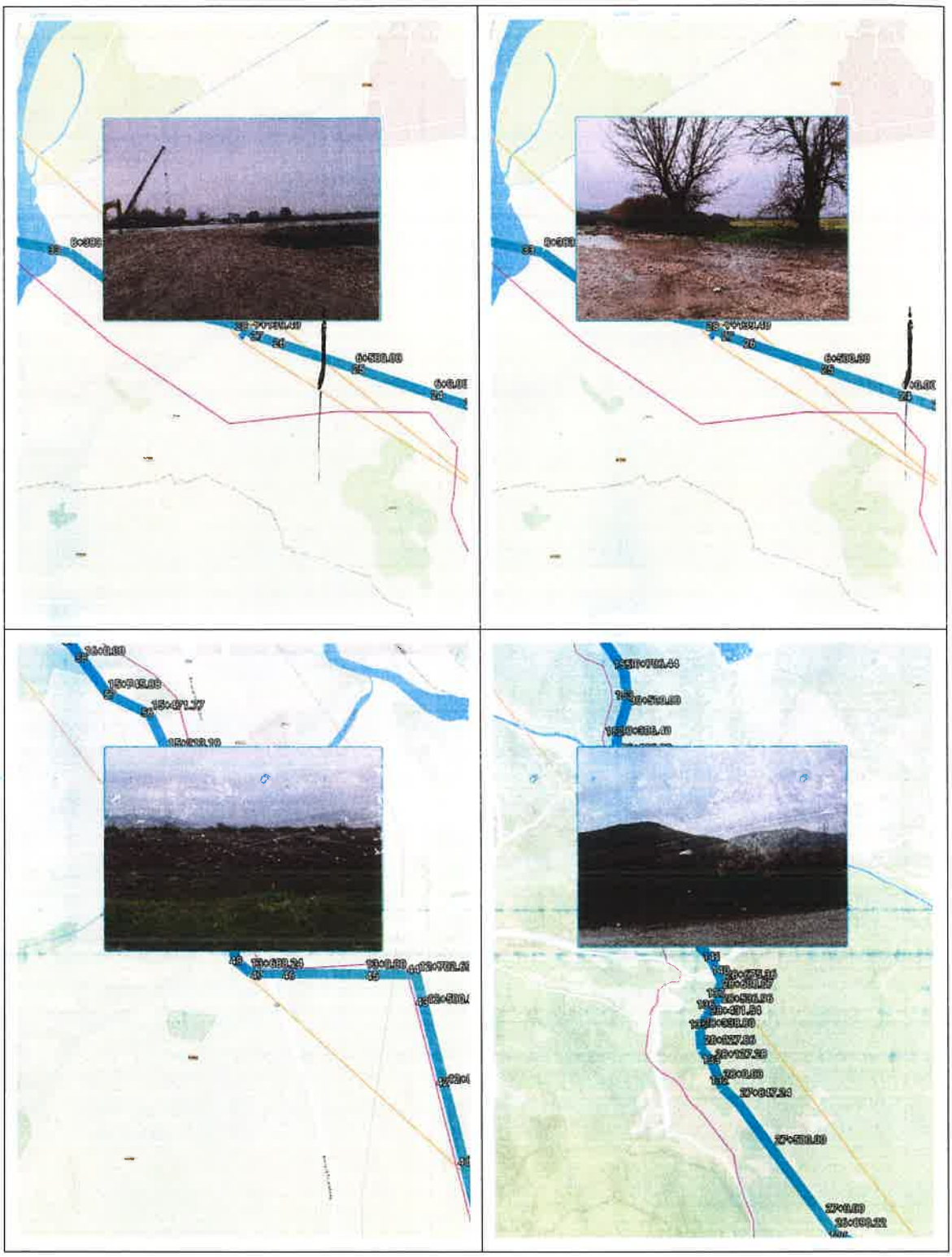
This baseline information was supplemented by spatial and descriptive datasets provided by the Project Implementation Unit (PIU), the Contractor, and the Supervisor, which were systematically reviewed and cross-checked against field observations to ensure internal consistency and spatial accuracy.

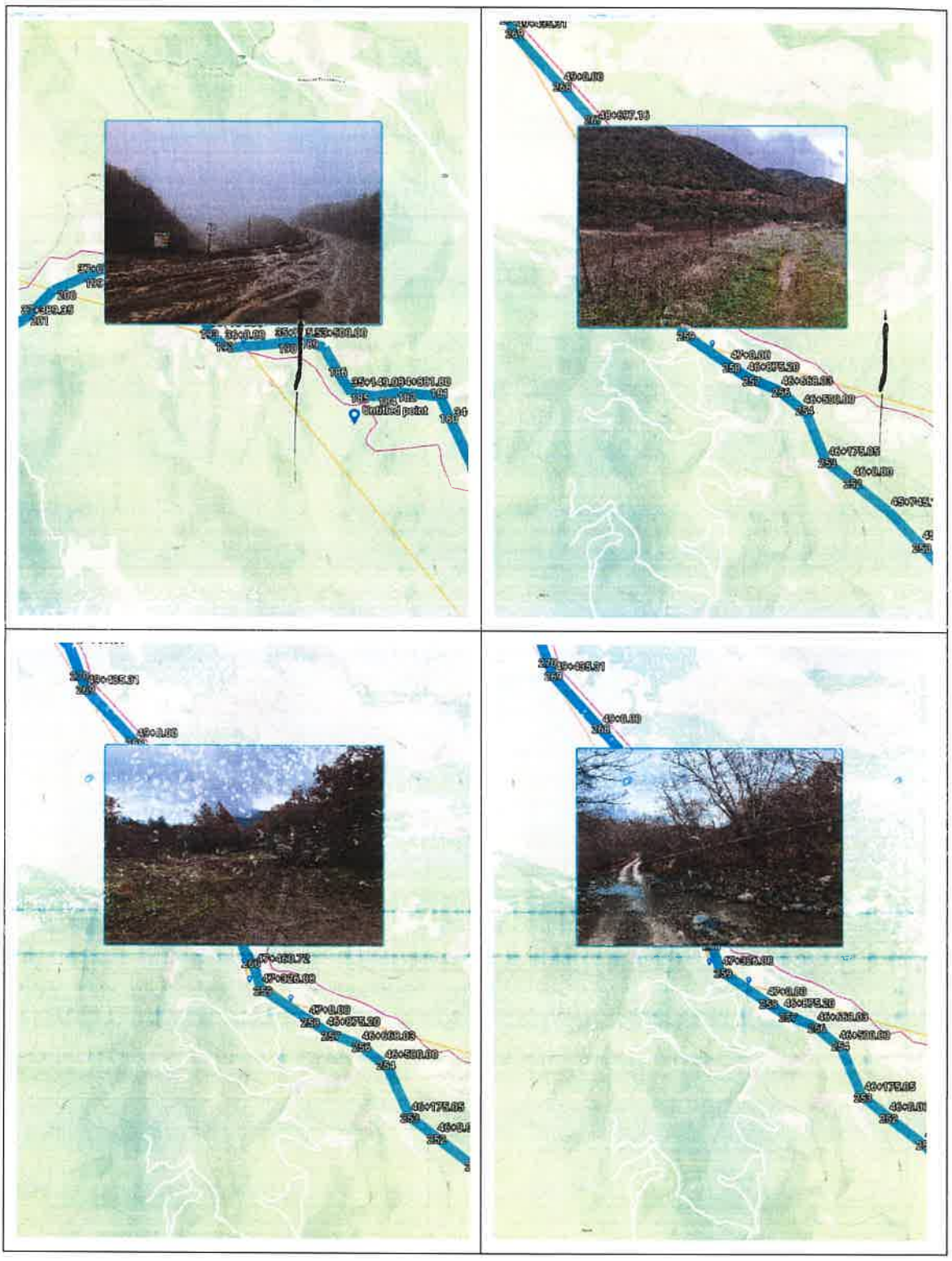
A structured field verification exercise was undertaken by the LRP team to validate and refine the compiled land use dataset. The exercise included targeted site inspections, direct observation of

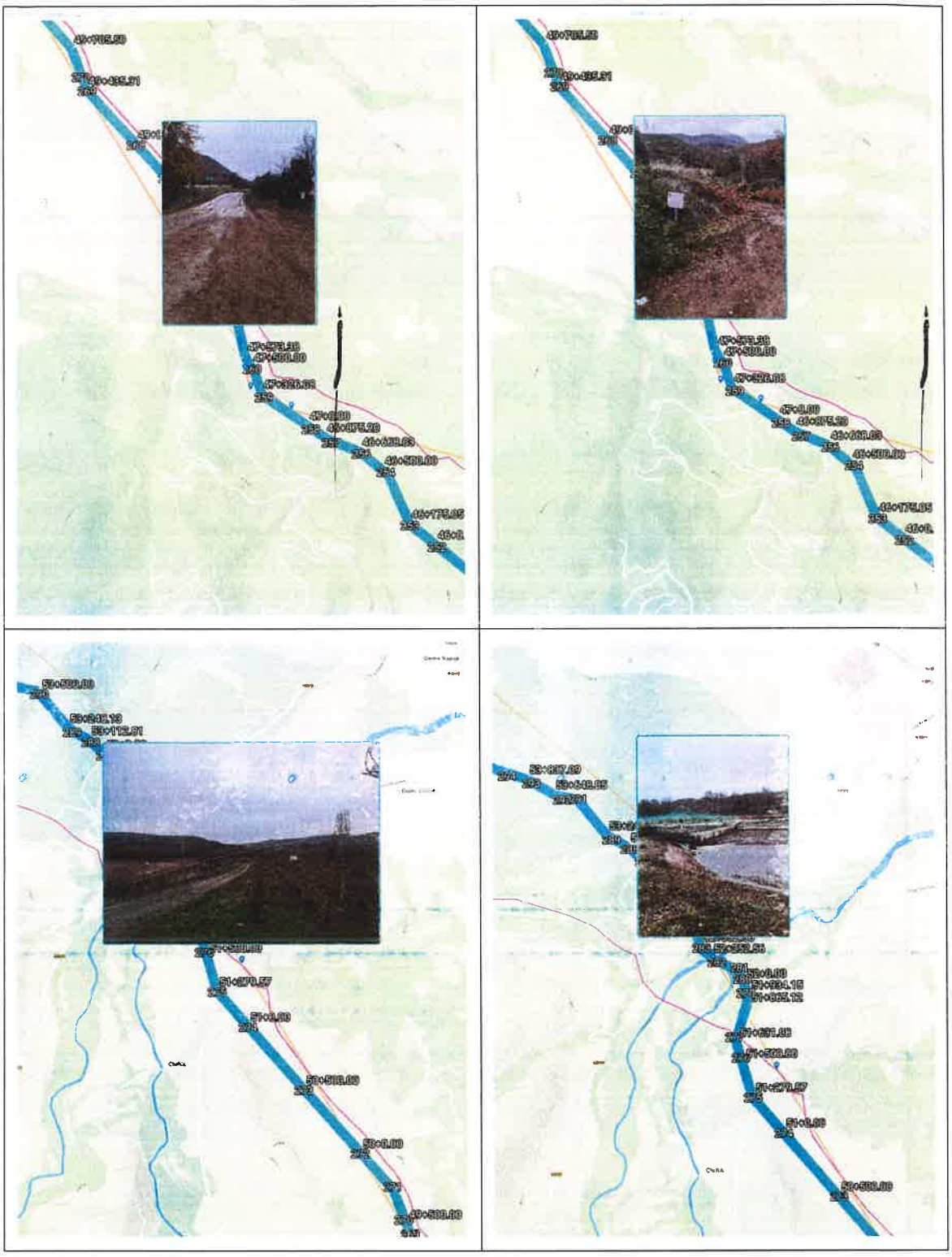
land use patterns along representative sections of the corridor, and stakeholder consultations with local land users. This process enabled confirmation of mapped land use features and refinement where informal and seasonal land use practices were identified.

The dataset was substantiated during the LRP site visit conducted in December 2025, which confirmed the continued presence and active functional use of key land use features, including agricultural land, grazing areas, potential livestock movement corridors, apiary sites/beehives, aquaculture activities, irrigation infrastructure, the Kaltun Wind Farm under construction, and recreational routes. This confirmed alignment between mapped data and actual on-the-ground conditions. Photographic documentation from the site visit is provided below.









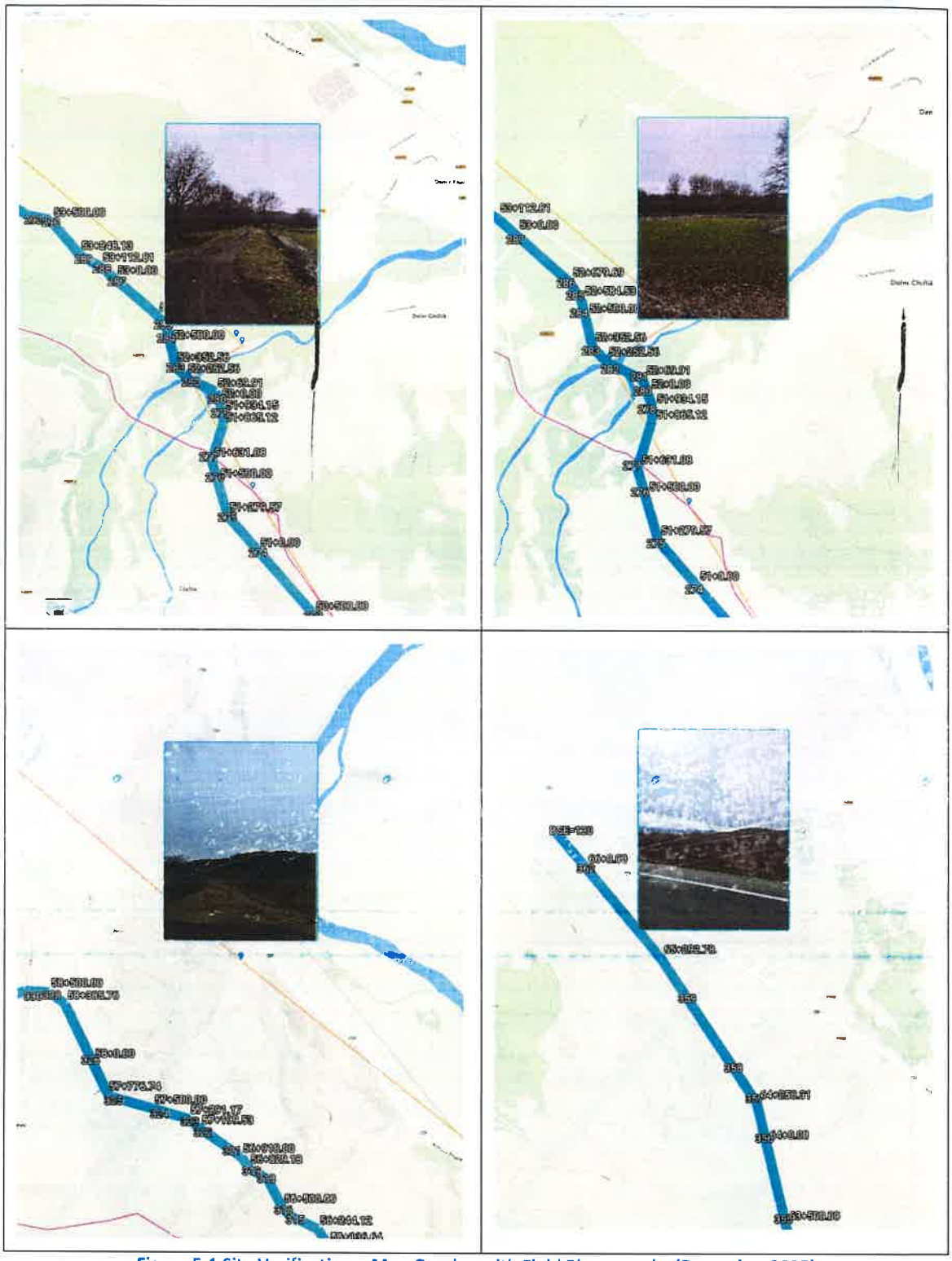


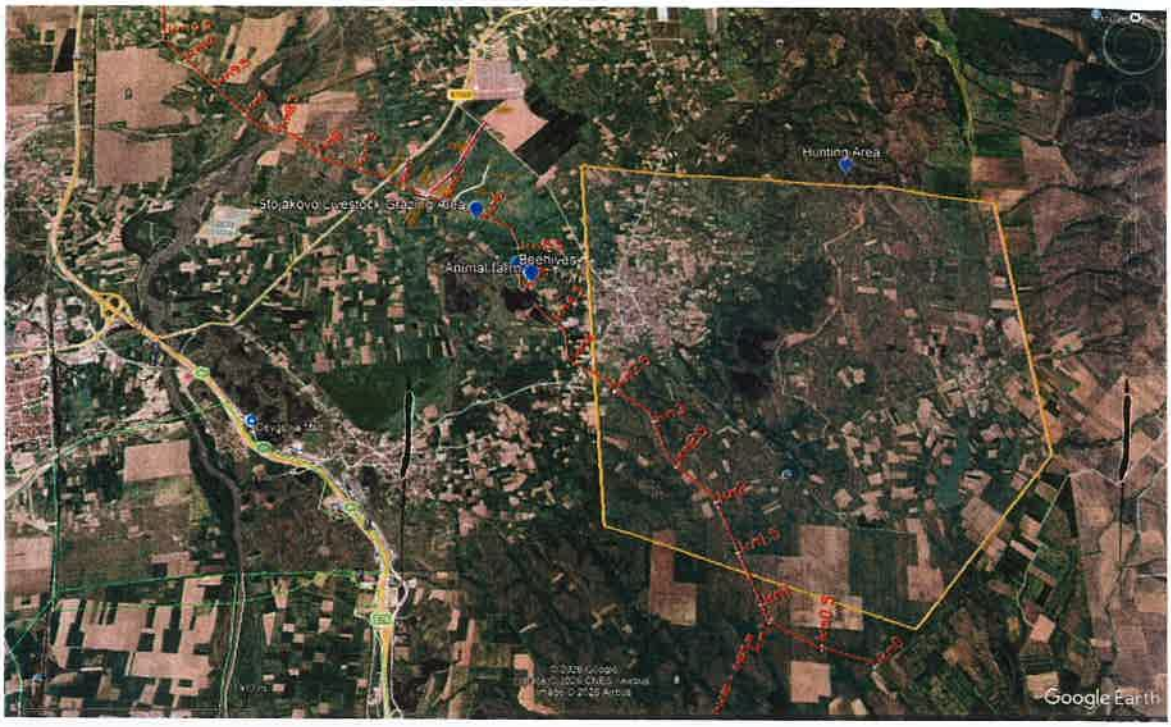
Figure 5-1 Site Verification – Map Overlay with Field Photographs (December 2025)

As mentioned, Nomagas and Engineers provided updated mapping (as of March 2025), identifying both formal and informal land users along the Project corridor. Based on this mapping, the LRP team developed a structured land use table consolidating and standardising the identified

features for LRP purposes. The table presents the land use features, their classification, and their corresponding description in terms of livelihood relevance and functional use.

Table 5-20 Land Use Features and Their Livelihood Relevance

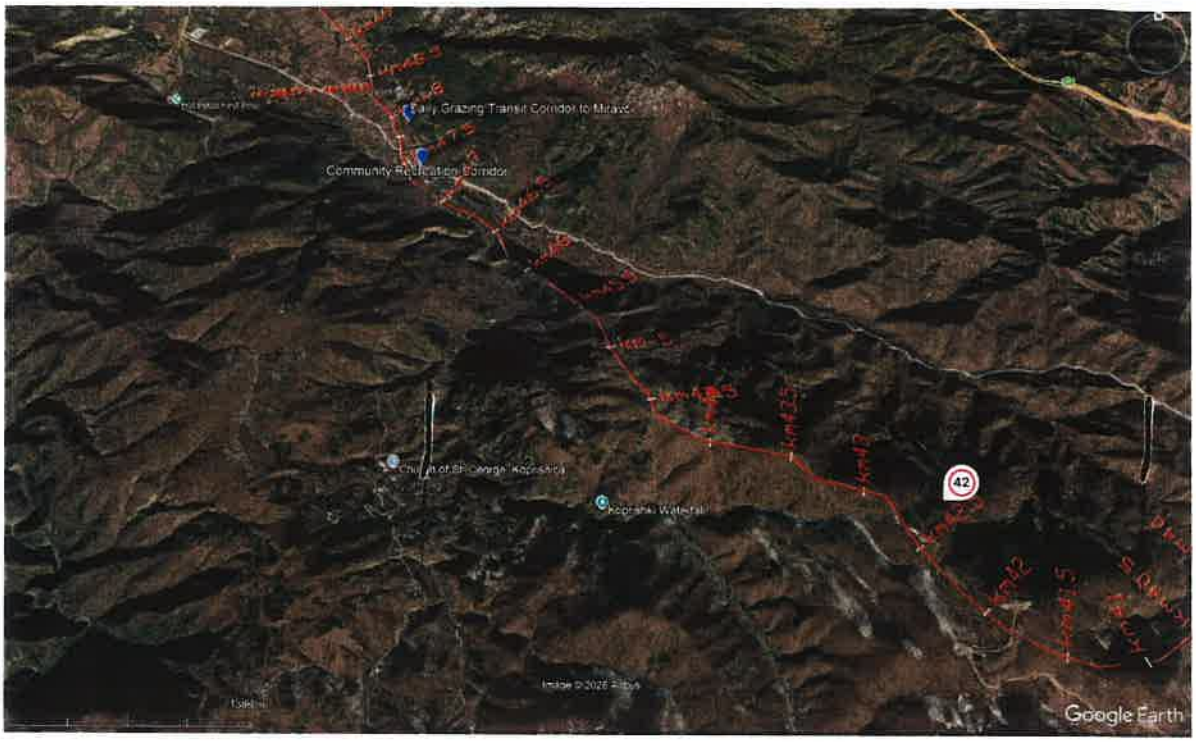
No.	Land Use Feature (Standardised Name)	Map Label	Classification	Description / Livelihood / Function
1	Apiary Sites / Beehives	Apiary Sites / Beehives	Livelihood resource / informal economic use	Small-scale household beekeeping activities contributing to supplementary income generation
2	Livestock Farm	Livestock Farm	Agricultural production asset	Facilities used for livestock keeping, breeding, and household-based animal production
3	Designated Hunting Area	Hunting Area	Common natural resource use area	Regulated hunting zone used for seasonal or controlled hunting activities
4	Irrigation Canal System	Irrigation Canal System	Critical agricultural infrastructure	Water distribution network supporting irrigation and agricultural productivity
5	Stojakovo Community Grazing Area	Stojakovo Grazing Area	Common property resource (CPR)	Communal grazing land used collectively by livestock owners; supports subsistence livelihoods
6	Livestock Movement Corridor (Stojakovo–Miravci)	Livestock Route – Miravci	Livelihood mobility / access route	Established corridor used for daily livestock movement between grazing and settlement areas
7	Aquaculture Facility (Fish Pond)	Fish Farm	Formal livelihood production asset	Small-scale fish farming and aquaculture production contributing to household income
8	Kaltun Wind Farm (Under Construction)	Wind Farm Kaltun	Planned infrastructure (energy sector)	Renewable energy development currently under construction within the Project influence area
9	Community Recreational Walking Trail	Recreation Corridor	Community social/recreational use area	Informal walking and recreational route used by local population


Hunting Area
Animal farm
Google Earth


Google Earth


Irrigation canal
Google Earth


Irrigation canal
Google Earth


Community Recreation Corridor
Google Earth


km32
km31
km50.5
km50
km49.5
km49
km48.5
Daily Grazing Transit Corridor to Miravci
km47.5
Community Recreation Corridor
Google Earth



These maps present the land use identified within the Project area based on field observations and data collection undertaken by the Project Implementation Unit (PIU), the Contractor, and the Supervisor. The assessment indicates a predominantly rural and mixed-use landscape, consisting mainly of agricultural land used for crop production and livestock farming, as well as communal grazing areas and associated livestock movement corridors. In addition, several small-scale economic and natural resource-based activities are present, including apiary sites and an aquaculture facility (fish farm). Existing and planned infrastructure is also identified within the area, including irrigation canals and the Kaltun Wind Farm, which is currently under construction. A designated recreational walking corridor used by the local population is also present. Overall, the land use profile reflects a combination of traditional agricultural livelihoods, ongoing infrastructure development, and community recreational use within the Project footprint.

Overall, land use information was triangulated through three sources: the 2020 EIA habitat maps, field verification during the December 2025 site visit, and updated Project Proponent data from March 2025 (Appendix 5). This triangulation confirmed a broadly consistent land use pattern across the Project area, with minor updates reflecting current land use conditions.

Findings of Land Use

The assessment indicates that land use along the Project corridor is predominantly **agricultural**, including vineyards, orchards, and arable land. In addition, areas of **pasture and semi-natural vegetation** are present, particularly in less intensively cultivated sections.

Limited areas of **built-up or residential use** were identified, mainly at a distance from the pipeline alignment. Some **government-owned land under concession** is also utilised for agricultural purposes.

Field verification confirmed the presence of both **formal land users (registered owners and concessionaires)** and **informal or ancillary users**, particularly in relation to cultivation, seasonal use, and grazing activities. Informal use also includes **beekeeping activities**, with beehives placed along agricultural plots and semi-natural areas, reflecting typical livelihood practices in the region.

Overall, land use patterns are consistent with the rural character of the Project area, with **agriculture representing the dominant land use and key livelihood source**, while informal uses such as beekeeping provide supplementary income and should be considered in impact assessment and mitigation planning.

These land use categories have been assessed with particular attention to potential livelihood dependencies and the continuity of existing land use practices. While the assessment undertaken to date has not identified significant livelihood impacts associated with the use of government-owned land, the Project Proponent will continue to verify land use conditions and maintain engagement with relevant authorities, lease beneficiaries, concessionaires, and other land users throughout the remaining stages of Project implementation.

Should any previously unidentified formal or informal land users be identified, or should unanticipated livelihood impacts arise during construction or reinstatement, the Project Proponent will assess such impacts on a case-by-case basis and implement appropriate measures to avoid, minimise, mitigate, or restore affected livelihoods, as required. Depending on the nature of the impact, such measures may include adjustments to construction planning, maintenance of access to land and resources, coordination with relevant authorities and land users, additional compensation where applicable, or other livelihood restoration measures consistent with the principles and objectives of this LRP.

Ongoing monitoring, stakeholder engagement activities, and operation of the Project Grievance Mechanism will support the identification and timely resolution of any issues related to land use, access restrictions, or livelihood impacts associated with Project activities.

Agricultural Production and Livelihood Characteristics

To establish the agricultural livelihood baseline within the Project area, Nomagas, supported by the EPC Contractor and the Supervision Consultant, conducted an agricultural census to identify existing agricultural production systems, characterize land use patterns, and assess potential impacts associated with Project-related land acquisition, easement establishment, and temporary land occupation. The census covered a total of 891 land parcels located within or adjacent to the Project footprint and provides an important baseline for the assessment of livelihood restoration requirements in accordance with the objectives of EBRD Performance Requirement 5 (PR5).

The results indicate that agricultural production remains an important land use activity within the Project area, although a significant proportion of surveyed parcels are currently inactive. Of the 891 parcels assessed, 206 parcels were identified as being under active agricultural use, while 685 parcels were classified as inactive, abandoned, or otherwise not currently used for productive agricultural purposes. The relatively high number of inactive parcels reflects broader rural land use trends observed in the region, including agricultural land fragmentation, demographic changes, labour migration, and the gradual reduction of small-scale agricultural production in some communities. A detailed tabular presentation of the findings is provided in Appendix 5.

Among actively cultivated parcels, agricultural production is strongly concentrated in perennial crop cultivation, particularly viticulture. Vineyards represent by far the dominant agricultural activity, accounting for approximately 73% of all productive parcels identified during the census. This finding demonstrates the economic and cultural importance of grape production within the Project area and confirms that viticulture constitutes the principal agricultural livelihood activity for a significant proportion of affected land users.

In addition to vineyards, the census identified a range of other agricultural activities, including cultivation of annual crops, vegetable production, orchards, olive groves, and limited beekeeping activities. The most frequently recorded agricultural uses after vineyards include general agricultural crops, cabbage cultivation, pear orchards, olive plantations, garden production, and maize cultivation. Several parcels were also identified as supporting mixed agricultural systems combining orchards and beekeeping activities. While these activities occur on a smaller scale compared to viticulture, they nevertheless contribute to household food security, supplemental income generation, and diversification of rural livelihoods.

The agricultural profile identified through the census suggests a relatively low level of crop diversification among active agricultural land users. Production is concentrated around a limited number of crop types, with vineyards representing the dominant source of agricultural output. Such specialization can increase sensitivity to Project-related impacts where access to productive land is temporarily restricted or agricultural activities are disrupted during construction. Households whose livelihoods depend primarily on a single agricultural activity may have fewer alternative income-generating opportunities and may therefore be more vulnerable to temporary production losses.

A notable characteristic of agricultural production within the Project area is the predominance of perennial crops. Vineyards, pear orchards, olive groves, peach orchards, and other fruit-bearing plantations require long-term investment, specialized cultivation practices, and several years to reach productive maturity. Unlike annual crops, which can generally be replanted within a single growing season, perennial crops represent long-term livelihood assets with a substantially longer recovery period in the event of physical damage or loss. Consequently, impacts affecting perennial crops have the potential to result in more significant livelihood consequences if not appropriately mitigated.

From a livelihood restoration perspective, the prevalence of perennial agriculture has important implications for compensation and restoration planning. Restoration measures should not be limited solely to the replacement of lost crops but should also consider the time required for re-establishment of productive capacity, loss of income during recovery periods, and costs associated with rehabilitation of agricultural land following construction activities. Particular attention should therefore be given to vineyard owners and orchard producers whose productive assets may be temporarily or permanently affected by Project activities.

The census also identified a small number of parcels associated with beekeeping activities. Although representing a limited proportion of overall agricultural production, beekeeping can provide an important supplementary source of household income and may be sensitive to temporary access restrictions, vegetation clearance, construction disturbance, and changes in flowering patterns within agricultural areas. Where relevant, specific mitigation measures should be considered to ensure that these activities are not adversely affected.

Overall, the findings demonstrate that agriculture remains an important livelihood component for a portion of the population within the Project area, despite the large number of inactive parcels. Agricultural production is characterized by a strong dependence on viticulture and other perennial crops, creating a livelihood profile that requires careful consideration during Project implementation. In accordance with EBRD PR5, livelihood restoration measures should be designed to ensure that affected land users are able to restore, and where feasible improve, their pre-project livelihoods and standards of living.

The agricultural census findings support the need for a livelihood restoration approach focused on maintaining agricultural productivity, minimizing disruption to farming activities, restoring land to its pre-construction condition, and providing timely compensation for any temporary or permanent impacts on crops and agricultural assets. Restoration measures should include reinstatement of agricultural land following construction, preservation of access to agricultural parcels wherever practicable, compensation for crop losses in accordance with applicable entitlement frameworks, and targeted support for households whose livelihoods are significantly dependent on vineyard cultivation, orchards, or other productive agricultural activities. Such measures will contribute to ensuring that Project-affected persons are not economically disadvantaged as a result of Project implementation and that the objectives of EBRD PR5 are effectively achieved.

5.6 Land Use based on the findings from KIIs and FGDs

Between January and February 2026, a series of Key Informant Interviews (KIIs), Focus Group Discussions (FGDs), and municipal-level meetings were conducted across the municipalities of Bogdanci, Gevgelija, Demir Kapija, and Negotino, including their respective villages. There were four (4) conducted meetings with the municipality administration as key informants, followed with meetings of (8) focus groups. These consultations were undertaken as part of the Livelihood Restoration Program (LRP) data collection process.

The primary objectives of these engagements were to:

- Assess current patterns of land use.
- Gather community perspectives regarding potential project impacts.
- Identify suitable measures for livelihood restoration.

Participants included municipal representatives, local representatives of forestry public enterprise and ministry for agriculture, forestry and water management, non-governmental organizations, various citizens' associations, representatives of affected villages, and representatives of vulnerable groups. The diversity of stakeholders ensured that a broad range of views and concerns were incorporated into the assessment process.

During these consultations, participants were informed that the land acquisition process is being implemented in compliance with national legislation and the European Bank for Reconstruction and Development (EBRD),and EBRD Environmental and Social Policy (ESP) 2019, with specific reference to Performance Requirement 5 (PR5). Importantly, it was emphasized that project-affected persons (PAPs) include both formal landowners and informal land users, provided they are economically

Land use and livelihood activities

Agriculture in the municipalities traversed by the Interconnector Bogdanci, Gevgelija, Demir Kapija, and Negotino reflects a diverse but largely supplementary livelihood base. In Bogdanci, agricultural activity is concentrated in Stojakovo village, where cabbage cultivation, vineyards, and pear orchards are most prominent. Much of the surrounding land is uncultivated, and farming generally provides additional rather than primary household income. Beekeeping exists in the wider municipality but is not significant within the project corridor, while forestry activities are negligible due to limited vegetation cover. The town itself has decreasing agricultural activity compared to the villages, with more focus on services and other income sources.

In Gevgelija, vegetable production dominates, particularly tomatoes and peppers, with smaller areas devoted to fruit and cereal crops. Forest product collection, such as blueberries and mushrooms, occurs but is minor and largely for household use. Livestock farming is minimal, and beekeeping is not a notable activity. Agriculture here is also supplementary, a trend reflected in the declining number of applications for agricultural subsidies in recent years.

Demir Kapija is characterized by extensive vineyards, which form the backbone of local agriculture, complemented by some orchards. Livestock farming is limited, though informal grazing of cattle and sheep by local households is observed, particularly in the village Dren area. Farming provides additional income for households, but outward migration and an aging population have reduced the resilience of local communities.

Negotino is widely recognized as part of North Macedonia's wine-producing region, with vineyards and fruit orchards, particularly peaches and apricots, forming the core of agricultural

activity. Livestock farming is limited and mostly stall-based, while beekeeping and forest product collection are negligible. As in the other municipalities, agriculture is supplementary, with households relying on mixed income strategies.

Across the Interconnector area, viticulture is the most prominent agricultural activity, particularly in Negotino and Demir Kapija, while vegetable cultivation is concentrated in Gevgelija and Bogdanci. Orchards provide additional diversity, with pears in Bogdanci and peaches and apricots in Negotino. Livestock farming is generally limited, with informal grazing noted in Demir Kapija, and forestry activities are minor, confined to small-scale collection of berries and mushrooms in Gevgelija. Overall, agriculture does not represent the primary source of livelihood in these municipalities, but rather a supplementary activity, with households preferring cash compensation for land acquisition impacts.

Seasonal aspects of livelihood activities

Agriculture in the Interconnector municipalities follow a seasonal rhythm, shaped by climate and crop cycles. In Bogdanci area, farming activity peaks twice a year, cabbage is planted and harvested in spring and again in autumn, while vineyards and pear orchards need work in the summer and in the autumn when harvests is happening. In Stojakovo, the municipality's most active farming village, families balance these seasonal tasks with other sources of income, making agriculture an important but not exclusive livelihood.

In Gevgelija, vegetable production such as tomatoes and peppers is mostly happening in the summer months. Fruit and cereal crops are gathered in late summer and autumn, while small-scale collection of blueberries in summer and mushrooms in spring and autumn adds a seasonal supplement, though mostly for household use rather than commercial sale.

Demir Kapija's vineyards set the pace of the agricultural calendar. Winter and spring are devoted to pruning and maintenance, while late summer and early autumn bring the grape harvest. Livestock grazing continues year-round, but herds are often moved between villages in spring and autumn, reflecting traditional seasonal patterns. Forestry plays only a minor role here, with livelihoods tied mainly to vineyard cycles.

In Negotino area, vineyards and orchards require care throughout the year, with harvests concentrated in late summer and autumn. Peaches and apricots are picked in mid to late summer, adding variety to the agricultural calendar. Livestock farming is limited and stall-based, and it is less influenced by seasonal changes and relies on steady feeding practices.

Taken together, these municipalities show how agriculture is deeply seasonal, with peaks in labour demand during planting and harvest periods. Families rely on household labor to manage these cycles, and farming often complements other income sources rather than serving as the sole livelihood.

Gender and community dynamics

Family and community dynamics are important to livelihoods in the Interconnector area, where agriculture (vineyards, orchards and vegetable production) and seasonal labor dominate. Family labor remains essential during harvest peaks, with strong traditions of mutual aid among households. Community solidarity thrives through shared knowledge on farming techniques and water management, yet it's eroding due to youth outmigration to urban centres like Skopje or abroad (e.g., EU countries). Younger generations prioritize education or off-farm jobs, reducing intergenerational farming support.

Gender roles are distinctly divided: men handle physically intensive tasks like plowing, irrigation from the Vardar River, while women manage household duties, childcare, elder care, food processing and lighter field work. During focus group discussions with women who participated, mobility restrictions and childcare shortages were discussed, curbing their entrepreneurial growth in agro-processing or small trade.

In Bogdanci and Demir Kapija women confirm that they bear primary responsibility for domestic work and caregiving, while men focus on income-generating activities. Spousal joint decision-making prevails for family finances, and women often assist in agriculture alongside men. Girls' enrollment has risen in vocational education (e.g., 95% primary completion rates per 2024 MAKEDSTAT data), but women reported that unavailable public transport and unreliable buses, high fuel costs, and low female driving rates—as blocking attendance.

Livelihood challenges and vulnerabilities

Findings from FGDs and KIIs conducted in the Negotino, Demir Kapija, Bogdanci, and Gevgelija regions indicate several common livelihood challenges affecting households engaged in agriculture and related activities.

Agriculture remains a key source of income, particularly through vineyards, orchards, and vegetable production. However, households are highly exposed to climate-related risks, including droughts and irregular rainfall, which lead to unstable yields and income fluctuations.

Landholdings are generally small and fragmented, limiting productivity and mechanisation. Combined with limited access to irrigation and rural infrastructure, this reduces agricultural efficiency and increases production costs.

A further key challenge is the ageing rural population, as younger members increasingly migrate to urban areas or abroad, resulting in labour shortages and reduced long-term sustainability of farming activities.

Many households also face limited income diversification, relying heavily on agriculture as a primary or secondary income source. This increases vulnerability to price volatility, market dependency, and rising input costs.

Access to finance remains constrained, particularly for smallholders lacking collateral or stable income, limiting investment in modernisation and productivity improvements.

Overall, the most vulnerable groups include small-scale farmers, elderly households, and those with limited alternative income sources, who are most exposed to agricultural and economic shocks.

Institutional support and training

Overview of Available Services

Institutional frameworks provide foundational support to communities in the Interconnector project area (Negotino, Bogdanci, Gevgelija, and Demir Kapija municipalities), primarily through the Ministry of Agriculture, Forestry and Water Economy (MAFWE) and the Employment Agency of the Republic of North Macedonia (AVRM). However, key informant interviews (KIIs) and focus group discussions (FGDs) conducted for LRP indicate that these services are perceived as fragmented, with insufficient coverage and depth to meet local needs.

MAFWE delivers essential administrative functions, including registration of agricultural holdings, applications for subsidies under the IPARD program, contract management for agricultural inputs. Extension services offer technical guidance on irrigation, pest management, and crop rotation, but implementation remains ad hoc and geographically limited, particularly in rural hamlets of Demir Kapija.

Employment and Vocational Programs

AVRM local branches in Gevgelija and Negotino administer self-employment initiatives for unemployed individuals, emphasizing crafts, agro-processing, and small-scale farming. These programs provide startup grants (up to MKD 300,000 as per 2025 cycles) and professional mentoring to foster sustainable livelihoods amid Vardar Valley seasonality.

Vocational trainings cover information technology (IT), welding, and agribusiness, supplemented by national public calls from AVRM headquarters in Skopje for retraining and labor market integration.

- Regional labor market surveys highlight demand for profiles such as :
- Construction workers ;
- Packers (Bogdanci processing facilities);
- Mechatronics technicians and hairdressers (industrial and service sectors near Gevgelija border).

Municipalities offer targeted measures, including grants prioritized for young and women farmers (e.g., 15% female uptake in Negotino per MAFWE 2024 data) and social protections like childcare scholarships and elderly home care.

During the meetings it was discussed that there is demand for enhanced, accessible training tailored to youth and women. Priority areas include:

- Technology integration in agriculture (e.g., precision farming tools);
- Project-specific skills (e.g., interconnector infrastructure works);
- Credentialed programs in professional agriculture and vocational trades.

5.7 Project impacts and preferred restoration measures

Table 5-21 Impact–Measure Matrix

Impact Type	Affected Households	Impact Severity	Proposed Measures	Priority
Partial land acquisition/land use restriction	Majority of households	Low	Cash compensation for the affected land	High
Temporary land occupation (construction phase)	Land users (agriculture)	Low–Moderate	Compensation + land restoration	High
Disruption of agricultural activities	Households using land for farming	Moderate (localised)	Agricultural support (inputs, tools, productivity support)	Medium–High
Loss of agricultural income (limited cases)	Agriculture-dependent households	Moderate–High (few cases)	Cash compensation + targeted livelihood support	High
Access limitations (temporary)	Households with affected plots	Low	Construction management + access restoration	Medium
Impacts on vulnerable households	Elderly, low-income, chronic illness	Moderate–High (targeted)	Additional assistance (financial or in-kind support)	High
Limited livelihood diversification	Households with no secondary income	Moderate	Livelihood diversification support (skills, small business)	Medium
Low awareness/uncertainty about the project	Households with no opinion/expectations	Low	Information sharing & stakeholder engagement	High
Community infrastructure needs	All communities	Indirect	Road improvements, local infrastructure support	High
Employment expectations	Working-age population	Indirect opportunity	Local employment during construction	High

The assessment of project impacts indicates that **effects on households are primarily land-related and generally limited in scale**. The majority of households will experience **partial land impacts**, while only a very small number may face more significant effects.

Importantly, most households are **not primarily dependent on agriculture**, as income is mainly derived from salaries and pensions. As a result, the overall impact on household income is expected to be **low for the majority of affected households**.

However, a **smaller group of households may be more vulnerable**, particularly those who:

- rely more heavily on agricultural land
- have no secondary income sources

- include elderly members or persons with chronic illness

Key Impact Areas

- Partial loss or restriction of land use
- Temporary disruption of agricultural activities
- Minor income impacts (limited to specific households)
- Temporary access constraints during construction

Livelihood Restoration Approach

The Livelihood Restoration Plan applies a **proportionate and targeted approach**, combining compensation with additional support measures where needed.

Core measures include:

- **Cash compensation** for land acquisition and temporary impacts
- **Agricultural support** for affected farming households
- **Employment opportunities** during construction
- **Infrastructure improvements**, particularly road access
- **Targeted support for vulnerable households**
- **Livelihood diversification support** where needed
- **Ongoing stakeholder engagement and information sharing**

Alignment with Community Priorities

The proposed measures are fully aligned with community feedback, which highlighted:

- road improvements
- job creation
- support to agriculture
- improved public services

Summary: Overall, the project is expected to have **limited and manageable impacts** on livelihoods. Most households demonstrate **sufficient resilience**, supported by diversified income sources and good access to services.

Targeted support measures will ensure that:

- **vulnerable households are protected,** and
- **no household is disproportionately affected**

The livelihood restoration measures outlined above follow a proportionate and differentiated approach, based on the type and magnitude of impacts as well as household vulnerability.

Compensation needs to be provided for all eligible losses in accordance with applicable requirements, while additional livelihood restoration measures are targeted to households with higher levels of vulnerability or dependence on affected assets.

During the implementation of this LRP, particular attention needs to be given to vulnerable Project-Affected Persons (PAPs), including households with limited income diversification, chronic health conditions, or higher dependency ratios, to ensure that they are not disproportionately affected.

The implementation of these measures will be monitored to assess their effectiveness in restoring livelihoods and maintaining pre-project living standards.

6. Eligibility and Entitlements

6.1 Overview

This section of the LRP outlines the eligibility criteria for PAPs to receive compensation and assistance, as well as the specific entitlements corresponding to each type of displacement impact within the Project's Land Acquisition Area.

It directly addresses key questions, including:

- Who qualifies for these benefits and
- The forms of compensation or support they can expect for various losses, such as land, structures, crops, businesses, or livelihoods.

This framework ensures equitable, transparent restoration of affected livelihoods at full replacement cost.

6.2 Eligibility criteria

In this project, PAPs are individuals who experience economic displacement due to the project. All individuals or households owning or using project-affected land within the NOMA Gas Interconnector area—whether formally or informally—who experience economic displacement (with no physical displacement anticipated), as identified through surveys and census activities, are eligible for compensation, livelihood restoration, or other assistance.

PAPs eligible for compensation and entitled to project assistance are those who meet at least one of the three criteria outlined in Table 6-1. The examples primarily reflect known, existing PAPs but also characteristics for potential future PAPs who may be identified.

Eligibility for compensation and livelihood restoration applies to:

- Legal landowners with formal title
- Leaseholders and tenants
- Informal land users with recognizable claims
- Users of government-owned land
- Vulnerable persons

Table 6-1 Eligibility criteria

Eligibility criteria[16]	Examples of PAPs for whom the criteria apply
Criteria 1 **Landowners or users with formal legal rights to the land or assets they occupy or use**	Private landowners (either companies or individuals) Concessionaires of publicly owned land Tenants with recognized rights (individuals renting private land or using it under written or verbal agreements) Employees (workers, with signed contracts for enterprises using land or for landowners, who are affected by employment loss)

[16] Eligibility criteria are mainly defined under Law on Property and Other Real Property Rights ("Official Gazette of the Republic of Macedonia" 18/01, 31/08), 92/08, 139/09 and 35/10)

Criteria 2 **Persons who do not currently possess formal legal rights to land or assets but have a claim to land that is recognised or recognisable under customary or national law**	Land heirs without registered ownership Individuals with pending legalisation of property (owners in the process of being legalised through adverse possession[17])
Criteria 3 **Persons who do not have any title or recognisable claim or legal right to the land or assets they occupy or use**	Informal land users (e.g., regular or seasonal users of publicly and privately owned land, gatherers of natural resources from the land for generating income,)

PAPs included under eligibility criteria 1) and 2) in Table 6-1 will be compensated for the relevant economic losses for affected land and assets on the land. PAPs included under criteria 3) will not be entitled to any compensation for the affected land but will be entitled to compensation for their non-land assets and other LRP assistance such as transitional support, support to find alternative land, training, among other depending on each individual situation. If any businesses are affected, they will also be compensated.

Project Affected Persons (PAPs) typically face permanent or temporary losses of land, assets, and sometimes income, necessitating fair compensation. These impacts may intensify due to vulnerability, loss severity, or livelihood disruptions, requiring targeted restoration measures. Additionally, across all project phases and under the three eligibility criteria in Table 6-2 PAPs could encounter asset damage or unforeseen effects, categorized as "other" losses that demand equivalent management focus. All criteria for evaluating PAP losses are summarized in Table 6-2.

Table 6-2 Criteria for assessment of PAP's losses

Main Categories of Affected Persons:	Eligibility of PAPs for Compensation & Assistance:
Owners of land (formal with legal rights or claims over the land): • **State (i.e. Forestry Company).** • **Mixed State/private owners** • **Private**	• PAPs with formal legal rights or claims over the land, including State and private owners of mixed State/private land parcels • In accordance with the Inheritance Law of Macedonia, where the registered owner of a land parcel is deceased, the entitlement passes to his or her inheritors. In the absence of an inheritor, the inheritance is transferred to the State. • The State/Forestry Company are not eligible for any other lease/rental/compensation payments beyond compensation for loss of forested land and timber according to a formula established in the Regulations for Calculating the Fee for Permanent Conversion of Forest and Forest Land (2011).
Owners of trees: • **Forestry Company.** • **Mixed State/Private owners.**	• The Public Enterprise North Macedonian Forests (the 'Forestry Company') who manage State owned forestry land on behalf of the State, are eligible for compensation for loss of forested land and timber according to a formula established in the Regulations for Calculating the Fee for Permanent Conversion of Forest and Forest Land (2011).
Owners (i.e. farmers) of crops or perennial plants.	• Owners of crops or perennial plants at the cut-off date established during the Appraisal of assets are eligible for

[17] Adverse possession is a legal principle that allows a person to claim ownership of land they do not legally own, provided they have possessed it continuously. It enables individual to acquire legal title to property through continuous occupation or use, and is often referred to as "usucaption" or "squatter's rights".

	compensation for loss of crops or perennial plants (whether or not the farmers have legal ownership of the land plots they farm).
Users of forestry (& pasture) land including: • **Cattle grazers (under assessment).** • **Hunting concession holder** • **Forest products gatherers**	Users whose income or livelihood is affected by the Project land access including: • Formal users of land – such as holders of licenses to collect timber from forestry land in the Concession. • Informal/unlicensed cattle graziers of land in the 'Project Area' who have no formal legal rights or claims over the land they use, but who use the land on a customary basis. • Those undertaking these livelihood activities identified during the inventory surveys and at the cut-off date will be eligible for compensation. • Regarding timber gathering activities, communities and private timber companies are not considered eligible for compensation, as the affected area—long and narrow along the pipeline route—is minimal in width and constitutes only a small portion of their much larger operational forestry area, where these activities can readily continue uninterrupted • Licenced & unlicensed gathering of non-forest products is rare and other areas of forest will remain in area for this activity, therefore this will not be specifically eligible within the entitlements framework. • Hunting concession holders with established yearly programs in the gas pipeline area will are eligible for compensation for income reductions caused by construction activities.
Owners of cultural heritage and archaeological resources affected by land acquisition	• NOMAGAS will consult with the custodians of cultural heritage and archaeological resources identified within the ESIA and during site development work (e.g. chance finds) regarding proposed protection measures (as summarised in Table x-x).
Vulnerable persons.	• Local community and individuals/households affected by loss of access and/or disruption of access which may potentially cause significant effects on livelihood, that due to their vulnerability and/or livelihood dependency on these activities may cause a disproportionate affect.

At this stage of the Project, there is no indication that project land acquisition will impact existing community facilities, such as water pipelines, energy distribution towers, schools, health units, or marketplaces.

Any PAP who is identified after the LRP surveys during subsequent stages of project development will follow the same procedure already applied to date. This procedure is detailed of this LRP and comprises three stages: (1) the land acquisition process; (2) LRP data collection for privately and publicly owned land; and (3) LRP data analysis both for privately and publicly owned land. The eligibility criteria and entitlement matrix outlined in this chapter apply equally to newly identified PAPs.

6.3 Cut-off date

For the purposes of the Project, affected land parcels and users were identified to determine eligibility boundaries for compensation or assistance arising from land acquisition, leasing, or

establishment of easements. The establishment of a **cut-off date** serves as the reference point for determining Project-Affected Persons (PAPs) and ensuring that eligibility is clearly defined, while preventing opportunistic claims following Project disclosure.

Different cut-off date reference points have been established for the identification of Project Affected Persons (PAPs), depending on the category of affected persons and the nature of land tenure and use.

For formal landowners and concessionaires, the cut-off date is defined as the period commencing in June 2025, when NOMAGAS initiated stakeholder consultations and invited landowners to meetings during project preparation, and continuing up to the date of receipt of the official notification of expropriation or other formal written communication regarding Project-related land requirements or amendments to existing agreements. For individual cases, the applicable reference point is the date of receipt of the official expropriation notification or equivalent formal communication. This ensures that eligibility for compensation and/or entitlements is based on legally recognized rights at the time of formal Project notification.

For informal land users and users of common property resources, the cut-off date is defined as 01.08.2026, which represents the final deadline for registration of claims by all potentially affected persons. An official notice has been disclosed along the Project corridor (see attached notification), informing stakeholders of the opportunity to register informal land use and associated claims prior to the specified cut-off date. To ensure completeness and inclusiveness of the PAP identification process, all informal land users and users of common property resources are encouraged to come forward and register their claims by this date, after which no further claims will be considered eligible for Project-related entitlements. To support full identification and ensure inclusiveness of the PAP register, the Project Implementation Unit (PIU), Contractor, and Supervisor facilitate self-registration of informal users through publicly displayed information notices, locally appropriate communication channels, and coordination with local representatives and designated contact points. All submitted information will be recorded, verified as necessary, and consolidated into the PAP database, which will be updated throughout Project implementation to ensure completeness and accuracy.

The classification of Project-Affected Persons (PAPs) and the applicable cut-off date reference points are presented in the table below.

Table 6-3 Definition of Project-Affected Groups and Cut-off Date Reference Points

PAP Category	Definition / Identification Basis	Cut-off Date Reference
Formal Landowners	Registered landowners affected by land acquisition, lease, or easement requirements	Period commencing June 2025 (start of Project consultations and formal engagement) up to the date of receipt of official notification of expropriation or other formal Project communication regarding land requirements

Concessionaires / Leaseholders	Users of land under formal lease or concession agreements affected by Project-related amendments or land requirements	Period commencing June 2025 up to the date of receipt of formal notification regarding agreement amendment, addendum, termination, or Project-related land use change
Informal Land Users	Individuals or households using land without formal legal title (e.g. grazing, beekeeping, small-scale agriculture) within the Project area	01.08.2026 (final deadline for registration of claims by all potentially affected informal land users)
Common Property Resource Users (CPR Users)	Community users of shared resources such as grazing areas and livestock movement corridors	01.08.2026 (aligned with the deadline for identification and registration of informal and community resource users)

6.4 Entitlements

The entitlement framework is based on socioeconomic census data and surveys of land and assets, which identify project-affected persons (PAPs) and affected resources. Findings inform the entitlement matrix, defining potential losses and corresponding compensation or support measures for each PAP category. The matrix also provides transitional assistance where temporary income or production shortfalls occur during re-establishment, including livelihood relocation, land rehabilitation, or shift to alternative activities, until livelihoods are restored to pre-project levels.

The framework is designed to reflect project conditions while remaining adaptable to unforeseen impacts. Government land users are addressed through collective livelihood restoration measures, while Table X.X lists entitlements applicable to all PAP categories.

Entitlements are structured into three groups:

- Compensation for land, assets, and livelihood losses
- Livelihood restoration measures and support
- Provisions for additional or unforeseen impacts

6.5 Entitlement Matrix

Type of Loss/Impact:	Category of Project Affected Persons:	Entitlements / Mitigation – Compensation and Assistance
Land, assets and livelihood compensation:		
• Permanent loss of land	Owners of land (formal with legal rights or claims over the land,) – private or mixed – based on Cadastral data and engagement with local communities, Municipalities and other stakeholders[18].	Cash compensation to registered private owners of mixed State/Privately owned land parcels, for the percentage of land and assets they own and compensation for lost crops, forest, orchard et based on the certified Appraiser's valuation. Access to livelihood restoration if their livelihoods rely on the affected land parcel. For farmers on privately owned land who receive government payments, the same payment will continue under the terms of the land agreement. Where a private registered owner is deceased, the compensation will be paid to the owner's inheritors.
• Permanent loss of land	• Concessionaires of publicly owned land • Tenants with recognized rights	Cash compensation to cover lost rental payments. For farmers, in privately owned land, who are receiving government support, the same payment will be provided in accordance with the terms of the land agreement. Access to livelihood restoration if their livelihoods rely on the affected land parcel.

[18] Owners with a claim without full legal documentation will be informed with aim to obtain and prepare necessary documentation to support valid claims (e.g. those where inheritance process needs to be completed and some agricultural land users).

Type of Loss/Impact:	Category of Project Affected Persons:	Entitlements / Mitigation – Compensation and Assistance
• Permanent loss of land	Informal land users	Cash compensation amounts based on paper evidence, like documents proving income from the affected plot, such as ID, land title or ownership proof, tax receipts, lease/rental agreements, bank/payment records, cultivation logs, sales invoices, cooperative membership, business registrations, employment contracts,, and social security records. If formal documents are unavailable, alternative verification may include pre-impact photos, certification from local leaders/authorities, signed witness statements. Access to livelihood restoration if their livelihoods rely on the affected land parcel.
• Temporary loss of land	• Owners of land (formal with legal rights or claims over the land) – private, State or mixed – based on Cadastral data and engagement with local communities, Municipalities and other stakeholders.	Cash compensation for the right to use land under contract/agreement for an agreed period; **and** reinstatement of land after use. For farmers in privately owned land who are receiving government support, the same payment will be provided in accordance with the terms of the land agreement. Access to livelihood restoration if their livelihoods rely on the affected land parcel.
• Temporary loss of land	• Concessionaires of publicly owned land	Cash compensation for cancelation of the contract/agreement with MAFWE for an agreed period, according national law and loss of assets and crops according. Access to livelihood restoration if their livelihoods rely on the affected land parcel.
• Temporary loss of land	Informal land users	Notice to harvest crops or collect tree produce before land is temporarily unavailable and to not reseed.

Type of Loss/Impact:	Category of Project Affected Persons:	Entitlements / Mitigation – Compensation and Assistance
		Access to livelihood restoration if their livelihoods rely on the affected land parcel.
Loss of timber:	Owner and users of timber, which may include: – Private landowners – Concessionaires of publicly owned land – Tenants with recognised rights	Cash compensation for timber volume and damages caused, established in accordance with the valuation according national legislation from certified Appraiser's valuation from Public Enterprise National Forest. Access to livelihood restoration if their livelihoods rely on the affected land parcel.
• Crops, orchards and vineyards losses	Owner users of land , which may include: – Private landowners – Concessionaires of publicly owned land – Tenants with recognised rights – Informal land users	Advance notification to harvest crops and to not reseed on plots needed for project works. Cash compensation for loss according Appraisal procedure and loss of income. Access to livelihood restoration if their livelihoods rely on the affected land parcel.
• Income losses (other than agriculture).	– Informal land users (for uses such as cattle and sheep grazing, and other natural resource uses such as wood cutting, hunting, beekeeping, herb gathering, among others)	Support to find alternative land to continue with their activity.
• **Vulnerable groups**	Identified vulnerable groups within Project area • Elderly and very low income (land-based livelihoods dependent) households. • Widows, women headed households and elderly with children who have emigrated abroad. • Families with disabled and/or very sick children. • Families in nearby settlements receiving assistance from the Intermunicipal Centre for Social Care in Gevgelija and Negotino.	Job seekers given preference to apply for employment on project and will be selected preferentially if they have the necessary skills that are equal or above to those held by other AP applicants. Skills diversification opportunities for vulnerable people will be made available through the livelihood restoration components of the RP.

Type of Loss/Impact:	Category of Project Affected Persons:	Entitlements / Mitigation – Compensation and Assistance
		Additional support provided in identifying alternative sources of income and assistance with skills training, based on their priorities, interests and skills At least one person participating to the "vulnerable household support programme" per affected household, (refer to section Livelihood Restoration Measures of this LRP for details on the programme).
• Temporary disturbance during construction (Access restrictions and environmental impacts during construction)	All AP's	30 days advance notice Consultation on traffic management approach and access provision solutions to provide temporary access Restoration of affected land
• Unexpected damage to physical assets and/or livelihood sources during construction, operation or decommissioning.	Owner of damaged asset, which may include: • Private landowners • Tenants with recognised rights • Heirs without registered ownership • Individuals with pending legalisation of property • Informal land users	Compensation paid by the Contractor according to full replacement cost for damage to property, crops, trees. Assistance with preparation or rehabilitation of land after damage by project if relevant.
• Unforeseen impacts.	Currently unknown.	Will be documented and mitigated or compensated based on the principles of this LRP.

7. Livelihood Restoration Measures

7.1 Overview

Where land acquisition or easements result in adverse impacts on Project Affected Persons' (PAPs) livelihoods or the loss of productive assets used for subsistence or income generation, tailored livelihood restoration measures are identified and implemented. International standards emphasize complementing compensation for direct land and asset losses with needs-based assistance to address economic displacement. This includes supplementary measures to: (1) support restoration and potential improvement of PAPs' livelihoods; and (2) enhance their long-term economic resilience. Such support is essential for enabling PAPs to maintain or exceed pre-project socioeconomic conditions.

This Livelihood Restoration Plan (LRP) outlines programs developed in response to PAPs' preferences and needs, as identified during data collection.

The socioeconomic survey indicates that the majority of affected households are not primarily dependent on agriculture as their main livelihood source, since salaries and pensions dominate household income. At the same time, agriculture remains an important supplementary or secondary source of income for a meaningful share of households, and a smaller subset of households shows higher dependence on land-based resources and limited livelihood diversification. For this reason, the LRP adopts a proportionate and targeted approach, combining compensation, livelihood restoration, and vulnerability-based support.

Programs under the LRP prioritize the restoration of existing livelihoods, while also offering alternative livelihood options where appropriate. PAPs will be able to select measures that correspond to their preferences and circumstances, and participation in any livelihood program will be voluntary and free from pressure. Vulnerability, age, and gender will be considered throughout implementation, with specific attention given to women, youth, elderly persons, low-income households, and households with chronic illness or limited adaptive capacity.

Programs prioritize restoring existing livelihoods per international standards, while also offering alternative options where appropriate. Designs incorporate individual choice, allowing PAPs to select options aligning with their preferences. Vulnerability, age, and gender are integrated throughout, with targeted support for vulnerable persons, youth, women, and men. Participation is fully voluntary, free from any pressure.

Agricultural continuity and crop management

Land agreements allow harvesting of existing crops, provided it does not delay implementation. Affected farmers on privately owned land receive advance notification prohibiting new crops or trees on plots needed for project works. Concessionaires, under government agreements, must

return agricultural land post-current harvest upon contract termination. Trees will be retained in situ wherever feasible.

Inclusivity and gender considerations

The LRP features a structured process presenting affected households with clear, feasible livelihood restoration options. Dedicated time and effort ensure PAPs fully understand these options and make informed decisions.

Special emphasis targets women: they receive full information on restoration packages, actively participate in decision-making, sign legal documents where feasible, and receive joint spousal compensation payments to promote equitable benefits.

Eligibility for livelihood restoration

This LRP identifies private landowner households affected by the project as eligible for livelihood restoration support where land acquisition, easements, temporary occupation, or other project-related impacts affect their livelihood base. PAPs with economic activities on government-owned land may also qualify if they meet the agreed eligibility criteria.

Where users of government land cannot be individually identified in advance, selected programs shall be made publicly available to interested persons in the project area and communicated through direct project channels, public notices, community meetings, local leaders, and other accessible information methods, which ensures that outreach is project-led.

It is absolutely necessary that all programs shall be monitored, evaluated, and adjusted during implementation, beginning with pilot support for priority PAPs where appropriate.

7.2 Livelihood restoration programmes

The following tables detail proposed programs, including objectives, eligibility, milestones, and potential partners. The project proponent will refine designs with implementation partners and prepare service provider scopes of work.

For the Interconnector North Macedonia-Greece LRP, these programs directly address PAP consultations emphasizing employment, agriculture, and vulnerability. Each follows the established format: tailored objectives, inclusive delivery (women/youth/vulnerable prioritized), stipends/childcare/transport support, and piloted monitoring.

Table 7-1 Agricultural Productivity Enhancement Support

Component	Description
Objective	Boost resilience and output for land-based livelihoods (agriculture/livestock/beekeeping) via training, inputs, and market links.
Details	8-12 sessions on soil/irrigation/pest management, climate-smart techniques, subsidies access. Demo plots; peer mentors; tailored for stočari (livestock farmers). Kits: seeds, organic inputs, fire prevention tools.
Eligibility	PAPs 16+ with land-based activities in Gevgelija, Bogdanci, Negotino, Demir Kapija.
Milestones	Attendance, mentoring completion, and post-training assessment
Partners	Ministry of Agriculture, Forestry and Water Management, Municipalities (Gevgelija, Bogdanci, Negotino, Demir Kapija), Food/Vet Agency, Universities.

Table 7-2 Provision of Seeds and Inputs

Component	Description
Objective	Ensure immediate productivity recovery post-displacement with quality seeds/inputs.
Details	Vouchers for certified seeds, fertilizers, tools; e-voucher system for transparency. Paired with training on use; focus on resilient/climate-smart varieties. Women/youth kits prioritized.
Eligibility	Affected private/government land users in Gevgelija, Bogdanci, Negotino, Demir Kapija.
Milestones	Voucher redemption, verification of use, and feedback collection
Partners	Agency for Financial Support of Agriculture, Municipalities (Gevgelija, Bogdanci, Negotino, Demir Kapija), Agro-dealers.

Table 7-3 Financial Literacy Training

Component	Description
Objective	Enable responsible compensation use, savings, and investment for sustainable livelihoods.
Details	Customized sessions: bookkeeping, budgeting, credit, business planning, taxation. Women/youth dedicated; online/in-person; 1-year follow-up.
Eligibility	All PAPs 16+; priority vulnerable households in Gevgelija, Bogdanci, Negotino, Demir Kapija.
Milestones	Attendance, learning assessment, and follow-up review
Partners	National Bank, Chambers of Commerce, Universities.

Table 7-4 Business Development Support

Component	Description
Objective	Launch/expand micro-enterprises, linking to employment and marketsnd diversify income sources
Details	Business mentoring, startup guidance, market linkage, and support for small investments. Tailored for agriculture/transport ventures; women-led focus.
Eligibility	PAPs 16+ post-financial literacy; who complete basic financial literacy ,who express interest in entrepreneurship and unemployed prioritized in project municipalities.
Milestones	Business plan development, launch support, and evaluation
Partners	Macedonian Enterprise Foundation, Employment Agencies, Chambers. [10]

Table 7-5 Preferential Employment During Construction

Component	Description
Objective	Provide temporary income opportunities to affected households during the construction phase.
Details	Priority consideration for PAPs for unskilled and semi-skilled jobs, subject to qualification and contractor needs; where relevant, transport support may be provided
Eligibility	Working-age PAPs in the project area in municipalities of Gevgelija, Bogdanci, Negotino and Demir Kapija, with priority to unemployed, vulnerable, and low-income households in
Milestones	Placement, retention, and worker feedback
Partners	Construction Contractor, Employment Agencies, Municipalities (Gevgelija, Bogdanci, Negotino, Demir Kapija).

Table 7-6 Targeted Support for Vulnerable Households

Component	Description
Objective	Bridge temporary economic gaps for vulnerable households experiencing greater project-related sensitivity
Details	Time-limited cash or in-kind assistance, transport support, referrals to social services, and case management where appropriate
Eligibility	Vulnerable households, including those with low income, no secondary income, chronic illness, elderly dependency, or limited livelihood alternatives
Milestones	Needs assessment, support delivery, follow-up, and exit review
Partners	Social Centers, NGOs (CARE), Municipalities (Gevgelija, Bogdanci, Negotino, Demir Kapija).

Additional opportunity: preferential employment

For the Interconnector North Macedonia-Greece project, preferential hiring offers PAPs affected by economic displacement an additional employment pathway, provided they possess relevant experience and skills.

This initiative—separate from formal LRP programs to prevent dependency—promotes inclusion, gender sensitivity, and long-term employability.

Nomagas will collaborate with contractors and subcontractors as well as engineer (supervison team) to prioritize PAPs expressing interest during LRP surveys, aligning with HR policies and recruitment procedures. Beyond immediate jobs, it provides on-the-job training, skills development, and practical experience, per IFC PS2 guidance on protective measures.

8. Stakeholder engagement and Grievance Mechanism

This chapter describes the consultation and information disclosure activities related to the LRP that have been and will be undertaken. These activities take into account international requirements, ensuring that PAPs are meaningfully consulted and have opportunities to participate in the planning and implementation of livelihood restoration programs.

8.1 Stakeholder Analysis

The following stakeholders have been identified as key to the LRP:

- Project-affected persons and their household members
- Local community representatives in the Municipalities from the villages the Project area
- Municipality authorities including Environmental department, Urban development department and, Local economic development department.
- Business and organizations located in the Project area
- Non-governmental organizations (NGOs) and various citizens associations active in the Project area

These stakeholders have already been engaged through previous consultation meetings held during development of technical documentation and ESIA of the Project as presented in the pprepared Stakeholder Engagement Plan (SEP).

Stakeholder engagement activities were conducted during the preparation of the Interconnector's EIA in 2019-2020. Additional public consultations were held in April and May 2022 to meet the Lenders' requirements and are documented in the Supplementary ESIA. Consultation with public for the Addendum of ESIA was held in March 2023. Grievance Mechanism was established in the Municipalities of Gevgelija, Bogdanci, Demir Kapija and Negotino, as well as in the premises of Nomagas in Skopje and Contractor's premises in Demir

Kapija in July 2025. Establishment of Public presentations in all four municipalities for commencement of the project were held in August 2025.

A Project-specific grievance mechanism needs to be implemented in line with the **EBRD Environmental and Social Policy (2019)** and **Performance Requirement 10 (PR10)**. The mechanism provides an accessible, transparent, and structured process for receiving and resolving concerns related to land acquisition, access, and livelihood restoration impacts.

8.2 Stakeholder engagement planned

Further consultations will be held with affected communities and broader stakeholders during the LRP disclosure, update and implementation. Noma Gas's social team will coordinate with municipalities and local council offices to agree on the meeting schedule.

After the LRP finalization, implementation, and monitoring) the following key nformation disclosure actions are planned:

- Preparation and distribution of Public Information Brochure in Macedonian language
- Placement of copies of the LRP in Macedonian language in municipal and local council offices
- Uploading of the LRP on the Noma gas websites for a predetermined period.

These activities are discussed in the subsections below.

Public Information Brochure

A summary of the final Livelihood Restoration Plan (LRP) will be prepared by Nomagas for disclosure purposes in the form of a Public Information Brochure. The brochure will present a simplified overview of the LRP, with technical terminology reduced where necessary to ensure clarity and accessibility.

It will outline the consultation process, including the methods and procedures for engaging Project Affected Persons (PAPs) in livelihood restoration activities, as well as the overall implementation process. The brochure will also provide clear information on the grievance redress mechanism.

The brochure will be prepared in Macedonian language and written in plain language, enabling PAPs and local communities to easily understand the available benefits and compensation measures for different categories of PAPs, as defined in the Entitlement Matrix.

Nomagas will distribute the brochures during community consultation meetings and will make copies available at key community locations, including local council offices, project engineer's and contractor's on-site offices.

LRP Disclosure

Approved LRP will be disclosed and discussed at meetings, with the Nomagas team explaining the adopted livelihood restoration and compensation processes. Livelihood Restoration Plan (LRP) will be disclosed within one week after approval and it will be publicly available in Macedonian and English. Hard copies will be placed at municipal halls and the project engineer's and contractor's on-site offices, while the document will also be uploaded to the municipalities' and Nomagas's websites. Additionally, a final brochure summarizing the LRP will be distributed to affected persons and local stakeholders. These measures will ensure all relevant information such as entitlements, grievance procedures, and implementation timelines remains accessible in community-appropriate formats and languages.

Nomagas will also share the approved LRP with the village councils and ensure that it is accessible to all affected persons and other relevant stakeholders, including government authorities and NGOs. Disclosure will be carried out in a form, manner, and language that is understandable to these stakeholders, including through the Public Information Brochure described above. In addition, the LRP will be published on the Nomagas website The disclosure process will continue throughout the duration of the project.

Further, disclosure will continue throughout the project. Once the final

These consultations will cover the following objectives:

- Disclosure of the LRP and distribution of the Public Information Brochure
- Agreement on entitlements and compensation packages
- Discussion of livelihood restoration needs and preferences
- Disclosure of project employment opportunities
- Discussion of assistance aligned with entitlements
- Facilitation of monitoring activities

Community meetings, supported by local council members, will continue as the primary engagement mechanism. Timeframes for these activities are outlined in the LRP implementation schedule (see Section 9.3)

8.3 Information disclosure

During fieldwork, the project team prepared and distributed an invitation clarifying the LRP process. This ensured that affected persons and local stakeholders received clear, accessible information on the project, entitlement framework, and grievance mechanism. The invitation was displayed on municipal buildings and posted on the municipalities' websites. Links from invitations are:

- Negotino Municipality

https://negotino.gov.mk/%d0%b8%d0%b7%d0%b2%d0%b5%d1%81%d1%82%d1%83%d0%b2%d0%b0%d1%9a%d0%b5-%d0%b7%d0%b0-%d1%81%d0%be%d1%81%d1%82%d0%b0%d0%bd%d0%be%d0%ba-%d0%b2%d0%be-%d0%b2%d1%80%d1%81%d0%ba%d0%b0-%d1%81%d0%be-%d1%81%d0%be/

- Demir Kapija Municipality

https://opstinademirkapija.gov.mk/pokana-za-sredba-so-pretstavnici-od-nomagas/

Further, disclosure will continue throughout the project. Once the final LRP is approved by lenders, it will be publicly available in Macedonian and English. Hard copies will be placed at municipal halls and the project engineer's and contractor's on-site offices, while the document will also be uploaded to the municipalities' and Nomagas's websites. Additionally, a final brochure summarizing the LRP will be distributed to affected persons and local stakeholders. These measures will ensure all relevant information—such as entitlements, grievance procedures, and implementation timelines—remains accessible in community-appropriate formats and languages.

8.4 Grievance Mechanism

Grievances may be submitted free of charge, either orally or in writing. All grievances will be acknowledged within **five (5) working days** and managed through the following process:

- **Registration and acknowledgment:** within 5 working days
- **Initial assessment and classification:** within 10 working days
- **Investigation and development of resolution:** within 20–30 working days (depending on complexity)
- **Communication of decision to complainant:** within 5 working days after resolution is determined
- **Closure:** upon acceptance of the resolution or completion of agreed corrective actions

Where additional time is required, the complainant will be informed in advance of the reasons for delay and the revised timeframe.

During LRP preparation, a grievance log was established and shared with **Nomagas**. All concerns raised during stakeholder engagement were systematically recorded and forwarded to Nomagas for further review and resolution.

Nomagas recognises that stakeholder engagement is an ongoing process and that grievances may arise during land acquisition and construction. Accordingly, the LRP includes a dedicated

grievance procedure for affected persons. This procedure aligns with the Company's overall stakeholder engagement grievance mechanism but is administered separately for land acquisition, access, and livelihood restoration matters.

Nomagas has established this grievance procedure for Project use, and a separate register will be maintained for LRP-related grievances to ensure proper tracking and management. The mechanism is designed to address, in a timely and fair manner, concerns related to compensation and livelihood restoration raised by affected persons and host communities. It includes a recourse mechanism to ensure impartial resolution of disputes, and does not prejudice the right of complainants to seek judicial remedy.

Submitting a Grievance/Concern – Grievance Form

Nomagas will accept all comments and complaints associated with the Project and in connection with the land acquisition and resettlement process, submitted either verbally or in writing. A Grievance Form is provided in Annex A. People raising Grievances should complete Part 1 only of the form. Preferably all land acquisition and resettlement grievances relating to this Project should be channelled to Nomagas through the contact details below of a designated staff member.

The Grievance Form (in Macedonian and English) is available on the Nomagas web site, the office of Supervision and Contractor on site, and all the concerned municipalities (i.e. Municipalities of Demir Kapija, Gevgelija, Negotino and Bogdanci) will receive pre-printed forms to be readily-available for the public.

Contact Information for Submitting a Grievance/Concern

Any project affected person or member of the host communities may send comments and/or complaints regarding the land acquisition, access and resettlement process in person, by phone or via post or email using the contact information provided below.

XXXXXNNmae Surname, Land Acquisition Co-ordinator.

Nomagas office Office, Skopje address

Or by telephone: *+389 (0) XXXXXXX*

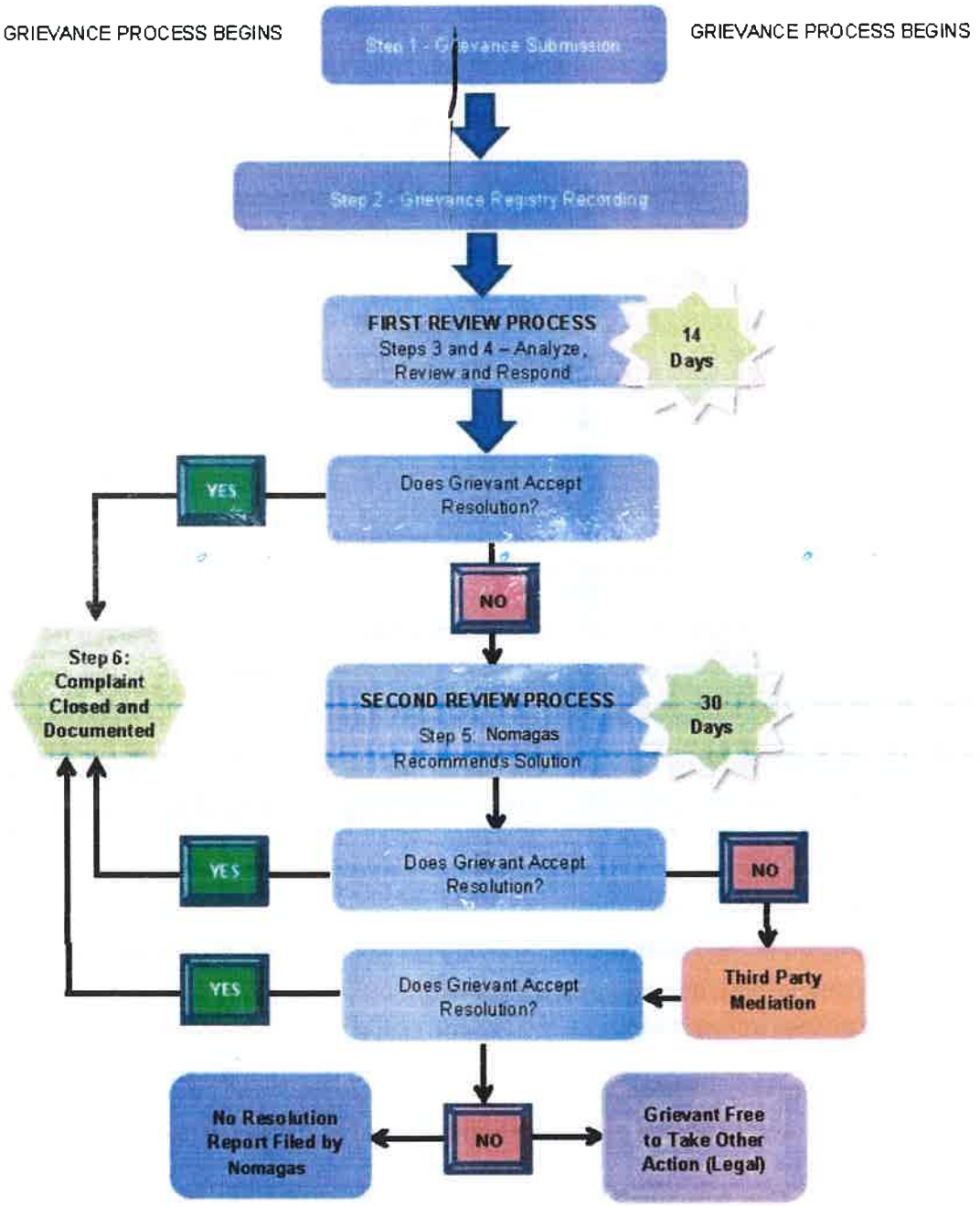
Or by email to: XXXXXX

Grievance Procedure

The full Grievance Procedure will be available on the Company websites (wwwwwin English and hwwww in Macedonian) and at their offices. The procedure covers: Grievance Submission; Grievance Registry Recording; Grievance Analysis & Review (2-stage review); Completion/Corrective Actions and Close Out; and Monitoring. The Grievance Procedure is summarised in the flowchart below.

Nomagas is obliged to respond to all complaints according to procedures prescribed in national legislation. The response time for grievances will be in accordance with national legislation for the particular issue in question. Nomagas will endeavour to acknowledge receipt of the Grievance within 5 working days, and to respond following the first review process within 15 days of receiving the grievance. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of North Macedonia.

GRIEVANCE PROCEDURE FLOW CHART



9. Implementation arrangements, schedule & budget

9.1 Overview

This chapter outlines the framework for executing the LRP, covering the roles and responsibilities of key entities, a tentative timeline for major activities, and the overall budget structure. Its aim is to guarantee that LRP commitments—especially those on compensation, livelihood restoration, and monitoring—are fulfilled promptly and in sync. Execution will match the construction timeline and comply with lender and regulatory standards, including flexibility for changes in project design or impact forecasts.

9.2 Roles and responsibilities

Implementation of the Livelihood Restoration Plan will require close coordination between the developer NOMAGAS, lender EBRD, national and local authorities, contractor and engineer, and the lenders' monitoring team. The overall responsibility for delivering the commitments set out in this plan rests with the Project Developer, supported by the EBRD and other stakeholders. Specific roles and responsibilities are:

- **Project Developer and Project Implementation Unit (NOMAGAS)**: Leads all LRP measures in line with lender standards, handling disclosure, stakeholder engagement, land restoration, grievance processes, and contractor coordination.
- **Lender (EBRD)**: Offers strategic guidance, verifies alignment with sustainability goals, tracks progress, and oversees external monitoring.
- **National and Local Authorities**: Support outreach and dialogue with affected households.
- **Contractors and Engineer**: Adhere to construction timelines, notify affected households ahead of time for harvesting and product collection, manage traffic and access during works, and restore land and roads to their original state.
- **LRP Team**: Delivers technical assistance to the developer on scheduling, entitlement verification, and documentation; aids in monitoring, reporting to lenders, and ensuring compliance.

9.3 Implementation schedule

The implementation of the Livelihood Restoration Plan will align with the construction program to ensure all land acquisition measures are complete before any access restrictions or works commence. Activities will start with:

- Disclosure of the LRP, followed by
- Agreements on compensation entitlements and relocation support with affected persons.

Compensation payments and required assistance will be fully settled prior to construction starting in relevant corridor sections. Land handover and any restoration measures will be executed during

and immediately post-acquisition. Monitoring will span the full process, with regular internal reviews and external verification at key milestones. A detailed schedule will be coordinated with the construction plan and disclosed to stakeholders once finalized. An indicative implementation schedule is shown in Table 9-1 below.

Table 9-1 LRP indicative implementation schedule

Activity	July 2026	August 2026	October 2026	September 2026
LRP disclosure to affected communities				
Draft LRP submission to lenders and finalisation				
Implement LRP alongside cable laying				
Monitoring & external LTA verification				

Notes:

LRP finalisation phase

LRP implementation phase

Budget and funding

The LRP will be funded via a dedicated, segregated budget from Developer Nomagas. This allocation covers all expenses for compensation, livelihood restoration activities, administration, and monitoring. It includes dedicated funds for external monitoring and evaluation to satisfy lender standards.

A comprehensive line-item budget will be completed post-LRP approval, synchronized with the entitlements matrix and construction timeline. Key indicative cost areas encompass compensation for temporary land use, land rehabilitation support, livelihood inputs, and stakeholder engagement plus grievance handling. Administrative expenses will handle staffing, logistics, and reporting, while monitoring covers internal checks and third-party audits (as needed). An indicative budget overview is shown in Table 9-2 below.

Table 9-2 Indicative LRP budget

Category	Indicative cost (€) ring-fenced in budget	Notes
Compensation for permanent land acquisition and potential subsidy loss reimbursement and Compensation for temporary land acquisition and potential subsidy loss reimbursement	360.000	
Land rehabilitation and potential livelihood (In BoQ - B303 restoration and deep plowing and revitalization of destroyed agricultural surfaces (40 % of the route length)	66.800	Includes costs for restoring disturbed pasture and agricultural land to pre-construction condition, including reseeding and soil stabilization
Stakeholder engagement & grievance management	33.000	
Administrative costs	15.000	
Monitoring & external audits	300.000	
Expropriation and damages from expropriation (Including Gas pipeline Sv. Nikole-Veles)	813.000	
Subtotal	Sum	
Contingency (10%)		Calculated at 10% of subtotal to cover unforeseen costs.
Total		**Sum of all categories including contingency.**

9.4 Change management

The LRP will be treated as a living document and updated as necessary to reflect changes in project design, schedule, or impact assumptions. Any modifications to the construction programme that affect land access or timing of works will trigger a review of the implementation schedule and associated measures. If additional affected persons are identified or if impacts differ from those anticipated, the entitlement framework and compensation provisions will be revised accordingly. Updates will be disclosed to stakeholders and communicated to lenders to ensure continued compliance with Lenders' requirements. All changes will be documented, approved by the Project Developer, and incorporated into monitoring reports.

9.5 Monitoring, evaluation, and completion

Overview

The LRP activities will be monitored, evaluated and reported on periodically. The objectives of monitoring and evaluation (M&E) are support effective implementation and achievement of the LRP objectives. Specifically, it will identify any gaps or improvements needed, and confirm that affected groups are able to restore or improve their livelihoods to pre-project levels. Monitoring will be participatory, involving affected communities and relevant stakeholders, and will provide transparency and accountability throughout implementation.

Internal Monitoring

Internal monitoring will be carried out by project staff to review the effectiveness and participation rates of LRP implementation and adjust as needed. Monitoring will focus on access continuity, grievance resolution, and satisfaction of affected households. Monitoring will include consultations with affected farmers and other stakeholders, tracking progress against agreed indicators, and maintaining gender-disaggregated data. Key performance indicators (KPIs) that will be tracked and reported on

External monitoring and evaluation (If required)

Cross-cutting KPIs (apply to all livelihood restoration programs)

- Number of PAPs enrolled (disaggregated by sex, age group, vulnerability status).
- Participation rate of women and youth (%%).
- Attendance/completion rate (%%).
- PAP satisfaction rate based on feedback surveys (%%).
- Number of grievances received related to LRP programs and resolution rate (%%).
- Percentage of vulnerable PAPs supported vs. identified.

Specific Key Performanse Indictors for programs:

Agricultural Productivity Enhancement Support

- Number of PAPs trained (by activity: agriculture, livestock, beekeeping).
- Percentage of participants applying at least one improved practice within 3–6 months.
- Increase in yield or productivity (%%, self-reported and sample-verified).
- Number of demonstration plots established and utilized.
- Percentage of PAPs accessing subsidies or extension services post-training.
- Average change in agricultural income after one season.

Provision of Seeds and Inputs

- Number of PAPs receiving vouchers (disaggregated).
- Voucher redemption rate (%%).
- Percentage of inputs verified as used for intended purposes.
- Area cultivated using distributed inputs (hectares).
- Percentage of PAPs reporting restored or improved production levels.
- Time between distribution and planting (efficiency indicator).

Financial Literacy Training

- Number of PAPs trained and certified.
- Pre- and post-training knowledge improvement scores (%%).
- Percentage of PAPs adopting budgeting or bookkeeping practices.
- Number of PAPs opening savings accounts or accessing formal financial services.

- Percentage of PAPs developing a simple financial or business plan.
- Follow-up retention of knowledge after 6–12 months.

Business Development Support

- Number of PAPs receiving mentoring support.
- Number of business plans developed and approved.
- Number of businesses started or expanded.
- Business survival rate after 6 and 12 months (%%).
- Average income increase among participating PAPs.
- Percentage of women-led enterprises supported.

Preferential Employment During Construction

- Number of PAPs employed (by skill level and contractor).
- Percentage of total workforce composed of PAPs.
- Average duration of employment (days/months).
- Retention rate during construction (%%).
- Percentage of PAP workers transitioning to longer-term employment.
- Worker satisfaction and grievance rate.

Targeted Support for Vulnerable Households

- Number of vulnerable households identified vs. supported.
- Time from identification to support delivery (days).
- Percentage of households receiving tailored support packages.
- Improvement in basic livelihood indicators (income stability, food security proxy).
- Number of referrals to social services completed.
- Exit success rate (households no longer requiring support after intervention).

Monitoring and Reporting Notes

- All KPIs should be tracked quarterly and consolidated annually.
- Data should be disaggregated by municipality (Gevgelija, Bogdanci, Negotino, Demir Kapija).
- Combine quantitative indicators with qualitative feedback (focus groups, interviews).
- Include baseline, midline, and endline assessments to measure livelihood restoration against pre-project conditions.

External review of LRP implementation won't occur as a separate exercise. Rather, it will integrate into the lenders' technical advisory monitoring. This streamlined method delivers independent scrutiny without redundancy, considering the project's minor and short-term impacts.

The review will cover:

- Verification of internal monitoring reports and progress on commitments
- Evaluation of grievance mechanism performance

- Confirmation of ongoing access for affected households to agricultural plots
- Spotting of any required corrective actions to meet objectives

The evaluation will emphasize:

- Effectiveness in sustaining farming and their activities and agricultural access
- Grievance mechanism operations
- Affected households' satisfaction with restoration results
- Lessons learned for upcoming projects

Findings will appear in lenders' regular monitoring reports, shared with the project team to inform adjustments and remedies.

Database Management and Reporting

The project will manage a secure database tracking all affected households and individuals eligible for livelihood restoration. It will capture baseline data, entitlements, and monitoring outcomes. Internal monitoring data will update profiles and measure progress.

Privacy and confidentiality will be strictly protected. Data sharing will be limited to authorized purposes, with no public disclosure.

Reporting will scale with impact levels. The project team will produce bi-annual progress overviews on implementation status, monitoring findings, and corrective actions. These will feed into lenders' technical monitoring reports, avoiding separate LRP documents.

Adaptive Management

Monitoring and evaluation findings will help spot any gaps or delays, enabling swift corrective measures. This approach promotes adaptability and ongoing refinement toward livelihood restoration goals. Changes will match the impact scale and get recorded in progress reports and lender updates. Corrective steps will be coordinated with the project team and noted in lender monitoring reports.

10. Appendices

Appendix 1

Breakdown of Affected Land by Cadastral Municipality (Temporary vs. Permanent Impacts, m² and %)

Appendix 2

Land Valuation and Expropriation Process

Appendix 3

The questionnaire used for data collection

Appendix 4

Map of habitats along the pipeline route

Appendix 5

Cenzus of the agricultural products