

**DOCUMENT OF THE EUROPEAN BANK
FOR RECONSTRUCTION AND DEVELOPMENT**

STRATEGY FOR FYR MACEDONIA

**REPORT ON THE INVITATION
TO THE PUBLIC TO COMMENT**

1. INTRODUCTION

In accordance with the EBRD Public Information Policy (PIP), the draft Strategy for FYR Macedonia was posted on the EBRD web site in English and Macedonian for 45 calendar days from 19 March 2013. The public was invited to submit comments on the draft Strategy no later than 5 April 2013. For information, the previous Strategy covering the timeframe 2010-2013 was also made available on the web site in English and Macedonian: <http://www.ebrd.com/pages/country/fyrmacedonia/strategy.shtml>.

Information about the public consultation process was posted on the EBRD's dedicated webpage "Have your say", which highlights the latest opportunities for public to comment on the Bank's policies and strategies under review. In addition, targeted notifications of the consultation process were sent to local and international civil society organisations (CSOs) that have expressed interest in the Bank's work in the country. The start of the review process was also advertised through Facebook and Twitter.

On 13 March 2013 the EBRD Resident Office in Skopje held a workshop with civil society organisations to discuss and solicit comments on the draft Strategy. The event attracted 18 participants coming from local and international CSOs operating in FYR Macedonia and one observer from the Organization for Security and Cooperation in Europe. The full list of participants to the consultation workshop is provided in the Annex 1. In addition, comments in written format were received from the Center for Economic Analyses, Analytica, Eko Svest, Preda Plus- Foundation for Sustainable Economic Development and Reactor- Research in Action.

The objective of this report is to summarize key comments received from the general public and civil society stakeholders during the consultation period dedicated to the review of the Bank's Strategy for FYR Macedonia as well as to provide management responses to these comments. The Bank's management reviewed all public comments and took them into account in the draft of the Strategy for FYR Macedonia as appropriate. The comments, which were received either in written or oral format, have been presented in this report to reflect the thematic structure of the Country Strategy.

2. PUBLIC COMMENTS AND STAFF RESPONSES

Reference	Comment	EBRD Response
The Bank's portfolio		
1. Overview over the Bank's activities to date	<p>1.1 Some concerns were raised regarding the portfolio ratio of the Bank that at least in the short term will continue to weigh in favour of public sector projects.</p> <p>To ensure transparency of investments in the private sector civil society encouraged the EBRD to: a) provide technical advice to the management of public companies b) ensure financial viability and sustainability of investment projects implemented with public companies and c) evaluate outcomes.</p>	<p>As highlighted in the Strategy at end-2012, the portfolio ratio stood at 38 per cent private/62 per cent public. In this period, the Bank signed 45 private (87 per cent of total) and 7 public sector projects, with average size of EUR 4.5 million and EUR 49 million respectively. This highlights the low absorption capacity of the private sector in the country. In terms of number of operations, however, it is worth noting that the majority of deals signed by the Bank in the country is already composed of private transactions.</p> <p>The EBRD provides technical assistance to its private sector clients for the implementation of projects, for instance for the modernisation and upgrade of the existing road and railway networks a significant portion of technical assistance was provided through the Western Balkans Investment Framework (WBIF). For all projects the EBRD staff thoroughly assesses the financial viability of its investments, the Office of the Chief Economist assesses the projects' expected contribution to transition at point of entry and the independent Evaluation Department analyses the results of individual project ex post.</p>
2. Implementation of the previous country strategy	<p>2.1 It is noted that more data would be needed to assess the impact of the previous strategy (e.g. kilometres of road and railway built or repaired).</p> <p>At page 7 the Strategy states that <i>'the Bank has engaged in policy dialogue in the roads sector focusing on the introduction of an electronic tolling</i></p>	<p>The EBRD does not provide country evaluations; however, the Chief Economist's Office and the Evaluation Department assesses individual projects as well as sectors. For more information visit http://www.ebrd.com/pages/about/what/evaluation.shtml.</p> <p>Regarding the project on electronic tolling collection system and road maintenance the EBRD has been securing technical assistance</p>

	<p><i>collection system and the reorganisation of road maintenance through implementation of performance-based maintenance contracts.</i>’ In this regard, it is unclear how the EBRD is engaged in policy dialogue and to what extent this dialogue will lead to the prospected outcomes.</p>	<p>for its beneficiaries and has been closely working with the agency for state roads in the implementation of the project. The electronic tolling is currently being procured and the Bank is closely following the implementation of the project.</p>
Operational environment		
3. Political context	<p>3.1 Several CSOs highlighted that the EBRD strategy should refer to the country as Republic of Macedonia as set forth in the Macedonian constitution.</p>	<p>The EBRD, being an international organisation, is obliged to use the official UN-sanctioned provisional name of the country.</p>
4. Macroeconomic and structural reform context	<p>4.1 In assessing the transition challenges of the capital market, the strategy should also highlight that the Governor of the National Bank publicly stated the need for more consolidation in the banking sector.</p>	<p>The current assessment of the capital market does not reflect upon linkages between banking sector consolidation and capital market development.</p>
	<p>4.2 The strategy assesses as <i>medium</i> the transitional challenges in the market structure of the Agribusiness sector. However, when this ranking is compared to other sectors like Real Estate, which is assessed as <i>high</i>, more details are needed to justify the medium rating of the Agribusiness sector.</p>	<p>The Bank undertakes an Assessment of Transition Challenges exercise of its countries of operations once a year on the basis of its methodology. The methodology for the Assessment of Transition challenges is available at the back of the annual Transition Report and details the kind of indicators have been looked at to determine the transition gap in each sector, including agribusiness. The information is available at</p> <p>http://www.ebrd.com/downloads/research/transition/tr12methodnotes.pdf.</p>
	<p>4.3 The analysis of the water and wastewater sector states that local infrastructure has been transferred</p>	<p>The Strategy has been amended to reflect the comment.</p>

	to municipalities. However, water management has always been a municipal competence since the period of Yugoslavia.	
5. Energy Efficiency and Climate Change	5.1. The Strategy thoroughly elaborated on energy efficiency issues but overlooks issues related to climate change that should be integrated in the Strategy in view of the proposed activities. In fact, investments in small hydro power plants may lead to dry river beds and affect the ecosystem.	The Bank is currently carrying out a technical cooperation assignment to understand the implications of climate change related to investments in small and medium hydropower plants. However, the construction of small hydro power plants, which are primarily run-of the river plants, do not lead to dry river beds. A minimum biological flow rate intended to maintain biodiversity is required to be left in the river in the short distances that other water is diverted away from the river and through the turbines before being returned to the river.
Strategic orientations		
6. Enhancing competitiveness and facilitating private investment in the corporate and municipal sectors	<p>6.1. The strategy should also focus on increasing the competitiveness of the gas and heat sector. The heat market is under-developed in the country and characterised by dominant market players. The distribution network is only in Skopje and consumers leaving the district heating switch either to wood or electricity. There is also the need to develop gas distribution infrastructure so that gas could be used for heating purposes.</p> <p>To address the gap in the heat sector, the EBRD could support municipalities in developing their own heat market by means of gasification and construction of co-generating utilities and should enhance competitiveness in the Skopje district heating market.</p>	<p>In the energy sector the Bank will invest in projects supporting the regional energy market development and integration such as regional electricity and gas interconnections, which will also benefit municipalities. The benefit of the creation of a national gas transmission network would be to provide wider use of gas within the country and facilitate greater integration of the gas market in the South and Eastern Europe (SEE) region.</p> <p>The heat sector is currently not a priority sector of operation of the Bank. It is worth noting that while investing in municipal environmental infrastructure the Bank does not suggest to municipalities in which areas to invest but welcome proposals on several sectors and screens the eligibility of investments according to the EBRD criteria of additionality, transition mandate and sound-banking principles.</p>

	<p>6.2 The Strategy states that fostering corporate governance remains a priority for the EBRD in the country; however the Strategy does not provide any pragmatic approach on how this priority will be met. The Strategy should elaborate more on the improvement of the corporate governance culture and seek synergies with existing initiatives like the Global Compact, the National Entrepreneurship and Competitiveness Council and civil society organisations working with the private sector.</p> <p>The Strategy should clearly commit the EBRD in the fight against corruption and how the Bank will prevent and address instances of corruption.</p>	<p>Promotion of sound corporate governance is part of the EBRD mandate. Through its investments, the EBRD seeks to improve corporate governance by encouraging all its investee companies to adhere to best international standards of corporate governance, and in doing so seeks to have a demonstration effect for others. In many of its equity investments the EBRD secures the right to nominate one or more members to the board of the investee company, whose task is to exercise their board duties with a view to improving the corporate governance arrangements of the investee company. Whenever preliminary investigations into a potential investment indicates corporate governance deficiencies, the Bank reviews the current arrangements by performing a “corporate check”, which enables the Bank to develop a remedial action plan addressing the corporate governance flaws identified. For further information see page 52 and following of “Law in Transition 2006” (http://www.ebrd.com/downloads/research/law/lit061.pdf) and “Sound business standards and corporate practices. A set of guidelines” (http://www.ebrd.com/downloads/research/guides/standards.pdf)</p>
	<p>6.3 Is the EBRD considering supporting the government in the development of the technological zones?</p>	<p>The EBRD is not considering supporting the government in the development of the technological zones as such. However, the EBRD is open to support individual private businesses if the proposed projects meet the criteria of additionality, transition and sound-banking principles.</p>
	<p>6.4 The EBRD is expected to facilitate the social dialogue between the private sector and the public sector.</p>	<p>As part of its mandate the Bank engages in active policy dialogue and continues to provide technical assistance to maximise transition impact in the country. Social dialogue is not part of the EBRD’s mandate but plays a critical role in achieving the objectives of other international institutions such as the International Labour Organisation. In addition, at national level the Economic and Social Council is currently gaining momentum in the promotion of social</p>

		dialogue.
7. Promoting energy efficiency and sustainable energy	7.1. The EBRD should aim at providing technical assistance to municipalities in the preparation and implementation of energy efficiency plans and promoting the dialogue on energy needs and supply between central and municipal level. To promote this dialogue the EBRD should seek the collaboration of the civil society sector.	The EBRD will support municipalities in the preparation and implementation of energy efficiency plans as part of the technical assistance provided within the scope of viable investment projects. The EBRD encourages all its clients to engage with relevant stakeholders, including civil society, at relevant project level. In addition, the Bank welcomes to receive the input from civil society's experts on specific projects, sectors or other initiatives. For instance, the collaboration might take the form of written submissions or organisation of <i>ad hoc</i> meetings.
	7.2. The Strategy should take into consideration to contribute towards the establishment of an Energy Efficiency Fund, which was prospected since 2004 in the first country's Energy Efficiency Action Plan. This support would be crucial in supporting municipalities countrywide in the implementation of their local energy efficiency plans. The Bank should also provide through local financial institutions small scale loans aimed at increasing the energy efficiency of private households. Also, the development of an ESCO market would be desirable in the country.	Funds for energy efficiency in the Western Balkans are already made available by other international financial institutions and bilateral donors, for instance within the framework of the Energy Community. In identifying its strategic objectives, the Bank ensures coordination with IFIs and other investors to avoid duplication of efforts and build synergies where relevant. The EBRD has established a credit line through local financial institutions to provide small scale loans for energy efficiency purposes to businesses. The Bank has also looked into the commercial viability of the provision of loans to private households and this has also been negotiated with local financial institutions, but so far no dedicated credit line has been established. The Bank is also favourable to and willing to support the development of an ESCO; initiatives from the private sector will be welcome in this regard.
	7.3 The EBRD is encouraged to focus on energy efficiency and renewable energy projects. In this context, the EBRD should give preference to investments in smart grids for the purpose of harnessing the potential of renewables over coal	The Bank pursues investments in energy efficiency, including smart grids transmission. The upgrade of energy distribution is currently pursued through the provision of credit lines within the framework of the Western Balkans Sustainable Energy Financing Facility (WeBSEFF) and the Western Balkans Sustainable Energy Direct

	<p>fired power plants in light of the EU's 2020 and 2050 energy policies of growth and decarbonisation. In addition, the Bank is not expected to become involved in the upgrade of thermal power plants since these investments would crowd out other investments in renewable energy projects.</p> <p>It is noted that the Strategy highlights the Bank's activities in small hydro power plants but does not prescribe that these plants should not be developed in protected areas such as national parks.</p>	<p>Financing Facility (WeBSEDF).</p> <p>The Bank recognises the challenges of the current carbon markets and regards carbon pricing as key to mitigate climate change. Through the EBRD's Sustainable Energy Initiative, the Bank aims to promote and develop carbon market development as this will put a price on carbon emissions, which cause global warming. Further to tackling global warming issues, most carbon market mechanisms, like the Clean Development Mechanism (CDM), incorporate sustainable development criteria. The Bank's promotion of carbon markets achieves a transition impact by increasing energy efficiency or reducing carbon intensity. Carbon markets can therefore help both on global warming and local environmental issues.</p> <p>The Bank ensures that all projects are consistent with the 2008 Environmental and Social Policy. Thus, all projects must meet the requirements of Performance Requirement 6, which includes rigorous biodiversity safeguards for protected areas. The 2008 Environmental and Social Policy is currently under review and all relevant stakeholders are invited to submit their comments about the existing policy until 20 May. For more information about the whole review process visit http://www.ebrd.com/pages/about/policies/governance.shtml.</p>
	<p>7.4. The importance of feed-in tariffs is recognized by environmental groups as a vital supporting mechanism for renewables. However, the sudden and frequent changes of the feed-in tariffs have been raising uncertainty among private sector investors as well as local banks. The Bank should ensure the predictability of these tariffs and promote consultations among all relevant stakeholders in case of major changes should take place.</p>	<p>The Bank engages in extensive policy dialogue with the authorities for the development of the energy sector. The Bank agrees on the importance of stability in tariffs and this topic is part of the on-going policy dialogue with the relevant authorities.</p>

	<p>7.5. The Bank should engage in policy dialogue to ease the administrative barriers faced by potential investors in renewables, in particular regarding the legal framework regulating environmental, construction, and spatial and urban planning issues.</p>	<p>The Bank agrees that legal reforms are needed to foster the development of the renewable energy sector. For this reason section 3.1.2 of the Country Strategy highlights that the Bank will support investments in renewable energy projects, as well as policy dialogue on related legislation.</p>
	<p>7.6. The EBRD should also support local financial institution in offering green credits with lower interests and simpler requirements both to corporates and municipalities.</p>	<p>The EBRD model is to work on commercial basis offering loans on market terms as they lead to stronger sustainability of projects in the future. Moreover, this model implies that the terms to the sub-borrowers (corporates and municipalities) are set by partner banks, which access and take credit risk of sub-borrowers.</p> <p>In FYR Macedonia the EBRD has already established credit lines for energy efficiency and renewable energies investments through three programmes implemented via financial intermediaries. Such programmes are: WeBSEFF, WeBSEFF II and the Private Sector Support Facility (PSSF). All these frameworks were supported by extensive technical cooperation including assistance with project preparation, market awareness support and incentive payments to end-users.</p>
	<p>7.7 The EBRD should support the development of a market for companies producing products/materials used for energy efficiency purposes like solar panels.</p>	<p>EBRD is ready to finance projects relating to the manufacture of sustainable products in its countries of operations and encourages businesses to apply for loans in this regard. On the policy side, the EBRD is supporting the development of an investment environment for such companies and aims at increasing the market for sustainable products through policy dialogue on the regulatory framework for energy efficiency and renewable energy.</p>
<p>8. Advancing Regional Integration</p>	<p>8.1 The Western Balkan Investment Framework, while serving as a framework for project cooperation and information sharing, so far has not proved to be a <i>framework for policy dialogue</i> as stated in the Strategy. The Bank's should promote a common strategic orientation in order to complement the Framework and advance regional cooperation. In</p>	<p>The Western Balkan Investment Framework (WBIF) is based on beneficiary ownership and is increasingly gaining ground as a tool to drive regional integration. To ensure regional long term sustainability at sector level, the WBIF provides a mixture of financial instruments as well as a platform for policy dialogue and regulatory reform.</p>

	<p>particular, the visibility of the framework should be increased through relevant institutions like the Energy Agency.</p>	<p>The Terms of Reference establishing the WBIF clearly highlights the role of regional networks. Funding priority is given to projects which are identified and prioritised in the context of regional networks such as the South- East Europe Transport Observatory (SEETO) and the Energy Community Secretariat. These regional bodies have their own governance structures and hold Steering Committees/Task Forces comprising members from relevant line ministries, the EU and IFIs. These bodies facilitate closer alignment of operations, policy dialogue and reform processes.</p> <p>A number of regional initiatives promoting regional integration have already been launched as a result of this Framework. Most recently the Regional Energy Efficiency Programme for the Western Balkans, which was established by EBRD to support participating countries to achieve their sustainable energy objectives as set out in their National Energy Efficiency Action Plans. In particular, there is a policy dialogue dimension focussed on setting up the regulatory frameworks and overcoming market barriers that will catalyse investment in energy efficiency and allow ESCO markets to emerge.</p>
	<p>8.2 The Strategy should pay greater attention in completing and upgrading trans-European networks, in particular the railway sector and Corridor VIII, which should connect the country with Albania and Bulgaria.</p>	<p>The EBRD's involvement in specific projects is usually not included in the Strategy. EBRD is already supporting the preparation of Corridor VIII and the development of the railway sector represents a priority in the Strategy period.</p>
	<p>8.3 The EBRD should support the construction of the gas transmission and distribution network at municipal level since the regional integration into the European gas infrastructure will not bring any benefit if the gas distribution network is non-existent.</p>	<p>The implementation of an extended gas transmission network in Macedonia would help the development of the gas market in the country. The Bank is open to consider participating in such initiatives subject to the viability of the project(s).</p>
<p>9. Environmental and Social Implications of Bank</p>	<p>9.1. This section should be broaden and should reflect the potential environmental and social implication of the Bank's activities in the energy</p>	<p>EBRD recognises that energy poverty and affordability are important issues. The Bank's approach to these, and more generally to environmental and social issues in the energy sector, will be</p>

Proposed Activities	sector. The Strategy should highlight the issue of energy poverty and how the Bank's proposed activities in the energy sector will ensure affordability, in particular of heating.	addressed in a comprehensive way in the EBRD's new Energy Sector Strategy. This is currently being developed and will be available of public comment in the second half of 2013.
	9.2. The EBRD was encouraged to allocate resources and targeted initiatives to ensure gender mainstreaming by setting benchmarks and indicators for measuring success. The Strategy states at page 17 that <i>'In all sectors, clients will be encouraged to promote equal opportunities in the work place and will be provided with support where necessary'</i> . This reference is in need for improvement and should highlight the Bank's pro-active engagement in working towards gender equality also in collaboration with the civil society sector.	The Bank is currently developing the Strategic Gender Initiative (SGI), part of which has involved the assessment of where the gender gaps are the most significant, so as to identify where resources are to be focused in the Bank's current countries of operations and potential recipient countries in the southern and eastern Mediterranean (SEMED). According to the draft SGI, most of the gender resources will be allocated to the regions with the most significant gender gaps, i.e. SEMED, Turkey and Central Asia. The former Yugoslav Republic of Macedonia (FYR Macedonia) is not among those countries where the gaps are the largest. However, subject to available human and financial resources and depending on opportunities, projects with a gender component will be considered elsewhere in countries with still considerable identified gender gaps. This may include the FYR Macedonia as the gender gaps are still considerable in the country. The Bank will engage with civil society organisations, when and as appropriate, and will make sure that they are consulted during the public consultations on the Strategic Gender Initiative, once the paper is out for consultations.
Annexes		
10. Political assessment	10.1. The political assessment provides and overview of the implementation of Ohrid Framework Agreement, which might be not shared by part of civil society.	The need for continuing implementation of the Ohrid Framework Agreement (OFA) and for further efforts in a constructive spirit to fulfil the objectives of the OFA is prominently present in relevant international documents pertaining to FYR Macedonia, particularly in all EU documents. The latest Conclusions of the Council of EU on the Enlargement, adopted on 11 December 2012, have at the very

		opening of the section on FYR Macedonia an assertion that “The implementation of the Ohrid Framework Agreement remains an essential element of democracy and the rule of law”. Commitment to the spirit of the OFA remains essential for FYR Macedonia for its further progress in democratic transition and for maintaining political stability in the country.
	10.2. The political annex depicts the 2012 political crises as a controversy around the adoption of the budget for 2013 but does not highlight the terms of this controversy. For a better understanding of the recent political developments the strategy should provide a description of the causes that led to the expulsion of the main opposition party from the Parliament leading to the political crisis.	The government and the opposition have different accounts of what exactly happened in the Parliament on 24 December 2012 and why. We stick to the facts and present them in neutral way, focusing on the consequences for the political system: boycott of the parliament by the opposition. This is in line with the language used by EU, which, in conclusions from the latest round of the High Level Accession Dialogue, issued on 9 April 2013, refers to these events simply as “the events in Parliament on 24 December 2012”.
	10.3 In the analyses of the independence of the media the strategy assesses that pluralism in the media has increased overall in recent years. However, the Press Freedom Index report for 2013, released by Reporters Without Borders indicate the ranking of FYR Macedonia falling of 22 positions since the 2012 index following the arbitrary withdrawal of media licenses, harassment of journalists and the lack of access to public documents.	The assessment refers to a wider period than the year 2012: it covers the entire period since the adoption of the previous Strategy.
11. Small Business Support	11.1 CSOs highlighted the need to invest in SMEs despite their low absorption capacity and invited the EBRD to conduct outreach activities outside the capital to provide visibility to the activities of the	The EBRD will continue supporting the Macedonian MSME sector through direct enterprise support and systemic market development interventions. The Bank plans to further enable MSMEs to access consulting services by facilitating projects with local consultants. A

	<p>Small Business Support Team to businesses outside the capital to ensure a geographical balance of investments. For outreach purposes the EBRD might take into consideration to collaborate with regional chambers of commerce as well as with local civil society organisations.</p>	<p>flexible grant scheme will be applied through annual updates of the Grant Guideline Matrix to prioritise intervention and avoid duplication of efforts with international donors and governmental organisations. Typically, higher grants will be allocated for certain type of enterprises including for enterprises located outside of Skopje. These include but are not limited to market analysis and planning, marketing, ICT systems, financial planning and energy efficiency.</p> <p>Currently, the EBRD is closely working with the Agency for the Promotion of Entrepreneurship to outreach MSMEs across the country. The EBRD will also explore the opportunity to expand its outreach efforts in the context of a strengthened civil society's engagement.</p>
<p>12. General remarks</p>		
	<p>12.1 The EBRD was encouraged to support the development of the civil society sector by providing opportunities for cooperation in relevant components of investment projects.</p>	<p>The EBRD is currently exploring the potential of a fostered engagement with civil society organizations in areas relevant to EBRD projects or strategic sectors.</p>
	<p>12.2 The Strategy should contain a specific section on transparency and access to information. The Bank should make available a list of projects financed through commercial banks and those financed under the different facilities (e.g. Western Balkans Sustainable Energy Financing Facility – WeBSEFF and the Western Balkans Sustainable Energy Direct Financing Facility- WeBSEDFF). Currently, no country specific information is available on the WeBSEFF website.</p> <p>The EBRD should also inform the civil society sector and the general public about prospected</p>	<p>The WeBSEDFF web-site (www.websedff.com) provides a list of projects financed under this facility. The list of all partner financial institutions that receive credit lines from EBRD under WeBSEFF is publicly available on the EBRD and WeBSEFF website. The availability of the detailed list of sub-projects financed by financial intermediaries under EBRD energy efficiency frameworks is constricted by confidentiality requirements of the partner banks financing such sub-projects. Regarding investments in the public sector under WeBSEFF II, the EBRD will contract project consultants to set up a project website to provide public information on municipal investments approved for finance by the fund.</p> <p>The EBRD acknowledges the request to inform the civil society</p>

	<p>investments in the public sector before the deals are done.</p>	<p>sector and the general public about prospected investments in the public sector before the deals are done and will work towards this goal.</p>
	<p>12.3. Consultation with the civil society sector could also contribute to improve the investment climate and foster competition.</p> <p>The Bank should also take into consideration to collaborate with CSOs to help improve transport networks, thereby facilitating greater cross-border trade and investment.</p>	<p>The Bank acknowledges and values the expertise of the civil society sector and consults with CSOs both during formal consultation periods such as in the context of country strategy reviews, policies and relevant category A projects. In addition, the Bank maintains a continuous and open dialogue with civil society on any projects or initiative that might be of interest to the civil society sector and welcomes research and studies conducted by CSOs in sectors relevant to EBRD activities.</p> <p>In FYR Macedonia the Bank has already successfully collaborated with civil society in the implementation of transport projects such as the Skopje Bypass project. In this case, several CSOs were selected and invited to be part of the environmental and monitoring advisory group, which consistently monitored the implementation of the Environmental Action Plan.</p>
	<p>12.4 Civil society organisation welcomed the Bank's initiative to organise a consultation workshop on the draft country strategy and acknowledged the Bank's effort in identifying civil society groups that have an understanding of and an interest in areas relevant to the EBRD activities. The presence of the Bank's Country Director and staff from the Civil Society Engagement Unit should have been coupled also by other specialised departments. Such meetings should complement and not replace the high-dialogue with the Board Directors on occasion of their visits to countries of operations.</p>	<p>The Bank is committed to an early engagement with civil society to ensure opportunities for dialogue from the outset and for this reason offers several opportunities for dialogue with civil society in preparation of country strategies. Early in the process high level dialogue is ensured on occasion of the country visits conducted by the representatives of the Board Directors. Then, during country strategy missions several EBRD departments, which contribute to the draft of the country strategy, often hold meetings with selected civil society organisations to gather their feedback on particular issues. Finally, during the formal 45-day consultation period the Bank organizes in relevant countries workshops with civil society on the draft country strategy.</p>

List of civil society organisations who participated in the consultation process

1. Analytica - Thinking Laboratory
 2. Association for Green Society – Greener
 3. Business Confederation of Macedonia
 4. Center for Civic Initiative
 5. Center for Economic Analyses (CEA)
 6. Eco-Svest
 7. Foundation for Small and Medium Enterprise Development
 8. Foundation for Sustainable Economic Development PREDA Plus
 9. Habitat for Humanity Macedonia
 10. Institute for Democracy SOCIETAS CIVILIS
 11. Konekt - Global Compact Network
 12. Macedonian Centre for European Training (MCET)
 13. Macedonian Enterprise Development Foundation (MEDF)
 14. Metamorphosis Foundation
 15. National Entrepreneurship & Competitiveness Council
 16. Open Society Foundation
 17. Reactor – Research in Action
 18. Regional Enterprise Support Centre Kumanovo
- Observer: Organisation for Security and Cooperation in Europe

Written comments submitted by:

19. Center for Economic Analyses (CEA)
20. Reactor – Research in Action
21. Eko-Svest
22. Foundation for Sustainable Economic Development PREDA Plus