



REPUBLIC OF NORTH MACEDONIA
PUBLIC ENTERPRISE FOR STATE ROADS

EXPRESS ROAD RANKOVCE – KRIVA PALANKA,
SUBSECTION: Lot 2 DLABOCHICA - KRIVA
PALANKA

ABBREVIATED RESETTLEMENT ACTION PLAN

**FOR STABILIZATION OF SLOPES ON THE SECOND SUBSECTION
DLABOCHICA - KRIVA PALANKA OF THE PROJECT CONSTRUCTION OF
STATE ROAD A2, SECTION RANKOVCE – KRIVA PALANKA (LOT2)**

SKOPJE 2023

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ABBREVIATIONS AND ACRONYMS

ARAP	Abbreviated Resettlement Action Plan
AREC	Agency for Real Estate Cadastre
CM	Cadastral Municipality
ESIA	Environmental and Social Impact Assessment
FL	Fertile land
IL	Infertile land
LUB	Land under building
LUO	Land under object
NGO	Nongovernmental Organization
NTS	Non-Technical Summary
OG	Official Gazette
OP	Operational Policy
OPLA	Office for Property and Legal Affairs
PAP	Project Affected Persons
PESR	Public Enterprise for State Roads
RNM	Republic of North Macedonia
WB	World Bank

Glossary

Abbreviated Resettlement Action Plan (RAP): A planning document that describes what will be done to address the direct social and economic impacts associated with involuntary displacement. This term is applicable where the project affected persons are less than 200 or the land acquired is less than 10% of all productive assets of the affected person.

Compensation Payment in cash or in kind of the replacement value of the acquired property.

Cut-of-date Date of socio-economic survey determining the number of PAPs and the extent of impact on their structures and other assets. Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. Similarly, fixed assets (such as structures, crops, fruit trees, and woodlots) established after the cut-off date will not be compensated.

Census is a field survey carried out to identify and determine the number of Project Affected Persons (PAPs), their assets, and potential impacts. The census will be carried out in accordance with the procedures, satisfactory to the relevant government authorities, and the World Bank Environmental and Social Framework. The meaning of the word shall also embrace the criteria for eligibility for compensation, resettlement and other measures, emanating from consultations with affected communities and local leaders.

Vulnerable Groups: Distinct groups of people who might suffer excessively from resettlement effects, such as, the old, the young, the persons with disabilities, the poor, isolated groups and single parents.

Economic displacement Loss of land, assets or access to assets, including those that lead to loss of income sources or other means of livelihood.

Resettlement **entitlement** are the sum total of compensation provided to persons in their respective eligibility category. The entitlement may comprise of cash or in-kind compensation, relocation costs, income rehabilitation assistance, transfer assistance, income substitution and relocation.

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

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

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

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

- a) Acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes;
- b) Repossession of public land that is used or occupied by individuals or households; and
- c) Project impacts that result in land being submerged or otherwise rendered unusable or inaccessible.

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

Livelihood refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering.

Livelihood Restoration Consists of the entitlements for affected persons and/or communities who are economically displaced, to provide them with adequate opportunity and resources to at least restore, if not improve, their livelihoods.

Project Affected People/Persons (PAP` s) are people who, as a result of Project activities, for reasons of the involuntary taking or voluntary contribution of their land and other assets, results in direct economic and or social adverse impacts, regardless of whether or not they are required to physically relocate.

These PAPs may have their:

- ✚ Standard of living adversely affected, whether or not the PAP must move to another location;
- ✚ Right, title, interest in any house, land or any other fixed or movable asset acquired or possessed, temporarily or permanently, adversely affected;
- ✚ Access to productive assets adversely affected, temporarily or permanently;
- ✚ Business, occupation, work or place of residence or habitat adversely affected.

Replacement Value: Method of valuation of assets that helps determine the amount sufficient to replace lost assets and cover transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account;

A **resettlement instrument** to be prepared when subproject locations are identified. In such cases, land acquisition leads to physical displacement of persons, and/or loss of shelter, and /or loss of livelihoods and/or loss, denial or restriction of access to economic resources.

Resettlement Action Plan (RAP): A time-bound action plan with a budget, setting out resettlement strategy, objectives, options, entitlements, actions, approvals, responsibilities, monitoring and evaluation.

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

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

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

1. INTRODUCTION

The Public Enterprise for State Roads (PESR) is in process to construct a new express road from road interchange Stracin to Kriva Palanka, a section called “Rankovce - Kriva Palanka” (the ‘Project), a part of the national A2 road network with international importance that connects Republic of Bulgaria, Republic of North Macedonia and Republic of Albania (Corridor VIII). The road section forms part of the core national transportation network and is categorized as a state road – A2. This document refers only to part of this project, namely, extension of the slopes for the second subsection of the road (Lot 2).

In accordance with the World Bank resettlement policy (OP 4.12) the RAP was prepared, completed and approved for both sections of the Rankovce- Kriva Palanka expressway. This Abbreviated Resettlement Action Plan is only for the additional land needed for the stabilization of the slopes on Lot 2.

For the stabilization of slopes for the second subsection there will be 217 project-affected private parcels in total. The land to be acquired for the project is used for agricultural activities mainly for vegetables (potato, cabbage, onion, leek, etc). There are no households or any other buildings that need to be acquired and demolished. Also, there will be no physical resettlement of people and households.

The expressway project Rankovce – Kriva Palanka is implemented by the Public Enterprise for State Roads (PESR) and is financed from loan from the World Bank.

The overall objective of this abbreviated resettlement action plan is to minimize the negative impact made by this Project.

The main objective of this abbreviated RAP is to ensure that all affected persons by the land acquisition are properly consulted, also ensured that the grievance mechanisms are available and accessible to everyone and properly and timely compensated for their losses at full replacement or market value (whichever is higher).

2. DESCRIPTION OF THE PROJECT

Government of the Republic of North Macedonia, i.e., Public Enterprises for State Roads (PESR) has requested the World Bank’s support for construction of a new expressway A2, Section Kriva Palanka - Rankovce. The section Rankovce – Kriva Palanka is part of the Corridor VIII (National Road A2, East – West: Deve Bair – Kriva Palanka – Kumanovo – Tetovo – Gostivar – Kicevo – Struga – Kjafasan), which is one of the two most important international corridors in the Republic of North Macedonia.



Figure 1: Map Showing Wider Location of the Project (Source: OpenStreetMap)

The Project is following the National Transport Strategy (2007-2017 and the new one 2018-2030), PESR's Annual Program for Construction, Reconstruction, Rehabilitation, Maintenance and Protection of the State Roads for year 2015. The Project for detailed design has been developed by the PESR in compliance with Macedonian spatial planning and legislative requirements as well as in compliance with the World Bank (WB) requirements.

The line of expropriation is defined by the basic project and the infrastructure project for modification and addition to the infrastructure project for the construction of the A2 expressway, Rankovce - Kriva Palanka section, Dlabochica - Kriva Palanka subsection for slopes from KM 3+054 – 10+308, for which a special project program has been developed by the Public Enterprise for State Roads under the title: ***Project program for the development of project documentation at the level of a basic infrastructure project for the construction of an expressway A2, section Rankovce - Kriva Palanka, section Dlabochica - Kriva Palanka for slopes from KM 3+054 - 10+308.***

Due to the conducted supplementary geotechnical investigations along the project in construction: **"Development, completion and adaptation on project documentation for construction of state road A2, section Rankovce – Kriva Palanka, at the level of the expressway"**, particularly the second subsection Dlabochica - Kriva Palanka, a need for additional land take occurs.

The stabilisation of the slopes should enable safe completion of construction works and safe traffic on the new expressway.

The project activities stretch on the territory of two municipalities: Rankovce and Kriva Palanka and include the following settlements: Petralica and Psacha (Rankovce) and Dlabochica, T'Iminci and Gradec (Kriva Palanka).

3. METHODOLOGICAL PROVISIONS OF ARAP

3.1. Type and Classification of Affected Land in N. Macedonia

A land that is, and can be utilized for any kind of agricultural, forestry and other production has been registered as a Cadastre culture.

According to the method of land use, the land is classified as fertile, infertile land and land under water.

There are three types of Land:

- 1) Fertile land
- 2) Infertile land
- 3) Land under water

The **fertile land** is classified as: fields, field under plastic greenhouse, fields under ancillary facilities, fields under a construction/object for primary processing of agricultural products, rice fields, gardens, orchards, vineyards, meadows, pastures, forests, and giant reeds and marshlands.

The **infertile land** is classified as: **naturally infertile land** and **artificially infertile land**. Naturally infertile land includes valleys, stony fields, beaches and other naturally infertile land. The artificially infertile land is the one for which an urban plan or urban planning documentation has been enacted. As an artificially infertile land is considered:

- 1) Urban non-constructed land (UNCL)
- 2) Urban constructed land (UCL): Land under a building (LUB) and Land under object (LUO).

Fertile lands (FL) are classified into eight cadastre classes, for each cadastre land use. For each cadastre land use, the most fertile land is classified into first class, the land which is slightly less fertile shall be classified into second class and it will successively be done so down to the eight (cadastral) class. **Infertile land (IL)** and land under water is not classified into cadastral classes. Reference/indication lands is determined by the Agency for Real Estate Cadastre (AREC).

Land covered with forest trees, as well as land covered with shrubs, juniper, maquis, hawthorn and the like, as well as with degraded forests is considered forest land and is classified as forest land use. Certain trees planted widely, i.e., solitary trees, is not considered as special land use areas, but are classified in the land use of the parcel in which they are located.

The following cadastral (culture) lands are registered during the geodetic and agricultural surveys conducted for the purpose of this project.

- A **field** is an agricultural land, on which in sequential seasons (crop rotation), dissimilar/different types of crops shall be grown, including: wheat, barley, oats, rye, corn, potatoes, alfalfa, clover, fodder beet, poppy, cotton, linen, hemp, tobacco, sugar beet, oilseed rapeseed, sesame, sunflower, chickpeas, lentils, etc. and shall be processed at least once every 5 years, as well as orchards, vineyards and forest nurseries, cultivated willow thickets for collecting rods, strawberry orchards, nurseries of mulberry used for breeding silkworm, hops etc.;
- A **garden** is an agricultural land used for cultivating vegetables: tomatoes, peppers, cabbage, leeks, onions, carrots, parsley, green beans, as well as land planted with flowers and ornamental plants used for sale, ornamental plants nurseries and others, and for whose cultivation is necessary to have conditions for irrigation (natural or artificial);
- An **orchard** is an agricultural land used for cultivating fruit, olive groves, orchards of raspberry, blackberry, and different types of nuts from which the dried seed is obtained;
- A **pasture** is an agricultural land on which grass grows naturally and serves exclusively for grazing livestock;

Regarding **ownership status** the affected land can be divided in three categories:

- 1) Land owned by Private Individuals: single ownership and joint ownership
- 2) Land owned by the Government of Republic of North Macedonia, whether directly or through other state-owned companies
- 3) Land in joint ownership of private individuals and the Government of the Republic of North Macedonia.

The land that is owned by private individuals must be compensated during the process of expropriation. The land owned by the state does not need to be paid when acquired, in such cases only land conversion will occur (from forest, forests, etc. into roads/construction land).

3.2. Approach in identification

3.2.1. Comprehensive approach

In order to gather proper data related to the project domain, quantitative methods were mainly used, and they included:

- Identification of affected parcels
- Census survey of affected PAP
- Valuation of assets (Real estate, other affected property and Crops)
- Analysis of gathered data, Data check.

3.3. Affected parcels identification

Professional geodetic survey has been conducted for the needs of the project in 2022. The survey gives exact data for the quantity of the land that should be expropriated for the needs of

construction the Road junction Rankovce and the New Road pass – access road. During the preparation of the land plans updated geodetic blueprints were used, as well as a list of indications for all cadaster parcels through which the construction passes.

The data for the affected parcels was received from the Agency for Real Estate Cadaster (number, category, land type) they were verified by the project's civil engineers in the planning phase, as well as the ARAP team before the completion of this document. Several site visits were also conducted, in order to establish the availability of the planned land, as well as the degree of its usage by the local population.

Data gathered from the Cadastral office about affected parcels (number, category, type of land), were verified by the project designers at the planning stage, as well as the RAP team before completion of this document. Also, several visits were made by the designers in order to examine the availability of the planned land and the level of its use by the local population. Most of the parcels that will be affected with this additional land take activity have already been affected with the expropriation process that took place in 2018-2022, for the Expressway purposes.

Gathered data, both from land and crops valuation have been merged and compared.

3.4. Cut-off Date

The assessment of the Bureau of Court Expertise for the affected land and crops was completed on 20 January 2023. The assessment of the property values was prepared and delivered to PESR to on 02.02.2023. The date of submission of the assessment to the owners, through the Property and legal affairs department, branch office in Kumanovo, is considered as a cut-off date.¹

3.5. CENSUS AND INVENTORY

3.5.1. Census

The database of Project Affected People and parcels for the census is prepared according to the Elaborate for expropriation. The Geodetic Elaborate for Geodetic works for special purposes / ELABORATE FOR EXPROPRIATION (for the CM Psacha, CM Petralica, CM Dlabočica, CM Gradec, CM T'Iminci) refers to the new land take needs related to expansion and stabilization of slopes.

According to the indications from the database of the Elaborate for expropriation or initial data on expropriation and initiated administrative procedures, the total number of affected parcels is 217.

The census is prepared in order to provide a database for all land parcels affected per cadastre municipality. Information is presented in tables (see ANNEX 4) that include the line of expropriation, name and surname of the owner, address, the number of cadastre parcel, the total area of the land, and the size of the land which is subject to expropriation.

¹ According to the Law on expropriation, the date of submission of the proposal for expropriation to the owner is considered the cut-of-date; and it is based on the assessment produced by the Bureau.

3.5.2. Asset's inventory, Cut-off date and valuation

PESR submitted the Census to the Bureau of Court Expertise of the properties, agricultural parcels, crops, plantations and forests that are located on the alignment of the road junction Rankovce and the connection section for access road and which will be subject to expropriation in accordance with the Law on Expropriation (Official Gazette of RM No. 95/12; 131/12; 24/13; 27/14, 104/15, 192/15, 23/16, 178/16).

The assessments conducted by the Bureau of Court Expertise have already been submitted to the PESR, and the PESR through the legal sector submitted the assessments to the Department of the Office for Property and Legal Affairs (OPLA) in Kriva Palanka. Hence - the assessments will be forwarded to all affected individuals.

These assessments of the expropriation value will be used in the legal procedures. Those affected persons who will be unsatisfied with the decision on the value, can initiate against the expropriation decisions.

Thus, based on the prepared census, the bureau will assess all affected parcels and plantations, i.e., will conduct an asset inventory and valuation. These data will be part of the proposal for expropriation that will be submitted to the project affected persons. **This date of submission will be considered as the cut-off date.** The owners of the parcels which are to be expropriated have no right of compensation to any investments made after the cut-off date (the day when the proposal for expropriation has been submitted to them).

4. IMPACTS

The area where the express road passes and the location of affected land, as previously said, is dominantly abandoned. Though it is incidentally used for production purpose near the footprint of the project nowadays, it is still registered as a potentially fertile land that can be used for agricultural, forestry and other production.

The data for the parcels that should be expropriated for the needs of this purpose (stabilization of the slopes) are received from the Agency for Real Estate Cadaster. During the site visits of the ARAP team it could be concluded that few parcels have agricultural activity with perennial plants as well as some trees (mainly plums).

Table 1: Number of affected parcels

Cadastral Municipality	RNM	Private individuals	Total number of affected parcels
Psacha	2	2	4
Petralica	1	6	7

Dlabochica	9	74	83
T'Iminci	13	59	72
Gradec	17	76	91
Total	42	217	257

There are 217 privately owned parcels that will be affected with the process of expropriation for the slopes' purposes. These 217 parcels are owned by 232 various people. Some 30% (70) of these owners of affected parcels live elsewhere in the country, while 75 of them live in the nearby urban settlement Kriva Palanka. Some 64% (148) owners of the affected parcels live in the affected municipalities (Rankovce and Kriva Palanka) and 31.5% (73) live in the rural settlements of the affected municipalities.

The following figure presents the number of parcels per owner, particularly how many individuals own 1, 2, 3...18 parcels. Some 38% of the owners have just a single parcel affected with expropriation, while 20% have 2 parcels affected with expropriation process. There are three owners that will experience acquisition of land from 18 parcels, each, and none of them live near the affected parcels (2 live in Skopje area, and 1 in Ohrid). Similar is with those that own 10+ parcels that will be affected with this additional land take process (expropriation).



Figure 2: Number of owners with extend of affected parcels by expropriation

The following table gives overview of the number of parcels that will be affected by different type of land/use.

Table 2: Structure of affected land by registered type of land/use

CD	Forest	Meadow	Field	Pasture	Vineyard	Orchard	TOTAL
Psacha	2	-	-	-	-	-	2
Petralica	6	-	-	-	-	-	6
Dlabochica	14	11	21	28	-	-	74
T'Iminci	6	7	22	18	1	5	59
Gradec	29	5	11	25	-	6	76
Total	57	23	54	71	1	11	217

Table 3: Area to be expropriated, by structure of land and cadastral municipality

CD	Forest (m2)	Meadow (m2)	Field (m2)	Pasture (m2)	Vineyard (m2)	Orchard (m2)	TOTAL (m2)
Psacha	333	-	-	-	-	-	333
Petralica	3861						3861
Dlabochica	5957	3096	6882	4883	-	-	20818
T'Iminci	1615	3329	15523	9443	2551	972	33433
Gradec	6761	895	2900	9792	-	1111	21459
Total (m2)	18527	7320	25305	24118	2551	2083	79904

The land to be acquired for the project is used for agricultural activities mainly for vegetables (potato, cabbage, onion, leek, etc), growing some fruit (plums, apricot, cherries, walnuts, etc). There are no households or any other buildings that need to be acquired and demolished. In addition, there will be no physical resettlement of people and households.

A summary of Project impacts is listed below.

Table 4: Summary of expropriation impacts

No.	Impact	Unit	Quantity
1	Private parcels affected	No.	217
2	Private land area to be acquired	sqm. (m ²)	79.904
3	Number of owners losing land	No.	232

5. LEGAL FRAMEWORK

5.1. Legal Framework

In the Republic of North Macedonia, the legislative acts given below regulate the issues of obtaining State ownership rights to privately owned land parcels based on the necessary public needs caused due to road constructions activities:

- Expropriation Law (Official Gazette of Republic of Macedonia No. 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16, 178/16);
- Law on Public Roads (Official Gazette of the Republic of Macedonia No. 84/08; 52/09; 114/09; 124/10; 23/11; 53/11; 44/12; 168/12; 163/13; 187/13; 39/14; 42/14; 166/14, 44/15, 116/15, 150/15, 31/16, 71/16);
- Law on Construction (Official Gazette of Republic of Macedonia No. 130/09, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16, 31/16, 39/16, 71/16, 132/16);
- Law on Assessment (Official Gazette of the Republic of Macedonia No. 115/10, 158/11, 185/11, 64/12, 188/14, 104/15, 153/15, 192/15, 30/16);
- The Law on Access to Public Information (OG of RM no. 13/06, 86/08, 06/10, 42/14, 148/15, 55/16)
- The Law on Acting upon Complaints and Proposals (OG of RM no. 82/08, 13/13, 156/15, 193/15).
- Methodology for assessment of the market value of the real estate (Official Gazette of the Republic of Macedonia No. 54/12)
- Rulebook on the method of cadastral classification and determination and registration of the change of cadastral culture and land class (Official Gazette of Republic of Macedonia No. 144/13, 95/15)
- Law on acting upon illegally constructed buildings (Official Gazette of the Republic of Macedonia No. 23/11, 54/11, 155/12, 53/13, 72/13, 44/14, 115/14, 199/14, 124/15, 129/15, 217/15, 31/16)
- Law on Property and Other Real Property Rights (Official Gazette of the Republic of Macedonia No. 18/01, 99/08, 139/09 and 35/10);
- Law on acting upon complaints and proposals (Official Gazette of Republic of Macedonia No.82/2008, 13/13, 156/15, 193/15);
- Law on Property Cadastre (Official Gazette of the Republic of Macedonia No. 55/13, 41/14, 115/14, 116/15, 153/15, 192/15, 61/16).

5.2. Macedonian Legal Framework for Social Issues

Social domain is the key pillar of every law. But those that are of particular interest relating to this project are:

- Law on Social Protection (OG of RM no. 79/09, 148/13,164/13, 187/13, 38/14, 44/14, 116/14, 180/14, 33/15, 72/15, 104/15, 150/15, 173/15, 192/18, 30/16)
- Law on Pensions and Disability Insurance (OG of RM no. 53/13, 170/13, 43/14, 44/14, 97/14, 113/14, 160/14, 188/14, 20/15, 61/15, 97/15, 129/15, 147/15, 154/15, 173/15, 217/15, 27/16, 120/16, 132/16)
- Law on Housing (OG of RM no. 99/09, 57/10, 36/11, 54/11, 13/12, 55/13, 163/13, 42/14, 199/14, 146/15, 31/16)

- Law for Health Protection (OG of RM no. 43/12, 145/12, 87/13, 164/13, 39/14, 43/14, 132/14, 188/14, 10/15, 61/15, 154/15, 132/15, 154/15, 192/15, 37/16)
- Law on Public Health (OG of RM no. 22/10, 136/11, 144/14, 149/15, 37/16)
- Law on Sanitary and Health Inspection (OG of RM no. 71/06, 139/08, 88/10, 18/11, 53/11, 164/13, 43/14, 144/14, 51/15, 150/15, 37/16)
- Law on Equal Opportunities of Women and Man (OG of RM no. 06/12, 166/14, 150/15, 201/15)
- Law on Traffic Safety (OG of RM no. 169/15, 55/16)
- Law on Safety and Rescue (OG of RM no. 93/12, 41/14, 71/16, 106/16)

Law on Pensions and Disability Insurance defines the obligatory pension insurance of workers under working contract and the natural persons performing activity, the bases of the capital funded pension insurance, as well as the special conditions how certain categories of insured persons receive the right to pension and enjoy disability insurance. The rights deriving from the pension and disability insurance are the following: right to age-related pension, right to disability pension, right to re-allocation to other adequate, working post, right to adequate employment, right to re-qualification or higher qualification and right to adequate financial compensations, right to family pension, right to monthly compensation for physical damage, and right to minimal pension.

The key point from social perspective relevant to this project in the Law on Housing is that it envisages the possibility for renting government-owned apartments to socially endangered and homeless persons in accordance with the Law on Social Protection. This Law deals, among other things, with the issue of social housing and the housing of the vulnerable groups (children without parents or without parental care, users of social and permanent financial assistance, persons affected by natural disasters, disabled persons and persons who need assistance and care by other persons, the socially endangered persons belonging to the Roma community, lone parents with minor children).

The Law on Equal Opportunities of Women and Man defines basic and special measures for establishing equal opportunities for women and men, competences, tasks and duties of the responsible actors for ensuring equal opportunities, the procedure for determining a non-equal treatment of women and men, and the related issues. It aims to promote the principle for establishing equal opportunities for women and men in political, economic, social and education fields, as well as in all other aspects of social life.

5.2.1. Expropriation Process

Macedonian legislation deals with involuntary resettlement and livelihood restoration under its legal framework for expropriation, with the basic notion that owners of properties are to be compensated for their losses, most often in monetary terms.

Brief presentation of the Expropriation process is presented in Annex 2.

The Law on expropriation ("Official Gazette of Republic of Macedonia" No. 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16, 178/16) regulates the procedure for the expropriation of property for projects that are of public interest and the connected rights for real estate (immovable properties). Construction of linear infrastructure, in this case expressway, falls under a project of national/public interest. The legal justification of why the project is in the public interest is submitted together with the request for expropriation (as part of the same process), to the State Attorney, by the expropriation beneficiary. The State Attorney of the Republic of North Macedonia

also represents public companies, funds, agencies, departments, public institutions, trade companies and other institutions established by the State. For this project, the Government of the Republic of N. Macedonia accepts the initiative for expropriation, the State Attorney conducts it.

Expropriation Authority, upon the proposal for expropriation, schedules debate where owner of the property or the holders of other property rights of the property that is subject to expropriation and Proposer of the expropriation are invited. At the hearing the existence of public interest is determined, then the right of ownership and other property rights, as well as the type and amount of compensation and other facts and circumstances relevant to the process of expropriation. The Authority must, after submission of the proposal for expropriation to the owner of the property or the holders of other property rights of the property, to schedule and hold a hearing on the proposal within 15 days of submission of the proposal to the owner of the property or the holders of other property rights of the property.

The hearing may end up with an agreement for compensation (payment in money or providing other suitable property), and for the amount of the fee if it is determined in money, as well as timeframes for payment. This agreement is an executive document and upon its signing it is considered that the expropriation process and the procedure for determining the compensation are completed and final.

If agreement is not reached the expropriation authority, relying on the facts set out in the procedure will issue a decision on expropriation. The decision on expropriation can be appealed to the Administrative Court within 15 days of receipt of the decision.

Ministry of agriculture, forestry and water economy leased the governmentally owned agricultural land to the tenants. This ministry terminates the existing contract with the tenant and sign a new one with the same terms as before, but without the amount of land that will be acquired. PESR will compensate these tenants, by using the same compensation methodology as for the landowners, but without compensation for land.

Other key aspects of the Expropriation Law are shown below:

Compensation - Article 18 “for the expropriated property there is a fair compensation that cannot be lower than the market value of the property. The market value of the property shall be established under conditions determined by this law, according to the methodology, rules and standards pursuant to the Law on Assessment. The right to seek compensation for expropriated property cannot become obsolete”. Article 37 governments that the market value of expropriated property and property that is given as compensation shall be determined by a qualified appraiser, pursuant to the Law on Assessment. Compensation for expropriated property usually is determined in financial means if the former owner or the possessor of other property rights and proposer of expropriation agree otherwise.

The owner of expropriated property shall also be entitled to compensation for crops, seeds, forests on the land and fruits, if they were not incorporated in the market value of the land. The owner of the property shall not be entitled to compensation for investments made after the date of submission of the proposal for expropriation.

If economic activity is performed in a property which is to be expropriated, the effect of interruption of this activity should be taken into account when determining the compensation due for expropriation. This amount shall be determined by an expert, pursuant to the Law on Assessment.

Proposal for expropriation, separate for each individual property, contains information on:

- The proposer of the expropriation;
- The property for which expropriation is proposed;
- The owner of the property (personal name or title, residence, main office);
- The holders of other real property rights (personal name or title, residence, main office);
- The type of facility or performing works for which expropriation is proposed.

The Proposal for expropriation is accompanied by the following documentation:

- An extract of the spatial planning act or approved project for infrastructure;
- A geodesic report with numerical data for the property which is proposed for expropriation;
- An offer of compensation equivalent to the market value of the property determined by a qualified appraiser pursuant to the Law on Assessment;
- A list of property under proposal for expropriation;
- Proof the funds for compensation are in place.

In addition to the Expropriation Law, provisions of the Constitution and the Law on Property and Other Real Property Rights are also relevant to land acquisition and resettlement:

- The **Constitution of the Republic of North Macedonia** guarantees legal protection of ownership and governments that no person may be deprived of his/her property or of the rights deriving from it, except in cases concerning the public interest determined by law. If property is expropriated or restricted, rightful compensation not lower than its market value is guaranteed.
- According to the **Law on Property and Other Real Property Rights**, no person may be deprived of his/her property or of the rights deriving from it, except in cases concerning the public interest determined by law and the acts for spatial planning. In case of deprivation (complete expropriation) or restriction (incomplete expropriation), rightful compensation for the property not lower than its market value at the time of expropriation is guaranteed.

5.3. WB Principles and Procedures of Resettlement adopted in this ARAP

Requirements of World Bank in regards with the Involuntary Resettlement is covered with OP 4.12 Involuntary Resettlement. This policy includes safeguards to address and mitigate impoverishment risks: people face impoverishment when their productive assets or income sources are lost; people are relocated to environments where their productive skills may be less applicable and the competition for resources greater; community institutions and social networks are weakened; kin groups are dispersed; and cultural identity, traditional authority, and the potential for mutual help are diminished or lost.

The main objectives of OP 4.12 are the following:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs;
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing

sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs;

- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

To achieve the objectives of this policy, particular attention is paid to the needs of vulnerable groups among those displaced, especially those below the poverty line, the landless, the elderly, women and children, indigenous peoples, ethnic minorities, or other displaced persons who may not be protected through national land compensation legislation.

5.4. Gap analysis – Macedonian legislation for expropriation and World Bank Safeguard Policies

The main gaps between the national legal expropriation framework in the Republic of North Macedonia and World Bank Safeguard Policies are described below. A Gap Analysis is presented in the following table.

Table 5 Differences between Macedonian law/regulation and WB policy

Macedonian legislation	WB Involuntary Resettlement Policy	Conclusion on gaps	Actions to address the gaps
Eligibility			
Macedonian law does not recognize persons who do not have formal legal title	<p>a) those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country);</p> <p>b) those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets provided that such claims are recognized under</p>	In general, the provisions of the Macedonian legislation and WB's OP 4.12 are the same, except of provision on persons lacking the formal legal right over the property.	The governmental initiative for legalization of objects without proper building permits started in 2010 and ended in June 2014. The initiative for legalization of illegally occupied land (backyard) started in 2011 and ended in October 2014. Therefore, it is not expected this project to meet persons falling under (c) category of PAPs. If such case occurs, WB

	<p>the laws of the country or become recognized through a process identified in the resettlement plan</p> <p>c) those who have no recognizable legal right or claim to the land they are occupying.</p>		<p>safeguards will be implemented.</p>
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Entitlements

<p>Macedonian laws do not include socio-economic assessment in order to determine the real magnitude of impact to the PAP</p>	<p>Implementation of a census and a social-economic assessment within an affected area, to identify the persons who will be displaced and determine who will be eligible for compensation and assistance.</p>	<p>The difference between OP 4.12 practice and national legislation is that by OP 4.12 apart from inventory of loses, a socio – economic assessment is done to determine how and whether the losses are impacting the livelihood of project affected person.</p>	<p>Law does not forbid getting more information from all affected persons those with and without title. Thus, not only the lost assets have been surveyed but also other assets and features that helps in profiling of the affected persons and determining impact. WB OP 4.12 to be followed</p>
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<p>Compensation under the Expropriation law is determined in accordance with the prevailing market price after taking into account the value of land, cost of structures (residential and business) & installations, crops, forest land and timber, also it covers compensation for transaction costs.</p>	<p>Compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets.</p>	<p>The difference between OP 4.12 practice and national legislation is that by OP 4.12 gives beneficiary to the PAP in means of improvement of quality of life or restoration to a previous condition.</p>	<p>Compensation will be at replacement value.</p>
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Timing of Compensation Payment

<p>According to paragraph 48 of the law Compensation has to be paid/provided within 30 days from the day when a compensation agreement has been signed or the court decision on compensation has become final.</p>	<p>Taking of land and related assets may take place only after compensation has been paid and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons.</p>	<p>There is a gap of 15 days where the land can be acquired before it is paid.</p>	<p>PESR must deposit funds equal to the offered amount plus 10% in a secure form of escrow or other interest-bearing deposit acceptable to the Bank in case where affected person does not accept proposed compensation and if compensation is equivalent to at least replacement value. Compensation of land and assets must be fully paid prior to taking of land in the cases that PAP have accepted the offer.</p>
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Information and consultation

<p>Those who have formal legal rights are informed throughout the expropriation process (i.e. that a request for expropriation has been submitted), before the decision on expropriation is passed, the municipal office in charge of expropriation has to invite the affected person with formal legal rights to a meeting to present any facts which may be relevant for expropriation.</p>	<p>Information related to quantification and costing of land, structures and other assets, entitlements, and amounts of compensation and financial assistance are to be disclosed in full to the affected persons. Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring of resettlement</p>	<p>dissemination and consultation with PAPs prior to the process of expropriation. PAPs are not consulted or offered opportunity to participate in planning, implementation and monitoring of resettlement.</p>	<p>Plans for consultations with all project affected people, including host communities should be incorporated in the RAP. Also, the draft RAP itself must be subject to public consultation.</p>
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6. INSTITUTIONAL FRAMEWORK

Following institutions, each with different roles and responsibilities, are main actors in the process of expropriation are:

State Attorney's Office of the Republic of North Macedonia is a Governmental institution which takes a measures and legal means for legal protection of property rights and interests of the Republic of North Macedonia and performs other duties prescribed by law.

Ministry for Transport and Connections is responsible for issuing permits for construction and monitoring the process of expropriation in means of completion of the process of expropriation.

The Real Estate Cadastre Agency of the Republic of North Macedonia holds and registers the information on ownership rights of the land. It can be consulted during the process of obtaining valuable and valid information on ownership and current land use/leasing.

Ministry of Agriculture, Forestry and Water Supply conducts transformation of agricultural land into construction land.

The following institutions offer wide spectrum of assistance that can enable, support and facilitate the consultation process for implementation of ARAP.

National level:

Ministry of Agriculture, Forestry and Water Supply It can be consulted during the process of creation of packages for compensation. Also, it can be consulted in the process of estimating compensation for lost crops.

Ombudsman can be consulted on various legal advice related to litigations of PAPs with the governmental bodies.

Local level:

The **Inter-municipal Centre for Social Work** established by the State that can be consulted during the process of realization of ARAP. The Centre can give valuable input into identification, communicating and addressing of the vulnerable social groups, thus giving appropriate direction for setting compensation means/packages for such groups.

Local community level (Village): Official representatives of the local villages be consulted for and actively involved in the preparation and execution of resettlement processes in their area of jurisdiction. They might be consulted and involved as mediators in the processes of redressing the complaints/grievances, before those are deposited with the Grievance Redress Committee.

7. ELIGIBILITY AND ENTITLEMENTS

7.1. Eligibility

The basic principle followed in this document is that Project affected persons / peoples PAPs should be assisted in their efforts to improve their former living standards, income earning capacity, and production levels, or at least to restore them to pre-Program level whereby lack of legal title does not exclude individuals from the eligibility to receive compensation and/or rehabilitation assistance.

Individuals entitled to compensation or at least rehabilitation provisions under the Project are:

- All affected individuals losing land either with legal title or traditional land rights, Legalizable, or without legal status;
- Tenants and sharecroppers whether registered or not;
- Owners of buildings, crops, plants, or other objects attached to the land; and
- Individuals and legal entity losing business, income, and salaries.

The WB's OP 4.12 recognizes that individuals and households who occupy project-affected areas after the cut-off date are not eligible for compensation. All people moving into the project area and/or people conducting construction works, planting trees, etc. after the cut-off date are non-eligible PAPs and thus will not receive any compensation. Advance notice will be given, requesting them to vacate their premises and dismantle affected structures prior to project implementation.

7.2. Entitlements

Land acquisition and resettlement are implemented according to a compensation and entitlements framework in line with Macedonian laws and regulations and WB OP 4.12. Where they are different, the entitlements most favourable to the PAPs are applied, as set out in the Entitlement Matrix below.

The entitlement matrix is based on the premise that resettlement, rehabilitation and compensation programs should improve or, at a minimum, maintain the PAPs pre-Project living standards and ensure their participation in Project benefits. This is reflected in the following principles of compensation.

All PAPs living in the Project area before the cut-off date are considered for compensation for their losses and/or rehabilitation assistance. Lack of legal rights or titles does not make them ineligible for entitlements.

Table 6 Entitlement Matrix

Category of PAP	Property	Type of Project affected right or property or loss	Entitlement
Owner	Land	Loss of fraction of agricultural land and the rest of the parcel is viable	Registration of land parcels according to Macedonian legislation, prior to expropriation, free of costs. Cash compensation for affected land at replacement cost (equivalent to the market value of the property, sufficient to replace the lost assets and cover transaction costs)
Owner		Loss of fraction of agricultural land Rest of the parcel is not usable	Registration of land parcels according to Macedonian legislation, prior to expropriation, free of costs. Cash compensation for all affected land at a replacement cost, or Land plot of similar size and characteristics, with a secure tenure status
Tenant			Assistance in lease of alternative land/property to re-establish use
Owner /Tenant	Standing Crops	Loss of annual Crops	The right to harvest crops or Cash compensation for annual crops at replacement value
Owner /Tenant	Trees	Trees affected	Cash compensation at market value on the basis of type, age and productive value of the trees
Claim to ownership	Land	Loss of land	Cash compensation for affected land at replacement cost
No recognizable legal right or claim	Land and other assets	Loss of land and assets	No cash compensation for affected land at replacement cost. Cash compensation for assets at replacement costs.

7.3. Cut-off Date

Based on the prepared census, the Bureau of Court Expertise made an assessment of all affected parcels and crops, i.e., it conducts an asset inventory and valuation. This data is part of the proposal for expropriation that is submitted to the persons affected by the project. The date of submission of the will be considered as the cut-off date.² Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance.

² According to the Law on expropriation, the date of submission of the proposal for expropriation to the owner is considered the cut-of-date; and it is based on the assessment produced by the Bureau of Court Expertise.

Similarly, fixed assets (such as built structures, crops, fruit trees, and woodlots) constructed after the cut-off date will not be compensated. A Moratorium notice informing the general public of the declaration shall be made to serve as the cut-off date for eligibility to entitlements. In addition, at the beginning of the Census, every individual surveyed shall be informed about the moratorium date and the respective consequences of commencing activities after the date of Census.

8. VALUATION

Project affected people will be compensated at full replacement and substitution costs without depreciation, and relocated or resettled in and after due consultation with them. The preliminary compensation rates for replacement and substitution cost will be proposed to the PAPs to give them an opportunity to compare those with the prevailing market rates.

Compensation in cash for all residential, commercial or other structures will be paid at replacement cost of these structures, without any depreciation of the structure and without deduction for salvageable materials.

All fees and taxes on land and/or house transfers are waived or otherwise fees and taxes are included in a compensation package for land and/or house.

8.1. Valuation of Real Estate Assets

During RAP preparation, PESR has engaged services of a competent and certified independent assessor (Bureau for Forensic Expertise), responsible for determining replacement cost of affected properties and assets. The methodology for assessment of real estate assets is described in the Methodology for assessment of the market value of the real estate (Official Gazette of the Republic of Macedonia No. 54/12). The definitions of agricultural land and cadastral cultures are set in the Rulebook of the method of cadastral classification and determination and registration of the change of cadastral culture and land class ("Official Gazette of Republic of Macedonia" No. 144/13). Beside this methodology, the Law on Assessments (OGRM 115/10) has been followed, too.

During the preparation of this document, PESR hired a competent and authorized independent appraiser from the Bureau of Court Expertise responsible to determine the expenses of replacing the properties and assets in question. The Bureau has already prepared the appraisal. It was initially delivered to PESR, and then through the legal department to the Property and Legal Affairs Office (PLAO), Kumanovo branch, from where it will be delivered to the owners.

The Market value of a construction land is determined according to the average price of the market trade in the year previous to the year the land appraisal is done. If there are no trades in that year in the municipality, or there is no data, the market value is determined according to comparable data for construction parcels trade in the adjacent municipalities.

To determine the market value of real estate (structures) which are subject to expropriation, as well as the compensation of any crops (fertile parcels), the beneficiary of expropriation (PESR) engages qualified experts (authorised assessors) from the relevant area. The selection of experts

for land expropriation follows the same procedure as those for land acquisition. The findings and opinions of the experts are submitted to the expropriation body together with the proposals for expropriation.

According to Macedonian legal framework, the Market Value of agricultural land, forests and pastures is determined in accordance with the average price of sold land, during the previous year. If in the previous year there has been no sale of land, then the market price will be equivalent to the average price of the expropriated agricultural land within the Municipality, in compliance with the Expropriation legislation.

The market value of the expropriated property and property that is provided as compensation is determined by a qualified appraiser pursuant to the national Appraisal Law.

Certified assessors calculated the compensation of the land to be acquired for the purpose of this project activities related to the stabilization of the slopes of the expressway in construction, in height of 140MKD per 1m².

8.2. Valuation of Agricultural Assets

The methodology for assessment of value of crops and trees is based on several official documents, academic and statistical resources.

The assessment of valuation of the crops, plants and cultures has been made in accordance with:

- the Methodology for assessment of the value of agricultural assets (OGRM 171/11),
- reports on Prices of agricultural products on retail, wholesale and livestock markets,
- Annual statistical review “Field crops, orchards and vineyards” where the average crop yield is listed, by municipalities (reports for the period 2010-2015).

Additionally, the following literature has been consulted:

1. Field crops, orchards and vineyards 2013-2015, Statistical Review. State Statistical Office, Skopje.
2. Prices of agricultural products on retail, wholesale and livestock markets, 2011-2015. State Statistical Office.
3. Costs and Calculation (Textbook) – M. Milanov, A.Martinovski Stojcevska, Faculty for Agricultural Sciences and Food, Skopje

The following table shows the assessed compensation price for acquired trees and crops for privately owned land.

Table 7: Valuation price for Crops and Trees

Crops and Trees	MKD
Pastures (m ²)	3.3
Meadow (m ²)	6.5
Field (m ²)	18
Orchard (m ²)	36
Forest (m ²)	89.8
Tree/Firewood (m ³)	2400

During the valuation process, PAPs, local officials and relevant government offices (such as the Cadaster) were consulted.

8.3. Replacement valuation

With regard to land and structures, the replacement value is defined as follows:

- (i) For agricultural land, it is the pre-project or pre-displacement, whichever is higher, market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes.
- (ii) For land near settlement areas, it is the pre-displacement market value of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the affected land, plus the cost of any registration and transfer taxes.
- (iii) For houses and other structures, it is the market cost of the materials to build a replacement structure with an area and quality similar to or better than those of the affected structure, or to repair a partially affected structure, plus the cost of transporting building materials to the construction site, plus the cost of any labor and contractors' fees, plus the cost of any registration and transfer taxes.

In determining the replacement cost to be compensated to the PAP, depreciation of the asset and the value of salvage materials are not taken into account, nor is the value of benefits to be derived from the project deducted from the valuation of an affected asset. Where domestic law does not meet the standard of compensation at full replacement cost, World Bank guidelines and technical specifications for compensation at replacement cost are applied.

Compensation for land, structures, business, fixed improvements and other temporary assets are based on market valuation, productivity valuation, negotiated settlements, material and labor valuation, disposition of salvage materials and other fees paid. It should be noted that lack of title, license or permit is not a bar to compensation.

9. COMMUNITY PARTICIPATION

This project has already informed all PAPs on the activities related to the expropriation process and conducted valid socio-economic survey in 2017. Relevant project documentation is visible online (PESR and WB websites) since 2017 and some earth excavation activities are completed, though some are still in-process.

In the period 12-13 April 2022, two separate consultation meetings (Public Hearings) with landowners affected by the expropriation activities related to the Road Junction Rankovce and new connection – crossing on Lot1, were held (Rankovce 12.04.2022, Skopje 13.04.2022). In Rankovce, the municipal office was used, while in Skopje, the meeting was held in the PESR office. Both meetings were scheduled at noon (12.00h).

PESR plans to disclose relevant information from this ARAP to the public and hold public consultations in the mid of June 2023. This ARAP will be disclosed on the PESR website, once it is cleared by the WB side and sensitive data, in accordance with the privacy law, are erased from the disclosed document.

Both municipalities (Rankovce and Kriva Palanka) will be involved in the information dissemination and public consultation process.

10. ARAP IMPLEMENTATION

The ARAP implementation team (AIT) within PESR is founded to execute the approved ARAP. All of the activities defined in the ARAP are covered with the PESR funding and will be completed before the construction activities begin. The AIT is responsible for the preparation and the execution of the approved ARAP, supervised by the World Bank.

The main responsibilities activities of the AIT are, but not limited to:

- Checking the ARAP census and the data for the inventories of the tagged parcel.
- Directly contacting the persons affected by the project (PAP) as well as the representatives of the settlements,
- Prepares documentation for new parcels registrations
- Provides necessary information to the public
- Negotiations and arrangements with the PAP
- Delivery of the compensation, and if necessary, implementation and supervision of the rehabilitation measures. Financial compensations are paid via bank transfers
- Supervising grievance procedures
- Court proceedings for cases there is not an agreement reached,
- Expropriation procedures through the court,

The responsible person in PESR for fulfilment of the ARAP is:

Mrs. Biljana Cvetkovikj

Manager of Human Resources Management and General Affairs Unit in PESR

Tel: + 389 (0)2 3118-044 312

Fax: + 389 (0)2 3220-535

E-mail: biljanal@roads.org.mk

Address: Public Enterprise for State Roads

Dame Gruev 14, 1000 Skopje, Republic of North Macedonia

Web: www.roads.org.mk

The following table gives overview on the timing of the planned activities related to this ARAP.

Table 8 Organizational responsibilities and arrangements

Task	Responsibility	Timing
Information disclosure to all Project Affected People and finalizing ARAP	PESR	June 2023
Negotiations and expropriation activities, prior to construction commencement	PESR / State Attorney	August 2023 - onwards
Payment / provision of compensation packages	PESR	August 2023

11. COST AND BUDGET

PESR will cover all costs associated with ARAP implementation. PESR is responsible for securing the necessary funding for the land acquisition.

Regarding the financial issues it is necessary to mention that within the Annual programme of PESR there are cumulative financial resources for expropriation for all current projects.

The budget needed for implementation of the ARAP include budgets for land acquisition/expropriation, compensation, resettlement, monitoring and evaluation, as well as contingencies and administrative expenses. The cost of resettlement will be included in the overall costs of the project.

Calculated costs for acquiring assets (real estate and crops) for this activity is **12.311.140** MKD.

12. GRIEVANCE REDRESS MECHANISM

PESR has developed a grievance mechanism to receive and consider all comments and complaints associated with the Project, including those related to land acquisition (Annex 1. Public Grievance Form). The following principles will apply to grievance management:

- Any grievance related to land acquisition or to any other matter will be registered, acknowledged within 5 working days and tracked until it is closed;
- The grievance management system will include at least one level of review/appeal, with the aim to reach an amicable settlement wherever possible without resorting to a judicial review;
- Grievances will be processed and responded to within 15 working days.

PESR is truly committed to receiving and responding to all complains, either verbally or in writing in relation to the resettlement impact and compensation segments of the project. PESR recognizes that consultation is an ongoing process and different concerns may arise as the Project moves into the land acquisition and construction phases.

All complaints will be forwarded and processed by the **responsible person of the PESR** services:

Mrs. Biljana Cvetkovikj
Manager of Human Resources Management and General Affairs Unit
Tel: + 389 (0)2 3118-044 ext. 312
Fax: + 389 (0)2 3220-535
E-mail: biljanal@roads.org.mk

Address: Public Enterprise for State Roads
Dame Gruev 14, 1000 Skopje, Republic of North Macedonia
Web: www.roads.org.mk

PESR will establish a registry of grievances and will monitor the resolution of grievances, which should be on a timely basis. Each grievance will be recorded in the registry with the following information:

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

The Grievance Form (in Macedonian and English) will be made available on the web site www.roads.org.mk and affected municipality of Rankovce will receive pre-printed forms to be readily available for the public. A worker's Grievance Mechanism will also be established for the employees of construction companies (as a separate system).

PESR will monitor the entire process of comments and complaints and the information will be transposed in the corresponding reports, which will be prepared and posted on its website. PESR is obliged to respond to all complaints within 15 days. Summaries of complaints and the measures taken to resolve them will be made public on a regular basis. In their complaints, stakeholders may also use legal assistance provided by the Macedonian legal system.

13. MONITORING AND EVALUATING

PESR legal department will regularly monitor land acquisition and the implementation of the ARAP. A land acquisition database on the individuals / households whose properties have been affected by the Project, compensation and livelihood restoration measures that have been implemented will be regularly updated. All information on individuals / families, their properties and their compensation payments will be kept confidential.

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

Internal monitoring is conducted by PESR to look at progress against inputs and commitments of the expropriation, compensation and livelihood restoration process, and at specific situations of economic or social difficulties arising from the implementation of this segment.

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

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

Table 9: Indicators for monitoring implementation of ARAP

Indicators	Frequency of measurement
Output indicators	
Number of compensation contracts signed?	Semi-annually
Number and % of compensation payments completed?	Semi-annually
Physical Displacement – number of people/households resettled, type of resettlement assistance provided (if any)	Semi-annually
Outcome indicators	
Number and type of outstanding or unresolved grievances and trends	Semi-annually
Average time for payment of compensation	Annually
Does compensation represent full replacement cost?	Semi-annually
Use of compensation?	Semi-annually
Physical displacement - satisfaction with new homes / assets (if any)?	Annually

ANNEXES

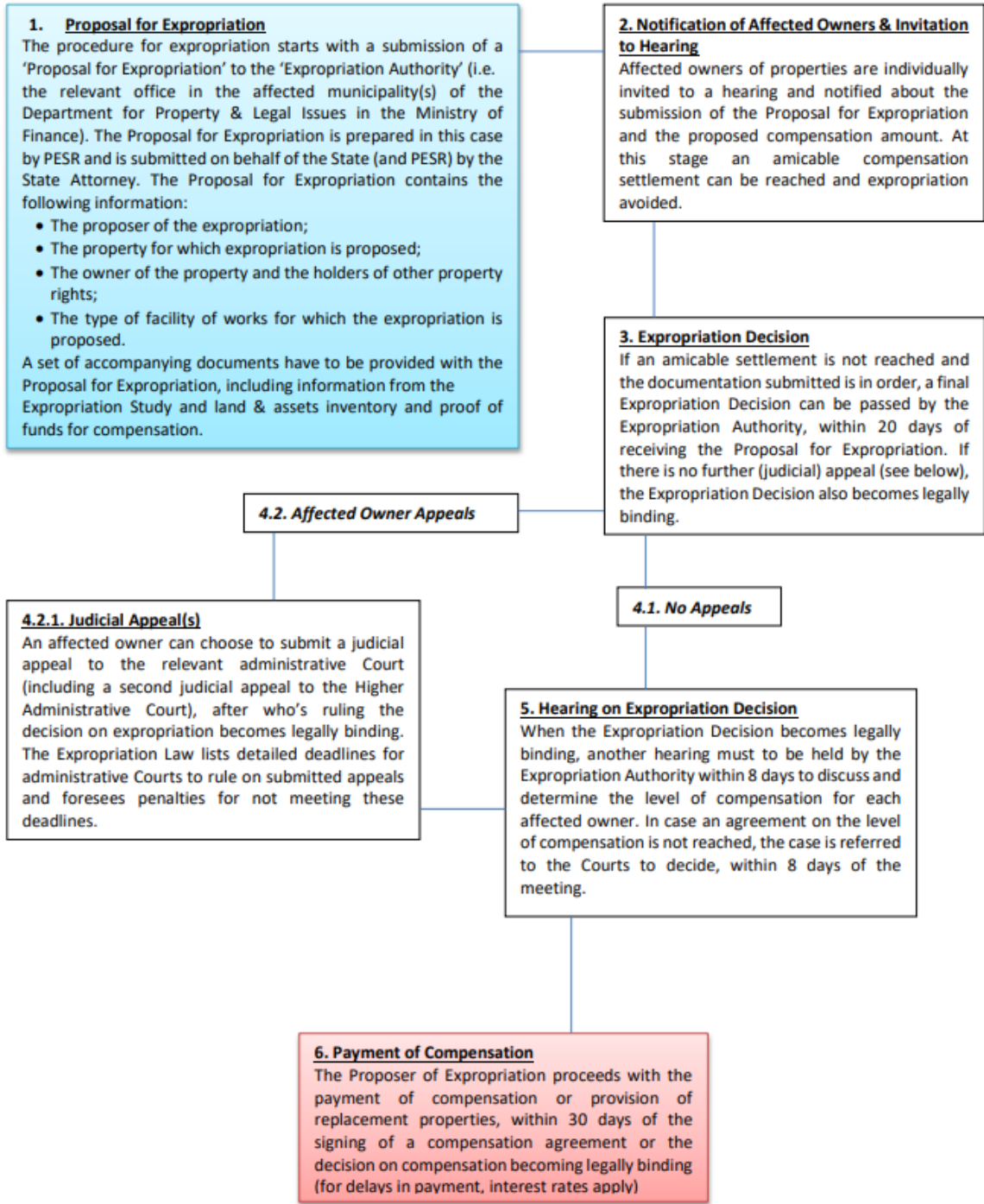
Annex 1: Public grievance form

Grievance Form	
Reference No:	
Name and Surname	
Contact Information: Please note how you like to be contacted (mail, phone, e-mail)	* By Post: Please provide mailing address: _____ _____ * By Phone: _____ * By E-mail _____
Preferred language for communication	* [Macedonian] * [Other: _____]
Description of Grievance: _____	
Date of Grievance	
	* One-time incident/grievance (date _____) * Happened more than once (how many times? _____) * On-going (currently experiencing problem)
What would you like to see happen to resolve the problem? _____	
Signature: _____ Date: _____	
Please return this form to:	
Ms Biljana Cvetkovikj Tel: + 389 (0)2 3118-044 ext.312 Fax: + 389 (0)2 3220-535 email: biljanal@roads.org.mk	Public Enterprise for State Roads Dame Gruev str. 14 1000 Skopje, Republic of Macedonia

Annex 2: Grievance Register

Number	Name/Contact details	Date received	Details of complaint/ comment	Responsibility	Actions taken	Date resolved	Follow-up

Annex 3: Brief Presentation of Expropriation Process



Annex 4: List of affected parcels and proposed compensation

Number	Cadastral Municipality	Parcel Number	Type of land	Total Land Area (m2)	Area to be expropriated (m2)	% to be expropriated	Compensation Value (MKD)	Compensation for the land (MKD)	Compensation for the plants and crops (MKD)	Total Compensation (MKD)
1	PSACHA	122/8	Forest	8087	46	0.6%	140			
2	PSACHA	122/13	Forest	821	287	35.0%	140			
3	PETRALICA	8260/17	Forest	4194	708	16.9%	140			
4	PETRALICA	8260/2	Forest	43150	91	0.2%	140			
5	PETRALICA	8260/4	Forest	8073	1380	17.1%	140			
6	PETRALICA	8260/6	Forest	28124	79	0.3%	140			
7	PETRALICA	8260/14	Forest	23859	91	0.4%	140			
8	PETRALICA	8277/2	Forest	30806	1512	4.9%	140			
9	DLABOCHICA	2180/1	Forest	1266	502	39.7%	140			
10	DLABOCHICA	2214/1	Forest	703	136	19.3%	140			
11	DLABOCHICA	2215/1	Pasture	886	202	22.8%	140			
12	DLABOCHICA	2218/1	Meadow	47	47	100.0%	140			
13	DLABOCHICA	2213/1	Pasture	22	22	100.0%	140			
14	DLABOCHICA	2212/1	Field	43	43	100.0%	140			
15	DLABOCHICA	2219/2	Forest	51	51	100.0%	140			
16	DLABOCHICA	2217/1	Meadow	940	582	61.9%	140			
17	DLABOCHICA	2077/1	Forest	824	144	17.5%	140			
18	DLABOCHICA	2075/1	Meadow	681	255	37.4%	140			
19	DLABOCHICA	2073/1	Field	36	36	100.0%	140			
20	DLABOCHICA	2068/2	Pasture	71	71	100.0%	140			
21	DLABOCHICA	2074/1	Field	279	191	68.5%	140			
22	DLABOCHICA	2072	Meadow	1471	35	2.4%	140			
23	DLABOCHICA	2163/1	Forest	4308	353	8.2%	140			
24	DLABOCHICA	2162/1	Forest	6442	264	4.1%	140			
25	DLABOCHICA	2174/1	Field	318	318	100.0%	140			
26	DLABOCHICA	2165/1	Pasture	456	191	41.9%	140			
27	DLABOCHICA	2171/1	Forest	176	176	100.0%	140			
28	DLABOCHICA	2170/1	Pasture	915	520	56.8%	140			
29	DLABOCHICA	2172/1	Forest	53	53	100.0%	140			
30	DLABOCHICA	2129/2	Pasture	425	163	38.4%	140			
31	DLABOCHICA	2176/1	Pasture	76	76	100.0%	140			
32	DLABOCHICA	2177/1	Forest	1405	604	43.0%	140			
33	DLABOCHICA	2069/1	Field	442	291	65.8%	140			
34	DLABOCHICA	2070	Pasture	3271	10	0.3%	140			
35	DLABOCHICA	2057	Pasture	2584	189	7.3%	140			
36	DLABOCHICA	2058/1	Pasture	1851	109	5.9%	140			
37	DLABOCHICA	2213/2	Pasture	28	28	100.0%	140			
38	DLABOCHICA	2196/1	Pasture	1152	111	9.6%	140			
39	DLABOCHICA	2211/1	Pasture	658	117	17.8%	140			
40	DLABOCHICA	2212/2	Field	74	74	100.0%	140			
41	DLABOCHICA	2210/1	Field	317	213	67.2%	140			
42	DLABOCHICA	2208/1	Meadow	779	155	19.9%	140			
43	DLABOCHICA	2209/1	Meadow	2	2	100.0%	140			
44	DLABOCHICA	2207/1	Field	1120	179	16.0%	140			
45	DLABOCHICA	2206	Meadow	888	39	4.4%	140			
46	DLABOCHICA	2223	Field	1596	169	10.6%	140			
47	DLABOCHICA	2222/1	Field	1100	477	43.4%	140			
48	DLABOCHICA	2221/1	Field	574	459	80.0%	140			
49	DLABOCHICA	2225/1	Pasture	1080	704	65.2%	140			
50	DLABOCHICA	2226	двоп	671	53	7.9%	140			

Number	Cadastral Municipality	Parcel Number	Type of land	Total Land Area (m2)	Area to be expropriated (m2)	% to be expropriated	Compensation Value (MKD)	Compensation for the land (MKD)	Compensation for the plants and crops (MKD)	Total Compensation (MKD)
51	DLABOCHICA	2068/1	Pasture	464	324	69.8%	140			
52	DLABOCHICA	2067/1	Pasture	625	223	35.7%	140			
53	DLABOCHICA	2058/2	Pasture	939	279	29.7%	140			
54	DLABOCHICA	2065/2	Forest	841	55	6.5%	140			
55	DLABOCHICA	2061/1	Pasture	483	55	11.4%	140			
56	DLABOCHICA	2051/1	Pasture	680	421	61.9%	140			
57	DLABOCHICA	2052	Pasture	9129	279	3.1%	140			
58	DLABOCHICA	2048/2	Meadow	1101	765	69.5%	140			
59	DLABOCHICA	2047/2	Field	3079	1264	41.1%	140			
60	DLABOCHICA	2042/1	Meadow	2387	701	29.4%	140			
61	DLABOCHICA	2040/1	Meadow	508	508	100.0%	140			
62	DLABOCHICA	2028/1	Field	223	223	100.0%	140			
63	DLABOCHICA	2028/2	Field	47	47	100.0%	140			
64	DLABOCHICA	2041/1	Field	2832	914	32.3%	140			
65	DLABOCHICA	2027/1	Forest	8488	1849	21.8%	140			
66	DLABOCHICA	2020/2	Uncategor.	294	201	68.4%	140			
67	DLABOCHICA	2009/3	Field	15	15	100.0%	140			
68	DLABOCHICA	2016/2	Field	77	77	100.0%	140			
69	DLABOCHICA	2009/2	Field	566	438	77.4%	140			
70	DLABOCHICA	2017	Forest	2733	1736	63.5%	140			
71	DLABOCHICA	2015	Pasture	10512	238	2.3%	140			
72	DLABOCHICA	2016/1	Field	2181	1200	55.0%	140			
73	DLABOCHICA	1596/1	Pasture	255	69	27.1%	140			
74	DLABOCHICA	1610/1	Pasture	143	105	73.4%	140			
75	DLABOCHICA	1612/1	Pasture	778	103	13.2%	140			
76	DLABOCHICA	1592/1	Pasture	116	24	20.7%	140			
77	DLABOCHICA	1590/1	Pasture	972	168	17.3%	140			
78	DLABOCHICA	2128/1	Forest	1439	14	1.0%	140			
79	DLABOCHICA	2123/1	Forest	771	20	2.6%	140			
80	DLABOCHICA	1606/1	Pasture	574	18	3.1%	140			
81	DLABOCHICA	1603/1	Pasture	970	64	6.6%	140			
82	DLABOCHICA	1602/1	Meadow	177	7	4.0%	140			
83	T'LMINCI	1196/1	Forest	784	128	16.3%	140			
84	T'LMINCI	1195/1	Field	285	65	22.8%	140			
85	T'LMINCI	1194/1	Forest	332	97	29.2%	140			
86	T'LMINCI	1199/4	Orchard	730	310	42.5%	140			
87	T'LMINCI	1198/1	Pasture	5421	236	4.4%	140			
88	T'LMINCI	1199/1	Orchard	381	179	47.0%	140			
89	T'LMINCI	1202/1	Orchard	708	109	15.4%	140			
90	T'LMINCI	1203/1	Field	878	878	100.0%	140			
91	T'LMINCI	1133/1	Field	1404	1404	100.0%	140			
92	T'LMINCI	1132/1	Pasture	1337	1337	100.0%	140			
93	T'LMINCI	1131	Meadow	215	215	100.0%	140			
94	T'LMINCI	1130/1	Field	1945	1945	100.0%	140			
95	T'LMINCI	1142/1	Pasture	709	709	100.0%	140			
96	T'LMINCI	1130/4	Field	288	166	57.6%	140			
97	T'LMINCI	1129/1	Pasture	859	859	100.0%	140			
98	T'LMINCI	1147	Pasture	687	456	66.4%	140			
99	T'LMINCI	1149	Field	1214	262	21.6%	140			
100	T'LMINCI	1150	Field	1318	54	4.1%	140			

Number	Cadastral Municipality	Parcel Number	Type of land	Total Land Area (m2)	Area to be expropriated (m2)	% to be expropriated	Compensation Value (MKD)	Compensation for the land (MKD)	Compensation for the plants and crops (MKD)	Total Compensation (MKD)
101	T'LMINCI	1128/1	Field	319	319	100.0%	140			
102	T'LMINCI	1127/1	Field	296	296	100.0%	140			
103	T'LMINCI	1126	Pasture	1672	617	36.9%	140			
104	T'LMINCI	1123/1	Field	2664	1086	40.8%	140			
105	T'LMINCI	1125/1	Field	1906	592	31.1%	140			
106	T'LMINCI	1124/1	Field	1120	762	68.0%	140			
107	T'LMINCI	1116/1	Field	3074	1086	35.3%	140			
108	T'LMINCI	1122	Field	2558	410	16.0%	140			
109	T'LMINCI	1130/2	Field	7313	1842	25.2%	140			
110	T'LMINCI	1208/1	Forest	1870	154	8.2%	140			
111	T'LMINCI	1133/2	Field	82	43	52.4%	140			
112	T'LMINCI	1198/4	Pasture	2163	262	12.1%	140			
113	T'LMINCI	1199/5	Orchard	498	89	17.9%	140			
114	T'LMINCI	1204/5	Pasture	1696	21	1.2%	140			
115	T'LMINCI	1199/7	Orchard	2480	285	11.5%	140			
116	T'LMINCI	1204/1	Field	4669	91	1.9%	140			
117	T'LMINCI	1206/1	Meadow	118	78	66.1%	140			
118	T'LMINCI	1207/1	Meadow	450	26	5.8%	140			
119	T'LMINCI	813/1	Meadow	25	25	100.0%	140			
120	T'LMINCI	815/1	Vineyard	3020	2551	84.5%	140			
121	T'LMINCI	816	Pasture	14610	1029	7.0%	140			
122	T'LMINCI	820	Field	22877	2103	9.2%	140			
123	T'LMINCI	821/2	Field	48	48	100.0%	140			
124	T'LMINCI	871/1	Field	2527	195	7.7%	140			
125	T'LMINCI	863/1	Meadow	4099	383	9.3%	140			
126	T'LMINCI	823/1	Pasture	5062	478	9.4%	140			
127	T'LMINCI	821/1	Field	4307	1494	34.7%	140			
128	T'LMINCI	863/2	Meadow	617	144	23.3%	140			
129	T'LMINCI	813/3	Meadow	4017	2458	61.2%	140			
130	T'LMINCI	814/1	Field	382	382	100.0%	140			
131	T'LMINCI	693	Pasture	8216	1020	12.4%	140			
132	T'LMINCI	694/1	Forest	1221	1109	90.8%	140			
133	T'LMINCI	974/1	Pasture	3918	1383	35.3%	140			
134	T'LMINCI	975/1	Pasture	1601	293	18.3%	140			
135	T'LMINCI	665/2	Pasture	995	464	46.6%	140			
136	T'LMINCI	976/1	Pasture	2513	142	5.7%	140			
137	T'LMINCI	979/1	Forest	455	84	18.5%	140			
138	T'LMINCI	654/1	Pasture	148	43	29.1%	140			
139	T'LMINCI	651/1	Pasture	685	16	2.3%	140			
140	T'LMINCI	653/2	Pasture	880	78	8.9%	140			
141	T'LMINCI	656/1	Forest	92	43	46.7%	140			
142	GRADEDEC	8089/5	Forest	1194	148	12.4%	140			
143	GRADEDEC	8889/1	Field	949	528	55.6%	140			
144	GRADEDEC	8890/2	Forest	1799	572	31.8%	140			
145	GRADEDEC	9025/1	Forest	602	259	43.0%	140			
146	GRADEDEC	9026/1	Pasture	580	428	73.8%	140			
147	GRADEDEC	9027/1	Forest	370	360	97.3%	140			
148	GRADEDEC	9028	Forest	3297	381	11.6%	140			
149	GRADEDEC	9019	Forest	3512	323	9.2%	140			
150	GRADEDEC	9020	Orchard	1578	214	13.6%	140			

Number	Cadastral Municipality	Parcel Number	Type of land	Total Land Area (m2)	Area to be expropriated (m2)	% to be expropriated	Compensation Value (MKD)	Compensation for the land (MKD)	Compensation for the plants and crops (MKD)	Total Compensation (MKD)
151	GRADEDEC	9021/1	Forest	756	248	32.8%	140			
152	GRADEDEC	9035/1	Field	3292	333	10.1%	140			
153	GRADEDEC	9036/1	Field	5079	699	13.8%	140			
154	GRADEDEC	9039/1	Pasture	4538	1010	22.3%	140			
155	GRADEDEC	9040/1	Forest	2722	285	10.5%	140			
156	GRADEDEC	8985/1	Pasture	5151	764	14.8%	140			
157	GRADEDEC	8890/1	Forest	5182	321	6.2%	140			
158	GRADEDEC	9024/1	Pasture	2080	1053	50.6%	140			
159	GRADEDEC	8913/1	Pasture	6360	797	12.5%	140			
160	GRADEDEC	9023/1	Field	522	205	39.3%	140			
161	GRADEDEC	8915/1	Forest	3522	198	5.6%	140			
162	GRADEDEC	9018	Forest	727	578	79.5%	140			
163	GRADEDEC	9017/1	Pasture	696	582	83.6%	140			
164	GRADEDEC	9016/1	Field	1335	142	10.6%	140			
165	GRADEDEC	9004/1	Orchard	1868	788	42.2%	140			
166	GRADEDEC	8987/1	Forest	1730	263	15.2%	140			
167	GRADEDEC	8986/1	Forest	996	311	31.2%	140			
168	GRADEDEC	8985/2	Pasture	3160	140	4.4%	140			
169	GRADEDEC	9044/1	Pasture	1308	126	9.6%	140			
170	GRADEDEC	9045/1	Pasture	1139	596	52.3%	140			
171	GRADEDEC	9049	Pasture	519	24	4.6%	140			
172	GRADEDEC	9055/2	Forest	439	199	45.3%	140			
173	GRADEDEC	9053/1	Pasture	1240	453	36.5%	140			
174	GRADEDEC	9043/1	Forest	9199	51	0.6%	140			
175	GRADEDEC	9045/2	Pasture	710	368	51.8%	140			
176	GRADEDEC	9055/1	Forest	1426	174	12.2%	140			
177	GRADEDEC	9061/1	Pasture	3105	276	8.9%	140			
178	GRADEDEC	9056/1	Pasture	1908	253	13.3%	140			
179	GRADEDEC	9060/1	Pasture	4026	340	8.4%	140			
180	GRADEDEC	8595/2	Forest	56	41	73.2%	140			
181	GRADEDEC	9095/1	Pasture	420	56	13.3%	140			
182	GRADEDEC	9093/1	Forest	1371	141	10.3%	140			
183	GRADEDEC	8520/1	Forest	420	220	52.4%	140			
184	GRADEDEC	8521/1	Forest	516	243	47.1%	140			
185	GRADEDEC	9096	Field	1293	47	3.6%	140			
186	GRADEDEC	9098/1	Field	66	66	100.0%	140			
187	GRADEDEC	9097	Field	1181	428	36.2%	140			
188	GRADEDEC	9100/1	Field	308	109	35.4%	140			
189	GRADEDEC	9109/1	Pasture	3071	336	10.9%	140			
190	GRADEDEC	9110/1	Pasture	1201	170	14.2%	140			
191	GRADEDEC	9112/1	Pasture	2685	246	9.2%	140			
192	GRADEDEC	9111/1	Pasture	1145	160	14.0%	140			
193	GRADEDEC	9087/12	Forest	3177	239	7.5%	140			
194	GRADEDEC	9107/1	Pasture	936	70	7.5%	140			
195	GRADEDEC	8517/1	Pasture	586	586	100.0%	140			
196	GRADEDEC	8530/2	Meadow	294	294	100.0%	140			
197	GRADEDEC	8600/1	Pasture	6770	584	8.6%	140			
198	GRADEDEC	8598/1	Pasture	1323	80	6.0%	140			
199	GRADEDEC	8599/1	Forest	1219	294	24.1%	140			
200	GRADEDEC	8596/1	Forest	1962	140	7.1%	140			

Number	Cadastral Municipality	Parcel Number	Type of land	Total Land Area (m2)	Area to be expropriated (m2)	% to be expropriated	Compensation Value (MKD)	Compensation for the land (MKD)	Compensation for the plants and crops (MKD)	Total Compensation (MKD)
201	GRADEDEC	8595/1	Forest	200	115	57.5%	140			
202	GRADEDEC	8594/1	Forest	117	31	26.5%	140			
203	GRADEDEC	8593	Forest	524	10	1.9%	140			
204	GRADEDEC	8523/1	Meadow	1177	123	10.5%	140			
205	GRADEDEC	8524/1	Meadow	256	124	48.4%	140			
206	GRADEDEC	8525/1	Meadow	886	27	3.0%	140			
207	GRADEDEC	8518	Object	29	27	93.1%	140			
			Meadow	1627	289	17.8%	140			
208	GRADEDEC	8519/1	Meadow	1342	332	24.7%	140			
209	GRADEDEC	9273/1	Field	349	185	53.0%	140			
210	GRADEDEC	9274/2	Forest	777	59	7.6%	140			
211	GRADEDEC	9274/3	Forest	1064	218	20.5%	140			
212	GRADEDEC	9280/1	Orchard	1928	17	0.9%	140			
213	GRADEDEC	9271/1	Orchard	7248	30	0.4%	140			
214	GRADEDEC	9315/1	Orchard	62	12	19.4%	140			
215	GRADEDEC	9316/1	Orchard	207	50	24.2%	140			
216	GRADEDEC	9003/1	Field	158	158	100.0%	140			
217	GRADEDEC	9087/11	Forest	339	339	100.0%	140			

Annex 5: List of affected property owners and proposed compensation

Number	Cadastral Municipality	Number of parcels affected	Affected parcels	Total Compensation
1	GRADEDEC	5	9025/1 (1/3), 9026/1 (1/3), 9027/1 (1/3), 9049 (1/3), 8987/1 (1/9)	
2	DLABOCHICA	1	2180/1 (1/12)	
3	GRADEDEC	5	9025/1 (1/3), 9026/1 (1/3), 9027/1 (1/3), 9049 (1/3), 8987/1 (1/9)	
4	DLABOCHICA	1	2180/1 (1/8)	
5	DLABOCHICA	1	2180/1 (1/12)	
6	DLABOCHICA	1	2180/1 (1/8)	
7	DLABOCHICA	1	2180/1 (1/4)	
8	DLABOCHICA	1	2180/1 (1/8)	
9	GRADEDEC	2	9024/1 (1/1), 8987/1 (1/3)	
10	DLABOCHICA	1	2180/1 (1/12)	
11	GRADEDEC	1	8089/5 (1/5)	
12	DLABOCHICA	2	2065/2 (1/5), 2067/1 (1/5),	
13	DLABOCHICA	2	2065/2 (1/5), 2067/1 (1/5),	
14	DLABOCHICA	2	2065/2 (1/5), 2067/1 (1/5),	
15	T'LMINCI	1	975/1(1/6),	
16	GRADEDEC	2	9056/1 (1/6), 9053/1 (1/4),	
17	T'LMINCI	1	976/1 (1/33)	
18	GRADEDEC	1	9004/1 (2/18)	
19	GRADEDEC	1	9004/1 (2/18)	
20	GRADEDEC	1	9004/1 (2/18)	
21	GRADEDEC	1	9004/1 (1/3)	
22	GRADEDEC	1	9004/1 (1/18)	
23	T'LMINCI	6	1203 (1/48), 1204/1 (1/48), 1204/5 (1/48), 820 (1/48), 821/1 (1/48), 821/2 (1/48)	
24	T'LMINCI	6	1203 (1/72), 1204/1 (1/72), 1204/5 (1/72), 820 (1/72), 821/1 (1/72), 821/2 (1/72)	
25	DLABOCHICA	3	2068/1 (6/40), 2068/2 (6/40), 2070 (6/40),	
26	DLABOCHICA	2	1610/1 (4/5), 1612/1 (4/5)	
27	T'LMINCI	6	1203 (1/48), 1204/1 (1/48), 1204/5 (1/48), 820 (1/48), 821/1 (1/48), 821/2 (1/48),	
28	T'LMINCI	3	653/2 (1/24), 654/1 (1/12), 974/1 (1/12)	
29	DLABOCHICA	2	1610/1 (4/5), 1612/1 (4/5)	
30	GRADEDEC	2	9055/1 (1/2), 9055/2 (1/2)	
31	T'LMINCI	1	975/1 (1/4)	
32	GRADEDEC	1	8089/5 (1/5)	
33	T'LMINCI	8	1199/4 (3/112), 1199/1 (1/28), 1202/1 (1/28), 1128/1 (1/14), 1199/5 (3/112), 1199/7 (1/28), 1206/1 (1/28), 1207/1 (1/28)	
34	DLABOCHICA	1	1602/1 (2/32)	
35	T'LMINCI	1	979/1 (1/5)	
36	GRADEDEC	2	9055/1 (1/2), 9055/2 (1/2)	
37	T'LMINCI	1	979/1 (1/5)	
38	T'LMINCI	1	979/1 (1/5)	
39	T'LMINCI	1	1208 (1/8)	
40	T'LMINCI	6	1203 (1/72), 1204/1 (1/72), 1204/5 (1/72), 820 (1/72), 821/1 (1/72), 821/2 (1/72),	
41	T'LMINCI	2	1208 (1/16), 1204/5 (11/72)	
42	DLABOCHICA	1	1603/1 (1/3)	
43	DLABOCHICA	1	1603/1 (1/3)	
44	T'LMINCI	5	1203 (22/72), 1204/1 (22/72), 820 (22/72), 821/1 (22/72), 821/2 (22/72),	
45	T'LMINCI	7	1203 (22/72), 1204/1 (22/72), 1204/5 (22/72), 820 (22/72), 821/1 (22/72), 821/2 (22/72), 1208 (1/8),	
46	DLABOCHICA	1	1603/1 (1/3)	
47	T'LMINCI	2	1208 (1/16), 1204/5 (11/72)	
48	T'LMINCI	1	979/1 (3/15)	
49	DLABOCHICA	3	2051/1 (1/3), 2058/1 (1/3), 2058/2 (1/3)	
50	PETRALICA	1	8277/2 (1/3)	

Number	Cadastral Municipality	Number of parcels affected	Affected parcels	Total Compensation
51	PETRALICA	1	8277/2 (2/3)	
52	GRADEDEC	4	8913/1 (1/5), 8915/1 (1/5), 9045/1 (1/5), 9045/2 (1/5)	
53	GRADEDEC	5	8987/1 (1/9), 8913/1 (4/15), 8915/1 (4/15), 9045/1 (4/15), 9045/2 (4/15)	
54	GRADEDEC	5	8987/1 (1/9), 8913/1 (4/15), 8915/1 (4/15), 9045/1 (4/15), 9045/2 (4/15)	
55	GRADEDEC	5	8987/1 (1/9), 8913/1 (4/15), 8915/1 (4/15), 9045/1 (4/15), 9045/2 (4/15)	
56	DLABOCHICA	6	2129/2 (2/4), 2209/1 (2/4), 2210/1 (2/4), 2218/1 (2/4), 2222/1 (2/4), 2206 (1/12)	
57	GRADEDEC	4	9274/2 (1/4), 9274/3 (1/4), 9273 (1/2), 9280/1 (1/6)	
58	DLABOCHICA	13	2009/2 (1/1), 2009/3 (1/1), 2016/1 (1/1), 2016/2 (1/1), 2028/1 (1/1), 2028/2 (1/1), 2041/1 (1/1), 2047/2 (1/1), 2052 (1/1), 2073/1 (1/1), 2051/1 (2/3), 2058/1 (2/3), 2058/2 (2/3),	
59	T'LMINCI	1	976/1 (1/77)	
60		5	2170/1 (2/24), 2171/1 (2/24), 2207/1 (2/24), 2221/1 (2/24), 2123/1 (2/24)	
61	DLABOCHICA	5	2171 (1/12), 2170/1 (1/12), 2207/1 (1/12), 2221/1 (1/12), 2123/1 (1/12),	
62	GRADEDEC	5	8594/1 (1/5), 9098/1 (1/5), 9110/1 (1/5), 9087/12 (1/30), 9087/11 (1/30)	
63	GRADEDEC	5	9025/1 (1/3), 9026/1 (1/3), 9027/1 (1/3), 9049 (1/3), 8987/1 (1/9)	
64	GRADEDEC	2	8889/1 (1/4), 9023/2 (1/4)	
65	T'LMINCI	2	1116 (1/1), 1142 (1/1)	
66	T'LMINCI	1	976/1 (1/11)	
67	T'LMINCI	1	1194/1 (1/1)	
68	T'LMINCI	3	1122 (1/2), 1123/1 (1/2), 1196/1 (1/2)	
69	T'LMINCI	1	1150 (1/1)	
70	T'LMINCI	2	1122 (1/2), 1123/1 (1/2),	
71	T'LMINCI	3	1126 (1/1), 1127/1 (1/1), 1196/1 (1/2)	
72	T'LMINCI	1	1149 (1/1)	
73	T'LMINCI	1	976/1 (1/11)	
74	T'LMINCI	2	1195/1 (1/2), 651 (1/22)	
75	GRADEDEC	2	9035/1 (1/4), 9016/1 (1/4),	
76	PSACHA	2	122/8 (1/3), 122/13 (1/3)	
77	T'LMINCI	9	1129/1 (1/15), 1130/1 (1/15), 1130/2 (1/15), 1130/4 (1/15), 1131 (1/15), 1132/1 (1/15), 656/1 (1/15), 665/2 (1/15), 694/1 (1/15)	
78	DLABOCHICA	3	2068/1 (12/40), 2068/2 (12/40), 2070 (12/40)	
79	GRADEDEC	1	8089/5 (1/25)	
80	GRADEDEC	1	8089/5 (1/25)	
81	T'LMINCI	1	976/1 (1/11)	
82	GRADEDEC	3	9093/1 (1/3), 9061/1 (1/6), 8525/1 (1/1),	
83	GRADEDEC	5	8523/1 (1/1), 8530/1 (1/1), 8598/1 (1/1), 8599/1 (1/1), 9060/1 (1/1)	
84	GRADEDEC	8	8520/1 (1/1), 8521/1 (1/1), 8517/1 (1/1), 8600/1 (1/1), 8596/1 (1/1), 8593 (1/1), 8518 (1/1), 8519/1 (1/1)	
85	GRADEDEC	2	9093 (1/3), 9061/1 (1/6)	
86	GRADEDEC	2	9093 (1/3), 9061/1 (1/6)	
87	GRADEDEC	1	8089/5 (2/10)	
88	T'LMINCI	7	1203 (22/72), 1204/1 (22/72), 1204/5 (22/72), 820 (22/72), 821/1 (22/72), 821/2 (22/72), 1208 (1/8)	
89	T'LMINCI	1	976/1 (1/33)	
90	T'LMINCI	1	976/1 (1/33)	
91	GRADEDEC	4	9274/2 (1/2), 9274/3 (1/2), 9280/1 (1/3), 9271/1 (1/1)	
92	DLABOCHICA	9	2072 (1/5), 2075/1 (1/5), 2077 (1/5), 2162/1 (1/5), 2165/1 (1/5), 2176/1 (1/5), 2177/1 (1/5), 2196/1 (1/5), 2215/1 (1/5)	
93	GRADEDEC	1	8089/5 (1/25)	
94	T'LMINCI	7	1128/1 (1/7), 1199/4 (3/56), 1199/5 (3/56), 1199/7 (1/14), 1202/1 (1/14), 1206/1 (1/14), 1207/1 (1/14)	
95	GRADEDEC	2	9315/1 (1/3), 9316/1 (1/3)	
96	T'LMINCI	1	976/1 (1/77)	
97	GRADEDEC	1	8089/5 (1/25)	
98	GRADEDEC	1	8089/5 (1/25)	
99	GRADEDEC	4	9274/2 (1/4), 9274/3 (1/4), 9273 (1/2), 9280/1 (1/6)	
100	GRADEDEC	1	9280/1 (1/3)	

Number	Cadastral Municipality	Number of parcels affected	Affected parcels	Total Compensation
101	T'LMINCI	1	979/1 (1/15)	
102	GRADEDEC	7	9017/1 (1/2), 9018 (1/2), 9100/1 (1/2), 9109/1 (1/2), 9087/12 (1/6), 9087/11 (1/6), 9003/1 (1/2)	
103	T'LMINCI	1	976/1 (1/77)	
104	T'LMINCI	6	1203 (1/72), 1204/1 (1/72), 1204/5 (1/72), 820 (1/72), 821/1 (1/72), 821/2 (1/72),	
105	GRADEDEC	1	9004 (1/3)	
106	T'LMINCI	1	976/1 (1/77)	
107	GRADEDEC	5	8524/1 (1/1), 8595/2 (1/1), 8595/1 (1/1), 9095/1 (1/1), 9096 (1/1), 9069/2 (1/2)	
108	GRADEDEC	7	9017/1 (1/2), 9018 (1/2), 9100/1 (1/2), 9109/1 (1/2), 9087/12 (1/6), 9087/11 (1/6), 9003/1 (1/2)	
109	PSACHA	2	122/8 (1/3), 122/13 (1/3)	
110	GRADEDEC	1	9056/1 (1/9)	
111	DLABOCHICA	2	2065(1/5), 2067(1/5),	
112	T'LMINCI	1	976/1 (1/33)	
113	T'LMINCI	1	976/1 (1/33)	
114	T'LMINCI	1	976/1 (1/33)	
115	DLABOCHICA	1	1592 (1/1)	
116	DLABOCHICA	1	1590 (1/1)	
117	PSACHA	2	122/8 (1/3), 122/13 (1/3)	
118	GRADEDEC	2	9056/1 (1/12), 9053/1 (1/9)	
119	DLABOCHICA	10	2123/1 (5/24), 2061/1 (1/2), 2226 (1/2), 2225 (1/2), 2221/1 (5/24), 2207/1 (5/24), 2057 (1/2), 2069/1 (1/2), 2170/1 (5/24), 2171/1 (5/24),	
120	GRADEDEC	1	9056/1 (1/6)	
121	DLABOCHICA	5	2170/1 (1/24), 2171/1 (1/24), 2207/1 (1/24), 2221/1 (1/24), 2123/1 (1/24)	
122	DLABOCHICA	1	2206 (1/3)	
123	GRADEDEC	1	9056/1 (1/9)	
124	GRADEDEC	1	9056/1 (1/6)	
125	GRADEDEC	1	9053/1 (1/2)	
126	DLABOCHICA	1	2223 (1/1)	
127	GRADEDEC	2	9056/1 (1/12), 9053/1 (1/9)	
128	DLABOCHICA	5	2170/1 (1/24), 2171/1 (1/24), 2207/1 (1/24), 2221/1 (1/24), 2123/1 (1/24)	
129	DLABOCHICA	9	2215/1 (1/10), 2077/1 (1/10), 2075/1 (1/10), 2072 (1/10), 2162/1 (1/10), 2165/1 (1/10), 2176/1 (1/10), 2077/1 (1/10), 2196/1 (1/10)	
130	DLABOCHICA	1	2206 (1/8)	
131	DLABOCHICA	3	2211/1 (1/1), 2206 (1/3), 2128/1 (1/1)	
132	DLABOCHICA	9	2211/1 (1/1), 2212/1 (1/1), 2217/1 (1/1), 2214/1 (1/1), 2213/1 (1/1), 2074/1 (1/1), 2163/1 (1/1), 2174/1 (1/1), 2172/1 (1/1)	
133	DLABOCHICA	9	2215/1 (1/10), 2077/1 (1/10), 2075/1 (1/10), 2072 (1/10), 2162/1 (1/10), 2165/1 (1/10), 2176/1 (1/10), 2077/1 (1/10), 2196/1 (1/10)	
134	DLABOCHICA	1	2206 (1/8)	
135	DLABOCHICA	10	2123/1 (5/24), 2061/1 (1/2), 2226 (1/2), 2225 (1/2), 2221/1 (5/24), 2207/1 (5/24), 2057 (1/2), 2069/1 (1/2), 2170/1 (5/24), 2171/1 (5/24),	
136	DLABOCHICA	9	2219/2 (1/1), 2208/1 (1/1), 2048/2 (1/1), 2042/1 (1/1), 2040/1 (1/1), 2207/1 (1/1), 2020/2 (1/1), 2017 (1/1), 2015 (1/1),	
137	DLABOCHICA	9	2215/1 (1/5), 2077/1 (1/5), 2075/1 (1/5), 2072 (1/5), 2162/1 (1/5), 2165/1 (1/5), 2176/1 (1/5), 2077/1 (1/5), 2196/1 (1/5)	
138	DLABOCHICA	9	2215/1 (1/5), 2077/1 (1/5), 2075/1 (1/5), 2072 (1/5), 2162/1 (1/5), 2165/1 (1/5), 2176/1 (1/5), 2077/1 (1/5), 2196/1 (1/5)	
139	DLABOCHICA	9	2215/1 (1/5), 2077/1 (1/5), 2075/1 (1/5), 2072 (1/5), 2162/1 (1/5), 2165/1 (1/5), 2176/1 (1/5), 2077/1 (1/5), 2196/1 (1/5)	
140	DLABOCHICA	5	2129/2 (1/4), 2209/1 (1/4), 2210/1 (1/4), 2218/1 (1/4), 2222/1 (1/4),	
141	DLABOCHICA	5	2129/2 (1/4), 2209/1 (1/4), 2210/1 (1/4), 2218/1 (1/4), 2222/1 (1/4),	
142	GRADEDEC	2	9039/1 (1/4), 9043/1 (1/4),	
143	GRADEDEC	2	9039/1 (1/2), 9043/1 (1/2),	
144	GRADEDEC	2	9039/1 (1/4), 9043/1 (1/4),	
145	DLABOCHICA	5	2170/1 (1/24), 2171/1 (1/24), 2207/1 (1/24), 2221/1 (1/24), 2123/1 (1/24)	
146	DLABOCHICA	5	2170/1 (1/24), 2171/1 (1/24), 2207/1 (1/24), 2221/1 (1/24), 2123/1 (1/24)	
147	T'LMINCI	4	1133/1 (1/1), 1133/2 (1/1), 1206/1 (8/14), 1207/1 (8/14),	
148	GRADEDEC	6	8890/1 (1/1), 8890/2 (1/1), 8985/1 (1/1), 8985/2 (1/1), 8986/1 (1/1), 9044/1 (1/1)	
149	GRADEDEC	2	8889/1 (1/4), 9023/1 (1/4)	
150	T'LMINCI	5	1199/4 (38/56), 1199/1 (8/14), 1202/1 (8/14), 1199/5 (38/56), 1199/7 (8/14)	

Number	Cadastral Municipality	Number of parcels affected	Affected parcels	Total Compensation
151	T'LMINCI	8	1128/1 (1/7)	
152	T'LMINCI	8	1199/1 (1/14), 1128/1 (1/7), 1199/4 (3/56), 1199/5 (3/56), 1199/7 (1/14), 1202/1 (1/14), 1206/1 (1/14), 1207/1 (1/14)	
153	T'LMINCI	1	1128/1 (1/7)	
154	GRADEDEC	2	8889/1 (1/10), 9023/1 (1/10)	
155	GRADEDEC	2	8889/1 (2/10), 9023/1 (2/10)	
156	GRADEDEC	2	8889/1 (1/10), 9023/1 (1/10)	
157	DLABOCHICA	2	1596/1 (1/3), 1606/1 (1/3)	
158	DLABOCHICA	2	1596/1 (1/3), 1606/1 (1/3)	
159	DLABOCHICA	2	1596/1 (1/3), 1606/1 (1/3)	
160	T'LMINCI	8	1199/4 (3/112), 1199/1 (1/28), 1202/1 (1/28), 1128/1 (1/14), 1199/5 (3/112), 1199/7 (1/28), 1206/1 (1/28), 1207/1 (1/28)	
161	T'LMINCI	18	1199/4 (1/56), 1199/1 (1/42), 1202/1 (1/42), 1132/1 (1/15), 1131 (1/15), 1130/1 (1/15), 1130/4 (1/15), 1199/1 (1/42), 1128/1 (1/21), 1130/2 (1/15), 1199/5 (1/56), 1199/7 (1/42), 1206/1 (1/42), 1207/1 (1/42), 693 (1/15), 694/1 (1/15), 665/1 (1/15), 656/1 (1/15)	
162	PETRALICA	5	8260/17 (1/5), 8260/2 (1/5), 8260/4 (1/5), 8260/6 (1/5), 8260/14 (1/5),	
163	GRADEDEC	1	9040/1 (1/1)	
164	PETRALICA	5	8260/17 (1/5), 8260/2 (1/5), 8260/4 (1/5), 8260/6 (1/5), 8260/14 (1/5),	
165	PETRALICA	5	8260/17 (1/5), 8260/2 (1/5), 8260/4 (1/5), 8260/6 (1/5), 8260/14 (1/5),	
166	PETRALICA	5	8260/17 (2/5), 8260/2 (2/5), 8260/4 (2/5), 8260/6 (2/5), 8260/14 (2/5),	
167	DLABOCHICA	5	2171 (1/12), 2170/1 (1/12), 2207/1 (1/12), 2221/1 (1/12), 2123/1 (1/12),	
168	T'LMINCI	1	979/1 (1/15)	
169	T'LMINCI	9	1129/1 (1/45), 1130/1 (1/45), 1130/2 (1/45), 1130/4 (1/45), 1131 (1/45), 1132/1 (1/45), 656/1 (1/45), 665/2 (1/45), 694/1 (1/45)	
170	T'LMINCI	18	1199/4 (1/56), 1199/1 (1/42), 1202/1 (1/42), 1132/1 (1/15), 1131 (1/15), 1130/1 (1/15), 1130/4 (1/15), 1129/1 (1/15), 1128/1 (1/21), 1130/2 (1/15), 1199/5 (1/56), 1199/7 (1/14), 1206/1 (1/14), 1207/1 (1/42), 693 (1/15), 694/1 (1/15), 665/2 (1/15), 656/1 (1/15)	
171	T'LMINCI	2	693 (1/15), 976/1 (1/55)	
172	T'LMINCI	11	1132/1 (1/5), 1131 (1/5), 1130/1 (1/5), 1130/4 (1/5), 1129/1 (1/5), 1130/2 (1/5), 693 (1/5), 694/1 (1/5), 665/2 (1/5), 656/1 (1/5), 976/1 (1/55)	
173	T'LMINCI	9	1129/1 (1/45), 1130/1 (1/45), 1130/2 (1/45), 1130/4 (1/45), 1131 (1/45), 1132/1 (1/45), 656/1 (1/45), 665/2 (1/45), 694/1 (1/45)	
174	T'LMINCI	9	1132/1 (1/5), 1131 (1/5), 1130/1 (1/5), 1130/4 (1/5), 1129/1 (1/5), 1130/2 (1/5), 694/1 (1/5), 665/2 (1/5), 656/1 (1/5)	
175	T'LMINCI	9	1132/1 (1/45), 1131 (1/45), 1130/1 (1/45), 1130/4 (1/45), 1129/1 (1/45), 1130/2 (1/45), 694/1 (1/45), 665/2 (1/45), 656/1 (1/45),	
176	DLABOCHICA	1	1602/1 (1/32)	
177	T'LMINCI	9	1132/1 (1/5), 1131 (1/5), 1130/1 (1/5), 1130/4 (1/5), 1129/1 (1/5), 1130/2 (1/5), 694/1 (1/5), 665/2 (1/5), 656/1 (1/5)	
178	DLABOCHICA	1	1602/1 (1/32)	
179	DLABOCHICA	1	1602/1 (1/4)	
180	DLABOCHICA	1	1602/1 (1/4),	
181	DLABOCHICA	1	1602/1 (1/4),	
182	DLABOCHICA	1	1602/1 (2/32),	
183	T'LMINCI	1	976/1 (1/55)	
184	T'LMINCI	2	693 (1/5), 976/1 (1/55)	
185	DLABOCHICA	1	1602/1 (2/32),	
186	DLABOCHICA	3	2068/2 (3/40), 2070 (3/40), 2068/1 (3/40)	
187	T'LMINCI	9	1129/1 (1/15), 1130/1 (1/15), 1130/2 (1/15), 1130/4 (1/15), 1131 (1/15), 1132/1 (1/15), 656/1 (1/15), 665/2 (1/15), 694/1 (1/15)	
188	T'LMINCI	4	1198/1 (1/1), 1198/4 (1/1), 816 (1/1), 823/1 (1/1),	
189	DLABOCHICA	3	2068/1 (9/40), 2068/2 (9/40), 823/1 (9/40)	
190	T'LMINCI	7	813/1 (1/2), 813/3 (1/2), 814/1 (1/2) 815/1 (1/2), 871/1 (1/2), 863/1 (1/2), 863/2 (1/2),	
191	T'LMINCI	7	813/1 (1/2), 813/3 (1/2), 814/1 (1/2) 815/1 (1/2), 871/1 (1/2), 863/1 (1/2), 863/2 (1/2),	
192	DLABOCHICA	3	2068/2 (16/40), 2070 (16/40), 2068/1 (16/40)	
193	T'LMINCI	8	1199/4 (3/56), 1199/1 (1/14), 1202/1 (1/14), 1128/1 (1/7), 1199/5 (3/56), 1199/7 (1/14), 1206/1 (1/14), 1207/1 (1/14)	
194	DLABOCHICA	5	2170/1 (2/24), 2171/1 (2/24), 2207/1 (2/24), 2221/1 (2/24), 2123/1 (2/24)	
195	GRADEDEC	1	8089/5 (1/5)	
196	T'LMINCI	2	1208/1 (1/2), 976/1 (1/11)	
197	T'LMINCI	1	975/1 (1/6)	
198	T'LMINCI	1	979/1 (1/15)	
199	T'LMINCI	1	975/1 (1/4)	
200	GRADEDEC	1	9506/1 (1/9)	

Number	Cadastral Municipality	Number of parcels affected	Affected parcels	Total Compensation
201	T'LMINCI	18	1199/1 (1/42), 1131 (1/15), 1130/1 (1/15), 1130/4 (1/15), 1129/1 (1/15), 1130/2 (1/15), 694/1 (1/15), 665/2 (1/15), 656/1 (1/15), 1199/4 (1/56), 1199/1 (1/42), 1202/1 (1/42), 1128/1 (1/21), 1199/5 (1/56), 1199/7 (1/42), 1206/1 (1/14), 1207/1 (1/42), 693 (1/15),	
202	T'LMINCI	2	651/1 (1/12), 653/2 (1/24)	
203	GRADEC	2	8889/1 (1/10), 9023/1 (1/10)	
204	T'LMINCI	2	974/1 (1/12), 654/1 (1/12),	
205	T'LMINCI	1	651/1 (1/3)	
206	T'LMINCI	1	653/2 (1/6)	
207	T'LMINCI	2	651/1 (1/12), 653/2 (1/24),	
208	T'LMINCI	1	653/2 (1/24),	
209	T'LMINCI	2	651/1 (1/12), 653/2 (1/24)	
210	T'LMINCI	3	974/1 (5/12), 654/1 (5/12), 653/2 (5/24),	
211	T'LMINCI	3	974/1 (5/12), 654/1 (5/12), 653/2 (5/24)	
212	T'LMINCI	2	654/1 (5/12), 653/2 (1/6),	
213	DLABOCHICA	5	2171/1 (1/12), 2170/1 (1/12), 2207/1 (1/12), 2221/1 (1/12), 2123/1 (1/12)	
214	GRADEC	3	9028 (1/1), 9021/1 (1/1), 9035/1 (1/4)	
215	GRADEC	3	9035/1 (2/4), 9036/1 (1/1), 9016/1 (2/4),	
216	T'LMINCI	1	976/1 (1/77)	
217	GRADEC	3	9035/1 (2/4), 9019 (1/1), 9020 (1/1)	
218	T'LMINCI	1	976/1 (1/77)	
219	T'LMINCI	1	976/1 (1/77)	
220	T'LMINCI	1	975/1 (1/6)	
221	GRADEC	2	9315/1 (1/3), 9316/1 (1/3)	
222	GRADEC	5	8594/1 (1/5), 9098/1 (1/5), 9110/1 (1/5), 9087/12 (1/30), 9087/11 (1/30)	
223	GRADEC	5	8594/1 (1/5), 9098/1 (1/5), 9110/1 (1/5), 9087/12 (1/30), 9087/11 (1/30)	
224	GRADEC	3	9112/1 (1/2), 9087/11 (1/6), 9087/12 (1/30)	
225	GRADEC	5	9098/1 (1/10), 9110/1 (1/10), 9087/12 (1/60), 8594/1 (1/10), 9087/11 (1/60),	
226	GRADEC	3	9112/1 (1/2), 9087/12 (1/6), 9087/11 (1/6)	
227	GRADEC	1	9097 (1/1)	
228	GRADEC	5	8594/1 (1/10), 9098/1 (1/10), 9110/1 (1/10), 9087/12 (1/30), 9087/11 (1/60)	
229	GRADEC	4	9111/1 (1/1), 9087/12 (1/6), 9107/1 (1/1), 9087/11 (1/6)	
230	GRADEC	5	8594/1 (1/5), 9098/1 (1/5), 9110/1 (1/5), 9087/12 (1/30), 9087/11 (1/30)	
231	DLABOCHICA	1	2180/1 (1/8)	
232	GRADEC	2	9315/1 (1/3), 9316/1 (1/3)	