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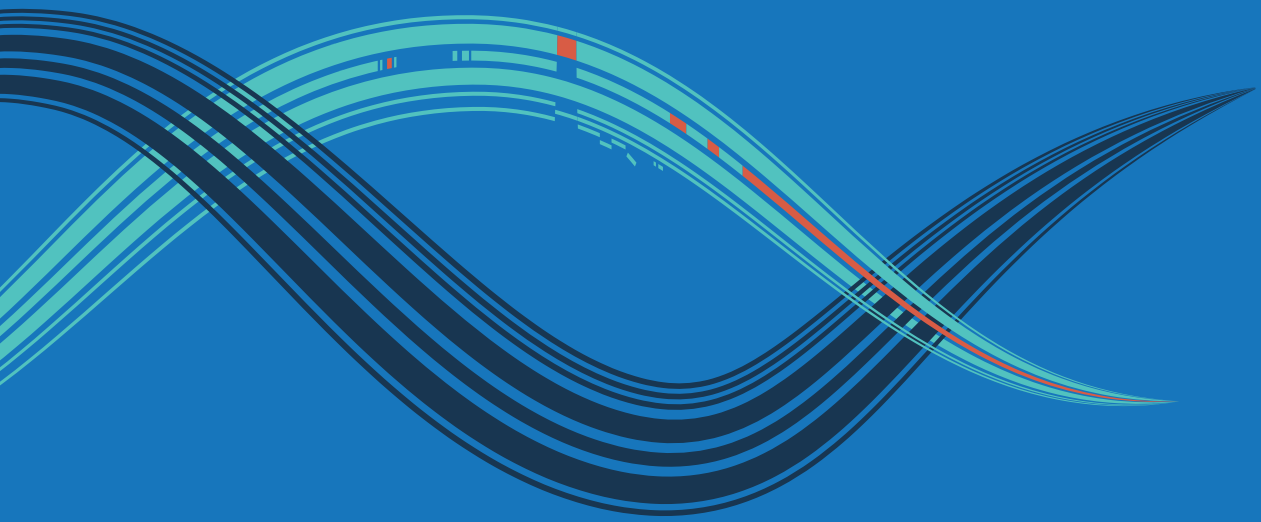
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The Twin Transition: Twinned in Name, Measured Apart

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Asymmetries, Gaps, Constraints and Financial Risk

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Executive Summary

This analysis assesses North Macedonia's preparedness to meet its green and digital obligations under the European reform framework, positions the country in relation to the region and examines the factors behind key delays. The key findings are as follows:

• **The twin transition brings together two fundamentally different processes under a single policy and financing framework.** Digital reforms are largely driven by regulatory alignment, institutional reforms and the introduction of common standards and systems, which makes progress relatively easier to define and track. The green transition, by contrast, requires deeper structural changes in energy systems, infrastructure, industrial production and investment patterns. Treating the two as equivalent components of the same transition can therefore obscure important differences in the depth, cost and time needed to implement reforms. This distinction is important for assessing progress: faster implementation of digital reforms does not necessarily indicate an equally advanced transformation of the economy as a whole.

• **Synergy is not an inherent property of technology, but depends on how it is introduced.** Digital infrastructure carries its own energy and water footprint, which can place the two transitions in tension rather than in support of each other. Experience in several European and non-European economies shows that this footprint becomes a policy issue once large-scale digital investment arrives, and it is especially relevant for a country already facing challenges related to air quality and water resources.

• **The Reform Agenda does not measure progress in the green and digital transitions in the same way.** Green reforms are more often linked to substantive implementation and measurable outcomes, while progress in the digital component is more frequently demonstrated through regulatory alignment, adoption of legislation and the establishment of institutional or technical frameworks. This creates an additional asymmetry in how progress is recorded: digital reforms can generate visible and verifiable milestones relatively quickly, whereas structural progress in the green transition takes longer to materialize. This measurement asymmetry is therefore not merely a reflection of the different nature of the two transitions; it is also reinforced by the way reform progress is operationalized and monitored under the Reform Agenda.

• **The chain Climate law → MRVA → carbon pricing or/and ETS represents a systemic risk for the region.** Whichever instrument an economy chooses, an emissions trading system or

a carbon tax it depends on verified emissions data, and therefore on a functioning monitoring system and the legal basis that underpins it. For North Macedonia, the first two links depend on a single act: adopting the Climate Action Law would provide both, making it the reform step with the greatest leverage over the rest of the chain.

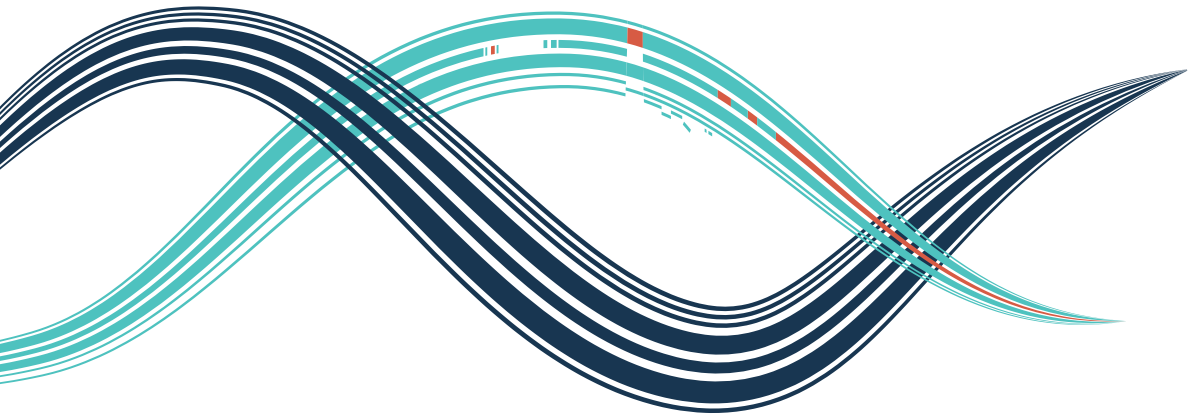
• **Integration between the two transitions remains largely declarative at the level of reform steps.** Within the European Union, a number of instruments already combine the green and digital transitions into a single legal requirement, but this integration has not yet been carried across into the enlargement framework. Across the Reform Agendas of the six Western Balkan economies (WB6), Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia the two transitions are planned, monitored and financed as separate pillars. North Macedonia places them under the same sub-area, which provides a natural starting point for introducing reform steps that link them.

• **On a national level, North Macedonia enters this phase with notable strengths:** its National Energy and Climate Plan was adopted on time, installed renewable capacity has outpaced the planned trajectory, and several digital reform steps have already been fulfilled. However, three gaps can be identified in North Macedonia's twin transition. The cross-sectoral gap is reflected in the digital transition appearing to advance faster than the green transition, partly because digital progress is assessed through transposition, while green progress is assessed through outcomes. The implementation gap arises because, in both processes, formal alignment is advancing faster than operational capacity. The coordination gap is shared: while the European Union increasingly regulates the two transitions together in its own legislation, the enlargement framework assesses them as separate pillars, and the domestic institutional set-up has developed along the same sectoral lines.

• **The analysis of the Climate Action Law, cross-referenced with findings from the State Audit Office and the European Commission, identifies five recurring constraints, which are institutional rather than sector-specific.** First, alignment with an evolving European framework has involved successive rounds of revision that have extended the timeline. Second, a dedicated administrative structure and permanent staffing for advancing the law have yet to be established. Third, responsibilities are dispersed without an explicit coordination mandate. Fourth, local government is not yet reflected in the draft. Fifth, the law is not currently linked to a payment condition under the Reform and Growth Facility. Similar patterns can be observed in waste management, air quality and interoperability. None of the five constraints is primarily financial, which means that most responses lie within reach of organisational and administrative decisions.

• **The financial risk is three-tiered and cumulative.** It is not limited to non-disbursement under the Reform and Growth Facility (RGF), but extends from public finances to investment and ultimately to the competitiveness of export-oriented companies.

• **The central challenge is therefore no longer the production of new strategies and policy documents, but connecting the existing elements into a functioning system.** North Macedonia already has a significant share of the strategies, institutions and instruments needed for the twin transition. The next step is to establish more clearly who is responsible for implementation, how green and digital reforms are coordinated, and by when specific results should be delivered. This shift from sectoral fulfilment of obligations towards managing the twin transition as a single reform and investment process is essential for translating reforms into measurable results, access to European funding and greater competitiveness.



Introduction

The green and digital transitions are two interconnected transformations shaping the development of the European Union and candidate countries. Within the Union, they are increasingly pursued together, through instruments that combine climate and digital objectives in a single legal requirement, such as the reporting obligations on the energy performance of data centres and the Digital Product Passport.[1] In the context of enlargement, they form part of a common reform agenda that directly affects competitiveness, investment and gradual integration into the Single Market. For the Western Balkans, meeting the obligations associated with the twin transition is a prerequisite not only for alignment with EU legislation, but also for access to significant financial support.[2]

The policy framework is well established: the European Green Deal[3] sets climate neutrality and digital transformation as interconnected drivers; the Green Agenda for the Western Balkans[4] translates these objectives into a regional context; the Reform and Growth Facility links access to funding to the implementation of the Reform Agenda; while the Common Regional Market[5] and the Economic and Investment Plan[6] complement this framework by advancing regional integration. In the digital sphere, the Digital Europe Programme[7] supports infrastructure, e-services, cybersecurity and artificial intelligence.

North Macedonia has made notable progress: significant legislative and strategic documents have been adopted in the energy and digital sectors, new institutional mechanisms for digitalisation have been established, and installed renewable capacity has outpaced the indicative trajectory of the National Energy and Climate Plan — progress that the Energy Community Secretariat has assessed positively[8]. Progress nonetheless remains uneven: key climate legislation is still pending, implementation capacity is still being built, and coordination between the two transitions has yet to be structured in an integrated way.

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[1] Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast), Official Journal of the European Union, L 231, 20 September 2023; Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, Official Journal of the European Union, L, 28 June 2024.

[2] European Commission, New Growth Plan for the Western Balkans, COM(2023) 691 final, Brussels, 8 November 2023.

[3] European Commission, The European Green Deal, COM(2019) 640 final, Brussels, 11 December 2019.

[4] Sofia Declaration on the Green Agenda for the Western Balkans, adopted at the EU–Western Balkans Summit, Sofia, 10 November 2020.

[5] Regional Cooperation Council, Common Regional Market Action Plan 2025–2028, Sarajevo, 2024.

[6] European Commission, An Economic and Investment Plan for the Western Balkans, COM(2020) 641 final, Brussels, 6 October 2020.

[7] Regulation (EU) 2021/694 establishing the Digital Europe Programme (2021–2027), Official Journal of the European Union, L 166, 11 May 2021.

[8] Energy Community Secretariat, Assessment of the Adopted National Energy and Climate Plans 2025–2030 and Progress in 2025 towards the Energy and Climate Targets in the Energy Community, Vienna, 2026.

The analysis is based on a qualitative and comparative assessment of the relevant EU and North Macedonia's strategic, legislative and policy documents, including the Regulation establishing the Reform and Growth Facility[9] and the Reform Agenda, the annual reports of the European Commission and the Regional Cooperation Council, and the Energy Community Secretariat's 2026 assessment of adopted National Energy and Climate Plans. The comparative component is based on a review of the six Reform Agendas, which, for the first time, allows reform commitments across the six economies to be compared within an identical structure and against measurable financial consequences. The section examining the underlying constraints also draws on the findings of the State Audit Office's performance audit and on findings emerging from the regular dialogue between the European Commission and North Macedonia.

Analytically, the paper builds on the existing literature on the twin transition. Existing European-level research has already shown that the concept remains ambiguous as to whether it refers to two simultaneous or two complementary processes, and that no official document has provided a comprehensive definition.[10] Some studies explicitly question whether the two transitions should be placed within a single "twin" framework at all.[11] Research on the Western Balkans, however, remains scarce.[12] This analysis therefore makes a twofold contribution. First, drawing on six reform documents with an identical structure, it shows that the apparent difference in pace between the green and digital transitions is largely a product of how progress is measured. Second, it moves beyond identifying shortcomings to analysing their underlying constraints and the responses that lie within reach.

The first section examines the two processes and their structural asymmetries. The second provides a comparative regional overview. The third assesses national preparedness through a scorecard. The fourth examines the factors behind key delays. The fifth assesses the financial implications, the sixth draws conclusions, and the seventh provides recommendations tailored to different institutional actors and linked to the identified constraints.

[9] Regulation (EU) 2024/1449 establishing the Reform and Growth Facility for the Western Balkans, Official Journal of the European Union, L, 24 May 2024.
[10] Aloisi, A., Integrating the EU Twin (Green and Digital) Transition? Synergies, Tensions and Pathways for the Future of Work, JRC Working Papers Series on Labour, Education and Technology 2025/01, European Commission, Joint Research Centre, Seville, 2025, JRC140964.
[11] Kovacic, Z., García Casañas, C., Argüelles, L. et al., "The twin green and digital transition: high-level policy or science fiction?", Environment and Planning E: Nature and Space, Vol. 7, No. 6, 2024, pp. 2251–2278.
[12] Doçi, V., "Twin Transition in Western Balkans", EMAN 2025 Conference Proceedings, 2026, pp. 71–81. See also Vučković, V. and Čučković, N., "Greening of SMEs in Western Balkan Countries – Evidence from Firm-Level Analysis", Economic Annals, Vol. 69, No. 243, 2024, pp. 7–40.

1. The Twin Transition: One Framework, Two Processes

The European Union treats the green and digital transitions as complementary and interdependent, hence the term "twin transition." The policy premise is that the two processes can reinforce each other and be planned, financed and monitored together. The Union's own analytical work, however, has been careful to qualify this premise: the Commission's 2022 Strategic Foresight Report noted that the capacity of the two transitions to reinforce each other deserves closer scrutiny, and the Joint Research Centre mapped not only their synergies but also their tension points and unintended effects.[13]

The wider literature points in the same direction. The green transition is goal-oriented: it has a predefined outcome, such as a specified reduction in emissions by a given year, and is predominantly government-driven and shaped by policy choices. The digital transition is process-oriented: it has no endpoint, but instead involves the continuous transformation of how work is performed, and is predominantly driven by the private sector.[14]

The two conventional explanations for this difference no longer fully reflect current realities, but they continue to shape policy. The first is that the green transition relies on tangible capital, while the digital transition relies on intangible capital. Today, however, the digital transition is equally dependent on physical infrastructure: artificial intelligence models cannot run efficiently on existing hardware, which is why data centres are being built with far higher energy demand per unit of floor space, different cooling systems and grid connections on a scale previously associated only with large industrial consumers.[15]

The second explanation is that the green transition is structural, while the digital transition is merely regulatory. Yet digitalisation has its own physical infrastructure base and displaces jobs through automation, just as the green transition displaces employment in energy-intensive sectors.

[13] European Commission, 2022 Strategic Foresight Report: Twinning the Green and Digital Transitions in the New Geopolitical Context, COM(2022) 289 final; Muench, S., Stoermer, E., Jensen, K. et al., Towards a Green and Digital Future, European Commission, Joint Research Centre, Luxembourg, 2022. See also European Commission, Joint Research Centre, "The twin green & digital transition: How sustainable digital technologies could enable a carbon-neutral EU by 2050", 29 June 2022.

[14] Muñoz de Bustillo Llorente, R., "A Critical Review of the Digital and Green Twin Transition: Implications, Synergies and Trade-offs", JRC Working Papers Series on Labour, Education and Technology 2024/07, JRC140036, 2024.

[15] Aloisi, A., op. cit., 2025.

The fundamental difference that remains is therefore not the nature of the change, but the pace of change and the way it is measured. In practice, the digital transition has advanced more rapidly, while the green transition requires longer-term changes in infrastructure, energy systems and investment patterns. More importantly for the purposes of this analysis, the two processes are not assessed against the same standard.

1.1. The limits of the synergy

Digital technologies can accelerate decarbonisation, but this outcome is not automatic: certain digital technologies, such as the processing of large datasets, can increase emissions.[16] Synergy is not an inherent property of technology; it depends on how technology is introduced.

Three mechanisms limit this synergy.

First, digital infrastructure is energy- and water-intensive: the information and communications technology sector accounts for approximately 4% of global electricity consumption[17] and approximately 1–3% of greenhouse gas emissions,[18] while cooling data centres requires significant quantities of water.[19] Second, rapid equipment replacement generates electronic waste, which directly conflicts with the objectives of the circular economy. Third, decarbonisation relies on lower consumption and reuse, whereas digital transformation requires more frequent technological upgrades and the deployment of new systems. Added to this is the risk that the two transitions, acting simultaneously, may change the demand for skills faster than training systems can adapt.[20]

The European Union has begun to address each of these mechanisms in its own legislation. The recast Energy Efficiency Directive introduced reporting obligations on the energy and water performance of data centres, creating the basis for a Union-wide assessment of their footprint.[21] The Ecodesign for Sustainable Products Regulation, together with the right-to-repair framework, targets the shortening of product lifecycles that drives electronic waste.[22] The European Skills Agenda addresses the risk that combined green and digital demand outpaces training systems.[23]

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[16] Bianchini, S., Damioli, G. and Ghisetti, C., "The environmental effects of the 'twin' green and digital transition in European regions", Environmental and Resource Economics, Vol. 84, No. 4, 2023, pp. 877–918.
[17] Malmodin, J., Lövehagen, N., Bergmark, P. and Lundén, D., "ICT sector electricity consumption and greenhouse gas emissions – 2020 outcome", Telecommunications Policy, Vol. 48, No. 3, 2024.
[18] Ayers, S., Ballan, S., Gray, V. and McDonald, R., Measuring the Emissions and Energy Footprint of the ICT Sector: Implications for Climate Action, World Bank Group, Washington, D.C., 2023.
[19] European Commission, 2022 Strategic Foresight Report, op. cit. See also Crawford, K., "Generative AI's environmental costs are soaring – and mostly secret", Nature, Vol. 626, 2024.
[20] Vandeplas, A., Vanyolos, I., Vigani, M. and Vogel, L., The Possible Implications of the Green Transition for the EU Labour Market, Discussion Paper 176, European Commission, Luxembourg, 2022.
[21] Directive (EU) 2023/1791 on energy efficiency (recast), Article 12 and Annex VII.
[22] Regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products; Directive (EU) 2024/1799 on common rules promoting the repair of goods.
[23] European Commission, European Skills Agenda for Sustainable Competitiveness, Social Fairness and Resilience, COM(2020) 274 final, Brussels, 1 July 2020.

These instruments demonstrate that the tensions are recognised and manageable, provided they are addressed through regulation rather than assumed away.

The attraction of data centres through foreign direct investment illustrates how these tensions play out in practice. In Ireland, data centres accounted for 23% of total metered electricity consumption in 2025, compared with 5% in 2015, which is more than the combined consumption of all urban households. Since 2022, the transmission system operator has not accepted new connection applications in the Dublin region, with the restriction set to remain in place until 2028.[24] In the Netherlands, pressure on land and the electricity grid led to a national moratorium on hyperscale data centres in 2022 and subsequently to a restriction of such facilities to two designated locations.[25] These national experiences informed the Union's response: the data-centre reporting obligations under the recast Energy Efficiency Directive were introduced precisely to give Member States the information needed to manage this pressure.

Outside Europe, the tension has shifted to water resources. In Uruguay, a planned data centre became the subject of a controversy over estimates that it would consume 7.6 million litres of drinking water per day, approximately equivalent to the daily consumption of 55,000 people. In Chile, an environmental court ordered the approval of a data-centre project to be reconsidered specifically because of its water consumption.[26] In the United States, the debate has shifted from environmental impacts to consumer costs: in 2026, a bill proposing a moratorium on new artificial-intelligence data centres was introduced in Congress, on the grounds that their grid connections increase household electricity bills.[27]

For North Macedonia, this debate has practical relevance. The energy and water costs of large-scale digital infrastructure are not yet reflected in domestic investment frameworks, while the country already faces challenges related to air quality and water resources. The EU instruments described above offer a ready-made model: aligning with them as the energy efficiency acquis is extended through the Energy Community would allow these costs to be assessed before, rather than after, investment decisions are made. The twin transition therefore requires a mechanism capable of identifying potential trade-offs between its two components, alongside their synergies.

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[24] Central Statistics Office of Ireland (CSO), Data Centres Metered Electricity Consumption 2025, Cork, 7 July 2026; EirGrid, Statement on Connecting New Data Centres in the Dublin Region, 2022.

[25] Government of the Kingdom of the Netherlands, National Moratorium on Hyperscale Data Centres, February 2022, followed by a restriction of capacities exceeding 70 megawatts to two designated locations. For the cancellation of the project in Zeewolde, see Datacenter Dynamics, July 2022.

[26] For the project in Canelones, Uruguay, see Mongabay, "The Cloud vs. Drought: Water Hog Data Centers Threaten Latin America", 2023. See also the decision of the Second Environmental Court of the Republic of Chile concerning the application by the Municipality of Cerrillos against the "Cerrillos Data Center" project, February 2024.

[27] Artificial Intelligence Data Center Moratorium Act, bill introduced in the Congress of the United States of America, March 2026.

1.2. Three structural asymmetries

A comparison of the six Reform Agendas reveals **three structural asymmetries** between the two processes.

• **Asymmetry of loss.** The green transition requires changes to existing assets and employment structures, including mines, thermal power plants and jobs, with losses that are concentrated, geographically located and visible. The digital transition predominantly adds new capital, while the losses it creates are dispersed across many sectors and occur gradually. Consequently, they lack a clearly identifiable constituency and rarely become politically salient.

• **Asymmetry of measurability.** The green transition produces tangible, independently verifiable indicators: tonnes of emissions, megawatts of capacity and efficiency rates. Digital maturity can also be measured with the EU tracks it through the Digital Economy and Society Index and the quantified targets of the Digital Decade however these indicators are not used as conditions in the Reform Agendas. In their absence, the adoption and transposition of legal acts are treated as evidence of progress.

• **Asymmetry of deadlines.** The green transition is subject to externally imposed deadlines with financial consequences, such as the requirement to establish an emissions trading system by 2030 or in a certain countries requirement to introduce carbon pricing by 2030 and the implications of the Carbon Border Adjustment Mechanism (CBAM). The digital transition is characterised by softer forms of convergence, with the only direct financial consequence being the potential loss of funding under the Reform and Growth Facility.

2. Regional Picture: Where do the Western Balkan countries stand?

The Reform Agendas of the six countries allow for a comparative analysis based on concrete reform obligations with financial consequences.[28] The comparison reveals three characteristics with direct implications for North Macedonia.

2.1. Convergence in Transposition, Divergence in Outcomes

Digital reforms in all six Reform Agendas show a high degree of convergence: all economies are working to transpose the Cybersecurity Directive, the Digital Identity Regulation and the Gigabit Infrastructure Act,[29] as well as expanding electronic public services. The differences are primarily a matter of degree: Serbia has a specific target for 5G network coverage and a national strategy for artificial intelligence, while Kosovo has already implemented a digital identity solution based on the European Blockchain Services Infrastructure.[30] Nevertheless, the direction, instruments and framework are identical.

This is, however, convergence in transposition, not in transformation. EU digital legislation is more harmonised and leaves less room for divergence in the wording of national legislation, but transposition itself says nothing about whether implementation follows in practice.

The green transition, by contrast, is unfolding differently in each country. Starting positions differ substantially: Albania has no coal and relies on hydropower for approximately 97% of its electricity production, while Bosnia and Herzegovina and Kosovo have coal dependencies of approximately 70% and 85%, respectively.[31] Decarbonisation mechanisms are at different stages: some economies have adopted a national Energy Just Transition Plan (Serbia), others have introduced

[28] Governments of Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia, Reform Agendas under the Reform and Growth Facility for the Western Balkans, 2024–2025, as assessed by the European Commission.
[29] Directive (EU) 2022/2555 (Network and Information Security), Regulation (EU) 2024/1183 (European Digital Identity Framework) and Regulation (EU) 2024/1309 (Gigabit Infrastructure).
[30] Government of the Republic of Serbia, Reform Agenda, 2024; Government of Kosovo, Reform Agenda, 2024.
[31] Energy Community Secretariat, Annual Implementation Report 2025, chapters on Albania, Bosnia and Herzegovina and Kosovo.

specific measures for replacing heating systems (Montenegro), while in others the foundational climate legislation is still pending at the state level (Bosnia and Herzegovina) or national level (North Macedonia).[32]

For North Macedonia, this has an immediate consequence. The payment approved in May 2026[33] was based on digitalisation and education-related steps, steps measured through transposition. The next payments will require green steps, which are measured through outcomes. The difference lies not in the difficulty of the transformation, but in the fact that progress on green reforms cannot be demonstrated without tangible results. As discussed in section 1.2, this reflects the way the instrument currently measures the two transitions, and it means that the pace of disbursements so far is not a reliable guide to the pace of those still ahead.

2.2. A Systemic Regional Risk: The Chain from Climate Law to Carbon Pricing

The obligation to introduce carbon pricing by 2030 applies to all coal-dependent economies and is directly linked to two processes: access to the Single Electricity Market after 2030 and recognition under the Carbon Border Adjustment Mechanism (CBAM). However, this obligation rests on a chain of prerequisites that have not yet been established in many economies.[34]

Carbon pricing depends on verified emissions data: an emissions trading system trades them, and a carbon tax is levied on them. Without a Monitoring, Reporting, Verification and Accreditation (MRVA) system,[35] neither instrument can operate, and without climate legislation, MRVA has no legal basis.

The instruments differ between economies. In its assessment of adopted National Energy and Climate Plans, the Energy Community Secretariat classifies Albania's carbon-pricing measure as an emissions trading system and North Macedonia's as a carbon tax, while Serbia adopted a law introducing a carbon tax in selected sectors in December 2025.[36] In North Macedonia's case,

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[32] European Commission, Assessment of the Reform Agenda of the Republic of North Macedonia under the Reform and Growth Facility, Brussels, 2024. Energy Community Secretariat, Annual Implementation Report 2025.

[33] European Commission, Commission releases €158.9 million to Albania, Montenegro and North Macedonia under the EU Growth Plan for the Western Balkans, 20 May 2026.

[34] Energy Community Ministerial Council, Roadmap for Decarbonisation of the Energy Community, Vienna, 2021.

[35] Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading, Official Journal of the European Union L 275, 25.10.2003, as subsequently amended; Commission Implementing Regulation (EU) 2018/2066 on the monitoring and reporting of greenhouse gas emissions; Commission Implementing Regulation (EU) 2018/2067 on the verification of data and the accreditation of verifiers.

[36] Energy Community Secretariat, Assessment of the Adopted National Energy and Climate Plans 2025–2030, op. cit., section on energy and manufacturing industries. The same report notes that Serbia adopted the Law on Greenhouse Gas Emissions Tax in December 2025, introducing a carbon tax in selected sectors.

the Reform Agenda also sets the establishment of an emissions trading system by 2030, and the country's first Biennial Transparency Report, submitted in July 2026, confirms the sequence: it foresees the phased introduction of a national carbon-pricing mechanism in 2025–2029, supported by an MRVA system and a digital registry, in preparation for alignment with the EU Emissions Trading System by 2030.[37] This distinction matters for CBAM, which recognises an explicit carbon price paid in the country of origin irrespective of the instrument used. It does not, however, affect the sequence described here: both instruments require verified emissions data, and therefore both depend on a functioning MRVA system and on the legal basis that underpins it.

The chain therefore looks like this:

Climate Law → MRVA → Carbon pricing (ETS or carbon tax) → Recognition under CBAM and market integration

Table 1: The chain of prerequisites for carbon pricing in the Western Balkans

Economy	Climate law	MRVA system	Carbon pricing	Notes
Albania	Climate Change Law (2020)	In preparation	ETS foreseen in NECP	No coal, but an ETS is planned
Bosnia and Herzegovina	No state-level law	Not yet established (confirmed in the Agenda)	Conditional on harmonisation between entities	Step valued at €14.5 million
Kosovo	Climate Change Law (2024)	Being established	Obligation applies	Law adopted; MRVA being established
North Macedonia	Climate Action Law in parliamentary procedure	Foreseen in the Reform Agenda; legal basis pending	ETS by 2030 (Reform Agenda); carbon tax foreseen in NECP	A single law unlocks the first two links
Serbia	Law on Climate Change (2021)	Being implemented under the 2021 law	Carbon tax (law adopted December 2025)	Legal basis and pricing law in place
Montenegro	Long-Term Climate Action Strategy	In development	Obligation applies	Strategic rather than legislative basis

North Macedonia deserves particular attention. MRVA and an emissions trading system by 2030 are

[37] Government of the Republic of North Macedonia, Ministry of Environment and Physical Planning, First Biennial Transparency Report of the Republic of North Macedonia under the Paris Agreement (BTR1), prepared with the support of the Global Environment Facility and UNDP, submitted to the UNFCCC on 29 July 2026.

foreseen in the Reform Agenda, but until the Climate Action Law is adopted, the monitoring system lacks the elements it needs to operate: a legal basis, a designated competent body, enforceable reporting obligations and a verification scheme.

The obstacles differ across the region. In Bosnia and Herzegovina, progress depends on constitutional agreement between the entities; in Serbia and Kosovo, the legal basis is in place and the task is to make MRVA fully operational.[38] In North Macedonia, the obstacle is a single law already in parliamentary procedure, which makes it among the most tractable in the region, and explains why its adoption carries such leverage.

This is particularly significant in the context of CBAM, whose definitive period began in January 2026.[39] CBAM currently applies to selected goods in six carbon-intensive sectors: iron and steel, aluminum, cement, fertilizers, electricity and hydrogen. Exporters of covered goods to the EU are therefore already exposed to a carbon cost linked to the embedded emissions of their products. Where a carbon price has been effectively paid in the country of origin, the corresponding amount may be deducted from the CBAM obligation. The timing of domestic carbon pricing therefore has a fiscal dimension: without an effective domestic carbon-pricing mechanism, carbon costs associated with exports to the EU are paid through the CBAM system rather than generating corresponding carbon-pricing revenues domestically.

2.3. Integration Remains Largely Declarative

The European Green Deal and the Reform and Growth Facility often conceive the twin transition as an integrated process: digital technologies should accelerate the green transformation through smart grids, digital emissions monitoring and the optimisation of energy systems, while the green transition should create new demand for digital solutions.[40]

A comparison of the Reform Agendas shows that this integration is not yet reflected in the reform steps themselves. Across the six economies, joint planning, coordinated monitoring and integrated financing of green-digital synergies have yet to be established. Montenegro comes closest, with investments that connect the two directly - smart metering (€12 million), 10,000 rooftop photovoltaic

[38] Law on Climate Change, Official Gazette of the Republic of Serbia, No. 26/2021; Government of the Republic of Serbia, Low-Carbon Development Strategy of the Republic of Serbia for the Period 2023–2030 with Projections to 2050, Belgrade, 2023.
[39] Regulation (EU) 2023/956 establishing a carbon border adjustment mechanism, Official Journal of the European Union L 130, 16.5.2023.
[40] European Commission, Digitalising the Energy System – EU Action Plan, COM(2022) 552 final, Brussels, 18 October 2022.

systems and the digital inclusion of workers in the Just Transition Programme for Pljevlja, although these reflect a specific regional context rather than a deliberate integration strategy. Bosnia and Herzegovina formally combines the two under the same programme area (€261 million jointly), but implementation is organised separately. North Macedonia places both under the same sub-area, although no reform step yet links them, and smart-grid technologies appear in the indicative investment list rather than among the reform steps. The shared sub-area nonetheless provides a natural starting point for introducing such steps.

This is not because the European Union treats the two transitions separately in its own regulatory practice. In addition to the instruments addressing the feedback effects discussed in section 1.1, the Carbon Border Adjustment Mechanism depends on digital reporting infrastructure for embedded emissions,[41] the Action Plan on Digitalising the Energy System sets out the digital measures needed to integrate renewable generation,[42] and the Green Deal Data Space and Destination Earth place data and modelling capacity at the service of climate objectives.[43]

What has not yet been carried across into the enlargement framework is this integration itself. The Reform and Growth Facility does not yet require or measure synergies, assessing and financing the two transitions separately. As a result, candidate countries receive them as two distinct reform pillars, with an institutional incentive to pursue them in parallel, while within the Union they are increasingly regulated together. This reflects the design of the instrument as much as the choices of the economies themselves. The gap is therefore one of transmission rather than of design intent, and it is one that the enlargement framework is well placed to close by incorporating the integrative approach already applied within the Union.

[41] Regulation (EU) 2023/956, op. cit.
[42] European Commission, Digitalising the Energy System – EU Action Plan, op. cit.
[43] European Commission, A European Strategy for Data, COM(2020) 66 final, Brussels, 19 February 2020; European Commission, Destination Earth (DestinE) initiative, Digital Europe Programme.

3. National Assessment: How Prepared Is North Macedonia?

North Macedonia's preparedness is uneven: progress does not occur at the same pace either between the green and digital transitions or among the individual components within each transition. Consequently, national preparedness cannot be assessed simply by counting adopted laws and strategies or established institutions, but rather by examining their capacity to produce measurable results.

A terminological distinction is necessary here. The term "asymmetries" refers to the three structural differences between the transitions themselves described in Section 1.2, namely the asymmetries of loss, measurability and deadlines. They arise from the nature of the two processes and apply across contexts; Section 3.3 examines how they manifest themselves in North Macedonia. The term "gaps" refers to the domestic distance between what has been formally established and what functions in practice. There are three such gaps: cross-sectoral, implementation and coordination gaps. The cross-sectoral gap is the apparent difference in pace between the two transitions, which partly reflects how each is measured, and is examined in Sections 3.1 and 3.2. The implementation gap is the distance between adopted policies and their practical application and appears in both sections. The coordination gap is shared: the European Union increasingly regulates the two transitions together in its own legislation, while the enlargement framework assesses them as separate pillars and the national institutional set-up has developed along the same sectoral lines; this is examined in Section 3.4. In short, asymmetries explain why the two processes are different, while gaps explain where implementation lags behind formal alignment.

3.1. The Green Transition

The energy sector is the most dynamic. The new Energy Law[44] created a basis for further alignment with EU legislation, market development and the integration of renewable energy sources, thereby contributing to the fulfilment of part of the commitments undertaken within the Energy Community. Investments in photovoltaic and wind capacity have increased significantly, while the National Energy and Climate Plan and the Reform Agenda envisage further increases in solar and wind generation capacity. However, the expansion of renewable energy creates a second layer of challenges: integrating variable generation requires grid modernisation, flexibility, storage and smart

[44] Energy Law, Official Gazette of the Republic of North Macedonia No. 101/2025.

metering. The success of the energy transition therefore cannot be measured solely through newly installed megawatts, but also through the system's capacity to integrate them safely.

This assessment is supported by external evaluation. In its 2026 assessment of adopted National Energy and Climate Plans, the Energy Community Secretariat records that North Macedonia adopted its Plan on time, one of only four Contracting Parties to do so, and that installed renewable capacity has outpaced the indicative trajectory set out in it.[45] The country is identified, alongside Albania, as a regional leader in solar photovoltaic development. It is among the few Contracting Parties providing disaggregated projections and a trajectory for the 2025–2030 period rather than a single 2030 target, one of only four reporting on climate adaptation, and one of only two examining the effects of the energy transition on air pollution. A revised plan (NECP 2.0) was adopted by the Government in April 2026, harmonised with the policies and measures of the country's first Biennial Transparency Report.[46]

Taken together, these findings shift the terms of the question. Installation capacity is no longer the limiting factor in the renewable energy transition; the capacity of the network to absorb it is. Success on the generation side makes grid modernisation more urgent rather than less.

The same report also identifies where the framework is thinner. It notes the absence of a clearly defined measure in the governance of research and innovation, the absence of specified financial instruments for research, innovation and competitiveness, and limited elaboration of the energy efficiency first principle. The pattern is consistent with the findings of this analysis: obligations expressed as planning and reporting are met on time, while obligations requiring an implementing structure advance more slowly.

By contrast, climate policy is where the gap is most pronounced, centred on the Climate Action Law, which is still pending.[47] The law's significance extends beyond formal alignment with the acquis: it is to provide the legal basis for climate governance, planning, emissions monitoring and reporting, as well as the institutional mechanisms needed for carbon pricing, including the carbon tax foreseen in the National Energy and Climate Plan and the emissions trading system foreseen in the Reform Agenda by 2030. Until it is adopted, decarbonisation ambitions advance faster than the institutional architecture required to manage and measure that transformation.

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[45] Energy Community Secretariat, Assessment of the Adopted National Energy and Climate Plans, op. cit., 2026.
[46] First Biennial Transparency Report (BTR1), op. cit., 2026.
[47] European Commission, North Macedonia Report 2024 and North Macedonia Report 2025, Chapter 27, Environment and Climate Change.

The gap is particularly significant in the context of the obligation under the Reform Agenda to establish a MRVA system, because without a functioning climate-law framework, establishing the subsequent links in the decarbonisation chain becomes more complex both institutionally and in terms of timing. A second consequence concerns investment: the incomplete climate framework leaves open questions regarding the future price of carbon, reporting obligations and the standards companies will have to meet, reducing the policy predictability needed for long-term investment in decarbonisation. The Climate Action Law should therefore be treated simultaneously as an environmental, integration and economic reform.

Waste management demonstrates a similar gap, but of a different kind. The legislative and strategic framework has been developed towards a circular economy, but the establishment of regional systems is progressing slowly, infrastructure capacity is insufficient, and municipalities have significantly different financial, technical and human resources. In terms of air quality, despite the existence of policies, plans and measures, concentrations of pollutants remain a serious environmental and public-health problem. This is the clearest example of the gap between policy input and reform outcome.

Institutional capacity represents a common constraint. The green transition requires coordination among institutions responsible for energy, environment, transport, industry, finance and local development, while in practice these policies are still predominantly planned and implemented on a sectoral basis. Capacity at the local level is a particularly significant constraint, as a substantial part of policies concerning waste, energy efficiency, urban mobility and air quality are implemented there. Differences between municipalities also create a territorial gap, whereby nationally established objectives are not translated into local results at the same pace.

The green transition therefore cannot simply be assessed as either “advanced” or “lagging.” It is characterised by a multilayered implementation gap, and in a system based on measurable outcomes, progress in the energy sector cannot permanently compensate for delays in climate legislation, waste management or air quality. The main challenge is not simply to accelerate progress, but to reduce the gap between the most advanced and the most lagging components.

[48] Ministry of Digital Transformation of the Republic of North Macedonia, documents on the institutional framework; Government Decision establishing the National Council for Digital Transformation and Cybersecurity, 6 May 2025.

3.2. The Digital Transition

The digital transition is progressing more rapidly in terms of legislative and institutional alignment. The establishment of the Ministry of Digital Transformation created a more centralised institutional set-up, while the National Council for Digital Transformation and Cybersecurity is intended to provide strategic coordination and reduce fragmentation.[48] An important step was also the adoption of the Law on Security of Network and Information Systems, through which the national framework moves closer to the requirements of the NIS2 Directive.[49]

The gap here is different from that in the green transition: regulatory convergence is progressing faster than the operational transformation of institutions, services and the economy. Cybersecurity is not merely a separate technical component, but a prerequisite for sustainable digital transformation, because every new service and every new connection between information systems increases exposure to risk. Effective implementation of the new cybersecurity framework requires functioning mechanisms, a clear allocation of responsibilities, incident-response procedures and a sufficient number of specialised personnel, and these are precisely the areas where further development is needed.[50]

The clearest example is interoperability. Increasing the number of electronic services represents significant progress, but the number of services alone is not a sufficient indicator of digital maturity. Many institutions still use separate information systems, and data exchange has not yet developed to the point where services can function seamlessly between institutions. Under such circumstances, a citizen may initiate a procedure electronically while, behind the scenes, institutions continue to exchange documents through traditional means.

The difference between a digitalised service and a digitally transformed administration lies precisely in this: the latter requires interoperability, automated data exchange, the "once-only" principle, and secure electronic identification.[51] The real indicator of maturity is therefore not the number of services available online, but how many administrative procedures can be completed without requiring citizens to resubmit information already held by the state. This is closely connected to digital identity. The European Digital Identity Framework (eIDAS 2.0) provides for the development of a European Digital Identity Wallet through which citizens will be able to prove their identity

[49] Law on the Security of Network and Information Systems, June 2025; Directive (EU) 2022/2555 (NIS2), Official Journal of the European Union L 333, 27.12.2022.
[50] European Commission, North Macedonia Report 2025, sections on digital transformation and cybersecurity.
[51] European Commission, European Interoperability Framework – Implementation Strategy, COM(2017) 134 final, Brussels, 23.3.2017; Regulation (EU) 2018/1724 establishing a Single Digital Gateway, Official Journal of the European Union L 295, 21.11.2018.

electronically and use services across different countries.[52] For North Macedonia, compatibility between the national system and the European architecture is a prerequisite for gradual integration into the European digital space.

What matters is whether the national infrastructure is technically and regulatorily compatible with the European architecture. Interoperability also has direct economic value: automated data exchange reduces administrative costs for companies, while secure digital identity is a prerequisite for electronic signatures and concluding contracts without physical presence.

Interoperability also has a regional dimension. The Common Regional Market treats digital integration as an instrument for reducing barriers to the movement of people, services and businesses in the Western Balkans. Consequently, national systems for digital identity, electronic signatures, registers and data exchange should not be developed as isolated national solutions.[53] Their value will increasingly depend on their ability to communicate with systems in the region and, even more importantly, with the infrastructure of the European Union. The cross-border use of electronic identity and digital documents is directly relevant to citizens' mobility, education and business activities.

At the same time, North Macedonia is strengthening its participation in the European digital innovation ecosystem. European Digital Innovation Hubs (EDIHs) create opportunities for small and medium-sized enterprises to gain access to expertise and technology testing,[54] while the VEZILKA project is envisaged as a national point of connection with European artificial-intelligence infrastructure through the Pharos AI Factory in Greece.[55]

Here too, however, the same gap emerges: integration into European initiatives is progressing faster than the diffusion of technologies throughout the domestic economy. Digital skills remain a horizontal constraint. The lack of advanced skills within the administration and parts of the private sector means that infrastructure and regulation can advance faster than the capacity to make effective use of them.[56]

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[52] Regulation (EU) 2024/1183 amending Regulation (EU) No 910/2014 as regards establishing the European Digital Identity Framework, Official Journal of the European Union L, 30.4.2024.
[53] Regional Cooperation Council, Common Regional Market Action Plan 2025–2028, op. cit. See also European Commission, New Growth Plan for the Western Balkans, op. cit.
[54] European Commission, Digital Europe Programme, European Digital Innovation Hubs (EDIH). See also Regulation (EU) 2021/694.
[55] European High-Performance Computing Joint Undertaking (EuroHPC JU), EuroHPC JU Selects AI Factory Antennas to Broaden the AI Factories Initiative, 13 October 2025. The VEZILKA project was selected as North Macedonia's AI Factory Antenna, connected to the Pharos AI Factory, with implementation through Ss. Cyril and Methodius University in Skopje.
[56] OECD, Competitiveness in South East Europe: A Policy Outlook 2024, Paris, 2024, sections on digital society and digital skills.

The Commission's initial assessments indicate that the country has already fulfilled some of the reform steps related to digitalisation.[57] This confirms that certain digital reforms can be translated into verifiable results relatively quickly. However, fulfilment of individual reform steps should not be equated with completion of the digital transformation.

3.3. The Three Structural Asymmetries in the Context of North Macedonia

Section 1.2 identified the three structural asymmetries between the two transitions. The national findings make it possible to examine how these asymmetries manifest themselves in a single country: two of the three are confirmed, while the third plays out differently from what the theoretical framework would suggest.

• **Loss.** In North Macedonia, the green transition has a clearly identifiable geographical focus, Bitola and Oslomej, where the closure of facilities entails concentrated, geographically located and visible losses. This is precisely why the just transition is already the subject of a dedicated roadmap and specific measures.[58] The losses associated with the digital transition, particularly those resulting from automation in public administration and professional services, are dispersed across many sectors, have no single geographical concentration and lack a clearly defined constituency. Although digital skills are frequently identified as a constraint in national documents, there is not yet a single instrument addressing the potential loss of jobs as a result of accelerated automation in the public and private sectors.

• **Measurability.** The scorecard below demonstrates the asymmetry directly: green areas are assessed through outcomes such as pollution, megawatts and emissions, while digital areas are assessed primarily through the existence of frameworks and the number of services. The case of North Macedonia, however, adds a further dimension. In theory, it is the green transition that produces tangible and independently verified indicators, yet, as the State Audit Office noted in 2025, the most recent domestic emissions data then dated from 2019.[59] The gap was closed in July 2026, when the first Biennial Transparency Report extended the national inventory to 2022 and revised the full time series from 1990, with the support of a GEF-funded project implemented by UNDP.[60] For several years, therefore, the transition that is theoretically measurable was not being measured, and the data now available still depend on project cycles. The asymmetry of measurability is consequently not merely a difference between the two processes, but also a difference between what can be measured and what is actually measured.

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[57] European Commission, Commission releases €158.9 million to Albania, Montenegro and North Macedonia under the EU Growth Plan for the Western Balkans, 20 May 2026.
[58] Ministry of Energy, Mining and Mineral Resources, Annual Implementation Plan for the Just Transition for 2026, https://energy.gov.mk/mk-MK/dokumenti/reformska-agenda.
[59] State Audit Office, Performance Audit: Preparedness of the Republic of North Macedonia to Address Climate Change, 2025.
[60] First Biennial Transparency Report (BTR1), op. cit., 2026.

• **Deadlines.** The theoretical framework suggests that the green transition is subject to externally imposed deadlines with financial consequences, while the digital transition involves softer forms of convergence. Formally, this also applies to North Macedonia: 2030 and the Carbon Border Adjustment Mechanism represent firm external constraints, whereas digital obligations are not subject to an equivalent external deadline. In practice, however, the pattern is reversed. Digital reform steps are progressing faster in part because they are linked to payments, while the Climate Action Law, a prerequisite for meeting a far more demanding external deadline, has been in preparation since 2019 and its adoption is not itself a condition for payment. What is decisive, therefore, is not simply whether a deadline exists, but whether meeting it carries an immediate financial consequence.

3.4. The Coordination Gap

The first two gaps would not necessarily constitute a systemic problem if a mechanism existed to connect the two transitions. However, the national institutional architecture continues to treat them as separate reform areas. Green policies are developed through institutions responsible for energy, environment, climate and transport, while digital transformation is concentrated around the Ministry of Digital Transformation and institutions responsible for public administration, electronic services, cybersecurity and innovation. A permanent horizontal mechanism with the explicit function of jointly planning and monitoring the two transitions as a single process has yet to be established.

This is particularly significant because a large part of the next phase of the green transition depends precisely on digital technologies. Integrating variable renewable energy sources requires smart grids, smart metering and improved forecasting. Climate policy requires functional systems for collecting, processing and verifying emissions data: MRVA is a climate instrument, but its functioning depends on digital infrastructure. In the opposite direction, the green transition creates demand for new digital solutions and opens opportunities for the domestic innovation sector. Initiatives such as EDIH and VEZILKA therefore gain additional value if their capacities are directed towards concrete challenges of the green transition.

The problem is also visible in monitoring. Indicators exist for the share of renewable energy, emissions, electronic services and cybersecurity, but it is much more difficult to track the extent to which digitalisation contributes to green objectives. In the next phase, it would be useful for the monitoring system to include integrated green-digital indicators, such as the share of smart meters, digitalisation of the electricity grid, digital emissions monitoring, interoperability of environmental data and the number of companies using digital solutions for decarbonisation. Such an approach

would make it possible to measure progress not only by how many green and digital reforms have been completed, but also by whether one transition accelerates the other.

The key finding of this chapter is that the gap in pace itself is not the greatest risk. The risk arises from the fact that the different speeds of the two transitions are not yet managed as part of a single process. Without such coordination, the country may achieve sectoral reform results without fully realising the transformative potential of the twin transition. The European framework recognises the two-way nature of this relationship: digital technologies can accelerate decarbonisation, while digitalisation itself must become more sustainable, as discussed in Section 1.1.[61]

3.5. Integrated National Scorecard

The following scorecard provides a synthetic overview based on the four dimensions examined in the analysis: legislative alignment with the European framework, institutional capacity for implementation, the pace of implementation to date, and the existence of measurable indicators and functional reporting mechanisms. The assessments represent analytical judgements derived from the documented findings and are not the result of quantitative calculations.[62]

Table 2: Integrated national scorecard

Area	Level of preparedness	Key assessment
Energy and renewable energy sources	Medium-high	Renewable capacity has outpaced the trajectory of the National Energy and Climate Plan and the Energy Community Secretariat has assessed progress positively; grid modernisation and digitalisation remain the binding constraints.
Just transition	Medium	A dedicated roadmap and quantified measures for Bitola and Oslomej are in place; the long-term phase and links to digital skills remain to be defined.
Climate policy and carbon pricing	Limited	The incomplete legislative framework is slowing the development of MRVA and preparations for carbon pricing, including the carbon tax foreseen in the NECP and the ETS foreseen in the Reform Agenda by 2030.
Waste management and circular economy	Limited	A strategic and legislative basis exists, but infrastructure, local capacities and implementation are lagging behind.

[61] Muench, S. et al., op. cit., 2022.
[62] See Annex 1 for an explanation of the scale.

Area	Level of preparedness	Key assessment
Air quality and environmental monitoring	Limited	Pollution remains a serious problem, while the capacity to translate data into effective policies needs to be strengthened.
Digital administration and public services	Medium-high	The number of services is growing and the institutional framework has been strengthened, but a gap remains between putting services online and transforming the underlying administrative processes.
Interoperability and digital identity	Medium	Foundations for data exchange and identification exist, but further progress is needed in connecting registers, applying the "once-only" principle and aligning with the European architecture.
Cybersecurity	Medium	The regulatory framework has been strengthened, but operational, institutional and human-resource capacities require further development.
Artificial intelligence and digital innovation	Medium	EDIH and VEZILKA strengthen access to the European ecosystem, but domestic uptake and the diffusion of these technologies remain at an early stage.
Digital skills and human capital	Medium	The lack of advanced skills remains a limiting factor for public administration, businesses and the uptake of new technologies.
Green-digital institutional coordination	Limited	A permanent mechanism for integrated planning, monitoring and linking of green and digital reforms and investments has yet to be established.

The scorecard shows that the country has the basic legislative, institutional and technological prerequisites in place, but their level of maturity varies significantly across areas. The greatest challenge stems from the combination of structural constraints in the green transition, the operational gap in the digital transition, and the absence so far of a mechanism linking the two processes.

4. Understanding Delays: An Analysis of the Factors

To address implementation challenges effectively, it is necessary to understand the factors associated with delays. Where constraints are sector-specific, responses can be designed at the sectoral level. Where similar constraints recur across different areas, recommendations need to address the underlying institutional and structural factors rather than individual symptoms. The Climate Action Law provides a useful case for this analysis because its development is extensively documented and has been the subject of regular dialogue with the European Commission and a dedicated performance audit by the State Audit Office.

4.1. The Climate Action Law: A Documented Case

Work on the law began in February 2019, as part of an EU-funded project to prepare a long-term strategy and a Climate Action Law.[63] The text was expected to reach Parliament in 2021. In 2022, the competent ministry announced that the law would not be adopted that year because a further round of alignment with new EU legislation and Energy Community law was required. The draft was published for consultation in July 2023, but was not submitted to Parliament in that parliamentary term. In 2026, the law is in parliamentary procedure.[64] Preparations have therefore extended over seven years. In 2025, the State Audit Office described the process as having been delayed for more than five years and found that, as a consequence, an established institutional system, coordination and communication among the institutions involved in climate policy had yet to be put in place.[65]

Cross-referencing the audit findings, Commission reports and the chronology itself points to five recurring constraints.

1. Successive rounds of alignment have extended the timeline

The European climate acquis continues to develop, particularly in areas related to emissions trading, monitoring and reporting, and climate governance. Each new legislative development can therefore require corresponding adjustments to national legislation. In the case of the

[63] Preparation of a Long-Term Strategy and Law on Climate Action, a project funded by the European Union, launched in February 2019 to support the Ministry of Environment and Physical Planning.
[64] Radio MOF, "The Climate Action Law Will Not Be Adopted This Year; It Had to Be Further Harmonised with the Energy Community," 13 July 2022. For the draft text published for consultation on 31 July 2023, which was not submitted to the Assembly during that parliamentary term, see Green CIVIL, Overview of North Macedonia's Green Policies for 2023, 10 January 2024. For the status of the law in parliamentary procedure, see the statement by the Minister of Environment and Physical Planning, reported by Makfax, 6 July 2026.
[65] State Audit Office, op. cit., 2025.

Climate Action Law, this has involved repeated rounds of alignment with evolving European requirements, including the "Fit for 55" package, the Carbon Border Adjustment Mechanism and the revised Emissions Trading Directive, as well as their incorporation into Energy Community law. This creates a moving-target dynamic: while each additional round of alignment responds to a specific regulatory development, the cumulative effect has been an extended legislative timeline. The issue is not specific to climate policy and is particularly relevant in areas where the European regulatory framework is developing rapidly.

2. Dedicated administrative structures and permanent staffing are not yet in place

In November 2025, the European Commission called for the establishment of the Climate Change Unit within the Ministry of Environment and Physical Planning.[66] A dedicated administrative structure with assigned responsibility for climate legislation has therefore yet to be established. The audit documents a related consequence: administrative capacity constraints have prevented the establishment of a single database for the National Greenhouse Gas Inventory. At the time of the audit, the most recent inventory covered 2019 and had been prepared with the support of international projects.[67] The first Biennial Transparency Report, submitted in July 2026, has since extended the inventory to 2022, again with project support, and itself describes the national system as being in transition from a project-oriented to a systemic and institutionalised approach, with a formal MRV system yet to be established.[68] Where such work relies on project cycles rather than permanent staff, timelines tend to shift between cycles.

3. Responsibilities are dispersed without an explicit coordination mandate

The State Audit Office identified the absence of a clearly defined structural arrangement and communication mechanism among relevant institutions. In particular, limitations in monitoring by the responsible ministry and in reporting from other ministries make it difficult to assess the relevance and effects of measures across sectors.[69] Climate policy is inherently horizontal, with greenhouse-gas emissions generated across energy, transport, industry and agriculture. Responsibility for the Climate Action Law rests with a single ministry, while the instruments to ensure systematic cross-sectoral input are not currently in place. This creates a coordination requirement that extends beyond the formal allocation of responsibility for

[66] European Commission, North Macedonia Report 2025, Brussels, November 2025.
[67] State Audit Office, op. cit., 2025.
[68] First Biennial Transparency Report (BTR1), op. cit., 2026.
[69] State Audit Office, op. cit., 2025.

the legislation itself. The first Biennial Transparency Report reaches the same conclusion, describing responsibilities as partially defined and fragmented between institutions.[70]

4. Local government is not yet reflected in the draft

The State Audit Office noted that local government was not included in the draft despite being identified among relevant stakeholders. This is significant because municipalities are responsible for a range of local policies that affect climate outcomes and will also have an implementation role once the national framework is established. Defining the role of local government at the legislative stage would reduce the risk that implementation after adoption faces the same challenges documented in waste management and air quality. Addressing this dimension would help clarify the respective responsibilities of central and local institutions.[71]

5. The obligation is not currently linked to a payment condition

The Climate Action Law is not currently linked to a payment condition under the Reform and Growth Facility. This creates a distinction between legislative obligations and the financial mechanisms used to monitor reform implementation. Adopting legislation that opens the way to carbon pricing creates concentrated and immediately visible costs for coal-fired electricity producers and energy-intensive exporters, while its benefits — recognition under CBAM, domestic carbon revenues and access to the market after 2030 — are diffuse and delayed. Payment conditions are set in the Reform Agenda agreed between the Government and the European Commission, which makes this a constraint that both parties can address.

A fiscal feedback loop is also linked to this constraint. The audit finds that in the absence of a legal basis, the budget has no system for climate tagging of projects. As a result, the state does not have data on funds allocated to climate change.[72] Until the law is in place, climate budgeting has no legal basis, and without climate budgeting the law has no established institutional advocate within the budgetary process. At the same time, the Long-Term Strategy for Climate Action estimates that implementing policies between 2020 and 2050 will require €35 billion in capital investment and €121 billion in energy sector expenditure.[73] Planning investment and expenditure on this scale depends on having a monitoring framework in place.

[70] First Biennial Transparency Report (BTR1), op. cit., 2026.
[71] State Audit Office, op. cit., 2025.
[72] State Audit Office, op. cit., 2025.
[73] Government of the Republic of North Macedonia, Long-Term Climate Action Strategy, Skopje, 2022.

4.2. The Same Pattern in Other Areas

The constraints identified above are not specific to the Climate Action Law. In November 2025, the European Commission reported limited progress in alignment with the environmental acquis and highlighted the need for stronger political commitment, adequate staffing and improved implementation, pointing to coordination, data and progress in air quality and waste management as areas requiring attention.[74] These findings correspond primarily to the second and third constraints.

- **Waste management.** Constraints related to administrative capacity and local implementation are particularly relevant. Regional waste-management systems require sufficient capacity at the local level, while sustainable financing arrangements remain an unresolved element. Inspection and administrative capacities also remain areas requiring further development. These factors correspond primarily to the second and fourth constraints.

- **Air quality.** The pattern is more closely associated with administrative capacity and coordination. Policies and strategic documents are in place, but limitations in the underlying data infrastructure and coordination across levels of government affect the ability to assess and implement measures consistently. This corresponds primarily to the second and third constraints.

- **Interoperability.** This area provides a useful comparison from the digital transition. Technical connectivity is among the more developed elements, while the remaining obstacles are largely legal and organisational. Sectoral legislation in some cases continues to require paper-based evidence even where the relevant information is already held by another state institution, so the technical capacity to exchange information does not necessarily translate into routine institutional exchange. The absence of a body with a sufficiently broad mandate to coordinate these processes reflects a variation of the third constraint, alongside elements of the second. Unlike in the climate field, the first constraint is less pronounced because the European digital framework is more stable, while the fifth operates in the opposite direction: digital reform steps are linked to payments, which helps explain why they are progressing more rapidly.

[74] European Commission, North Macedonia Report 2025, Brussels, November 2025, Chapter 27, Environment and Climate Change.

4.3. The Common Pattern

Table 3: Recurring constraints and possible responses

Recurring constraint	Areas affected	Possible response
1. Successive alignment with evolving European requirements	Climate and other areas where the EU framework is developing rapidly	A defined date for the first parliamentary reading, with further alignment taking place during the legislative procedure rather than delaying the initial submission
2. Dedicated organisational units and permanent staffing not yet in place	Climate, waste, air quality, interoperability, cybersecurity	A Government decision on internal organisation and staffing, complemented where necessary by technical assistance focused on personnel and institutional capacity rather than only on documentation
3. Coordination mandate not formally assigned	Climate, air quality, interoperability	Clear reporting obligations, deadlines and follow-up mechanisms, together with a horizontal coordination mechanism
4. Local government not yet formally included	Climate, waste, air quality	A defined role for municipalities in legislation and secondary legislation, with implementation support, particularly for smaller municipalities
5. Obligations not linked to payment conditions	Green reforms that are not currently payment conditions	Joint consideration by the Government and the Commission of linking key legislative steps to payment conditions, following the approach used for selected digital reforms

The comparison suggests that none of the five recurring constraints is primarily financial in nature, although financial linkages can influence implementation incentives. Four of the five lie largely within the scope of domestic institutional arrangements. The second, third and fourth constraints can be addressed through decisions concerning staffing, allocation of responsibilities, reporting requirements and coordination mechanisms. The first can be addressed through a defined legislative timetable that allows alignment to continue during the parliamentary process rather than requiring the process to restart with each regulatory development. Importantly, these measures do not depend on the prior adoption of the Climate Action Law itself: institutional arrangements, staffing decisions, reporting mechanisms and legislative scheduling can be developed in parallel with the legislative process. The fifth constraint relates to the selection of payment conditions under the Reform and Growth Facility and can therefore be addressed jointly by the Government and the European Commission.

5. Financial Implications

The Reform and Growth Facility introduces a substantial change in the way reform progress is linked to financial support. Under the Facility, access to a significant share of the funding is conditional on fulfilment of specific reform steps set out in national Reform Agendas.[75] The Facility provides up to €6 billion for the Western Balkans for the 2024–2027 period, of which €2 billion is non-repayable support and €4 billion consists of concessional loans.[76] For North Macedonia, the indicative allocation amounts to €750.4 million, with final access depending on results achieved. The European Commission states that failure to meet the conditions may result in the reduction and reallocation of funds.[77]

Implementation to date indicates that conditionality operates as a practical requirement rather than a formal principle. In May 2026, the Commission approved €65.7 million for North Macedonia based on completed steps in education and digitalisation, bringing the total amount released to €142.1 million.[78] The digital component is already generating fulfilled payment conditions. For the green transition, the dynamics are different. As Section 2.2 showed, green reforms depend on a sequence of mutually conditional steps: if the legal framework is delayed, MRVA is delayed, and if MRVA is delayed, preparedness for carbon pricing is reduced. The financial exposure associated with the green transition is therefore cumulative rather than limited to a single step.

The exposure also extends beyond direct payments. Part of the funding is channelled through the Western Balkans Investment Framework for priority investments in transport, energy, digital infrastructure and human capital. Reform timelines and investment timelines are closely linked: new renewable-energy capacity delivers limited systemic impact unless the grid is modernised in parallel, just as investment in digital platforms delivers limited value unless institutions connect their registers. The Energy Community Secretariat's finding that renewable capacity has outpaced the national trajectory makes this link particularly relevant for North Macedonia.

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[75] Regulation (EU) 2024/1449 establishing the Reform and Growth Facility for the Western Balkans, in particular Articles 12, 21 and 26.
[76] Ibid. See also European Commission, New Growth Plan for the Western Balkans, COM(2023) 691 final, Brussels, 8 November 2023.
[77] European Commission, Allocations Available for Each Beneficiary, Reform and Growth Facility for the Western Balkans. For North Macedonia, an indicative allocation of EUR 750.4 million.
[78] European Commission, Commission releases €158.9 million to Albania, Montenegro and North Macedonia under the EU Growth Plan for the Western Balkans, 20 May 2026.

Table 4: Three levels of financial risk

Risk level	Mechanism	Example from the twin transition	**Potential consequence**
Reform-financial	Delay in meeting a payment condition	Legislative or implementation step under the Reform Agenda	Delayed, reduced or reallocated access to available financial support
Investment	Reforms and infrastructure do not progress in a coordinated manner	New renewable-energy capacity without grid modernisation; digital services without interoperability	Reduced investment impact and slower absorption
Economic and competitive	Delayed convergence with EU rules and markets	Carbon pricing and CBAM, digital identity, cross-border digital services	Higher costs for companies and slower integration into the Single Market

This division shows that financial risk should not be equated simply with non-disbursement from the EU. Its consequences are transmitted from public finances to investment and subsequently to the private sector. Accordingly, the success of the Facility should not be assessed solely by the percentage of available funds accessed. High absorption is a positive indicator, but does not in itself demonstrate whether the funds have generated structural change. The key question for North Macedonia is therefore not only how much of the €750.4 million it will access, but whether the reforms that enable access to those funds will create lasting capacities for green and digital competitiveness.

6. Conclusion

The twin transition is no longer a parallel process of aligning with the EU's green and digital policies, but one of the central mechanisms of economic modernisation and gradual integration into the Single Market. The Reform and Growth Facility changes the logic: formal alignment remains necessary, but access to financial support depends on the timely fulfilment of specific reform steps and measurable results. The gap between adoption and implementation therefore acquires a direct financial dimension.

The concept of the "twin transition" brings together processes with significant asymmetries. Both are structural, but they differ in pace, in the losses they create and, above all, in how progress is measured: the green transition is assessed by outcomes, the digital transition largely by transposition. Faster fulfilment of digital reform steps does not necessarily imply deeper digital transformation, just as the adoption of green strategies does not guarantee decarbonisation. Within the Union, the two transitions are increasingly regulated together; carrying that integrative approach into the enlargement framework would help candidate countries manage them as a single process.

North Macedonia enters this phase with real strengths. Its National Energy and Climate Plan was adopted on time, renewable capacity has outpaced the planned trajectory, and several digital reform steps have already been fulfilled. The challenges lie in the three gaps identified in this analysis — cross-sectoral, implementation and coordination — and, more importantly, in the constraints behind them. These are not sector-specific: the same five constraints recur in climate legislation, waste management, air quality and interoperability. This suggests that the most effective responses lie less in new strategies or additional funding, and more in decisions concerning organisational structure, staffing and reporting obligations and, jointly with the European Commission, in the design of payment conditions.

The success of the twin transition should therefore not be measured by the number of laws adopted, services digitised, megawatts installed or European funds disbursed. The true measure will be the capacity of these changes to create an interconnected system that simultaneously reduces carbon exposure, increases productivity and accelerates the country's integration into the Single Market.

7. Recommendations

The recommendations below are linked to the constraints identified in Chapter 4 and are offered as a basis for discussion with the institutions responsible for implementation. Several build on work already under way, and most can be taken forward within existing institutional arrangements.

7.1. For the Assembly of the Republic of North Macedonia

- **Prioritising the Climate Action Law in the legislative programme.**
  The law is currently in parliamentary procedure, and its adoption would put in place the first two links of the chain described in Section 2.2. Setting a date for the first reading would allow further alignment to continue during the procedure rather than before it. The parliamentary review also offers an opportunity to confirm that the text includes three elements that would address the constraints identified in Chapter 4: organisational units for climate policy with clearly defined responsibilities; a reporting obligation for sectoral ministries, with defined deadlines and follow-up; and a clear role for local self-government, which the State Audit Office also highlighted.

- **Regular parliamentary oversight of the Reform Agenda.**
  The competent parliamentary committee could review a report on the status of reform steps and disbursements at least twice a year, with the participation of the relevant ministries and a public hearing before each Commission assessment. This would give the Assembly a structured and continuous role in a process with direct budgetary consequences.

7.2. For the Government of the Republic of North Macedonia

- **Establishing organisational units for climate policy in parallel with the legislative process.**
  Organisational units responsible for climate policy can be established without waiting for the adoption of the law. Creating dedicated internal units, defining staffing needs and setting clear timelines for recruitment can be done under existing arrangements. As the quickest measure available, this would provide a strong foundation for implementing all other climate policy actions, and would respond to the Commission's call for the establishment of the Climate Change Unit.

- **Institutionalising the National Greenhouse Gas Inventory.**
  Building on the first Biennial Transparency Report, which updated the inventory to 2022, a stable domestic staffing and methodological basis for its continued maintenance would allow

future reports to be prepared without relying on individual project cycles. Given the relevance of the inventory to MRVA, CBAM and future carbon pricing, this continuity is particularly valuable.

• **Introducing climate expenditure tagging in the budgetary process.**
Even before the adoption of the law, a methodology for tagging climate-relevant projects would enable the state to determine how much it is spending on climate-related measures, giving climate policy its own place within the budgetary process.

• **A horizontal coordination mechanism for the twin transition.**
Rather than creating a new institution, a mechanism could connect the institutions responsible for energy, environment and climate, digital transformation, the economy, transport and local development, with the task of identifying common priorities, coordinating investments and monitoring green-digital synergies. It could build on existing coordination bodies, and the shared sub-area of the two transitions in the Reform Agenda offers a natural entry point.

• **Gradually introducing integrated indicators.**
The monitoring framework could incorporate more integrated indicators alongside existing sectoral measures. Areas where the two transitions overlap include smart grids and meters, digital emissions monitoring, digitalised waste management, interoperable environmental data and the use of digital technologies for energy efficiency.

• **Treating reform deadlines as financial deadlines.**
An early-warning system for steps at risk of delay, together with their financial consequences, would allow priority to be given to reforms that are prerequisites for multiple subsequent steps.

• **Reviewing requirements for paper-based evidence.**
Sectoral legislation requiring documents that are already available in state registers could be systematically reviewed, since technical interoperability delivers results only when the legal framework allows it.

• **Moving from electronification towards interoperability.**
The next phase of public-administration digitalisation could focus on connecting registers, applying the "once-only" principle in practice and developing electronic identification in line with the European framework. A more meaningful indicator than the number of services is how many procedures can be completed entirely digitally without requiring citizens to resubmit data already held by the state.

[79] Directive (EU) 2023/1791 on energy efficiency (recast), Article 12.

• **Linking renewable-energy investment with grid investment.**
With installed renewable capacity already ahead of the national trajectory, approvals of new generation capacity could be accompanied by an assessment of grid readiness and corresponding investment in the digital management of transmission and distribution.

• **Assessing the energy and water footprint of large digital investments.**
Large digital infrastructure projects attracted as foreign direct investment could be assessed for their energy and water consumption before approval, drawing on the approach of the recast Energy Efficiency Directive.[79] These costs are not yet reflected in domestic investment frameworks.

• **Building on the just transition measures for Bitola and Oslomej.**
The roadmap and its annual implementation plan already include quantified reskilling and re-employment measures. The next phase could link the timeline for closures more closely with local economic diversification, include digital skills as a component of reskilling, and report publicly on the fulfilment of the quantified targets, drawing where relevant on approaches used elsewhere in the region.

7.3. For Local Self-Government Units

• **A defined role in the climate framework.**
The Association of the Units of Local Self-Government could contribute to discussions on the inclusion of local responsibilities in the law and secondary legislation, given the importance of local implementation for climate outcomes.

• **Integrated green-digital local projects.**
Local governments could further explore projects that serve both transitions, such as smart public lighting, digital management of energy consumption in public buildings, air-quality monitoring, smart waste management and digital solutions for local transport.

• **Strengthening capacities to prepare and manage European investments.**
Smaller municipalities would benefit from technical support in preparing mature projects, conducting cost-benefit analyses and managing public procurement. Joint projects involving several municipalities offer a solution where individual capacities are limited.

• **Developing local electronic services on national interoperability standards.**
Building local services on national standards, rather than as isolated local IT solutions, would allow them to connect with national registers and benefit from the "once-only" principle.

7.4. For the European Commission and other partners

The EU already supports both transitions in the region through the Reform and Growth Facility, IPA and the Western Balkans Investment Framework, and it increasingly integrates them in its own legislation. The following measures would help carry that integrative approach into the enlargement framework.

• **Linking selected foundational legislative measures to payment conditions.**
Where a legislative act is a prerequisite for multiple subsequent steps, as the Climate Action Law is for MRVA and carbon pricing, linking its adoption to disbursement is among the strongest available instruments. Experience to date indicates that reform steps carrying financial consequences progress more quickly. This could be considered jointly with the Government at the next revision of the Reform Agenda.

• **Placing greater emphasis on permanent staff in technical assistance.**
Alongside policy preparation, support could focus on the institutions and human resources needed to implement rules that have already been adopted, such as CBAM, carbon pricing, cybersecurity, interoperability and data management, reducing reliance on project cycles.

• **Developing outcome-oriented indicators for the digital component.**
Measures such as the share of services that actually exchange data between registers, or the reduction in the number of documents citizens are required to submit, would create a more balanced basis for assessing the two transitions. They could draw on indicators the Union already uses, such as the Digital Economy and Society Index and the Digital Decade targets.[80]

• **Capturing both synergies and trade-offs between the two transitions.**
The current mechanism assesses green and digital reform steps separately. Indicators

[80] Decision (EU) 2022/2481, op. cit.; European Commission, Digital Economy and Society Index (DESI).

for integrated measures and feedback effects would help capture cases where presumed synergies prove to be trade-offs depending on the context, drawing on integrative instruments already applied within the Union, such as energy-performance reporting under the recast Energy Efficiency Directive and the Digital Product Passport.

• **Supporting projects that connect both transitions.**
These include the digitalisation of energy networks, smart metering, digital emissions monitoring and the use of data analytics for energy efficiency.

• **Linking European digital initiatives to domestic needs.**
Projects such as EDIH and VEZILKA could also support the green transformation of domestic companies and the public sector, enabling European digital integration to translate more rapidly into domestic technological diffusion.

• **Encouraging regional exchange of good practices.**
Models for just transition and integrated green-digital investment already exist in the region and can be transferred with minor adaptations.

7.5. For Civil Society

• **Contributing to a broader public discussion on the Climate Action Law.**
Public discourse has so far largely framed the law as an environmental issue. Framing it also as an issue of export competitiveness and fiscal revenue could broaden support for its adoption.

• **Monitoring the underlying constraints, not only the status of the law.**
Questions such as whether organisational units have been established, whether the emissions inventory has been updated, whether ministries are reporting and whether local government is involved provide measurable points through which implementation can be followed over time.

• **Encouraging the participation of affected communities in the just transition.**
Workers and local communities in the Pelagonia region could be involved in designing the measures, not only in receiving them.

7.6. Final Recommendation

The common denominator of these recommendations is the shift from sectoral fulfilment of obligations towards managing the twin transition as a single reform and investment process. North Macedonia already has a significant share of the necessary strategies, institutions and instruments in place. The next step is to connect them into a system capable of translating obligations into measurable results, European funding and greater competitiveness in a timely manner. As the analysis of the underlying constraints suggests, this depends less on producing new documents and more on clearly establishing who is responsible for doing what, and by when which is a task that national institutions and their European partners can take forward together.

Annex 1

Explanation of the Scoring Scale for the Scorecard

The scorecard assesses the preparedness of each area across four dimensions: (1) legislative alignment with the European framework; (2) institutional capacity for implementation; (3) the pace of implementation to date; and (4) the existence of measurable indicators and functional reporting mechanisms. The overall assessment represents an analytical judgement based on the evidence collected. The scale consists of five levels:

Level	Meaning
Initial	No basic legal or institutional framework exists, and progress is limited to strategic documents.
Limited	The framework has been partially established, but a foundational legislative act, competent body or reporting system is not yet in place.
Medium	The framework exists and is being applied, but implementation is uneven and results are difficult to demonstrate.
Medium-high	The framework is established and functional, while the remaining weaknesses concern its scope and quality rather than its existence.
High	The framework is established, fully operational and accompanied by regular reporting and measurable results. None of the areas assessed in this analysis reaches this level.

Information about KAS

Freedom, justice, and solidarity are the basic principles underlying the work of the Konrad Adenauer Foundation (KAS).

The KAS is a political foundation, closely associated with the Christian Democratic Union (CDU) of Germany. We conduct education programs for the society and cooperate with governmental institutions, political parties, civil society organizations and handpicked elites, building strong partnerships along the way.

Together with our partners, we make a contribution to the creation of an international order that enables every country to develop in freedom and under its own responsibility.

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Information about WMCES

The Wilfried Martens Centre for European Studies (WMCES) is the official think tank of the European People's Party (EPP). Through its work, WMCES inspires ideas for action and shape responses to European challenges. As a political think tank, it is a full part of the European policy-making ecosystem. Centre's mission is to offer decision makers and opinion leaders assistance in formulating new and effective policy options.
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Information about IDSCS

IDSCS is a think-tank organisation researching the development of good governance, rule of law and North Macedonia's European integration.

IDSCS has the mission to support citizens' involvement in the decision-making process and strengthen the participatory political culture.

By strengthening liberal values, IDSCS contributes towards coexistence of diversities.

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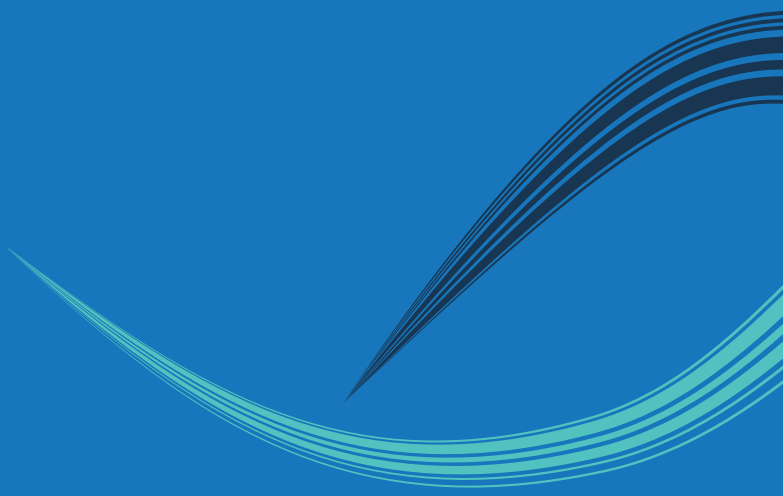
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