Agency for Legislative Initiatives

CIVIL NETWORK

CENTRE FOR DEMOCRACY AND RULE OF LAW

EUROPEAN PRAVDA
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Shadow Report

Assessment of Ukraine's Progress in Implementing the European Commission's Recommendations under the 'Fundamentals of the Accession Process' Cluster



Functioning of Democratic Institutions

The Report was prepared by:

The Agency for Legislative Initiatives (ALI) is a leading independent Ukrainian think tank which has been operating since 2000. ALI's activities are aimed at strengthening the institutional capacity of the Parliament and Government, continuing European and Euro-Atlantic integration, supporting the stabilisation and reconstruction of Ukraine to overcome the aftermath of the Russian Federation's aggression, monitoring and backing reforms in justice and security, and political and civic awareness-raising.

Civil Network OPORA is a Ukrainian think tank and one of the country's leading non-governmental, non-partisan, nationwide organisations, with unique local, national, and international expertise. OPORA's work focuses on strengthening democratic governance and protecting citizens' political rights through elections and electoral reform, integrating security measures into democratic practices, advancing Ukraine's EU accession, as well as supporting justice and accountability mechanisms.

Centre for Democracy and Rule of Law (CEDEM) is an independent think-and-act tank focused on developing independent media, strengthening civil society, supporting European integration and advancing the rule of law in Ukraine. CEDEM's mission is to foster the development of a society of active and responsible citizens.

European Pravda (EP) is an independent Ukrainian media outlet established in 2014. It is the first online media in Ukraine specialising in covering news and analytics on European topics, the process of Ukraine's European and Euro-Atlantic integration, and international security.

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List of Abbreviations

AFU — Armed Forces of Ukraine

AGE — Advisory Group of Experts

AI — artificial intelligence

AICS — Automated Information and Communication System of the State Voter Register

AMCU — Antimonopoly Committee of Ukraine

AML/CFT — anti-money laundering and combating the financing of terrorism

AMLA — Authority for Anti-Money Laundering and Countering the Financing of Terrorism

AR Crimea — Autonomous Republic of Crimea

ARMA — National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes

ASC — Administrative Service Centre

BCU — Bar Council of Ukraine

CAP of Ukraine — Code of Administrative Procedure of Ukraine

CC of Ukraine — Criminal Code of Ukraine

CCU — Constitutional Court of Ukraine

CEB — central executive bodies

CEC UAIS — Unified Automated Information and Analytical System of the Central Election Commission

CEC, Commission — Central Election Commission

CERT-UA — Computer Emergency Response Team of Ukraine

Chairman, Chairman of the Verkhovna Rada, Chairman of the Parliament — Chairman of the Verkhovna Rada of Ukraine

CO — charitable organisation

Committee on EU Integration — Committee on Ukraine's Integration into the European Union

Committee on Foreign Policy — Committee on Foreign Policy and Interparliamentary Cooperation

Conciliation Council — Conciliation Council of Parliamentary Factions (Parliamentary Groups) in the Verkhovna Rada of Ukraine

CPC of Ukraine — Criminal Procedure Code of Ukraine

CPU — Council of Prosecutors of Ukraine

CSO — civil society organisation

CUAO — Code of Ukraine on Administrative Offences

DEC — district election commissions

Derzhkomteleradio — State Committee for Television and Radio Broadcasting of Ukraine

DESS — State Service of Ukraine for Ethnic Policy and Freedom of Conscience

Diia Portal — Unified State Web Portal of Electronic Services

DREAM — Digital Restoration Ecosystem for Accountable Management

EBA — European Banking Authority

EC of Ukraine — Electoral Code of Ukraine

ECHR — Convention for the Protection of Human Rights and Fundamental Freedoms

ECtHR — European Court of Human Rights

EDA — election district abroad

Educational Centre — Educational Centre of the Verkhovna Rada of Ukraine

EEAS — European External Action Service

EFF — Extended Fund Facility

EP — European Parliament

EPA — election precincts abroad

EU — European Union

EU acquis — the legal system of the European Union, which includes (but is not limited to) European Union legislation adopted within the framework of the European Community, the Common Foreign and Security Policy, and cooperation in the field of justice and internal affairs

EU Enlargement Package 2025 Report — European Commission's Ukraine 2025 Report under the EU Enlargement Package

European Parliament Mission — European Parliament's Needs Assessment Mission led by Pat Cox

Faction 'Opposition Platform – For Life' — the faction of the 'Opposition Platform – For Life' political party in the Verkhovna Rada

FATF — Financial Action Task Force

FDI Roadmap — Roadmap on the Functioning of Democratic Institutions

FIMI — Foreign information manipulation and interference

GMAP — Government Medium-Term Action Plan

Government — Cabinet of Ministers of Ukraine

Government Office — Government Office for Coordination of European and Euro-Atlantic Integration of the Secretariat of the Cabinet of Ministers of Ukraine

Government Programme, the PACM — Programme of Activities of the Cabinet of Ministers of Ukraine

GPAP — Government Priority Action Plan

GRECO — Group of States against Corruption

HACC — High Anti-Corruption Court

HCJ — High Council of Justice

HQCJ — High Qualification Commission of Judges of Ukraine

Human Rights Committee — Committee on Human Rights, De-occupation and Reintegration of Temporarily Occupied Territories of Ukraine, National Minorities and Interethnic Relations

ICCPR — International Covenant on Civil and Political Rights

IDP — internally displaced person

IFA — inter-factional associations

IFES — International Foundation for Electoral Systems

IMF — International Monetary Fund

Interagency Working Group — Interagency Working Group on Ensuring the Negotiation Process for Ukraine's Accession to the European Union and the Approximation of Ukrainian Legislation to EU Law

IT — information technology

ITA — international technical assistance

JMMC — joint multi-member constituency

KPI — Key Performance Indicators

LAC — logical and arithmetic control

LSG bodies — local self-government bodies

MA — military administrations

MAS — military administrations of settlements

MFA — Ministry of Foreign Affairs of Ukraine

MiCA — Markets in Crypto-Assets Regulation

Ministry for Development — Ministry for Development of Communities and Territories of Ukraine

Ministry for Strategic Industries — Ministry for Strategic Industries of Ukraine

Ministry of Agrarian Policy — Ministry of Agrarian Policy and Food of Ukraine

Ministry of Culture — Ministry of Culture of Ukraine

Ministry of Digital Transformation, MDT — Ministry of Digital Transformation of Ukraine

Ministry of Economy — Ministry of Economy, Environment and Agriculture of Ukraine

Ministry of Energy — Ministry of Energy of Ukraine

Ministry of Environmental Protection — Ministry of Environmental Protection and Natural Resources of Ukraine

Ministry of National Unity — Ministry of National Unity of Ukraine

Ministry of Veteran's Affairs — Ministry of Veterans Affairs of Ukraine

Ministry of Youth and Sports — Ministry of Youth and Sports of Ukraine

ML/FT — money laundering and terrorism financing

MMC — multi-member constituency

MMI — means of mass information

MoD — Ministry of Defence of Ukraine

MoES — Ministry of Education and Science of Ukraine

MoF — Ministry of Finance of Ukraine

MoH — Ministry of Health of Ukraine

MoIA — Ministry of Internal Affairs of Ukraine

MoJ — Ministry of Justice of Ukraine

MONEYVAL — Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism

MP — Member of Parliament of Ukraine

MSP — Ministry of Social Policy, Family and Unity of Ukraine

NABU — National Anti-Corruption Bureau of Ukraine

NACP, Agency — National Agency on Corruption Prevention

NACS — National Agency of Ukraine on Civil Service

National Council, media regulator — National Council of Television and Radio Broadcasting of Ukraine

National Programme — National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis)

NATO — North Atlantic Treaty Organization

NATO PA — NATO Parliamentary Assembly

NBU — National Bank of Ukraine

NGO — Non-Governmental Organisation

NHRI — National Human Rights Institution

NPM — National Preventive Mechanism

NPO — non-profit organisations

NPU — National Police of Ukraine

NRA — National Risk Assessment

NSDC — National Security and Defence Council of Ukraine

ODIHR — OSCE Office for Democratic Institutions and Human Rights

OECD — Organisation for Economic Co-operation and Development

Office of the President — Office of the President of Ukraine

Ombudsman, Commissioner — Ukrainian Parliament Commissioner for Human Rights

OPCAT — Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment

OSCE — Organization for Security and Co-operation in Europe

PA — public association

PACE — Parliamentary Assembly of the Council of Europe

Parliamentary faction 'Batkivshchyna', faction All-Ukrainian Union 'Batkivshchyna' — the parliamentary faction of the political party All-Ukrainian Union 'Batkivshchyna' in the Verkhovna Rada of Ukraine of the IX convocation

Parliamentary faction 'European Solidarity', faction 'European Solidarity' — the parliamentary faction of the political party 'European Solidarity' in the Verkhovna Rada of Ukraine

Parliamentary faction 'Holos', faction 'Holos' — the parliamentary faction of the political party "Holos" in the Verkhovna Rada of Ukraine of the IX convocation

Parliamentary faction 'Servant of the People', faction 'Servant of the People' — the parliamentary faction of the political party 'Servant of the People' in the Verkhovna Rada of Ukraine

PEC — precinct election commissions

PEP — politically exposed person

PGO — Prosecutor General's Office

PIT — personal income tax

POLITDATA Register — Unified State Register of Political Party Reports on Property, Income, Expenses and Financial Obligations

President — President of Ukraine

Rada TV channel — state enterprise 'Parliamentary TV Channel Rada'

RDA — Regional Development Agency

Research Service — Research Service of the Verkhovna Rada of Ukraine

Roadmap of the European Parliament Mission — Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine

RSA — regional state administration

Rules of Procedure Committee, Rules Committee — Committee on Rules of Procedure, Parliamentary Ethics and Administration of Verkhovna Rada's Work

Rules of Procedure, Rules of Procedure of the Verkhovna Rada — Law of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine' No. 1861-VI of February 10, 2010

SAPO — Specialised Anti-Corruption Prosecutor's Office

SBGS — State Border Guard Service of Ukraine

SBI — State Bureau of Investigation

SC — Supreme Court

SCMU — Secretariat of the Cabinet of Ministers of Ukraine

SCS — State Customs Service of Ukraine

SDGs — Sustainable Development Goals

Secretariat, Secretariat of the Verkhovna Rada — Secretariat of the Verkhovna Rada of Ukraine

SEF — Strategic Executive Framework

SEP — special election precincts

SEPA — Single Euro Payments Area

SES — State Enforcement Service

Shadow Report 2025 — Shadow Report on Chapter 23 'Justice and fundamental rights' and Chapter 24 'Justice, Freedom and Security' of the European Commission's Report on Ukraine's Progress under the 2024 EU Enlargement Package

SFMS — State Financial Monitoring Service of Ukraine

SFRD — State Fund for Regional Development

SJA — State Judicial Administration of Ukraine

SMC — single-member constituency

SMS — State Migration Service of Ukraine

SNC — single nationwide constituency

SPFU — State Property Fund of Ukraine

SSSCIP — State Service of Special Communications and Information Protection of Ukraine

SSU — Security Service of Ukraine

State Budget — State Budget of Ukraine

SVR, Register — State Voter Register

TC — territorial constituency

TEC — territorial election commission

TOT — temporarily occupied territories

UAS — Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine

UBO — ultimate beneficial owner

UINM — Ukrainian Institute of National Memory

Ukraine Facility — the European Union's financial assistance programme for the country for the period 2024–2027

UN — United Nations

United States — United States of America

URPTI — Unified Register of Pre-Trial Investigations

USAID — United States Agency for International Development

USREOU — Unified State Register of Legal Entities, Individual Entrepreneurs and Public Associations

Verkhovna Rada, Parliament — Verkhovna Rada of Ukraine

Introduction

Ukraine has consistently demonstrated its commitment to becoming a full member of the European Union as soon as possible. During 2025 and the first half of 2026, Ukraine completed the screening of its national legislation for compliance with EU law under all six negotiation clusters, presented the Report on the Implementation of the Association Agreement between Ukraine and the European Union for 2025 and approved the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis).

At the same time, the information system for monitoring the implementation of Ukraine's commitments in the field of European integration, 'Accession Pulse', is operating to monitor the implementation of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis), the roadmaps on the rule of law, the functioning of democratic institutions and public administration reform, the Action Plan on the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine and other strategic documents in the field of European integration.

For its part, the European Commission published the Ukraine Progress Report under the 2025 European Union Enlargement Package and provided Ukraine with the accession benchmarks for all negotiation clusters. In addition, the European Commission and the Ukrainian side agreed on a list of 10 key reform priorities aimed at strengthening the rule of law, ensuring an effective fight against corruption and reinforcing democratic institutions.

A landmark development in summer 2026 was the holding of the EU–Ukraine Intergovernmental Conferences, which resulted in the opening of negotiations on Cluster 1 'Fundamentals of the Accession Process' on 15 June 2026 and Cluster 6 'External Relations' on 14 July 2026.

Over the past few years, the coalition of civil society organisations led by the Agency for Legislative Initiatives has consistently monitored and assessed Ukraine's progress on the European integration track and proposed solutions to the problems identified.

In this report, civil society focused on selected components of Cluster 1, 'Fundamentals of the Accession Process', which is decisive throughout the negotiations on Ukraine's accession to the European Union, as it is opened first and closed last. In previous years, the coalition of civil society organisations monitored and assessed Ukraine's progress under Chapter 23, 'Judiciary and Fundamental Rights', and Chapter 24, 'Justice, Freedom and Security'. In 2026, this work was extended to the area of 'Functioning of Democratic Institutions'.

Drawing on their long-standing experience, knowledge and the broad sectoral expertise of their specialists, the members of the coalition of civil society organisations distributed the areas of responsibility for preparing the report as follows:

- **Agency for Legislative Initiatives** — 'Parliament', 'European Integration', 'Governance', 'Multi-Level Governance', 'Judicial Reform' (except for the topic 'Digitalisation of

Justice'), 'Prosecution Reform', 'Combating Serious and Organised Crime' (except for certain topics), 'Cooperation in the Field of Drug Control', 'Counter-Terrorism and Prevention of Radicalisation and Violent Extremism' and 'Judicial Cooperation in Criminal, Civil and Commercial Matters'.

- **Civil Network OPORA** — 'Elections'.
- **Centre for Democracy and Rule of Law** — 'Civil Society'.
- **Tomorrow's Lawyer** — 'Bar Reform'.
- **Ukrainian Bar Association** — 'Judicial Reform' (the topic 'Digitalisation of Justice') and 'Legal Education Reform'.
- **Transparency International Ukraine** — 'Fighting Corruption' and certain aspects under 'Combating Serious and Organised Crime'.
- **ZMINA Human Rights Centre** — 'Protection of Fundamental Rights and Freedoms', certain aspects under 'Combating Serious and Organised Crime' and 'Legal and Illegal Migration', as well as 'Asylum'.
- **Europe Without Barriers** — 'Visa Policy', 'Integrated Border Management' and certain aspects under 'Legal and Illegal Migration'.
- **European Pravda** — communication partner for covering current issues related to Ukraine's European integration processes.

Given the Russian Federation's full-scale invasion of Ukraine and the challenges faced by Ukrainian society on a daily basis, in this report the Agency for Legislative Initiatives, together with ZMINA Human Rights Centre, has included a standalone section, 'War-Related Justice'. This section addresses the capacity of the national system to prosecute perpetrators of international crimes, collaboration activities and other crimes against the foundations of national security, as well as international cooperation in this area.

Monitoring and assessment of Ukraine's progress under Chapters 23 and 24 covered the period from September 2025 to July 2026. In the context of the area 'Functioning of Democratic Institutions', experts also analysed the state of play in the relevant areas over a broader period, extending to before September 2025, to demonstrate the factors that may have contributed either to the emergence of certain negative trends or, conversely, to the adoption of progressive decisions. Information on progress achieved in the relevant areas during August 2026 that is not directly reflected in the text of the report is presented in a separate Annex.[1]

This report follows the structure of the Ukraine Progress Report under the 2025 European Union Enlargement Package with respect to the area 'Functioning of Democratic Institutions' and Chapters 23 and 24. A brief overview of the challenges and recommendations for addressing them is provided in a separate annex to this report.[2]

1 Annex 1 to this Report.

2 Annex 2 to this report.

Methodology

Once again, the coalition of civil society organisations uses the shadow report format to present the results of monitoring and assessing Ukraine's progress. A shadow report is an independent alternative analysis of public policy and of a candidate country's fulfilment of its obligations to the EU. It is a systematic audit conducted by specialised experts from civil society organisations. It does not duplicate the state's official documents or the European Commission's assessments but instead serves as a tool of civic oversight and expert engagement in the reform process. At the same time, it assesses the compliance of Ukrainian legislation and the system as a whole with EU standards. One of the objectives of the Shadow Report is to identify gaps and encourage the effective implementation of changes.

For the preparation of this report, a methodology was developed with the aim of conducting an alternative independent assessment of Ukraine's progress in the area of 'Functioning of Democratic Institutions', Chapter 23, 'Judiciary and Fundamental Rights', and Chapter 24, 'Justice, Freedom and Security', of negotiation Cluster 1, 'Fundamentals of the Accession Process'. Based on this assessment, experts of the coalition of civil society organisations formulated conclusions on the effectiveness of the mechanisms chosen to achieve the objectives in the respective areas of public policy and provided recommendations reflecting their own vision for addressing the problems identified.

In line with the methodology, experts of the coalition of civil society organisations analysed, for each area outlined in the report, national legislation, including laws, acts of the President, the Government, central executive authorities and other institutions, as well as international instruments, including conventions, charters, resolutions, principles and so forth; draft normative legal acts; the practice of Ukrainian judicial authorities and the European Court of Human Rights; open registers and databases; research and reports by state and civil society institutions; media materials and information obtained through public information access requests.

In monitoring and assessing Ukraine's progress in each area, the experts determined the level reached by the country, taking into account the timeliness and effectiveness of implementation of:

1) the recommendations provided by the European Commission in the Ukraine Progress Reports under the European Union Enlargement Package for 2023–2025;

2) the measures envisaged by the roadmaps on the rule of law, the functioning of democratic institutions and public administration reform, the Ukraine Facility Plan and other international commitments of Ukraine that may affect European integration processes;

3) the measures envisaged by Ukraine's strategic documents in each area.

With the aim of incorporating and reflecting different positions, including alternative views, in the report, the coalition of civil society organisations conducted approximately

139 semi-structured in-depth interviews, **8** consultations and **14** written surveys with representatives of state authorities,[3] international technical assistance projects, various non-governmental organisations, academics and experts, based on pre-prepared guides for the relevant areas.

3 Annex 3 to this report.

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Elections



In 2019, the Parliament adopted the Electoral Code of Ukraine (EC of Ukraine).[4] It broadly harmonised electoral procedures for national and local elections[5] and introduced a new electoral system for parliamentary elections and elections to most local councils — a proportional representation system with open lists.[6] The adoption of the EC of Ukraine marked a significant step forward in implementing the recommendations of the OSCE/ODIHR[7] and the Venice Commission[8] on the harmonisation of electoral legislation. Its provisions were first tested in practice during the regular local elections in 2020. Based on the results of these elections, international[9] and Ukrainian civil society organisations[10] put forward a number of recommendations to improve the EC of Ukraine and its practical application.

Since the legislation[11] prohibits the holding of any elections until the lifting or termination of martial law, no regular national or local elections under the new EC of Ukraine have been conducted since 2020.[12] Their postponement does not violate the Constitution of Ukraine,[13] is consistent with political agreements between parliamentary factions and groups in the Verkhovna Rada of Ukraine[14] (Verkhovna Rada, Parliament), reflects the joint position of Ukrainian civil society organisations[15] and aligns with the position of the Parliamentary Assembly of the Council of Europe (PACE).[16] The organisation of any democratic elections under martial law — which entails restrictions on fundamental rights and freedoms — is impossible, particularly in the context of ongoing active hostilities.[17]

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4 Electoral Code of Ukraine No. 396-IX of 19.12.2019. ↗

5 In July 2020, a number of amendments were introduced to the EC of Ukraine, providing for the introduction of electoral procedures for local elections that differ somewhat from those applied in parliamentary and presidential elections. For example, the list of requirements for the content of protocols on vote counting, voting results and the outcomes of local elections is narrower than that applicable to national elections. On Amendments to Certain Legislative Acts of Ukraine on Improving Electoral Legislation: Law of Ukraine No. 805-IX of 16.07.2020. ↗

6 For more details, see the subsection 'Electoral System'.

7 Final Report on the Observation of the Presidential Election in Ukraine of 31 March and 21 April 2019. OSCE/ODIHR, 2019. Recommendation A1, p. 47. ↗

8 Opinion on the Law on Elections of the People's Deputies of Ukraine. Venice Commission and the OSCE/ODIHR, 2005. Paragraph 106, p. 24. ↗

9 Final Report on the Observation of the Local Elections of 25 October 2020. OSCE/ODIHR, pp. 45–49; 2020 Local Elections in Ukraine: Post-Election Report. International Foundation for Electoral Systems, 2021, p. 56–64. ↗

10 Final Report on the Observation of the 2020 Local Elections by the Civil Network OPORA. Civil Network OPORA, 2021. ↗

11 The Constitution of Ukraine directly prohibits only elections of Members of Parliament during martial law; however, it allows for the restriction of electoral rights by law. Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Part 3 Article 64, Article 83; On the Legal Regime of Martial Law: Law of Ukraine No. 389-VII of 12.05.2015, Article 19. ↗

12 Had martial law not been introduced in Ukraine, the regular presidential election would have been held on 31 March 2024, the regular parliamentary election on 29 October 2023, and the regular local elections on 26 October 2025.

13 The Constitution of Ukraine does not provide for the automatic termination of the powers of elected bodies and elected officials upon the expiry of their term of office, while the Law of Ukraine 'On the Legal Regime of Martial Law' expressly excludes such termination. The Legal Dimension of the Legitimacy of Local Self-Government Bodies: Current Issues and Search for Solutions. Civil Network OPORA, 2025. ↗

14 Conclusions adopted during the Ninth Jean Monnet Dialogue. Verkhovna Rada of Ukraine, European Parliament, 10–12.11.2023. ↗

15 Statement by Ukrainian CSOs: Elections Are Possible Only After the End of the War and the Achievement of Sustainable Peace. Hromadskyi Prostir, 2025. ↗

16 Resolution 2636 (2026) Elections in times of crisis. Parliamentary Assembly of the Council of Europe, 2026. Paragraph 17.1. ↗

17 Legal brief on the impossibility of holding elections under martial law. Civil Network OPORA, 2023. ↗

Among the key challenges of the first post-war elections, which must be addressed prior to the start of the electoral process, are: (1) the absence of an adequate legislative framework, including a comprehensive assessment of the state of electoral infrastructure and the conditions for holding or not holding elections in certain territories; (2) the outdated State Voter Register (SVR, Register) database; (3) the lack of a comprehensive system to counter disinformation and external interference in the electoral process; (4) the State Budget deficit and potential difficulties in financing the first post-war elections; (5) the presence of large groups of voters, numbering in the millions, whose electoral rights cannot be adequately ensured under the EC of Ukraine.[18] Even if martial law is lifted, preparations for the first post-war elections should take no less than six months[19] — and this preparatory period does not include the duration of the electoral process itself, which, even under the shortened procedures for early elections, ranges from 90 to 50 days.[20]

Russia's full-scale invasion of Ukraine and the introduction of martial law not only made it impossible to hold any elections but also halted further implementation of electoral reform. Following 24 February 2022, a number of draft laws were submitted by Members of Parliament of Ukraine (MP) to the Verkhovna Rada, proposing modifications to electoral systems for parliamentary and/or local elections,[21] as well as addressing specific shortcomings in electoral legislation (for example, improving the effectiveness of gender quotas,[22] refining the regulation of election campaigning[23] and the rules on campaign financing[24]). Although all of these draft laws were included in the agenda of the regular session of the Verkhovna Rada of the current convocation[25] in February 2026, none was adopted even at first reading. The activities of the working group established in 2021 under the Committee of the Verkhovna Rada on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning[26] to identify areas for improving electoral legislation were effectively suspended following the introduction of martial law. In 2022, the Central Election Commission prepared proposals to improve electoral legislation concerning the

18 Roadmap for Ensuring the Organisation of Post-War Elections in Ukraine. Civil Network OPORA, pp. 22–32 ↗; Key Challenges Related to the Possible Holding of an All-Ukrainian Referendum on Changes to the Territory of Ukraine. Civil Network OPORA, 2026. ↗

19 Conclusions adopted during the Ninth Jean Monnet Dialogue. Verkhovna Rada of Ukraine, European Parliament, 10–12.11.2023 ↗; Roadmap for Ensuring the Organisation of Post-War Elections in Ukraine. Civil Network OPORA, pp. 22, 29. ↗

20 Early presidential elections are held on the last Sunday of the 90-day period from the date of their calling by the Verkhovna Rada of Ukraine; early parliamentary elections — on the last Sunday of the 60-day period from the date of publication of the Decree of the President of Ukraine on the early termination of parliamentary powers. Early local elections are called no later than 60 days before election day, and the electoral process for these elections begins 50 days before election day. Electoral Code of Ukraine: Law of Ukraine No. 396-IX of 19.12.2019, Articles 78, 136, 195, 287. ↗

21 For more details, see the subsection 'Electoral System'.

22 On Amendments to the Electoral Code of Ukraine on Countering Sexism in Electoral Processes and Ensuring Balanced Representation of Women and Men in the Verkhovna Rada of Ukraine and Local Councils: Draft Law of Ukraine, registration No. 11300 of 27.05.2024. ↗

23 On Amendments to the Electoral Code of Ukraine on Improving the Regulation of Information Support for Elections and the Conduct of Election Campaigning: Draft Law of Ukraine, registration No. 8310 of 27.12.2022. ↗

24 On Amendments to Certain Legislative Acts of Ukraine on Financing Election Campaigns and Exercising Oversight of Election Funds: Draft Law of Ukraine, registration No. 11462 of 05.08.2024. ↗

25 On the Agenda of the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4775-IX of 10.02.2026. ↗

26 The Working Group was established on 17 February 2021 and commenced its activities on 11 March 2021. Following the introduction of martial law, the Working Group has not held any further meetings. Changes to electoral legislation to be prepared by over 80 experts. Civil Network OPORA, 2021. ↗

conduct of the first post-war elections.[27] These proposals were discussed within three thematic working groups under the Central Election Commission (CEC, Commission) in 2023–2024;[28] however, after 2024, meetings of these groups were no longer held,[29] and the proposals prepared by the Central Election Commission in 2022 were not registered in the Parliament by any subject of the right of legislative initiative.

In 2025, the European Commission identified four priorities for electoral reform in Ukraine: ensuring the political rights of Ukrainian citizens who are internally displaced within Ukraine or residing abroad, as well as the rights of service members; conducting an audit and updating the SVR; countering cyber threats and disinformation; and reforming the rules on political advertising.[30]

The Roadmap on the Functioning of Democratic Institutions (FDI Roadmap)[31] provides for the active implementation of electoral reform in 2026–2027, taking these priorities into account, with the exception of certain measures related to conducting an inclusive expert dialogue on the issues raised in the OSCE/ODIHR recommendations and developing a communication strategy for the CEC, which were scheduled for 2025.[32] While the measures planned for 2025 were generally implemented,[33] they do not address the most pressing challenges of electoral reform and post-war elections. Measures scheduled for implementation by the end of the fourth quarter of 2026 — particularly those related to political finance reform and the improvement of media regulation during election campaigns — had not been completed as of 31 July 2026.

In response to statements by the President of Ukraine (President) regarding the possible holding of elections prior to the lifting of martial law,[34] the Chairman of the Verkhovna Rada established, on 22 December 2025, a Working Group to prepare comprehensive legislative proposals on the specific arrangements for organising and conducting elections during a special period and/or post-war elections in Ukraine.[35] The Working Group's discussions were based on a draft special law on the first post-war elections prepared by the

27 On Proposals for Improving the Legislation of Ukraine Aimed at Ensuring the Preparation and Conduct of Elections after the Termination or Lifting of Martial Law in Ukraine: Resolution of the Central Election Commission No. 102 of 27.09.2022. ↗

28 In 2023, three thematic working groups were established under the CEC to develop amendments to electoral legislation concerning the first post-war elections. After 2024, meetings of these groups were no longer held.
On Proposals for Improving the Legislative Regulation of the Specific Arrangements for Organising and Conducting National Elections after the Termination or Lifting of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026 ↗; Annual Report of the Central Election Commission for 2023. Central Election Commission, 2023, pp. 11–20 ↗; Annual Report of the Central Election Commission for 2024. Central Election Commission, 2024, pp. 11–14. ↗

29 Throughout 2025, the Central Election Commission reviewed legislative proposals developed within the working groups and examined international practice on certain aspects of post-war elections (including out-of-country voting and logistical support for elections); however, no meetings of the working groups were held. Annual Report of the Central Election Commission for 2025. Central Election Commission, 2025, p. 10. ↗

30 Ukraine 2025 Report. 2025 Communication on EU Enlargement Policy, p. 22. ↗

31 The Roadmap on the Functioning of Democratic Institutions: Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

32 The Roadmap on the Functioning of Democratic Institutions, p. 4. ↗

33 On Approval of the Communication Strategy of the Central Election Commission for Post-War Elections in Ukraine: Resolution of the Central Election Commission No. 70 of 23.12.2025; Legislation in Ukraine Should Be Improved to Enable Persons with Intellectual Disabilities to Vote — Ombudsman. ZMINA, 2025 ↗; The CEC Presented Proposals for the Implementation of Election Observation Recommendations at the OSCE PA. Central Election Commission, 2025. ↗

34 Zelenskyy ready to amend legislation on elections during martial law. Ukrainska Pravda, 2025. ↗

35 A Working Group was established in the Verkhovna Rada to prepare legislation on elections during wartime and in the post-war period. Novynarnia, 2025. ↗

CEC in December 2025.[36] To facilitate its consideration, seven thematic subgroups[37] were established within the Working Group. These subgroups developed proposals addressing problematic aspects of the draft special law on the first post-war elections and submitted them to the Working Group in February 2026. The activities of the Working Group are generally open and inclusive.[38] At the same time, its work is limited to developing legislative amendments only in relation to the preparation and conduct of national elections, while the procedure for the first local elections and referendums, as well as broader reform of electoral legislation, remains outside the scope of its work.

No meetings of the Working Group had been held since 3 May 2026 and, as of 31 July 2026, the Working Group had not yet finalised the draft special law on the first post-war elections. Although representatives of parliamentary factions and groups are members of the Working Group, it remains unclear to what extent these factions and groups will support the draft law developed by the Working Group during its possible consideration by the Parliament.[39] The advancement of electoral reform is hindered by its relatively low prioritisation compared to other reforms,[40] the lack of institutional coordination,[41] the reluctance of political actors to pursue reform during wartime, the absence of clear prospects for the end of the war[42] and the traditional tendency to postpone electoral reform until elections approach, the timing of which also remains uncertain.[43]

36 On Proposals for Legislative Regulation of the Specific Features for Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

37 Seven subgroups were established in the Verkhovna Rada to develop legislation on elections during a special period. Ukrinform, 2026. ↗

38 Information provided by Respondent No. 31 based on the results of a survey conducted on 25.03.2026. Information provided by Respondent No. 32 based on the results of a survey conducted on 25.03.2026. Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

39 Information provided by Respondent No. 35 based on the results of a survey conducted on 28.03.2026. Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

40 Information provided by Respondent No. 32 based on the results of a survey conducted on 25.03.2026.

41 Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026.

42 Information provided by Respondent No. 38 based on the results of a survey conducted on 30.03.2026. Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026.

43 Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

Electoral Reform

Electoral System

State of play

In Ukraine, presidential elections have always been held under a majoritarian electoral system requiring an absolute majority — a two-round system.[44] Since 2011, parliamentary elections in Ukraine — in 2012, 2014 and 2019 — have been held under a parallel electoral system,[45] while the 2015 local elections were held under three different electoral systems: the first-past-the-post system,[46] a two-round system[47] and a mixed electoral system that combined elements of proportional and majoritarian systems, but differed significantly from the parallel system used for parliamentary elections.[48]

The Electoral Code of Ukraine (EC of Ukraine) substantially changed the electoral systems for parliamentary elections and elections of local council members. The key changes were:

1. the transition to a proportional representation system with open lists[49] for parliamentary elections and elections of local council members in communities with at least 10,000 voters;

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44 If, based on the voting results, none of the candidates receives more than half of the votes of voters who took part in the vote, a repeat vote is held between the two candidates who received the highest number of votes, and the candidate who receives more votes than the other candidate is deemed elected.

45 Under this system, half of the Verkhovna Rada of Ukraine — 225 MPs — was elected in SMCs under the first-past-the-post system, while the other half — 225 MPs — was elected under a proportional electoral system with voting for closed party lists in the JMMC.

46 The candidate who receives more votes than any other candidate in the same SMC is deemed elected. In 2015, this system was applied in elections of members of village and settlement councils and heads of villages and settlements, as well as mayors in cities with fewer than 90,000 voters. On Local Elections: Law of Ukraine No. 595-VIII of 14.07.2015, Article 2. ↗

47 This system was applied in mayoral elections in cities with 90,000 voters or more. On Local Elections: Law of Ukraine No. 595-VIII of 14.07.2015, Article 2. ↗

48 This system was applied in all elections of local council members, except for elections to village and settlement councils. The main difference between this system and the first-past-the-post system used in parliamentary elections was that the territory of the administrative-territorial unit was divided into territorial election constituencies; in each constituency, one candidate was nominated by a party organisation, and votes cast for that candidate were deemed to have been cast in support of the party organisation. Mandates were distributed among candidates nominated by the party organisation according to the percentage of votes they received in the constituencies. On Local Elections: Law of Ukraine No. 595-VIII of 14.07.2015, Articles 2 and 86. ↗

49 A proportional system with open lists provides for the right of a voter to vote for an individual candidate on an electoral list, unlike a proportional system with closed lists, under which a voter may vote only for the list as a whole.

2. the introduction of a majoritarian system with voting in multi-mandate constituencies (MMC)[50] for elections of local council members in communities with up to 10,000 voters;[51]

3. the lowering of the threshold for applying the two-round system in mayoral elections from 90,000 voters, which applied in the 2015 regular local elections, to 75,000 voters. In communities with fewer voters, heads of communities are elected under the first-past-the-post system.[52]

The transition to a proportional electoral system with voting for open regional party lists was in line with the Parliamentary Assembly of the Council of Europe (PACE) recommendations.[53]

The main features of the proportional electoral system in parliamentary elections in Ukraine include the following:[54]

1. **self-nomination** of candidates is not permitted;

2. a party nominates two types of lists: one nationwide list containing no more than 450 candidates and regional lists in all or at least one electoral region,[55] with 5–18 candidates on each list;

3. all candidates on the nationwide list, except for the first nine, are included in one of the regional lists; the order of candidates on each list is determined by the party;

4. in the election district abroad (EDA), a voter may vote only for the nationwide list of one of the parties; in an electoral region, a voter may vote only for a regional list and, if he/she wishes, for an individual candidate on that regional list (a vote in support of a candidate is also counted as a vote in support of the party as a whole);

5. to participate in the distribution of parliamentary mandates, a party must pass the 5% electoral threshold in the single nationwide constituency (SNC);

6. the seats among parties that have passed the electoral threshold and among candidates on the party lists are distributed in accordance with the following rules: 1) parliamentary mandates are distributed among parties in proportion to the number of votes cast for their lists; 2) priority in obtaining mandates is given to the first nine candidates on the nationwide list, the so-called **'guaranteed seats'**; 3) after these candidates have taken up parliamentary seats, within the total number of mandates

50 Under this system, the candidates deemed elected in an MMC are those who receive more votes than the other candidates in that constituency, in a number corresponding to the number of mandates allocated to the constituency. For example, in a three-mandate constituency, the three candidates who receive the highest number of votes in their support would be deemed elected.

51 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 182, 183, 184, 185, 186, 256, 257, 258, 259 and 260. ↗

52 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 192. ↗

53 Resolution 1755 (2010) The functioning of democratic institutions in Ukraine. Parliamentary Assembly of the Council of Europe, 2010. Paragraph 7.1.2 ↗; PACE. Election observation report. Doc. 13070. Parliamentary Assembly of the Council of Europe, 2012. Paragraph 59. ↗

54 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 133, 154, 173, 183, 184, 185 and 186. ↗

55 For more detail on electoral regions, see the subsection 'Territorial Organisation of Elections'.

obtained by the party,[56] the number of guaranteed seats distributed among all parties is subtracted from the total number of seats in Parliament, which is 450; 4) the total number of votes cast for all party lists of the parties that have passed the electoral threshold is divided by the resulting number — this determines the **electoral quota**; 5) the votes cast for a party's regional list are divided by the electoral quota — the resulting whole number is the number of Members of Parliament of Ukraine (MP) deemed elected from the regional party list;[57] 6) these mandates are allocated first to candidates on the regional list who received a number of votes equal to at least **25% of the electoral quota** (the priority of mandate allocation among them is determined by the number of votes received by each candidate); 7) the remaining seats available for distribution on the regional list are allocated in the order of candidates on the list, regardless of the number of votes received by each candidate; and 8) the remaining seats to which the party is entitled and which have not been distributed through its regional lists are allocated among candidates on its nationwide list, starting with candidate number 10, in the order determined by the list.

Similar rules for the distribution of mandates under the proportional system are also provided for elections of local council members, with several differences: 1) candidates in elections of local council members are nominated by local party organisations; 2) the number of guaranteed seats on the single electoral list of a party organisation is not nine, but one; and 3) unlike the boundaries of electoral regions in parliamentary elections, the boundaries of territorial constituencies (TC) are not defined by the EC of Ukraine, but are established by the relevant territorial election commissions (TEC) on the second day after the start of the electoral process.[58]

In 2023, following the 9th Jean Monnet Dialogue, representatives of parliamentary factions and groups in the Verkhovna Rada agreed on the need to preserve, for national and local elections, the electoral systems introduced by the EC of Ukraine, with a return to the provisions that ensure competition between candidates within the same party list, that is, by abolishing the threshold of 25% of the electoral quota for a candidate to move up the electoral list.[59]

Despite these agreements, in 2025–2026 some MPs publicly supported the idea of returning,[60] in parliamentary elections, to a proportional system with closed party lists[61]

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56 If, under the proportional distribution of mandates, a party is entitled to eight parliamentary mandates, these mandates are allocated to the first candidates on the nationwide electoral list. If, for example, the party is entitled to 15 mandates, the first nine mandates are allocated to the first nine candidates on the nationwide list and the remaining six mandates are distributed at the level of electoral regions.

57 If the result of the division is less than one, no MP will be elected from the relevant regional electoral list of the party, and the mandates will be distributed through its nationwide list. If the result of the division is, for example, 1.5, one MP will be elected from the party's regional list and the unused votes equivalent to 0.5 of the electoral quota will be transferred to the nationwide list for the distribution of mandates among the candidates included in it.

58 For more detail, see the subsection 'Territorial Organisation of Elections'.

59 Conclusions Adopted during the Ninth Jean Monnet Dialogue. Verkhovna Rada of Ukraine, European Parliament, 10–12.11.2023, pp. 4–5. ↗

60 Razumkov on Elections during the War: 'It Is Impossible to Organise Them — Either for the Military or for Ukrainians Abroad'. Apostrophe, 2025 ↗; Kharkiv MP Dmytro Mykysha: Zelenskyy Removes Leaders Who Show Agency. Dumka, 2026. ↗

61 Under this system, the entire Parliament — 450 MPs — was elected in 2006 and 2007, and half of the Parliament — 225 MPs — was elected as part of the 'parallel' electoral system in 1998, 2002, 2012, 2014 and 2019.

or to a parallel system. Some Members of Parliament also submitted seven draft laws to the Verkhovna Rada which provided either for the complete abandonment of proportional systems with open lists for parliamentary and/or local elections, for changing the threshold for their application or for a substantial modification of these systems:

- Draft Law No. 13419[62] provides for using the open-list proportional system in local elections in communities with at least 50,000 voters, rather than 10,000 voters;
- Draft Law No. 13464[63] proposes reducing the number of 'guaranteed seats' from nine to one on the nationwide and regional lists (i.e., only for the first candidate on the relevant list); enabling voters to vote only for a candidate on a regional list, rather than for the regional list as a whole; distributing mandates among candidates on a regional list in descending order of the votes cast for them, except for the candidate placed first on the list; holding all elections of local council members under the open-list proportional system; abolishing 'guaranteed seats' for lists in local elections and determining the priority of mandate allocation among candidates on territorial lists in local elections according to the descending order of the votes cast for them;
- Draft Law No. 13464-1[64] suggests lowering the electoral threshold in parliamentary elections from 5% to 3%, reducing the number of 'guaranteed seats' from nine to one and increasing the threshold for applying the proportional system in local elections from 10,000 voters to 50,000 voters;
- Draft Law No. 13464-2[65] provides for the abolition of 'guaranteed seats' on parties' nationwide lists and the introduction of a guaranteed seat for each candidate placed first on a regional list; stipulates that any MP candidate who receives a number of votes equal to at least the electoral quota is deemed elected regardless of whether the party that nominated him/her has passed the electoral threshold; determines the priority of mandate allocation on regional lists according to the number of votes received by a candidate on that list; allows a voter to vote only for a candidate on a regional list rather than for the list as a whole; raises the threshold for applying the two-round system in mayoral elections from 75,000 to 150,000 voters and proposes holding all elections of local council members under a proportional system without 'guaranteed seats', with mandates allocated among the local council candidates on territorial lists in descending order of the votes cast for them;
- Draft Law No. 13464-3[66] proposes a return to a parallel electoral system with certain modifications, including the nomination by parties of regional lists in electoral regions and the impossibility of self-nomination in TCs;

62 On Amendments to the Electoral Code of Ukraine Regarding Certain Specific Features of the Organisation of Local Elections: Draft Law of Ukraine, registration No. 13419 of 25.06.2025. ↗

63 On Amendments to the Electoral Code of Ukraine Regarding the Improvement of Legal Regulation of the Organisation, Preparation and Conduct of Elections: Draft Law of Ukraine, registration No. 13464 of 10.07.2025. ↗

64 On Amendments to Certain Legislative Acts Regarding the Improvement of Legal Regulation of the Organisation and Preparation of Parliamentary and Local Elections: Draft Law of Ukraine, registration No. 13464-1 of 24.07.2025. ↗

65 On Amendments to the Electoral Code of Ukraine Regarding the Improvement of Legal Regulation of the Organisation, Preparation and Conduct of Elections: Draft Law of Ukraine, registration No. 13464-2 of 24.07.2025. ↗

66 On Amendments to the Electoral Code of Ukraine Regarding the Improvement of Legal Regulation of the Organisation, Preparation and Conduct of Elections: Draft Law of Ukraine, registration No. 13464-3 of 24.07.2025. ↗

- Draft Law No. 13464-4[67] provides for the introduction of a majoritarian system in MMCs for all elections of local council members;
- Draft Law No. 13464-5[68] proposes establishing that a candidate for MP who receives a number of votes equal to at least one and a half electoral quota is deemed elected regardless of whether the party that nominated them has passed the electoral threshold, as well as holding elections of local council members in communities with at least 30,000 voters under a proportional system, while leaving the system itself unchanged.

These draft laws were criticised by civil society organisations, which noted their inconsistency with the outcomes of the 9th Jean Monnet Dialogue, their failure to take into account the challenges of post-war elections, their potentially negative impact on the level of women's representation in elected bodies, the risks of fragmentation of the party system or, conversely, of monopolising the role of parties in nominating candidates, their inconsistency with the recommendations of the Venice Commission and other concerns.[69] Although none of them was adopted even at first reading, all of them were included on the agenda of the fifteenth session of the Verkhovna Rada of the current convocation.[70] MPs do not have a unified position on the specific electoral system under which the first post-war elections should be held or on the specific communities in which elections should be held under an open-list proportional system.[71] At the same time, a number of international and Ukrainian non-governmental organisations have positively assessed the transition to a proportional system with open lists and support its further application.[72] According to opinion poll data, in 2022, before the start of Russia's full-scale invasion of Ukraine, 42% of Ukrainian citizens supported the idea of holding parliamentary elections under a proportional system with open lists, 4% supported a closed-list proportional system, 5.5% supported the first-past-the-post system and 6% of respondents supported a parallel system.[73]

Progress and issues

The negative impact of the impossibility of self-nomination under the proportional electoral system on the representation of national minorities and the stability of the electoral and party systems

The EC of Ukraine does not provide for the possibility of self-nomination of candidates under the proportional electoral system in parliamentary elections and elections of local

67 On Amendments to the Electoral Code of Ukraine Regarding the Improvement of Legal Regulation of the Organisation, Preparation and Conduct of Local Elections: Draft Law of Ukraine, registration No. 13464-4 of 24.07.2025. ↗

68 On Amendments to the Electoral Code of Ukraine Regarding the Improvement of the Electoral Process in Ukraine: Draft Law of Ukraine, registration No. 13464-5 of 24.07.2025. ↗

69 Analytical Note on Legislative Initiatives to Change Electoral Systems for Local and Parliamentary Elections. Civil Network OPORA, 2025 ↗; Proposed Updates to the Electoral Code: Who Will Control the Mandates? Vox Ukraine, 2025 ↗; Opinion on Draft Law No. 13464. YurFem.ua, 2025. ↗

70 On the Agenda of the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4775-IX of 10.02.2026. ↗

71 Oleksandr Korniienko: After the War, Ukraine May Change the Rules for Parliamentary Elections. Civil Network OPORA, 2026. ↗

72 Only Open Lists: Forum of Supporters of Electoral Reform Held. Civil Network OPORA, 2022. ↗

73 What Ukrainians Know and Think about the Electoral System. OPORA Survey. Civil Network OPORA, 2022. ↗

council members. Self-nomination under a proportional system in the form of a list of independent candidates is technically possible[74] and was envisaged for local elections in an earlier version[75] of the EC of Ukraine before its adoption by Parliament. The impossibility of self-nomination of candidates in parliamentary elections and in most elections of local council members directly contradicts the Organization for Security and Co-operation in Europe (OSCE) Copenhagen Document[76] and, in the absence of statutory quotas for representatives of national minorities in elected bodies, a ban on the establishment of regional parties or any other alternative positive measures, does not contribute to ensuring the representation of national minorities in elected office.[77] This prohibition also encourages potential candidates who have been refused nomination by registered parties to establish new parties, thereby further fragmenting the party system, increasing the number of parties participating in elections and complicating the administration of elections. Alternatively, it encourages political corruption and/or the nomination by parties of candidates who are not their members and do not share the party programme or ideology.[78]

Violation of the principle of equal passive suffrage and strengthening the closed nature of the proportional electoral system as a result of granting priority in obtaining mandates, or 'guaranteed mandates', to the first candidates on nationwide/single lists

The EC of Ukraine provides for a priority in obtaining parliamentary mandates for the first nine candidates on a party's nationwide electoral list in parliamentary elections and for the first candidate on the single list of candidates in elections of local council members. The existence of guaranteed seats reduces the number of mandates distributed through regional/territorial electoral lists and increases the closed nature of the proportional electoral system. For example, in the case of a party that receives 5% of the vote in parliamentary elections, candidates on its nationwide electoral list will receive nine out of approximately 23 mandates. Guaranteeing seats to certain candidates regardless of the election results violates the principle of equal passive suffrage, as such candidates are not required to conduct election campaigning, establish their own election funds and so on. Moreover, since these candidates are not assigned to any electoral region or TC in local elections, they are unable to establish election funds or campaign for themselves.[79] Guaranteed seats also contradict the very nature of elections, as they do not reflect the results of voters' expression of will: voters do not vote at all for candidates who are granted

74 O. Romtsiv. Characteristics of Ukraine's Electoral System through the Prism of the Electoral Code of Ukraine. Bulletin of Lviv Polytechnic National University, 2023, No. 2 (38), p. 271. ↗

75 Electoral Code of Ukraine: Draft, registration No. 4234-1 of 23.03.2010. ↗

76 Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE. Conference on Security and Cooperation in Europe, 1990, Paragraph 7.5, p. 6. ↗

77 Recommendations on Ensuring the Electoral Rights of Vulnerable Categories of Voters in the Context of the Recommendations of the European Commission, the Office for Democratic Institutions and Human Rights and the Venice Commission. Civil Network OPORA, 2026. ↗

78 Mokhonchuk B.S. Electoral Systems: A Comparative Legal Study. Monograph, 2021, p. 244 ↗; OPORA Statement on Parliament's Consideration of Amendments to Electoral Legislation. Civil Network OPORA, 2020 ↗; White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 41–42. ↗

79 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 38. ↗

the right to guaranteed representation. Unlike other candidates, such candidates are not included in regional or territorial electoral lists and voters do not cast votes for them.[80]

Reduction of voter influence on the order of mandate allocation among candidates on regional/territorial lists due to the high threshold — 25% of the electoral quota — that a candidate must pass to obtain priority in mandate allocation

The 2020 local elections showed that only 10–17% of candidates on the territorial lists of party organisations were able to pass the 25% threshold. Since, under such a threshold, voters have little influence on the order of mandate allocation among candidates on the lists, the proportional system with open lists effectively turns into a closed-list proportional system and voters lose incentives for voting for individual candidates.[81] Reducing the threshold established by the EC of Ukraine from 25% to 5% could significantly increase the number of candidates elected through regional/territorial lists.[82]

Increased risks of politicisation of local councils and of the closed nature of the proportional system due to its application in small communities in local elections

Under the EC of Ukraine, the threshold for applying the proportional system with open lists is 10,000 voters. In communities with fewer voters, elections are held under a majoritarian system with voting in multi-mandate constituencies, while in communities with more voters, they are held under an open-list proportional system. The small size of communities results in elections being held in TCs with a small number of mandates, where it is difficult for candidates on lists to obtain 25% of the electoral quota. This increases the closed nature of the proportional system, heightens the politicisation of the work of the relevant local councils and, given the impossibility of self-nomination of candidates, restricts political competition in elections.[83] This is why the threshold for applying the proportional system in local elections should be raised to communities with at least 50,000 voters.[84]

Recommendations

1. Provide for the possibility of self-nomination of candidates under the proportional electoral system at least in elections of local council members.

2. Remove from the EC of Ukraine the provisions that provide for guaranteed seats for the first nine candidates on nationwide electoral lists in parliamentary elections and for the first candidate on the single electoral list in elections of local council members.

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80 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 38 ↗; B. Mokhonchuk. Electoral Systems: A Comparative Legal Study. Monograph, 2021, pp. 209–210. ↗

81 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 39 ↗; How Did the New Electoral System Work in Lviv? Civil Network OPORA, 2020 ↗; Oleksandr Fisun et al. Two-Tier Proportional Electoral System in Ukraine: A Cross-Regional Analysis of the First Trial. Political Studies, 2021, No. 2, p. 64. ↗

82 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 40. ↗

83 Ibid., p. 36. Pros and Cons of Ukraine's New Electoral Legislation: The Devil Is in the Details. Vox Ukraine, 2020. ↗

84 Ibid, p. 36.

3. Provide for each candidate on the nationwide list to be included in one of the regional lists in parliamentary elections and, in local elections, in one of the territorial electoral lists.

4. Reduce the share of votes that a candidate on a regional/territorial list must receive to move up the list from 25% to 5% of the electoral quota.

5. Provide for the application of the proportional electoral system in elections of council members in communities with 50,000 voters or more.

Territorial Organisation of Elections

State of play

In Ukrainian presidential elections, the system of territorial organisation of elections comprises three layers: SNC, TCs and election precincts. In parliamentary elections, this system includes the same levels, but an additional tier of electoral regions is introduced between the SNC and TCs. These levels, except for electoral regions, determine the territorial jurisdiction of the relevant election commissions: the Central Election Commission (CEC, Commission) in the SNC, district election commissions (DEC) in TCs and precinct election commissions (PEC) at the level of election precincts.[85] The SNC includes the entire territory of Ukraine, meaning all TCs, as well as election precincts abroad (EPA). At the level of electoral regions, election commissions are not established — electoral regions are used for nominating the regional party lists and for establishing the election results by the CEC. In local elections, the territorial organisation of elections depends on the electoral system and comprises two to three tiers:[86]

- the joint single-member constituency, in elections of community mayors, or MMCs, in elections of local council members under the majoritarian system, and election precincts;
- the joint multi-member constituency (JMMC), TCs and election precincts in elections of local council members under the open-list proportional electoral system.

Before the adoption of the EC of Ukraine and the introduction of the open-list proportional system in parliamentary elections, 225 of the 450 MPs were elected in single-member constituencies (SMC) under the first-past-the-post system. The Law 'On Elections of People's Deputies of Ukraine' did not provide for periodic review of the SMC boundaries. Therefore, following the 2019 early parliamentary elections, the OSCE/ODIHR recommended providing for the review of SMC boundaries in line with international practice.[87] After the electoral system for parliamentary elections was changed, this

85 The boundaries of each of the 25 electoral regions coincide with the boundaries of the city of Kyiv and the regions; however, one electoral region — Southern Electoral Region No. 16 — includes Kherson Region, the Autonomous Republic of Crimea and the city of Sevastopol. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 138. ↗

86 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 198, 199, 200 and 201. ↗

87 OSCE/ODIHR Final Report on the Observation of the 2019 Early Parliamentary Elections in Ukraine, p. 7. ↗

recommendation is no longer relevant: as the boundaries of electoral regions are fixed directly in the EC of Ukraine[88] and do not require periodic review.

TECs administering the relevant local elections establish MMCs and TCs at each local election no later than the second day after the start of the electoral process. In doing so, they have broad discretionary powers to determine the number of such constituencies and their boundaries.[89] Decisions on the establishment of MMCs and TCs may be challenged only by participants of the electoral process[90] and by voters whose electoral rights and legitimate interests in the electoral process have been violated.[91]

The basic level of the territorial organisation of elections is election precincts: regular, special (SEPs) and abroad (EPAs).[92] Regular precincts and EPAs exist on a permanent basis, while SEPs may exist either on a permanent basis or be established ad hoc in the cases provided for by the EC of Ukraine.[93]

The system of regular precincts and permanent EPAs was established by the CEC in 2020[94] and has not been comprehensively reviewed since then. All precincts are divided into small precincts with up to 500 voters, medium-sized precincts with 500–1,500 voters and large precincts with 1,500–2,500 voters.[95] The size of a precinct is of practical importance, as it determines the number of members of the PEC[96] in charge of organising voting at that precinct, the requirements for voting premises, the number of voting booths

88 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 5 Article 138. ↗

89 The number of MMCs is determined as the integer quotient obtained by dividing the total composition of the relevant council by three. However, the TEC may deviate from this quotient by one constituency. The number of TCs is determined as the integer quotient obtained by dividing the total composition of the council to which elections are held under the proportional system by 10. The TEC may establish two constituencies more or fewer than this quotient. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 199 and 201. ↗

90 Electoral process participants in local elections are voters, election commissions, the party organisation that nominated the candidate or candidates, candidates registered by the election commission and official observers. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 22. ↗

91 A voter is also a participant to electoral process. However, under the Code of Administrative Procedure of Ukraine, the right to file an administrative claim with a court is granted not to any voter, but only to a voter who proves that their electoral rights or legitimate interests in the electoral process have been violated by a decision, action or omission concerning elections. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Article 273. ↗

92 A regular election precinct is established to organise and conduct voting by voters at their place of residence. A special election precinct is established in places where voters are temporarily staying, including inpatient healthcare facilities, penal institutions, pre-trial detention centres, vessels sailing under the State Flag of Ukraine on election day, polar stations and similar locations. In local elections, SEPs are established only in inpatient healthcare facilities. An EPA is established to organise and conduct voting by voters who, on election day, reside or stay in the territory of a foreign state. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 29, 30 and 31. ↗

93 Ibid., Article 30.

94 On the Establishment of Regular and Special Election Precincts on a Permanent Basis: Resolution of the Central Election Commission No. 117 of 25.06.2020. ↗

95 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 28. ↗

96 According to the EC of Ukraine, in parliamentary and local elections, a PEC for a small precinct is formed with 10–14 members, a PEC for a medium-sized precinct with 12–16 members and a PEC for a large precinct with 14–18 members. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 141 and 204. ↗

and the number of stationary ballot boxes in the polling station.[97] Before the most recent nationwide elections in 2019 and 2020 local elections, the Venice Commission and the OSCE/ODIHR, in their joint opinions on draft amendments to election laws,[98] recommended reducing the maximum number of voters per election precinct below the limit of 2,500 voters provided for in electoral legislation, in particular to 1,000–1,500 voters.[99]

These recommendations were not included in the OSCE/ODIHR election observation reports for the 2019–2020 elections. The EC of Ukraine also does not provide for such a reduction, retaining the limit of 2,500 voters for regular and special precincts.

EPAs are established exclusively at Ukrainian diplomatic missions abroad and at the deployment locations of military units or formations outside the territory of Ukraine.[100] Unlike regular and special precincts, there is no upper limit on the number of voters at EPAs.[101] Some election precincts abroad officially have tens of thousands of voters registered.[102] The large number of voters assigned to EPAs is offset by low turnout,[103] although when turnout increased in some countries during previous national elections, voting was accompanied by long queues.[104]

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97 The area of polling premises must be at least 50 m² for a small precinct, 75 m² for a medium-sized precinct and 90 m² for a large precinct. The number of voting booths must be at least two for a small precinct, at least four for a medium-sized precinct and at least six for a large precinct. The number of large stationary ballot boxes must be at least two at a small precinct, at least four at a medium-sized precinct and at least six at a large precinct. On Requirements for Election Commission Premises and Polling Premises, Standards for Equipping Precinct Election Commission Premises and Polling Premises, the List and Standards for Providing Election Commissions with Vehicles, Means of Communication, Equipment, Inventory and Other Material Assets, and the Types of Services and Works that May Be Procured by Constituency and Territorial Election Commissions at the Expense of the State Budget of Ukraine or the Relevant Local Budget for the Organisation, Preparation and Conduct of the Relevant Elections: Resolution of the Central Election Commission No. 164 of 08.08.2020. ↗

98 Joint Opinion on the Draft Amendments to the Laws on Election of People's Deputies and on the Central Election Commission and on the Draft Law on Repeat Elections of Ukraine. Venice Commission, OSCE/ODIHR, 2013, p. 9. ↗

99 Joint Opinion on the Law on Amending Some Legislative Acts on the Election of the President of Ukraine. Venice Commission, OSCE/ODIHR, 2009, p. 9. ↗

100 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 31. ↗

101 Ibid., Article 28.

102 For example, according to data from the State Voter Register as of 31.07.2026, the most recent update, 45,653 voters were registered at the precinct at the Embassy of Ukraine in the Republic of Moldova, 23,664 voters at the precinct at the Consulate General in Munich and so on. Data from the State Voter Register according to the most recent update of 31.07.2026. Central Election Commission. ↗

103 In the 2014 presidential election, voter turnout was 15.36%; in the first round of the 2019 presidential election, it was 12.62%, while in the second round it was 10.83%; in the 2014 and 2019 parliamentary elections, it was 8.83% and 7.27% respectively. Protocol of the Central Election Commission on the Voting Results within the Foreign Constituency in the Early Presidential Election of 25 May 2014. Central Election Commission ↗; Voting Results within the Foreign Constituency in the 2019 Presidential Election. Central Election Commission ↗ ; Voting Results within the Foreign Constituency in the 2019 Presidential Election (Repeat Vote). Central Election Commission ↗; Protocol of the Central Election Commission on the Voting Results in the Nationwide Multi-Mandate Election Constituency within the Foreign Constituency in the Early Parliamentary Elections of 26 October 2014. Central Election Commission ↗; Protocol of the Central Election Commission on the Voting Results in the Nationwide Multi-Mandate Election Constituency within the Foreign Constituency in the Early Parliamentary Elections of 21 July 2019. Central Election Commission. ↗

104 On Proposals for Legislative Regulation of the Specific Features of Organising and Conducting Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026, para. II.2 ↗; Elections 2019: Why So Few Ukrainians Vote Abroad. BBC News Ukraine, 2019 ↗; In Warsaw and Krakow, Voters Have Been Queuing at Polling Stations since Early Morning. European Pravda, 2019. ↗

Progress and issues

Lack of safeguards for political impartiality in the establishment of MMCs and TCs

When establishing MMCs and TCs, TECs are required only to ensure the continuity of the boundaries of the relevant constituencies, not to split precinct boundaries[105] and to comply with the maximum 15% deviation in the number of voters between MMCs.[106] TECs are not required to take into account the boundaries of the administrative division-territorial structure when establishing MMCs and TCs and they also have broad discretionary powers in determining the number of MMCs and TCs.[107] A 15% deviation in the number of voters between MMCs is significant, contradicts international standards[108] and violates the principle of equal suffrage.[109] Moreover, it is not observed in practice: in the 2020 regular local elections, a number of MMCs were established in excess of this limit.[110]

Local party organisations and potential candidates do not have the right to challenge decisions on the establishment of constituencies. This right is granted only to electoral process participants,[111] while local party organisations and candidates acquire this status only after the constituencies have been established.

All these factors create conditions for abuse, including so-called gerrymandering[112] — the drawing of constituency boundaries in the interests of particular party organisations or candidates by concentrating their supporters within one constituency and splitting the electorate of competitors across several constituencies — which is contrary to international standards.[113] The risks of political bias in determining electoral constituency boundaries are even higher given that TECs are not politically impartial bodies,[114] as they are formed from nominees proposed by local party organisations.[115]

The OSCE/ODIHR recommended considering the possibility of granting an independent and impartial body the powers to delimit electoral constituencies in local elections.[116] Implementing this recommendation is problematic: the establishment of such an independent body at central level could be regarded as state interference in the

105 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 199 and 201.

106 Ibid, Part 3 Article 199.

107 Ibid, Parts 3 and 5 Article 201.

108 Code of Good Practice in Electoral Matters: Guidelines, Explanatory Report and Interpretative Declarations. Venice Commission, p. 10; Document of the Copenhagen meeting of the Conference on the Human Dimension of the CSCE. Conference on Security and Cooperation in Europe, 1990, par. 7.3, p. 6.

109 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections, p. 11.

110 Ibid.

111 Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Article 273.

112 Hungary. Opinion on Act LXXIX of 2024 Amending Certain Laws Relating to Elections. Venice Commission and OSCE/ODIHR, 2025, Section 21, p. 7.

113 Ibid., Sections 19 and 21, p. 7.

114 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections, p. 11.

115 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 204.

116 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections, p. 11.

competence of local self-government, which is expressly prohibited by the Constitution,[117] while the possibility of establishing such a body by the relevant council at each level of the administrative-territorial structure, from community to region, is not provided for by the Law of Ukraine 'On Local Self-Government in Ukraine'. Even if such a possibility were provided for, the establishment of such a body by a local self-government body, which is political in nature, or by a local state administration, which forms part of the system of executive authorities, would not guarantee its independence or political impartiality. An alternative to establishing such an independent body could be to set out in the EC of Ukraine clear requirements for the establishment of constituencies, provisions on mandatory public consultations on decisions to establish them and an obligation for TECs to establish constituencies before the start of the electoral process for each regular local election. The risks of political preferences influencing the establishment of constituencies could also be reduced by granting local party organisations the right to challenge decisions on the establishment of constituencies regardless of whether they have the status of electoral process participants.

Recommendations

1. Amend the EC of Ukraine to: (1) establish clear requirements for creating MMCs and TCs in local elections, including the mandatory consideration of the administrative-territorial structure and compliance with the principle of compactness; (2) reduce the maximum permitted deviation in the number of voters between MMCs to 10%, in line with international standards; (3) require TECs to hold public consultations on draft decisions establishing MMCs and/or TCs; (4) require TECs to adopt decisions on the establishment of constituencies within timeframes that allow potential electoral process participants to timely plan their election campaigns, in particular before the start of the electoral process.

2. Amend the Code of Administrative Procedure of Ukraine (CAP of Ukraine) to allow decisions establishing MMCs and TCs in local elections to be challenged not only by electoral process participants, but also by local party organisations that have not acquired that status but have the right under the EC of Ukraine to nominate candidates in the relevant local elections.

Administration of Elections. Reform of the CEC. Election Observation

State of play

Ukraine has an independent model of election administration, under which the system of election commissions consists of the CEC, DECs and PECs in nationwide elections, and the CEC, TECs and PECs in local elections. At the same time, the CEC and TECs (in local elections) are permanent bodies, while DECs and PECs are temporary bodies established for the period of preparation and conduct of the relevant elections pursuant to the EC of

117 According to Article 140 of the Constitution of Ukraine, local self-government is the right of a territorial community to resolve issues of local significance independently within the limits of the Constitution and laws of Ukraine. See: Constitution of Ukraine No. 254k/96-VR of 28.06.1996. ↗

Ukraine.[118] The CEC heads the system of election commissions, operates as the higher-level commission in relation to all DECs, TECs and PECs and, in nationwide elections, also exercises the powers of a DEC in the EDA.[119]

In the nationwide elections, the DECs, within the powers defined by the EC of Ukraine, ensure the organisation of the preparation and conduct of nationwide elections within the respective territorial constituencies and are higher-level commissions in relation to PECs within those constituencies. In local elections, TECs establish the local election results and are higher-level commissions in relation to PECs for the respective local elections.[120] Members of TEC exercise their powers until the new composition of the relevant commission is formed in accordance with the procedure defined by the EC of Ukraine. In view of this, by Resolution No. 29,[121] the CEC stated that there were no grounds for forming a new composition of TECs due to the fact that regular local elections had not been called, thereby effectively confirming the continuity of the powers of the TECs formed in 2020. PECs, within the powers defined by the EC of Ukraine, ensure the organisation of the preparation and conduct of nationwide and local elections within the respective election precincts.[122]

The full-scale war has had a significant impact on the condition of premises used to organise the work of election commissions and conduct voting. As of 28 July 2026, 33,150 election precincts were functioning in Ukraine, located in 30,261 buildings. Of these buildings, 1.3% had been completely destroyed and were beyond repair, 0.3% had been destroyed as a result of deterioration over time, 3.1% had been damaged but could be restored, 2% had been damaged but had already been restored and 19% were located in the temporarily occupied territories of Ukraine and/or the CEC had no information on their condition.[123]

The European Commission's 2025 report notes that Ukraine's overall legal framework generally remains conducive to the organisation of democratic elections after martial law is lifted, when circumstances allow, and that some key recommendations of the most recent OSCE/ODIHR election observation missions have already been implemented. At the same time, further electoral reforms should focus on addressing outstanding recommendations and preparing for a potential post-war election scenario. The European Commission also noted the absence of an active parliamentary working group on electoral reform.[124] Taking this recommendation into account, the Working Group on the Preparation of Legislative

118 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 2 Article 3, Part 1 Article 32, Article 33, Part 1 Article 83, Part 1 Article 139, Part 1 Article 202 ↗; On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Articles 1–3. ↗

119 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Articles 1–3. ↗

120 In the 2019 early parliamentary elections, 199 DECs operated, while in the 2020 local elections, 532 TECs were formed. Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019. Civil Network OPORA, pp. 84–85 ↗; Final Report on the Results of Observation of the 2020 Local Elections. Civil Network OPORA, pp. 39–40. ↗

121 On Certain Issues of Forming a New Composition of Territorial Election Commissions Responsible for the Preparation and Conduct of Local Elections: Resolution of the Central Election Commission No. 29 of 25.07.2025. ↗

122 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 33. ↗

123 Letter of the Central Election Commission No. 21-17-2202 of 28.07.2026 in response to an information request from Civil Network OPORA.

124 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

Proposals on Elections in the Special and/or Post-War Period was established, within which a thematic subgroup on election administration and electoral infrastructure operates.[125]

Voting in post-war elections and preparations for it will take place amid a number of war-related challenges, which will need to be addressed both through legislative amendments and relevant organisational measures.[126] In particular, the relevance of security and other risks that may affect the electoral process varies across different territories of Ukraine: some territories are under occupation, some border the aggressor state, some are subject to periodic shelling, while certain territories, particularly in the west of the country, are relatively safe.[127]

According to the findings of national observers at the 2020 local elections,[128] one of the key challenges for ensuring citizens' electoral rights was the CEC decision, adopted on the basis of opinions by the Donetsk and Luhansk Regional Military-Civil Administrations, that it was impossible to organise elections in 10 territorial communities in Donetsk region and 8 communities in Luhansk region. Almost half a million voters were unable to exercise their voting rights — a very significant figure, amounting to almost a quarter of all votes cast in Donetsk and Luhansk regions in the 2019 parliamentary elections.

This issue was analysed in the OSCE/ODIHR Final Report on the 25 October 2020 elections.[129] The report found that the regulatory framework governing decisions on the impossibility of holding elections in communities controlled by the Government of Ukraine, including those where national elections had recently been held, lacked sufficient safeguards for the exercise of electoral rights. According to the OSCE/ODIHR, public confidence was also affected by the lack of transparent criteria for implementing such decisions.

The European Parliament Resolution of 11 February 2021 on the implementation of the EU–Ukraine Association Agreement emphasised that civil society had criticised the decision not to hold elections in 18 territorial communities in the Government-controlled territories of Donetsk and Luhansk regions due to the absence of a clear justification for this decision by the military-civil administration, which effectively disenfranchised approximately 475,000 voters living in those communities.[130]

After the local elections, national experts initiated discussions on options for legislative regulation of local elections in Donetsk and Luhansk regions and the development of clear criteria for decisions not to hold elections.[131] A concept for resolving the issue of elections

125 A meeting of the Working Group on the Preparation of Legislative Proposals on Elections in the Special or Post-War Period was held. Seven subgroups were created in the Verkhovna Rada to develop legislation on elections during a special period. Ukrinform, 2026. ↗

126 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 169. ↗

127 Ibid, pp. 20–21.

128 Final Report on Observation Findings on the 2020 Local Elections by Civil Network Opora. Civil Network Opora, 2021. ↗

129 OSCE/ODIHR Final Report on Election Observation of 25 October 2020. ↗

130 European Parliament Resolution of 11 February 2021 on the implementation of the EU Association Agreement with Ukraine (2019/2202(INI)). ↗

131 OPORA's Statement on Establishing the Impossibility of Holding Local Elections in Certain Communities of Donetsk and Luhansk Regions. Civil Network OPORA, 2020. ↗

in these territories was developed and submitted to the parliamentary Working Group, which, in particular, formed the basis for joint legislative proposals.[132]

In 2021, the Venice Commission and the OSCE/ODIHR issued a joint opinion on a relevant draft law concerning the legal regulation of the issue of not holding local elections in 18 communities in Donetsk and Luhansk regions. In the opinion, international experts confirmed that the state may temporarily postpone elections on security grounds, but such a decision must be based on a clear legislative procedure, be proportionate and temporary, ensure an appropriate role for the CEC, transparent inter-agency cooperation and effective guarantees of judicial appeal. The absence of these elements, as was the case in 2020, results in the effective disenfranchisement of a significant number of citizens and undermines the principles of universal and equal suffrage.[133]

An important issue remains the CEC's capacity to conduct post-war elections. As of 31 July 2026, the CEC operated with 15 members out of the 17 provided for by law.[134] The vacancies are due to the early termination of powers of certain CEC members, with no relevant nominations having been submitted for the vacant positions.[135] However, the Commission remains legally competent under the law.[136]

At the same time, the seven-year term of office of the current CEC members expires on 4 October 2026.[137] The current legislation links the termination of powers of a CEC member to a decision of the Verkhovna Rada of Ukraine on their dismissal, while the provisions of Article 30 of the Law of Ukraine 'On the Central Election Commission', as amended in 2014, effectively allow members to continue exercising their powers after the expiry of their term of office until the relevant decision is adopted by Parliament.[138] For example, the term of office of the then CEC composition expired in 2014, but legislative amendments allowed its members to continue exercising their powers until 2018.[139]

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132 Concept for Resolving the Issue of Elections in Certain Communities of Donetsk and Luhansk Regions. Civil Network OPORA, 2021. ↗

133 Joint Opinion of the Venice Commission and the OSCE/ODIHR on the draft law 'On improving the procedure for establishing the impossibility of holding national and local elections, all-Ukrainian and local referenda in certain territories and polling stations', adopted by the Venice Commission at its 129th Plenary Session (Venice and online, 10–11 December 2021), p. 12. ↗

134 In 2018, the composition of the Central Election Commission was increased from 15 to 17 members by amending Article 6 of the Law of Ukraine 'On the Central Election Commission'. On Amendments to Article 6 of the Law of Ukraine 'On the Central Election Commission': Law of Ukraine No. 2550-VIII of 18.09.2018, Part 1 Article 6 ↗; This decision was adopted in the context of renewing the Commission's composition after a prolonged period during which a significant number of its members continued to exercise their powers beyond the seven-year term, as well as in view of the need to take parliamentary representation into account when forming the new composition of the CEC. The Verkhovna Rada Increased the Composition of the CEC to 17 Members. Civil Network OPORA, 2018. ↗

135 The powers of Yurii Frytskyi were terminated early on 16.11.2022 due to him reaching the age of 65, while Yurii Buhlak was dismissed on 07.02.2024 in connection with his personal statement on resignation. The Verkhovna Rada Dismissed a CEC Member. Should He Be Replaced? Civil Network OPORA, 2024. ↗

136 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Part 3 Article 8 ↗; The Verkhovna Rada Dismissed a CEC Member. Should He Be Replaced? Civil Network OPORA, 2024. ↗

137 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Part 8 Article 6, Parts 1, 2 Article 30 ↗; Final Report on the Results of Observation of the 2020 Local Elections. Civil Network OPORA, 2021, pp. 39–40 ↗; Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026.

138 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 8 Article 33 ↗; On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Parts 1, 2 Article 30. ↗

139 New CEC Members Approved and Two Constitutional Court Judges Elected. ↗

The observation reports on the 2019 parliamentary elections, and the 2020 local elections recorded concerns among some electoral stakeholders regarding the impartiality of the CEC and reports of pressure on some of its members before the start of the electoral process.[140] The Venice Commission has emphasised that the procedure for appointing and dismissing CEC members should exclude the possibility of external pressure, while allowing potential election candidates, including the President of Ukraine or MPs, to initiate the termination of powers of CEC members may call the Commission's independence into question.[141] At the same time, the legislation provides for the possibility of early termination of powers of the entire CEC composition, which has already been applied to the Commission appointed in 2018.[142]

In addition, some grounds for early termination of powers of individual CEC members are evaluative in nature, particularly the ground of breach of oath.[143]

The issue of the CEC's independence is linked not only to the termination of powers, but also to the procedure for appointing its members. Under the Constitution of Ukraine, CEC members are appointed and dismissed by the Verkhovna Rada of Ukraine upon submission by the President of Ukraine,[144] while the Law 'On the Central Election Commission' requires such a submission to incorporate proposals from parliamentary factions and groups. At the same time, taking such proposals into account is not a constitutional obligation of the President, meaning that the procedure remains dependent on the balance of political forces in Parliament and political agreements between the head of state and the parliamentary majority.[145]

Ukrainian legislation provides for the possibility of establishing regional and territorial offices of the CEC, as well as assigning to them certain powers related to ensuring the organisation of the preparation and conduct of elections, interaction with election commissions and the performance of functions in the area of maintaining the State Voter Register (SVR).[146] At the same time, no CEC offices have been established to date.

After the 2020 local elections, the Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning established a Working Group in 2021 to develop comprehensive amendments

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140 Following the 2019 parliamentary elections, the OSCE/ODIHR recorded that some electoral stakeholders expressed doubts about the impartiality of the CEC, while the Commission itself regarded this as an attempt to discredit its members and influence its work. OSCE/ODIHR Final Report on Observation of the 2019 Early Parliamentary Elections of Ukraine, p. 9. ↗ During the 2020 local elections, information was also circulated about certain CEC members allegedly being encouraged to submit statements on the early termination of their powers before the start of the electoral process. Civil Network OPORA, Final Report on the Results of Observation of the 2020 Local Elections, p. 40. ↗

141 Venice Commission Opinion on the Draft Electoral Code, CDL-AD(2010)047, para. 27. ↗

142 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Article 31[1] ↗; O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 14–16. ↗ In October 2019, the powers of the entire CEC composition, which had been formed in 2018 and had ensured the conduct of two nationwide election campaigns in 2019, were terminated early. Civil Network OPORA, Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019, pp. 84–85 ↗; Civil Network OPORA, Final Report on the Results of Observation of the 2020 Local Elections, pp. 39–40. ↗

143 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, para. 8 Part 4 Article 30. ↗

144 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, para. 21 Part 1 Article 85. ↗

145 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Part 2 Article 6 ↗; O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 14–16. ↗

146 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004, Article 35. ↗

to electoral legislation.[147] A separate subgroup on the professionalisation of election commission members operated within this Working Group. It developed amendments to the procedure for forming election commissions and terminating the powers of their members, but the relevant draft law has still not been registered in Parliament.

One of the key prerequisites for ensuring free and fair elections is independent observation of the electoral process. During observation of the 2019 presidential election, it was noted that the rights of non-governmental organisations (NGOs) to observe had not been fully ensured due to the lack of legal certainty regarding observation of the CEC's activities, access to election commission documents and the right to be present on the premises of election commissions.[148] Following the 2019 elections, amendments to the EC of Ukraine introduced by Law No. 805-IX provided that, in nationwide elections, an official observer from an NGO in the nationwide constituency has the right to be present at a CEC meeting, which partially removed the previous uncertainty in this specific respect.[149]

The Venice Commission also noted that official observers should have the right to observe all aspects of the electoral process, including procedures for challenging election results, while provisions allowing observers to be removed from commission meetings should contain clear criteria for unlawful obstruction to prevent abuse and unjustified restrictions on the right to observe. It was separately emphasised that the right to take photographs and make video recordings should not violate the secrecy of the vote or lead to voter intimidation.[150] In addition, the Venice Commission indicated that requirements under which the right to observe elections is granted only to organisations registered two years before the elections are excessive and should be reviewed.[151]

Observation reports recorded that guarantees of the right to observe should cover not only admission to the process but also access to all procedures on election day and during the vote count. At the 2020 local elections, 14.3% of PECs began their preparatory meetings earlier than the prescribed time, which impeded the right of electoral stakeholders to observe all electoral procedures, while at 8.09% of polling stations observers were unable to obtain copies of vote count protocols.[152] At the 2019 parliamentary elections, incidents limiting observers' ability to monitor preparatory procedures were recorded at 0.7% of polling stations, while 19.1% of polling stations opened for voting earlier than the time

147 The Committee Established a Working Group to Develop Comprehensive Amendments to Electoral Legislation with a View to Unifying the Mechanisms of Legal Regulation of the Electoral Process in Ukraine. Verkhovna Rada of Ukraine, 2021. ↗

148 During the 2019 presidential campaign, the discrepancy between the Law of Ukraine 'On the Election of the President of Ukraine' and the Law of Ukraine 'On the Central Election Commission' did not provide a clear answer as to whether observers had the right to be present at CEC meetings, and the Commission interpreted the legislation in a way that did not allow observers from NGOs to attend its meetings without permission or invitation. As a result, international observers registered by the CEC exercised their powers throughout the entire nationwide constituency, while the powers of observers from NGOs were tied to the territory of the constituency in which they had been registered by the DEC. OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine. Civil Network OPORA, pp. 66–67, 192. ↗

149 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 8 Article 60 ↗ ; This decision of Parliament resolved the issue of legal uncertainty regarding observers' right to be present at CEC meetings, although it did not grant NGOs an independent status as electoral stakeholders. OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine. Civil Network OPORA, p. 67. ↗

150 Venice Commission Opinion, CDL-AD(2009)040, paras. 34–36, 38. ↗

151 Venice Commission Opinion on the Draft Electoral Code, CDL-AD(2010)047, para. 48. ↗

152 Final Report on the Results of Observation of the 2020 Local Elections. Civil Network OPORA, pp. 128–129. ↗

prescribed by law.[153] At the 2019 presidential election, 17.3% of PECs began their work earlier than the formally prescribed time.[154]

In the view of the OSCE/ODIHR, the formal expansion of NGO participation in official observation was not always accompanied by adequate safeguards for their actual independence, as a significant number of such organisations had been newly established, while some could be perceived as linked to political actors. In this regard, the OSCE/ODIHR emphasised the inadmissibility of abusing the status of official observer and the need for a clear distinction between party-based and independent citizen observation. This is consistent with the provision of the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations[155] that such observers must be free from any political, economic or other conflicts of interest.[156]

According to national observation data, during the 2019 presidential election, 152 NGOs applied to the CEC, of which 139 were granted permission to have official observers. However, 85 of them had no previous experience of observing elections in Ukraine;[157] the names of 13 NGOs contained references to candidates, politicians or political parties; cases were recorded where the same person was the founder of two NGOs; organisations had the same registered legal address; and more than 30 organisations were directly linked to presidential candidates.[158] At the 2019 parliamentary elections, 163 NGOs received the relevant permission, of which 68 also lacked such experience, while some organisations had been established shortly before the electoral process.[159]

A separate aspect of observation is the transparency of party congresses and conferences for the nomination of candidates. According to the results of citizen observation at the 2020 local elections, party organisations generally complied with the EC of Ukraine requirements on informing the CEC of the time and place of conferences. However, the information submitted often did not correspond to the actual circumstances in which such events were held, which complicated or made it impossible for journalists and observers to access them. At the same time, judicial practice on whether failure to notify, or the provision of inaccurate notification, of the time and place of a congress constitutes a violation of the candidate nomination procedure proved inconsistent.[160]

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153 Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019. Civil Network OPORA, pp. 152–153. ↗

154 OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine. Civil Network OPORA, pp. 174, 181. ↗

155 Declaration of Global Principles for Non-Partisan Election Observation and Monitoring by Citizen Organisations. Commemorated 3 April 2012, at the United Nations, New York; initiated by the Global Network of Domestic Election Monitors (GNDEM); endorsed by the Venice Commission at its 91st Plenary Session (Venice, 15–16 June 2012), reproduced in CDL-AD(2012)018. ↗

156 OSCE/ODIHR Final Report on Observation of the 2019 Presidential Election in Ukraine, Rec. B20 ↗; OSCE/ODIHR Final Report on Observation of the 2019 Early Parliamentary Elections of Ukraine, Rec. B27 ↗; OSCE/ODIHR Final Report on Observation of the 2020 Local Elections, Rec. B34. ↗

157 OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine. Civil Network OPORA, pp. 163–166. ↗

158 One Step Away from Fake: Citizen Observation of the Presidential Election in Ukraine. Civil Network OPORA, 2019. ↗

159 Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019. Civil Network OPORA, pp. 140–141. ↗

160 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 88–89. ↗

Progress and issues

The legislation lacks clear criteria and requirements for making decisions not to hold elections or voting in a particular territory

The Roadmap on the Functioning of Democratic Institutions (FDI Roadmap) includes a measure to define, at legislative level before the start of the post-war electoral process, objective criteria and the procedure for deciding whether elections may or may not be held in certain territories of Ukraine.[161]

The CEC's proposals on legislative regulation of the organisation of post-war elections in relation to election campaigning provide that the procedure, process and criteria for conducting the initial assessment, as well as other related issues, should be defined by a separate law establishing the criteria and procedure for deciding whether it is possible or impossible to organise and conduct voting in certain territories of Ukraine. The criteria for conducting the initial assessment shall include the state of the security situation, the proper functioning of critical infrastructure facilities and facilities that ensure the vital needs of the population in the relevant territories and the possibility of ensuring appropriate conditions for the free formation and expression of voters' will.[162]

At the same time, experts note the need to define the procedure for assessing the impossibility of organising and conducting elections in a particular territory of Ukraine directly in the draft law on the specific features of holding post-war elections, considering previous discussions within the working groups under the CEC and proposals from NGOs. Such a draft law should define clear criteria and time limits for conducting such an assessment, the range of entities involved in carrying it out and in making decisions based on its results, as well as the procedure for appealing and reviewing the assessment results.[163]

A transparent system for deciding whether elections can or cannot be held in certain territories should include a security audit that would make it possible to analyse:

- preparedness to respond to security challenges: the level of the security situation in the community and the capacity of local authorities to respond effectively to potential threats;
- the dynamics of socio-economic processes: whether community residents have access to services that guarantee basic social and economic conditions, including healthcare, financial and postal services;
- the possibility of implementing electoral procedures: an assessment of the conditions for holding free and fair elections and the availability of organisational capacity to ensure the electoral process.[164]

161 Roadmap on the Functioning of Democratic Institutions, Measure 2 of Strategic Outcome 1 of Subsection II.A Free and Fair Elections of Section II. Electoral Process, p. 3. ↗

162 Proposed wording of Part 1 Article 4 of the draft law 'On Specific Features of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine', prepared by the CEC. On Proposals for Legislative Regulation of Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

163 Analysis of the Draft Law 'On Specific Features of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine'. Civil Network OPORA, 2026. ↗

164 Community Security Audit: Consolidated Results. Civil Network OPORA, 2025. ↗

At the end of 2025, within the Working Group on the Preparation of Legislative Proposals on Elections in the Special or Post-War Period,[165] a Subgroup on developing security criteria for the possibility of organising and conducting elections was established.[166] Agreements were reached on the procedure for assessing security and taking the final decision on whether elections should or should not be held. Following the discussion, a model was proposed under which a comprehensive assessment of security, organisational and other conditions would be carried out by the Cabinet of Ministers of Ukraine, while the final decision establishing the impossibility of holding voting or elections in the relevant territories would be adopted by the Verkhovna Rada.[167] It is also proposed to supplement the CAP of Ukraine with Article 266^3, which would establish a special procedure for challenging resolutions of the Verkhovna Rada on the impossibility of holding elections. Voters in the relevant territories, political parties and referendum initiators would have the right to challenge such resolutions.[168] These proposals are aimed at implementing the Venice Commission's recommendation on the need to provide for an effective system for electoral stakeholders to challenge decisions not to hold elections, which should ensure the timely, substantive and independent consideration of complaints and claims.[169]

As of 31 July 2026, all provisions[170] agreed at the level of the Working Group remain recommendations and conceptual developments and have not yet been formalised in a separate draft law registered in Parliament.

In addition to the criteria themselves, it is important to ensure that citizens' electoral rights can be exercised where it is established that elections cannot be held. Possible ways to enable the exercise of their electoral rights may include changing the place of voting without changing the electoral address in nationwide elections[171] or opening additional polling stations in adjacent territories.[172]

165 A Meeting of the Working Group on the Preparation of Legislative Proposals on Elections in the Special or Post-War Period Was Held. Verkhovna Rada of Ukraine, 2025. ↗

166 Seven Subgroups Were Created in the Verkhovna Rada to Develop Legislation on Elections during a Special Period. Ukrinform, 2026. ↗

167 Analytical Update on Ukraine's Progress in Meeting the Indicators of the Roadmap on the Functioning of Democratic Institutions Based on the Work of Thematic Subgroups Preparing the Legislative Framework for the First Post-War Elections. Civil Network OPORA, 2026. ↗

168 Security and Organisation: the Rada Proposes 18 Criteria for Assessing the Possibility of Holding Post-War Elections. Ukrinform, 2026. ↗

169 Joint Opinion of the Venice Commission and the OSCE/ODIHR on the Draft Law 'On Improving the Procedure for Establishing the Impossibility of Holding National and Local Elections, All-Ukrainian and Local Referenda in Certain Territories and Polling Stations', adopted by the Venice Commission at its 129th Plenary Session (Venice and online, 10–11 December 2021). P. 2. ↗

170 Meeting of the Working Group on the Preparation of Comprehensive Legislative Proposals on the Specific Features of the Procedure for Organising and Conducting Elections during a Special Period and/or Post-War Elections in Ukraine. 2026. ↗

171 For more details, see the subsection 'Voter Registration and Voter Lists, Update and Audit of the State Voter Register'.

172 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 23. ↗

The procedure for appointing and terminating the powers of CEC members does not ensure compliance with the principles of independence, professional competence and integrity

The current legislation does not provide for an open competition for positions of CEC members. The law does not contain requirements for a public announcement of the selection process, the submission by candidates of a standardised set of documents for open consideration, public interviews, ranked assessment of candidates or the involvement of an independent selection commission. Under the Constitution of Ukraine and the Law of Ukraine 'On the Central Election Commission', the formation of the CEC's composition is largely reduced to the exercise of discretionary powers by political appointing actors and the agreement of candidacies within inter-institutional and inter-factional interaction.[173] For this reason, the procedure for appointing CEC members remains dependent on political agreements and does not create sufficient guarantees of the political neutrality of the collegial body.[174]

The current legislative requirements for candidates for CEC membership also do not create a fully-fledged mechanism for professionalising the composition of the CEC. The law requires a CEC member to be a citizen of Ukraine, to have reached the age of 25, to have the right to vote, to have resided in Ukraine for the past five years and to have command of the state language. At the same time, the requirement to have a higher legal education is expressly established only for the Head, Deputy Heads and Secretary of the Commission, as well as at least five other members of the Commission.[175]

As a result, the law does not require the entire composition of the Commission to have specialised training in electoral law, experience in organising elections or confirmed qualifications in public administration, while the absence of competitive selection does not make it possible to compensate for this gap by assessing candidates against the criteria of competence, integrity and reputation. Consequently, the professional level of the Commission's full composition is not guaranteed by the formation procedure itself but depends on the political discretion of the nominating and appointing actors.[176]

As part of the strategic outcome on strengthening the institutional capacity and independence of the CEC, the FDI Roadmap included a measure to improve the procedure for forming the CEC with a view to strengthening its continuity, professionalism and integrity, with implementation due by the fourth quarter of 2027.[177] This indicates recognition of the need for further review of the legislative regulation in this area.

The current legislation also allows both the early termination of powers of individual CEC members on evaluative grounds, in connection with a breach of oath and the early termination of powers of the entire Commission composition under the special procedure defined by Article 31[1] of the Law of Ukraine 'On the Central Election Commission'.[178] In

173 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004. ↗

174 Opinion on the Draft Election Code of Ukraine : CDL-AD(2010)047/ European Commission for Democracy through Law (Venice Commission), 2010, para. 27. ↗

175 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004. ↗

176 Ibid.

177 Roadmap on the Functioning of Democratic Institutions, II.A Free and Fair Elections, p. 5. ↗

178 On the Central Election Commission: Law of Ukraine No. 1932-IV of 30.06.2004. ↗

the absence of legislatively defined criteria for establishing a breach of oath, this ground allows for broad interpretation.[179]

In addition, the very possibility of political actors who may potentially be electoral subjects initiating procedures for terminating powers does not eliminate the risk of external influence on the Commission.[180] Therefore, removing from the legislation the possibility of simultaneous early termination of powers of the entire CEC composition is a justified step that would make it impossible to apply this procedure for reasons of political expediency.[181]

However, this area currently remains outside the Working Group's focus.

To implement international recommendations and European Union (EU) integration requirements in this area, it is necessary to improve competitive and transparent procedures for forming the CEC, narrow the grounds for early termination of powers of Commission members, remove the possibility of simultaneous early termination of powers of the entire CEC composition and introduce procedural safeguards against inaction in the relevant procedures.[182]

Absence of functioning CEC offices

The FDI Roadmap, as part of Ukraine's EU integration, provides that the phased functioning of CEC offices should be ensured by the fourth quarter of 2027.[183]

The main obstacle to the rollout of the network of CEC offices is the lack of adequate funding. The launch of the offices is linked to the need for changes to budget planning, the definition of the organisational model of the offices, their structure, staffing levels, functional scope and interaction with the CEC's central apparatus and the bodies maintaining the SVR.[184] At the same time, at the level of Parliament, the basic legislative preconditions for the offices have already been created, but without budgetary resources and the adoption of secondary legislation this model has not become operational.[185]

179 Ibid., para. 8 Part 4 Article 30; O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 14–16. ↗

180 Opinion on the Draft Election Code of Ukraine : CDL-AD(2010)047. European Commission for Democracy through Law (Venice Commission), 2010, para. 27. ↗

181 Roadmap on Electoral Reform in Ukraine 2023 — under Wartime Conditions, 2023, p. 5. ↗

182 Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026.
Information provided by Respondent No. 35 based on the results of a survey conducted on 28.03.2026.
Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

183 Roadmap on the Functioning of Democratic Institutions, II.A Free and Fair Elections, p. 5. ↗

184 Information provided by Respondent No. 31 based on the results of a survey conducted on 25.03.2026.
Information provided by Respondent No. 32 based on the results of a survey conducted on 25.03.2026.
Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026.
Information provided by Respondent No. 35 based on the results of a survey conducted on 28.03.2026.
Information provided by Respondent No. 38 based on the results of a survey conducted on 30.03.2026.
Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.
Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026.
Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

185 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026. The effect of Article 35 of the Law of Ukraine 'On the Central Election Commission' concerning regional and territorial offices of the CEC has been suspended by the Laws of Ukraine on the State Budget for the relevant year since 2021.

The impracticality of recommendations on reducing the number of voters at election precincts and the composition of PECs

The unsatisfactory condition of election precinct premises is relevant not only for assessing the readiness of electoral infrastructure, but also for reconsidering earlier recommendations on the formation, numerical composition and organisation of the work of lower-level commissions. Given the extensive destruction of infrastructure caused by the war, full implementation of these recommendations in their unchanged form is impractical and requires their adaptation to current realities. The Venice Commission recommendation to reduce the number of voters at a polling station to 1,000–1,500 people and the recommendation to reduce the minimum and maximum composition of PECs[186] in the first post-war elections are linked not only to the quality of administration, but also to the availability of premises, human resources and the possibility of establishing additional election precincts. If premises are unavailable for the work of PECs and the organisation of voting, or if it is impossible to form the composition of a PEC at an additional polling station, it will not in practice be possible to reduce the number of voters at regular election precinct. This will complicate the organisation of voting and may result in the premises failing to meet regulatory requirements.[187]

Disproportionate advantages for parliamentary parties in forming the composition of TECs and PECs

The Venice Commission and the OSCE/ODIHR have noted that granting guaranteed representation in TECs and PECs only to parliamentary parties, while including representatives of other parties based on the results of a draw, is not consistent with an approach based on equality of electoral stakeholders. They recommended increasing pluralism in the formation of commissions.[188] In this regard, the advantages enjoyed by parliamentary parties when nominating candidates to TECs and PECs in parliamentary elections may be reviewed, in particular to prevent the effective doubling or tripling of their representation through the simultaneous use of the status of a parliamentary party and a party with status of election process participant.[189]

At the same time, this area was assessed as the most politically sensitive. Guaranteed seats on commissions are a controversial practice, but revising the relevant provisions of the EC of Ukraine would require broad political dialogue.[190] Recommendations to abandon guaranteed representation for parliamentary parties or to fill all positions by

186 Joint Opinion of the Venice Commission and the OSCE/ODIHR on draft amendments to the laws on parliamentary elections in Ukraine, the Central Election Commission and the draft law on repeat elections, CDL-AD(2013)016, para. 29 ↗; Venice Commission Opinion on the law on amendments to certain legislative acts concerning the election of the President of Ukraine, CDL-AD(2009)040, para. 28. ↗

187 Analysis of the Draft Law 'On Specific Features of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine'. Civil Network OPORA, 2026 ↗; Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

188 Joint Opinion of the Venice Commission and the OSCE/ODIHR, CDL-AD(2013)016, para. 37 ↗ ; Venice Commission Opinion, CDL-AD(2013)026, para. 31. ↗

189 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 96–97. ↗

190 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

drawing lots appear to have limited prospects.[191] In this regard, in the short term, it seems more likely that the preferential approach will not be abolished entirely, but that its most disproportionate consequences will be addressed by changing the rules for nominating candidates and the procedure for drawing lots.[192]

Issues in filling positions on commissions and their numerical composition

The Venice Commission positively assessed the drawing of lots for the allocation of positions separately for each commission, while the OSCE/ODIHR recommended reviewing the procedure for forming TECs and PECs, including by setting a reasonable maximum number of commission members that corresponds to actual needs, as well as considering the possibility of establishing permanent TECs (in the nationwide elections).[193] In presidential elections, the absence of an upper limit on the numerical composition of TECs and PECs had previously created organisational difficulties.[194] The post-war shortage of personnel and limited space in premises should also be considered. Accordingly, amendments to the EC of Ukraine that would limit the maximum composition of TECs and PECs in presidential elections as already provided for the parliamentary elections, appear justified.[195] In the same context, recommendations on reducing the numerical composition of PECs and setting a maximum composition of commissions in presidential elections are directly linked to the current state of infrastructure and the staffing capacity of the election commission system.[196]

Changes concerning the reduction of the numerical composition of PECs, the introduction of a maximum composition of election commissions in presidential elections and the revision of the procedure for recalling commission members by entities that nominated

191 Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026. Information provided by Respondent No. 35 based on the results of a survey conducted on 28.03.2026. Information provided by Respondent No. 38 based on the results of a survey conducted on 30.03.2026. Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026. Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026. Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

192 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 96–98 ↗; OSCE/ODIHR Final Report on Observation of the 2015 Local Elections, Rec. B10. ↗

193 Joint Opinion of the Venice Commission and the OSCE/ODIHR, CDL-AD(2013)016, para. 39 ↗; OSCE/ODIHR Final Report on Observation of the 2020 Local Elections, p. 26 ↗; OSCE/ODIHR Final Report on Observation of the 2019 Early Parliamentary Elections of Ukraine, p. 22. ↗

194 In the 2019 presidential election in Ukraine, candidates had the exclusive right to submit nominations to election commissions. Each of them could nominate one person to each DEC and PEC, while the maximum composition of commissions was not limited. In total, the number of DEC members formed as of 18 February 2019 was 7,355, which was not a record figure for presidential elections. The record was set in 2004, when all 225 DECs, then classified as DECs, established for the presidential election had 9,604 members. Under the legislation in force at that time, each candidate had the right to nominate no more than two persons to each TEC. The average (median) number of members in the DECs formed on 18 February was 37. The largest DECs had 41 members, namely DEC No. 174 and DEC No. 176 in Kharkiv region, while the smallest had 29 members, namely TEC No. 105 in Luhansk region. In the 2004 presidential election, the average numerical composition of DECs was considerably higher, at 43 members. Results of the Formation of District Election Commissions in the 2019 Presidential Election: No Records and Procedures Followed. Civil Network OPORA, 2019. ↗; The operation of a collegial body composed of 37 members objectively creates organisational difficulties — with ensuring a quorum, convening meetings in a timely manner, rationally distributing duties among commission members and adopting decisions promptly.

195 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 95–96. ↗

196 Ibid.

them are considered more realistic.[197] At the same time, the CEC's proposals on regulating the specific features of organising and conducting nationwide elections after the termination or cancellation of martial law[198] do not contain proposals for resolving this issue. Article 22 of the CEC's legislative proposals, which formed the basis for the work of the parliamentary Working Group,[199] sets out proposals on establishing specific features for forming PECs at election precincts abroad.[200]

Absence of separate drawing of lots for the allocation of positions in each election commission

The drawing of lots procedure in parliamentary elections is conducted once for all PECs simultaneously,[201] which is inconsistent with the approach of drawing lots separately for each commission and poses risks of reduced transparency and controllability in forming the composition of individual commissions. Considering the opinion of the Venice Commission and the OSCE/ODIHR,[202] it would be advisable to conduct the drawing of lots for the allocation of management positions separately for each election commission, rather than as part of a single nationwide procedure.

Shortcomings in the mechanism for replacing election commission members

Recommendations concerning the time limits and grounds for replacing election commission members remain unimplemented. The OSCE/ODIHR recommended setting time limits for replacing commission members before election day, as well as introducing deadlines and clear, restrictive conditions for replacing TEC and PEC members to ensure the stability and independence of their work.[203] The Venice Commission also noted that the possibility for nominating entities to recall commission members at any time increases the risk of political pressure and makes them dependent on instructions from nominating entities; the only ground for terminating the powers of a commission member should

197 Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026. Information provided by Respondent No. 35 based on the results of a survey conducted on 28.03.2026. Information provided by Respondent No. 38 based on the results of a survey conducted on 30.03.2026. Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026. Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026. Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

198 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

199 'Preparation Is Already Underway'. When Elections Will Be Announced in Ukraine — the CEC Explains. Radio Free Europe/Radio Liberty, 2026. ↗

200 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

201 On the Procedure for Drawing Lots for the Inclusion of Nominees in Precinct Election Commissions for Parliamentary Elections in Ukraine: Resolution of the Central Election Commission No. 50 of 15.02.2022, para. 16 ↗; On the Procedure for the Central Election Commission to Conduct the Drawing of Lots for the Inclusion of Nominees in Constituency Election Commissions for Parliamentary Elections in Ukraine: Resolution of the Central Election Commission No. 49 of 15.02.2022, para. 14. ↗

202 Joint Opinion on the Draft Amendments to the Laws on the Election of People's Deputies and on the Central Election Commission and on the Draft Law on Repeat Elections of Ukraine, CDL-AD(2013)016, adopted by the Council for Democratic Elections at its 45th meeting, Venice, 13 June 2013, and by the Venice Commission at its 95th Plenary Session, Venice, 14–15 June 2013, paras. 37, 39. ↗

203 OSCE/ODIHR Final Report on Observation of the 2015 Local Elections, Rec. A3. ↗

be their inability to perform the duties prescribed by law.[204] In this regard, it has been proposed to introduce legislative restrictions on replacements shortly before election day and/or repeated rotations by the same electoral stakeholder, including by prohibiting submissions for replacement later than two days before election day, as well as requiring nominating entities to propose as replacements only persons who have completed CEC-approved training.[205] Stakeholders consider the revision of the procedure for recalling commission members and the narrowing of the grounds for their replacement to be the most realistic areas for change in this regard.[206]

Need to professionalise election commissions

The professionalisation of commission members also remains at the centre of international recommendations. The OSCE/ODIHR recommended introducing professional selection criteria, mandatory training and certification of commission members, establishing a national register of election commission members as an alternative recruitment mechanism, considering additional mechanisms for recruiting commission members and increasing remuneration.[207] The FDI Roadmap provides that the Centre for Training Participants in Electoral Processes should be functioning as a legal entity under public law by the fourth quarter of 2027.[208] An interim option could be the introduction of continuous training for certain representatives of the management of election commissions and, in the longer term, mandatory training for all candidates for commission membership, mandatory certification, an electronic register of persons who have completed training and the possibility of revoking certification where a violation has been established that served as grounds for early termination of powers.[209]

CEC Resolution No. 48 and the legislative proposals prepared for it identify professional selection criteria, mandatory training and certification of commission members, a national register of election commission members, increased remuneration and the introduction of deadlines and restrictive grounds for replacing election commission members among the tools for guaranteeing the integrity and independence of the bodies responsible for organising elections.[210] The issue of professionalisation, like other issues of election administration, currently remains outside the Working Group's focus.

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204 Venice Commission Opinion, CDL-AD(2009)040, para. 31. ↗

205 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 98–100. ↗

206 Information provided by Respondent No. 31 based on the results of a survey conducted on 25.03.2026.
Information provided by Respondent No. 32 based on the results of a survey conducted on 25.03.2026.
Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026.
Information provided by Respondent No. 38 based on the results of a survey conducted on 30.03.2026.
Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.
Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026.
Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

207 OSCE/ODIHR Final Report on Observation of the 2019 Early Parliamentary Elections of Ukraine, pp. 12, 35 ↗; OSCE/ODIHR Final Report on Observation of the 2020 Local Elections, pp. 14, 45 ↗; OSCE/ODIHR Final Report on Observation of the 2019 Presidential Election in Ukraine, pp. 14, 49. ↗

208 Roadmap on the Functioning of Democratic Institutions, II.A Free and Fair Elections, p. 5. ↗

209 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 100–101. ↗

210 On Measures to Take into Account the Recommendations of the OSCE Office for Democratic Institutions and Human Rights Based on the Results of Election Observation Missions in Ukraine: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

Disproportionate remuneration of election commission members

International missions have also drawn separate attention to the remuneration of election commission members. The recommendations concerned prohibiting payments by candidates and parties and setting remuneration that is proportionate to the workload.[211] In the CEC's legislative proposals, remuneration of election commission members is also treated as something that should be funded from the state budget, while payments from other sources should be prohibited. Certified commission members may receive increased remuneration.[212] The unpaid nature of the work of a significant part of election commission members, shadow remuneration of commission members by the entities nominating them and the lack of adequate budget funding are considered factors contributing to corruption risks and the opacity of election process financing. In this regard, a gradual expansion is proposed of the categories of persons entitled to remuneration for their work in election commissions, alongside a potential reduction in the numerical composition of commissions and the maximum number of voters assigned to one polling station.[213]

Lack of funding for the creation of the CEC UAIS and a comprehensive cybersecurity system for electoral infrastructure

The Concept for the Unified Automated Information and Analytical System of the CEC (CEC UAIS) was approved back in 2021.[214] The lack of funding for the creation of the CEC UAIS in 2022–2024 made it impossible to create the system within the planned timeframe.[215] This delay is taking place against the backdrop of systemic underfunding of cybersecurity for electoral infrastructure.

The FDI Roadmap provides for the creation and implementation of the CEC UAIS by the fourth quarter of 2027, including new electronic services for voters, candidates, political parties and election commissions, as well as reliable cybersecurity.[216]

In this area, it would be advisable to ensure: (1) the full transition of commissions to electronic document management, (2) electronic processing of protocols, automatic verification of their completion and transmission of documents in the EDA and (3) amendments to the EC of Ukraine to enable electronic submission of nominations to commission membership and the introduction of electronic drawing of lots following an audit and certification of the system.[217]

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211 OSCE/ODIHR Final Report on Observation of the 2015 Local Elections, Rec. A4 ↗; OSCE/ODIHR Final Report on Observation of the 2019 Presidential Election in Ukraine, pp. 44, 51. ↗

212 On Measures to Take into Account the Recommendations of the OSCE Office for Democratic Institutions and Human Rights Based on the Results of Election Observation Missions in Ukraine: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

213 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 107–110. ↗

214 On Approval of the Concept for Creating the Unified Automated Information and Analytical System of the Central Election Commission: Resolution of the Central Election Commission No. 447 of 29.10.2021. ↗

215 Report on the Review of State Budget Expenditure in the Area of Elections and Referendums for the Period from 2022 to the First Nine Months of 2024. Central Election Commission. ↗

216 Roadmap on the Functioning of Democratic Institutions, II.A Free and Fair Elections, p. 5. ↗

217 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 97–98, 104–106, 112–113. ↗

At the same time, during 2025, a significant strengthening of the CEC's institutional and technological capacity in information technology and cybersecurity can be observed — largely thanks to international technical assistance.[218] This positive trend in strengthening the CEC's technological resilience[219] also confirms the critical dependence of this process on donor support in the absence of adequate state funding.

Insufficient transparency of the CEC's activities

The OSCE/ODIHR recommended that the CEC increase the transparency of its work by publishing documents related to the electoral process on its website, including dissenting opinions to resolutions and a register of annotated complaints; the Venice Commission indicated that all written documents of election commissions should be made public and posted on the CEC website, and that discussions of issues should not be held 'behind closed doors'.[220] According to national observers, during the 2019 presidential and parliamentary elections, the practice of holding working meetings continued,[221] resulting in discussions of draft decisions at public meetings[222] becoming largely formal. This showed signs of non-compliance with the principles of collegiality and transparency in the CEC's activities. At the same time, NGO observers were unable to observe such meetings. Cases of unequal treatment by the CEC of international and national observers were repeatedly recorded: the former were invited to working meetings, while the latter were refused access.[223] Taking this negative experience into account, experts proposed strengthening the principles of transparency, openness and collegiality in the CEC's work at legislative level, in particular by: (1) enshrining the right of observers to receive information on the agenda of working meetings; (2) clearly defining the grounds for restricting presence at such meetings; and (3) providing for the need to publish draft decisions and meeting agendas in advance, and to inform the media and electoral stakeholders in advance of planned CEC meetings.[224] After 2019, no amendments to the legislation or to the Rules of Procedure of the CEC aimed at strengthening the transparency of working meetings and formal meetings were adopted, and this issue is not being discussed in the working groups.

218 Report of the Central Election Commission for 2025. Central Election Commission. Kyiv, 2026, pp. 35–37.

219 During 2025, with the support of international partners, including IFES, the European Union and International IDEA, the CEC took several systemic steps to modernise electoral IT infrastructure. In particular, the software of the information and analytical systems 'Election of the President of Ukraine', 'Parliamentary Elections of Ukraine' and 'Local Elections', which form part of the UAIS 'Elections', was modernised on the basis of a contemporary web-oriented architecture. Licensed software and a specialised software and hardware solution were also procured to strengthen cybersecurity.

220 OSCE/ODIHR Final Report on Observation of the 2015 Local Elections, Rec. B11; Joint Opinion of the Venice Commission and the OSCE/ODIHR, CDL-AD(2013)016, paras. 33, 41.

221 CEC working meetings are not provided for by the Law of Ukraine 'On the Central Election Commission' and are regulated exclusively at the level of the Commission's Rules of Procedure.

222 Civil Network OPORA, Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019, pp. 84, 189.

223 Civil Network OPORA, OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine, pp. 15, 23–24, 67.

224 Civil Network OPORA, OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine, pp. 192, 197; Civil Network OPORA, Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019, p. 189.

In addition, the publication of election documentation through the CEC website should be ensured, broken down by constituencies and precincts.[225]

Need to review the legislation on the accreditation of NGO observers to guarantee their access to all stages of the electoral process

International election observation missions have drawn attention to the need to review the regulatory framework governing the accreditation of observers from non-governmental organisations to ensure their clear right to observe all stages of the electoral process, including the formation of TECs and the work of the CEC from the start of the electoral process.[226]

Observer access at local elections is limited at the early stages, during the formation of TECs and TCs. This is due to the fact that the legislation does not provide for their right to register simultaneously with the first meetings of the relevant commissions, which led, during the 2020 local elections, to the practice of forming TECs and TCs without full-fledged public oversight. [227]

The CEC's 2025 legislative proposals outline the need to simplify certain formalities for NGOs to obtain permission to have official observers at the relevant elections, namely by removing the requirement to submit a notarised copy of the statute to obtain such permission. State registration of an NGO does not always involve the issuance of constituent documents in paper form, which in practice made it difficult to notarise a copy of the NGO's statute.[228] At the same time, the relevant proposals are currently not under consideration by either the Working Group or Parliament.

There is also a spread of 'fake' or politically motivated observation, where NGOs and individual 'observers' are used not for independent oversight of the electoral process, but to legitimise it in the interests of individual candidates or the authorities. This undermines trust in the institution of citizen observation and complicates the work of reputable observer networks. In the CEC's 2025 legislative proposals, in implementation of the OSCE/ODIHR recommendations, it was proposed to counter the use of the observation mechanism for political or other private purposes.[229] At the same time, specific legislative restrictions in this area require inclusive discussion to avoid creating disproportionate barriers to citizen observation.

Limited access of observers and the media to party congresses and conferences for the nomination of candidates

In view of the existing barriers to observing the candidate nomination process, it would be advisable to treat the following as violations of the candidate nomination procedure:

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225 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 97–98, 104–106, 112–113 ↗; For more details, see the subsection 'Voting and Establishment of Election Results'.

226 OSCE/ODIHR Final Report on Observation of the 2019 Presidential Election in Ukraine, Rec. B21. ↗

227 Final Report on Observation by Civil Network OPORA at the 2020 Local Elections. ↗

228 On Measures to Take into Account the Recommendations of the OSCE Office for Democratic Institutions and Human Rights Based on the Results of Election Observation Missions in Ukraine: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

229 On Approval of Proposals for Improving Ukrainian Legislation in Connection with Taking into Account the Recommendations of OSCE/ODIHR Election Observation Missions: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

failure to comply with the requirements to inform the CEC and the media of the time and place of congresses, discrepancies between their actual time and place and the information made public, as well as the creation of obstacles to the presence of media representatives, election commissions and observers at such events.[230] Draft Law 'On Political Parties' No. 14289 partially takes these approaches into account. In particular, Article 25 provides for the open nature of congresses and conferences for the nomination of candidates, the obligation to notify the time and place of their holding and the procedure for accrediting media representatives, as well as the right of authorised representatives or official observers from NGOs that have obtained permission from the CEC to have official observers at the relevant elections, and media representatives, to be present at such events without prior permission or invitation from the organisers.[231] At the same time, as of 31 July 2026, Draft Law No. 14289 had not yet become the subject of broad political discussion or practical further development either at the level of the relevant parliamentary committee or within internal faction working formats.

Recommendations

1. Legislatively establish an exhaustive list of requirements for decisions not to hold elections or voting in a specific territory, as well as a procedure for making such decisions that would ensure their impartiality and objectivity.

Regarding the CEC

1. Remove the possibility of simultaneous early termination of powers of the entire CEC composition by deleting Article 31[1] from the Law of Ukraine 'On the Central Election Commission' and provide additional procedural safeguards against politically motivated reconfiguration of its composition.
2. Replace the legislatively defined criteria for establishing a breach of oath by a CEC member, which allow for broad interpretation, with grounds that are subject to objective verification — in particular, failure to attend meetings without valid reasons or failure to comply with CEC decisions.
3. Provide in the legislation for transparent procedures for forming the CEC composition on a competitive basis, which would ensure the political neutrality of the collegial body, its professionalism and public trust in it, taking into account the requirements of professional competence, integrity and proper reputation.
4. Ensure the stability of the CEC's functioning by filling vacant positions of CEC members.
5. Ensure the phased establishment and functioning of CEC offices by defining their organisational model, functional competence, procedure for interaction with the Commission's central apparatus and bodies maintaining the SVR, as well as adequate budgetary support for their activities.

230 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 88–89. ↗

231 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025, Article 25. ↗

Regarding lower-level election commissions

1. Launch a systematic dialogue involving representatives of public authorities, the CEC, political parties and civil society with a view to forming a consolidated position and agreed legislative solutions to reduce disproportions in the representation of electoral stakeholders and eliminate the most significant advantages for certain parliamentary parties by changing the rules for nominating candidates and the procedure for drawing lots, guided by the principles of equality and impartiality enshrined in the Venice Commission's Code of Good Practice in Electoral Matters.
2. Establish a reasonable maximum numerical composition of TECs and PECs in presidential elections, taking into account the actual needs of organising voting, vote counting and the available electoral infrastructure.
3. Provide for the drawing of lots for the allocation of management positions in parliamentary elections separately for each election commission, rather than once for all commissions simultaneously, to increase the transparency and controllability of the formation of commission compositions.
4. Establish deadlines and clear, restrictive grounds for replacing election commissioners before election day, as well as limit the possibility of repeated rotations by the same nominating entity.
5. Introduce a mandatory system of prior training and certification of election commission members and create a national register of persons who have completed the relevant training.
6. Ensure, in accordance with the FDI Roadmap, the phased establishment and full functioning of the Centre for Training Participants in Electoral Processes as a legal entity under public law, integrating it into a sustainable system of professional training for election commission members.
7. Provide adequate budgetary support for the remuneration of election commissioners.
8. Introduce electronic document management in the operations of election commissions, electronic submission of documents for forming commission compositions, automated verification of election documentation and the phased introduction of electronic drawing of lots after a proper audit and certification of the relevant system.
9. Ensure the publicity of the activities of the CEC and other election commissions, through the systematic publication of decisions, documents, dissenting opinions and materials related to the electoral process.

Regarding observation

1. Improve the legal regulation of official observation so that observers from NGOs have a clearly defined right to observe all stages of the electoral process, including those that precede, in time, the possibility of obtaining official accreditation.
2. Incorporate the legislative proposals of the CEC on simplifying the formal requirements for NGOs to obtain permission to have official observers.
3. Ensure inclusive discussion with relevant stakeholders on possible forms of preventing the use of the observation for political or other private interests, while avoiding the introduction of disproportionate barriers to genuine citizen observation.

4. Consider the provisions of Draft Law 'On Political Parties' (registration No. 14289), provide for legislative requirements on the openness of congresses and conferences of political parties for the nomination of candidates, including in cases of inaccurate notification of the time and place of their holding and the creation of obstacles to the presence of media representatives, election commissions and observers.

Voter Registration and Voter Lists, Updating and Auditing the State Voter Register

State of play

The SVR remains the key institutional safeguard for the exercise of the right to vote, as voter lists are compiled on its basis. Ukraine has a model of 'passive' registration, under which voters are included in the Register on the basis of information received from other state authorities, as part of the periodic data update procedure, combined with the possibility for voters to initiate the clarification of their own data, change their electoral address and change their place of voting.[232] After 24 February 2022, updates to and access to the Register database were suspended on the grounds of personal data protection and cybersecurity. The CEC subsequently restored the functioning of the system in stages: in September 2023, the Automated Information and Communication System of the State Voter Register, AICS Register was put into test operation; on 22 December 2023, the periodic updating of the database was resumed;[233] on 20 September 2024, the functioning of the system was restored in the part concerning records of election precincts;[234] and on 23 December 2025, the functioning of the AICS Register was restored in the part concerning interaction with voters, including the recording of applications and requests, monitoring of their consideration, generation of information for voters and operation of the 'Voter's Personal Account' service.[235]

At the same time, the restoration of the AICS Register does not mean that the capacity of the entire system for maintaining the Register has been fully restored. The structure of Register bodies comprised 411 bodies maintaining the SVR and 27 regional administration bodies. As of 28 July 2026, only 293 Register maintenance bodies were working in the AICS Register, representing 71%. A further 118 Register maintenance bodies had not resumed their work, of which 77 have not functioned since 2014 and 41 — since 24 February 2022[236].

232 State Voter Register: More than a Database. Civil Network OPORA, 2026 ↗; O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Centre for Civil Liberties, 2026, p. 6. ↗

233 On Certain Issues of Partial Restoration of the Functioning of the Automated Information and Communication System 'State Voter Register': Resolution of the Central Election Commission No. 83 of 22.12.2023. ↗

234 On Restoring the Functioning of the Automated Information and Communication System 'State Voter Register' in the Part Concerning Records of Election Precincts Existing on a Permanent Basis: Resolution of the Central Election Commission No. 54 of 20.09.2024. ↗

235 On Restoring the Functioning of the Automated Information and Communication System 'State Voter Register': Resolution of the Central Election Commission No. 73 of 23.12.2025. ↗

236 Letter of the Central Election Commission No. 21-17-2202 of 28.07.2026 in response to an information request from Civil Network OPORA.

In addition, as of 31 July 2026, the Register contained records of 34,120,593 voters, of whom only 32,646,041 had an electoral address, while 1,474,552 had a note on deregistration; 558,370 voters were recorded in the EDA, of whom only 380,873 had an electoral address.[237] According to Eurostat, as of 31 May 2026, 4.38 million persons[238] who had left Ukraine as a result of the war were under temporary protection in EU countries. According to the information presented in the 'Internally Displaced Persons' dashboard of the Information and Computing Centre of the Ministry of Social Policy, Family and Unity of Ukraine, 4.652 million internally displaced persons (IDPs)[239] were registered as of 31 July 2026. This means that a significant proportion of displaced persons do not reside at their electoral address, which affects the accuracy of the Register data.

Since 2023, the CEC has established working groups in three areas: (1) developing mechanisms for updating information on voters to ensure the conduct of post-war elections; (2) preparing proposals on the organisation of voting for voters who reside or are present in the territory of a foreign state on election day; and (3) developing an action plan for organising the preparation and conduct of post-war elections.[240] As part of this work, mechanisms were analysed for updating data on voters who, as a result of the armed aggression, were forced to change their place of residence or leave Ukraine, as well as ways to ensure voting by Ukrainian citizens abroad. As a result, on 7 January 2026, the CEC adopted the Resolution 'On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine', the provisions of which envisage, in particular, simplified procedures for determining an electoral address, changing an electoral address and changing the place of voting, as well as a mandatory voter information campaign.[241] Informing voters about the new procedures will remain difficult until special legislation on post-war elections is adopted.[242]

The adoption of this resolution was also preceded by the establishment, on 22 December 2025, by the Chairman of the Verkhovna Rada of a Working Group to prepare comprehensive legislative proposals on the specific features of the procedure for organising and holding elections during a special period and/or post-war elections in Ukraine.

The European Commission 2024 Report noted that the CEC, in cooperation with international partners and civil society organisations, was preparing amendments on updating the voter register and voting abroad.[243]

The Roadmap on the Functioning of Democratic Institutions provides that, by Q4 2026, the functioning of the SVR and its electronic services should be ensured, taking into

237 Information on the Number of Voters within the Autonomous Republic of Crimea, regions, the cities of Kyiv and Sevastopol and the foreign constituency, as of 30.07.2026. Official website of the State Voter Register. ↗

238 Temporary protection for persons fleeing Ukraine – monthly statistics. Eurostat, 2026. ↗

239 Internally Displaced Persons. State Enterprise 'Information and Computing Centre' of the Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

240 Report of the Central Election Commission for 2023, pp. 11–21 ↗; Report of the Central Election Commission for 2025, p. 9. ↗

241 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

242 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

243 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

account security factors and cybersecurity requirements.[244] Experts have also identified the restoration of the Register, an independent audit and legislative amendments to procedures related to voter lists as priorities.[245]

Progress and issues

Register data becoming outdated

The statistics on voter displacement after the beginning of the full-scale invasion indicate that the Register data are becoming outdated. The main groups include officially registered internally displaced persons, citizens who have relocated without a formal change of status, citizens who have left Ukraine,[246] citizens who have remained in the temporarily occupied territories or moved there,[247] persons missing under special circumstances[248] and citizens involved in the defence of the state.[249]

Thus, due to the widespread failure by citizens, in the context of the full-scale invasion, to comply with the requirements for registering or declaring their place of residence[250] and due to the absence of up-to-date data from the temporarily occupied territories, a significant proportion of the information in the SVR remains outdated, despite the restoration of its technical functioning from 23 December 2025.

The CEC proposals provide for an initial update of the SVR database, aimed at a one-off set of organisational and technical measures by the Register administrator to enter, clarify and verify voters' identifying personal data based on information received through electronic information exchange from state authorities, local self-government bodies and other entities specified by law. This mechanism is intended to ensure the completeness, reliability and currency of the Register data, including by entering information on the registration number of the taxpayer's record card or the passport series and number in cases provided for by law, as well as the unique record number in the Unified State Demographic Register for Ukrainian citizens who have reached the age of eighteen.[251]

It should be noted that, in addition to these ad hoc changes, which are currently designed exclusively for the first post-war nationwide elections, the CEC submitted to the parliamentary Working Group for the preparation of legislative proposals on elections

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244 Roadmap on the Functioning of Democratic Institutions. II.A Free and Fair Elections, p. 5. ↗

245 Roadmap for Ensuring the Organisation of Post-War Elections. Civil Network OPORA, pp. 10–11, 26. ↗

246 The statistics are provided in the state of play section of this subsection.

247 During a meeting of the Working Group for the preparation of legislative proposals on the specific features of holding elections during a special period, it was also noted that more than 42,000 voters in the temporarily occupied territories are over 100 years old and more than 1,000 are over 115 years old, while information on their deaths is absent. Meeting of the Working Group for the preparation of legislative proposals on the specific features of holding voting during a special period, 2026. ↗

248 More Than 90,000 Ukrainians Are Considered Missing — Commissioner. Ukrainska Pravda, 2026. ↗

249 State Voter Register: More than a Database. Civil Network OPORA, 2026. ↗

250 Under the legislation, a citizen of Ukraine residing in Ukraine, as well as a foreigner or stateless person lawfully residing permanently or temporarily in Ukraine, must declare or register their new place of residence or stay within 30 calendar days of arrival. On the Provision of Public (Electronic Public) Services for Declaring and Registering Place of Residence in Ukraine: Law of Ukraine No. 1871-IX of 05.11.2021, Article 5. ↗

251 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

during a special or post-war period (the Working Group) proposals for amendments to the Law of Ukraine 'On the State Voter Register'. These proposals are aimed at aligning the rules for maintaining the Register with the current model of declaration and registration of place of residence, expanding digital services and strengthening interoperability between registers. In particular, they concern: (1) the use of the wording 'declared or registered place of residence'; (2) clarification of the rules for determining the electoral address; (3) expansion of electronic channels for submitting requests to the Register, including through the Diia Portal; and (4) granting the Register administrator automated access to other state information systems.[252]

As part of the Working Group's activities, a Subgroup on Internally Displaced Persons, Temporarily Occupied Territories and Frontline Territories was established.[253] Its work was focused on Articles 23 and 24 of the CEC draft law, which concern, respectively, the specific procedure for changing a voter's electoral address and the temporary change of a voter's place of voting.[254]

All these proposals for amendments to the Law of Ukraine 'On the State Voter Register' were supported by the Working Group. However, as of 31 July 2026, they had not been registered in Parliament as a draft law.

Imperfect mechanisms for updating data on voters abroad

The CEC links the difficulty of proper voting planning without additional collection of up-to-date data to the fact that the actual number of forced migrants outside Ukraine significantly exceeds the number of voters who are registered with consular authorities or have changed their electoral address to an election precinct abroad. In this context, the proposals on legislative regulation of the specific features of organising and holding nationwide elections after the termination or cancellation of martial law,[255] which summarised the work of the CEC working groups in 2022–2025,[256] proposed a mechanism of 'active voter registration'. It would allow Ukrainian citizens staying abroad to submit an application independently to participate in voting outside Ukraine. Active registration is defined as an instrument for establishing the approximate number of voters who intend to vote in a particular region of a foreign state, in order to decide whether to establish additional election precincts abroad.[257] At the same time, the introduction of

252 Comparative Table on Amendments to the Law of Ukraine 'On the State Voter Register' and the Electoral Code of Ukraine. Library of the Working Group for the Preparation of Comprehensive Legislative Proposals on the Specific Features of the Procedure for Organising and Holding Elections during a Special Period and/or Post-War Elections in Ukraine. Subgroup on Administration and Election Infrastructure. CEC Proposals. ↗

253 Constitutional and Legal Limits of Organising Elections during a Special or Post-War Period Discussed at a Meeting of the Verkhovna Rada Working Group. Verkhovna Rada of Ukraine, 2026. ↗

254 Meeting of the Working Group for the Preparation of Comprehensive Legislative Proposals on the Specific Features of the Procedure for Organising and Holding Elections during a Special Period and/or Post-War Elections in Ukraine. Rada TV Channel, 2026 ↗; On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

255 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

256 Report of the Central Election Commission for 2025. ↗

257 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

such a mechanism requires amendments not only to the Law of Ukraine 'On the State Voter Register' but also to the EC of Ukraine, since the deadlines and procedure for compiling voter lists at election precincts abroad and the mechanisms for ensuring the principle of universal suffrage depend on the procedure and methods of voting in the EDA. As part of the work of the parliamentary working subgroup preparing proposals on the participation in elections of Ukrainian citizens staying abroad, the approach of introducing an active voter registration mechanism was supported.[258] However, as of 31 July 2026, this Working subgroup had not yet completed its work on a comprehensive draft law that would implement the proposed mechanism of active registration of voters abroad and the related package of amendments to election legislation.

The effectiveness of active registration is also linked to the optimisation of consular registration, the expansion of electronic services, including the Voter's Personal Account and the Diia application, and the introduction of dedicated programmes to inform voters abroad about the procedure for registration in the Register, updating their data and changing their place of voting without changing their electoral address.[259] The development of electronic services for voters and the digitalisation of document flow remain constrained by limited resources, as the implementation of the project to modernise the Elections IAS was suspended due to the full-scale war and the reallocation of budgetary resources to defence needs.[260]

Absence of a legal framework for auditing the Register

An audit is an important tool for assessing and updating the Register data. The European Commission's 2025 Report identifies the audit and update of the Register as among the most urgent tasks in preparing the first post-war elections.[261] At the same time, there is currently no vision for the legal regulation of the Register audit.[262] In this regard, it may be advisable to amend the Law of Ukraine 'On the State Voter Register' to provide for a public audit of the Register in line with international standards and to define the criteria for selecting the entities authorised to conduct it, the methodology, procedure and consequences of such an audit.

This mechanism would ensure an independent assessment of the completeness, accuracy and reliability of the Register database, as well as the degree of its protection against unlawful interference.[263] At the same time, the legal framework for the audit should be adopted and the audit itself conducted well in advance of the start of the electoral process for the first post-war elections.[264] In this context, the approach of the Venice Commission should also be taken into account, according to which any changes to voter data should

258 Analytical Update on Ukraine's Progress in Implementing the Indicators of the Roadmap on the Functioning of Democratic Institutions Based on the Work of Thematic Subgroups on Preparing the Legal Framework for the First Post-War Elections. Civil Network OPORA, 2026. ↗

259 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 64–65. ↗

260 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

261 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

262 Civil Network OPORA, State Voter Register: More than a Database, 30.03.2026. ↗

263 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 56–57, 65–67. ↗

264 Roadmap for Ensuring the Organisation of Post-War Elections. Civil Network OPORA, p. 26. ↗

be accompanied by proper notification and an opportunity to challenge them, while the openness of the Register should be balanced with the protection of personal data.[265]

The updating of the Register and preparation for its audit have time-related, organisational and resource dimensions. A full update of the SVR database will be possible only after martial law is lifted, while the minimum preparatory period before the first post-war elections should be at least six months. The development of electronic services for voters and the digitalisation of document flow are linked to funding issues.[266] The accuracy of the Register is also affected by the destruction of part of the election infrastructure, population mobility and further decisions by public authorities on the organisation of voting and the workload of election precincts.[267]

Insufficient deadlines for submitting applications to change the electoral address

In the area of voter registration and voter lists, even before the full-scale invasion, the OSCE/ODIHR drew attention to the link between the system of residence registration and the implementation of the principle of equal suffrage. Following the 2015 local elections, the OSCE/ODIHR recommended ensuring that different groups of citizens, including IDPs, could participate in voting after a certain period of residence in the relevant locality.[268] In its report on the 2019 early parliamentary elections, the OSCE/ODIHR also noted the need to remove obstacles created by the residence registration system in order to ensure equal suffrage and the participation in voting of voters who had effectively been deprived of the opportunity to vote. In the context of the expansion of the temporarily occupied territories, this remains relevant today.[269]

The 2020 amendments to election legislation simplifying the change of electoral address helped expand IDPs' access to the exercise of the right to vote,[270] which was positively assessed by the OSCE/ODIHR in its final report on the 2020 local elections. However, a recommendation was also made to extend the deadlines for submitting applications to change the electoral address.[271] In CEC Resolution No. 48 of 3 October 2025, this recommendation is reflected in the proposal to extend the deadline for submitting

265 Venice Commission, Joint Opinion on the Draft Amendments to the Laws on Election of People's Deputies and on the Central Election Commission and on the Draft Law on Repeat Elections of Ukraine, adopted by the Council for Democratic Elections at its 45th meeting (Venice, 13 June 2013) and by the Venice Commission at its 95th Plenary Session (Venice, 14–15 June 2013), para. 44 ↗; Joint Opinion on Draft Amendments to Legislation on the Election of People's Deputies of Ukraine, adopted by the Venice Commission at its 96th Plenary Session (Venice, 11–12 October 2013), para. 33 ↗; Opinion on the Draft Election Code of the Verkhovna Rada of Ukraine, adopted by the Council for Democratic Elections at its 35th meeting (Venice, 16 December 2010) and by the Venice Commission at its 85th Plenary Session (Venice, 17–18 December 2010), para. 35. ↗

266 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

267 Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026.

268 OSCE/ODIHR Final Report on the Observation of the 2015 Local Elections, Rec. 13. ↗

269 OSCE/ODIHR Final Report on the Observation of the 2019 Early Parliamentary Elections in Ukraine, Rec. B18. ↗

270 O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Centre for Civil Liberties, 2026, pp. 5–6. ↗

271 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections, Rec. A7, pp. 17, 46. ↗
The practice of applying the 2020 amendments showed that around 5.5 million citizens were, for the first time, given the opportunity to vote at their place of actual residence in the 2020 local elections. However, the Register maintenance bodies processed 105,290 applications to change the electoral address, of which 100,081 were granted. This indicates that, even after some legal barriers had been removed, the scale of electoral address changes remained limited and depended to a significant extent on the accessibility of the procedure, the deadlines for completing it and the level of voter information. Civil Holding 'GROUP OF INFLUENCE'. Local Elections under the New Rules: Around 100,000 Citizens Changed Their Electoral Address, 2020. ↗

applications to change the electoral address from five to seven calendar days from the start of the electoral process,[272] while CEC Resolution No. 1 of 7 January 2026 provides that an application to change the electoral address may be submitted no later than 30 days before election day.[273]

Insufficient accessibility of the procedure for temporarily changing the place of voting

In its report on the 2019 presidential election in Ukraine, the OSCE/ODIHR proposed simplifying the procedure for temporarily changing the place of voting, including through electronic submission forms, the possibility of applying through an authorised person and a more flexible approach for voters registered in places where voting cannot be organised.[274] At the same time, the experience of the 2020 local elections showed that, even after more accessible mechanisms had been introduced, including the possibility of applying online, the actual use of the procedure remained limited.[275]

Simplification of the procedures for determining a voter's electoral address, changing the electoral address and changing the place of voting without changing the electoral address is proposed in the CEC draft law 'On the Specific Features of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine'. In particular, these proposals provide for: (1) the possibility of submitting an application to change the place of voting through an authorised person or through the Unified State Web Portal of Electronic Services, including the Diia mobile application; (2) the possibility of including a voter in the Register if no data on them are available; (3) a three-day time limit for considering the relevant applications; and (4) immediate notification of the voter, by electronic message, of a change in electoral address or place of voting.[276]

Insufficient clarity and convenience of procedures for informing voters about a change of electoral address and temporary change of place of voting

Voters do not always have timely, complete and clear information about the procedure itself, the deadlines for applying, the procedure for considering an application and the legal consequences of changing their electoral address or place of voting. In the CEC proposals, information provided through electronic services is viewed mainly as support for an application that has already been submitted, rather than as a dedicated mechanism for informing a broad range of voters in advance about the procedures available.

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272 On Measures to Take into Account the Recommendations of the Office for Democratic Institutions and Human Rights of the Organization for Security and Co-operation in Europe Following Election Observation Missions in Ukraine: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

273 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

274 OSCE/ODIHR Final Report on the Observation of the 2019 Presidential Election in Ukraine, Rec. 3. ↗

275 Between 1 July and 9 September 2020, almost 100,000 voters exercised the right to change their electoral address, although the procedure potentially concerned a much wider group of citizens who were mobile within the country. In its final report, OPORA linked this, in particular, to the short application period and the need to properly inform voters about the new procedure. Report on the Results of Civil Network OPORA's Observation of the 2020 Local Elections. ↗

276 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026 ↗; Analysis of the Draft Law 'On the Specific Features of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine'. Civil Network OPORA, 2026. ↗

Following the 2020 local elections, the OSCE/ODIHR recommended continuing voter education on the procedure for changing the electoral address,[277] while in its report on the 2019 presidential election in Ukraine it drew attention to the need for information campaigns on checking data in the Register and submitting applications for amendments.[278] In addition, the Venice Commission notes that where changes to voter data are initiated not only by the voter concerned but also in respect of other voters,[279] the voter concerned should be properly informed before such changes are made.[280]

The CEC proposals suggested immediate notification of a voter about a change in electoral address or place of voting by electronic message sent to the email address indicated in the application or to the Diia mobile application.[281] Voters from frontline territories where voting cannot be organised will require additional information about the available mechanisms for participating in voting.[282]

Insufficient time limits and mechanisms for checking and clarifying voter lists in post-war elections

In 2019, the OSCE/ODIHR drew attention to the advisability of giving voters more time[283] to check voter lists and submit applications for amendments. Under Part 5 of Article 42 of the EC of Ukraine, as under the previous legislation, this must be done no later than five days before election day.[284] This problem remains relevant both under current legislation and in the context of the legal framework for post-war elections.

The CEC[285] draft law provides for voter lists at additional and foreign election precincts to be transferred two to three days before election day without preliminary lists being produced, which may limit voters' ability to check the lists and correct inaccuracies in a timely manner.[286]

Within the Working Group, the issue of automatically determining the place of voting or electoral address of IDPs based on data from the Unified Information Database of IDPs did

277 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections, Rec. A7, pp. 17, 46. ↗

278 OSCE/ODIHR Final Report on the Observation of the 2019 Presidential Election in Ukraine, Rec. 12. ↗

279 Under Part 1 of Article 42 of the EC of Ukraine, the PEC of a regular election precinct makes the preliminary voter list available for public inspection at the premises of the PEC on the day following its receipt. Paragraph 2 of Part 3 of the same Article provides that a voter may apply to the PEC or directly to the body maintaining the State Voter Register with an application to clarify the preliminary voter list, including the inclusion or exclusion from the list of the voter themselves or other persons, as well as the presence or absence of notes on a voter's permanent inability to move independently.

280 Venice Commission, CDL-AD(2013)016, para. 44 ↗; CDL-AD(2013)026, para. 33. ↗

281 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

282 IDPs Should Change Their Electoral Address to Increase Voter Turnout — Korniienko. ZMINA, 2026. ↗

283 Under Part 5 of Article 42 of the EC of Ukraine, as well as under Part 5 of Article 32 of the Law of Ukraine 'On the Election of the President of Ukraine' in force at the time, an application to clarify the preliminary voter list, including the inclusion or exclusion from the list of the voter themselves or other persons, as well as the presence or absence of notes on a voter's permanent inability to move independently, may be submitted no later than five days before election day.

284 OSCE/ODIHR Final Report on the Observation of the 2019 Presidential Election in Ukraine, Rec. 12. ↗

285 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

286 Analysis of the Draft Law 'On the Specific Features of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine'. Civil Network OPORA, 2026. ↗

not receive full consensus. A model was discussed under which the MSP would provide the CEC with access to the relevant data, followed by their verification and the possibility of a temporary change of place of voting or a change of place of voting without changing the electoral address. At the same time, the need for further expert discussion of this mechanism was recognised.[287]

Abuse of the procedure for changing the electoral address in local elections

Cases of mass, suspicious changes of electoral address that showed signs of abuse of this procedure were repeatedly recorded by official observers from civil society organisations during the 2020 local elections.[288] In its report on the 2020 local elections, the OSCE/ODIHR noted that information on possible cases of abuse of registration procedures should be forwarded to law enforcement authorities, which should ensure proper and timely investigation of such cases.[289] To counter cases of mass changes of electoral address or changes of place of voting that may distort election results, especially in local elections following the mass inclusion in voter lists of persons who have no connection with the relevant territorial community, experts recommend extending the deadlines for voters to submit applications to change their electoral address, while introducing effective mechanisms to prevent 'electoral tourism', including proportionate, effective and dissuasive sanctions for the relevant violations.[290]

Recommendations

1. Ensure a comprehensive update of the SVR database before the start of the electoral process for the first post-war elections, taking into account the large-scale internal and external displacement of the population, changes in voters' actual place of residence, limited access to data from the temporarily occupied territories and the consequences of the destruction of part of the election infrastructure.
2. Ensure the updating of state information resources and registers whose data are used to populate the State Voter Register, as well as proper interagency information exchange for the timely sharing of up-to-date data.
3. Restore the capacity of the bodies maintaining the SVR in all territories where this is objectively possible and provide for special organisational mechanisms for territories where such bodies cannot function.

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287 Analytical Update on Ukraine's Progress in Implementing the Indicators of the Roadmap on the Functioning of Democratic Institutions Based on the Work of Thematic Subgroups on Preparing the Legal Framework for the First Post-War Elections. Civil Network OPORA, 2026. ↗

288 This refers to organised actions aimed at the mass change of electoral address or place of voting without voters having a genuine connection to the relevant territorial community, which could distort the expression of will in the community. In Zaporizhzhia District, Settlement Council Head Organised Transporting People to Change Their Place of Voting. Civil Network OPORA, 2020 ↗; Mass Transportation of People to Change Electoral Address, Distribution of Sugar and Campaigning: Luhansk Region Police Recorded 5 Possible Violations in the First 4 Days of the Electoral Process. Civil Network OPORA, 2020 ↗; In Odesa Region, Police Investigate Circumstances of Mass Changes of Electoral Addresses in Three Communities. Civil Network OPORA, 2020 ↗; In Lviv Region, Anomalous Change of Electoral Address Detected in Another Community. Civil Network OPORA, 2020. ↗

289 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections, Rec. B20. ↗

290 Recommendations on Ensuring the Electoral Rights of Vulnerable Categories of Voters in the Context of the Recommendations of the European Commission, the Office for Democratic Institutions and Human Rights and the Venice Commission. Civil Network OPORA, 2026. ↗

4. Provide separate budget funding for measures to update the Register, digitalise procedures, protect information and ensure the technical functioning of the AICS Register.
5. Before the termination of martial law, enshrine in law a mechanism for active voter registration in the TC, combined with the existing passive registration model.
6. Regulate the procedure for submitting applications to vote outside Ukraine, in paper and electronic form, including through the Voter's Personal Account and the Diia application.
7. Optimise the mechanisms of consular registration and collection of data on voters' actual place of stay abroad for the purposes of planning voting and determining the need for additional EPAs.
8. Introduce dedicated programmes to inform voters abroad about registration in the Register, data updates, changing the place of voting and the procedure for exercising electoral rights in the EDA.
9. Before the termination or cancellation of martial law, adopt amendments to the Law of Ukraine 'On the State Voter Register' defining the legal framework for auditing the Register, including its subject matter, the entities authorised to conduct it, the methodology, procedure, use of results and legal consequences.
10. Conduct an audit of the SVR before the start of the electoral process for the first post-war elections, so that the results of such audit can be taken into account when compiling voter lists and preparing the election infrastructure.
11. Adopt legislative amendments to simplify the procedures for determining the electoral address, changing it and changing the place of voting without changing the electoral address, taking into account the solutions already developed by the CEC and the parliamentary subgroups.
12. Provide for the possibility of submitting applications to change the electoral address and to change the place of voting without changing the electoral address in electronic form, through an authorised person and by other accessible means for voters who are unable to apply in person.
13. Regulate the procedure for the initial update of the Register database on the basis of information transmitted by state authorities after the adoption of the special law on post-war elections.
14. Provide for a mechanism for including in the SVR persons whose data are absent from the Register, but who apply to change their electoral address or place of voting.
15. Extend the deadlines for submitting applications to change the electoral address and place of voting, to ensure that a significant proportion of voters have a real opportunity to use these procedures.
16. Review the deadlines for compiling, transferring and clarifying voter lists, primarily at election precincts abroad and additional election precincts, so that voters have sufficient time to check their data and correct inaccuracies.

17. Provide mechanisms for informing voters in advance about their inclusion in voter lists and any change of electoral address or place of voting, including through electronic notifications.
18. Establish clear rules for the participation in voting of voters from frontline territories and other territories where some citizens will be unable to vote at their place of residence, ensuring that the available voting mechanisms are determined in advance.
19. Ensure broad public information on the procedure for checking one's data in the Register, the deadlines for applying and the available procedures for clarifying such data.

Political Parties in Elections. Candidate Nomination and Registration

State of play

With the introduction of a proportional electoral system in the EC of Ukraine[291] for parliamentary and local elections (in territorial communities with at least 10,000 voters), political parties have effectively acquired a dominant role, and in some cases even a monopoly, in the formation of representative bodies in Ukraine.[292] At the same time, the legal regulation of political parties, as well as the mechanisms for the nomination and registration of candidates, despite certain amendments, largely retain approaches dating back to the mid-2000s. As a result, problems identified during previous electoral campaigns by national and international election observation missions remain relevant for future electoral processes, including post-war elections.[293] The current regulatory framework creates conditions for the emergence and functioning of a 'shadow market' of political parties[294] and does not promote the institutionalisation of political parties as internally democratic structures operating at the national level.[295]

As of 1 January 2026, 399 political parties were registered in Ukraine,[296] of which 72 were in the process of termination and 21 had been banned by court decisions.[297] At the same time, as of 31 July 2026, only 321 parties were registered in the Unified State Register of Political Party Reports on Property, Income, Expenditures and Financial Liabilities

291 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Section XXIII. ↗

292 Parties Should Not Be Merely Objects of Trade. Civil Network OPORA, 2021. ↗

293 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 69. ↗

294 Parties Should Not Be Merely Objects of Trade. Civil Network OPORA, 2021. ↗

295 Party Legislation and the Development of Political Parties in Ukraine. National Institute for Strategic Studies, 2015, pp. 18–20. ↗

296 Letter of the National Agency on Corruption Prevention No. 205-02/50849-26 of 27.07.2026 in response to an information request from Civil Network OPORA.

297 From the Communist Party of Ukraine to Opposition Platform – For Life: How Ukraine Got Rid of Pro-Russian Parties. CHESNO. 2025 ↗; Over 110 Political Parties Failed to Submit Reports for the First Quarter of 2026. National Agency on Corruption Prevention. 2026. ↗

(POLITDATA Register). According to the NACP, 131 parties failed to submit financial reports for the fourth quarter of 2025 and 114 parties for the first quarter of 2026.[298]

For political parties, participation in elections is an obligation, the failure of which entails legal consequences. The failure of a political party to nominate its candidates in elections of the President and elections of Members of Parliament for a period of ten years constitutes grounds for revoking the party's registration certificate.[299]

Despite this, in the 2019 early parliamentary elections in Ukraine, only 22 political parties nominated candidates in the JMMC, and 52 political parties nominated candidates in SMC,[300] while in the 2019 regular presidential election in Ukraine candidates were nominated by 24 political parties.[301] Only 194 political parties declared their participation in the regular local elections.[302] In the 2020 local elections, 4,188 council members, or about 10% of all elected council members, were elected from parties that are now banned.[303]

The Ministry of Justice (MoJ) continues its systematic efforts to seek, through the courts, the revocation of the registration of parties that have not nominated candidates in presidential or parliamentary elections for 10 years or that violated statutory requirements governing their establishment and activities.[304]

Under martial law and in the absence of elections,[305] specific features have emerged regarding the replacement of council members/MPs from dissolved parties. During martial law, replacements are carried out only for Members of Parliament and council members elected through party lists,[306] while by-elections to fill vacant seats in representative bodies are not possible. Given that the Parliament was elected under a parallel electoral system, under the current electoral legislation, in the event of the early termination of powers of an MP elected in the JMMC, the CEC recognises the next candidate on the party list of the respective political party as elected.[307] The CEC's position regarding MPs from banned parties proceeds from the view that such MPs cannot be replaced.[308]

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298 Letter of the National Agency on Corruption Prevention No. 205-02/50849-26 of 27.07.2026 in response to an information request from Civil Network OPORA.

299 On Political Parties in Ukraine: Law of Ukraine No. 2365-III of 05.04.2001, Article 24. ↗

300 OPORA Final Report on the Results of Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019. ↗

301 OPORA Final Observation Report on the 2019 Regular Presidential Election in Ukraine. ↗

302 Final Report of the All-Ukrainian NGO Committee of Voters of Ukraine on the Results of Observation of the Regular Local Elections of 25 October 2020. ↗

303 Impact of the Termination of Political Parties' Activities on the Capacity of Local Governance under Martial Law. Civil Network OPORA, 2026. ↗

304 Ministry of Justice Initiates Lawsuits against Fictitious Parties. Ministry of Justice of Ukraine. 2025. ↗

305 Part 4 Article 83 of the Constitution of Ukraine and Part 1 Article 19 of the Law of Ukraine 'On the Legal Regime of Martial Law' exclude the holding of elections until the circumstances making elections impossible have been removed; On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015. ↗

306 On Elections of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011 (the law has ceased to be in force, except for provisions on the organisation and conduct of by-elections and the replacement of MPs elected in the nationwide election constituency whose powers were terminated early), Article 105 ↗; Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 284. ↗

307 On Elections of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011, Part 1 Article 105 ↗; Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 190. ↗

308 In Resolution No. 114 of 08.12.2022, the Central Election Commission determined that the court ban on the activities of the Political Party 'Opposition Platform — For Life' made it impossible to adopt a decision recognising the next candidate in sequence on its electoral list as elected.

By contrast, in the event of the termination of the mandate of Members of Parliament elected under the first-past-the-post system, the CEC, under martial law, has consistently refrained from calling by-elections and merely takes note of the fact of the early termination of the mandate.[309]

As regards local council members, the CEC in practice differentiates the legal consequences of termination of a political party's activities depending on the legal grounds for such termination. When a party is banned by a court, the CEC, as in the case of MPs, proceeds from the position that the entry into force of the relevant court decision constitutes a substantial and exceptional legal circumstance that makes it impossible to apply the replacement mechanism to council members elected on the party lists of that party. The consequence is the effective termination of movement along the relevant electoral list and the impossibility of subsequently recognising the next candidates in sequence as elected.[310] When a party's activities are terminated through self-dissolution, the CEC proceeds from the permissibility of applying the general replacement procedure and recognises legal grounds for the TEC to declare the next candidate in sequence on the relevant party list elected.[311] At the same time, this approach of the CEC does not eliminate the legislative gap, since the principles of local self-government, the organisation and procedure for holding elections and therefore the procedure for replacing mandates, under Article 92 of the Constitution of Ukraine, must be determined exclusively by laws of Ukraine and not merely by secondary legislation.[312]

During the preparation of the legislative framework for the first post-war elections, the definition of a model of lustration restrictions for persons who cooperated with the aggressor state will be a separate subject of discussion.

In Ukraine, the legislative framework for lustration was introduced in 2014 through two laws: 'On Restoring Trust in the Judiciary',[313] concerning the lustration of judges, and 'On Government Cleansing', concerning lustration in the public service. At the same time, the Law of Ukraine 'On Government Cleansing'[314] did not provide for political lustration, meaning that it did not apply to elected office.[315]

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309 For example: On Certain Issues Related to the Early Termination of Powers of MPs Elected in Single-Mandate Election Constituencies No. 102 (Kirovohrad Region) and No. 117 (Lviv Region): Resolution of the Central Election Commission No. 33 of 12.08.2025 ↗; On Certain Issues Related to the Early Termination of Powers of an MP Elected in Single-Mandate Election Constituency No. 170 (Kharkiv Region): Resolution of the Central Election Commission No. 61 of 12.11.2025 ↗; On Certain Issues Related to the Early Termination of Powers of an MP Elected in Single-Mandate Election Constituency No. 121 (Lviv Region): Resolution of the Central Election Commission No. 8 of 30.01.2026. ↗

310 On Certain Issues of Replacing Local Council Members Whose Powers Were Terminated Early: Resolution of the Central Election Commission No. 25 of 13.04.2023. ↗

311 On Issues of Implementing Certain Electoral Procedures by Election Commissions: Resolution of the Central Election Commission No. 57 of 28.10.2025 ↗; The need for this clarification arose after the self-dissolution of the party 'Nash Krai', information on the termination of which was entered into the Unified State Register on 07.10.2025; according to OPORA, this party held 1,860 mandates in local self-government, accounting for 4.46% of all elected council members, while in some communities its representation reached almost a quarter of the council composition ; Can Council Members Be Replaced after Parties' Self-Dissolution: CEC Clarification. Civil Network OPORA, 2025. ↗

312 Can Council Members Be Replaced after Parties' Self-Dissolution: CEC Clarification, 31.10.2025. ↗

313 On Restoring Trust in the Judiciary in Ukraine: Law of Ukraine No. 1188-VII of 08.04.2014. ↗

314 On Government Cleansing: Law of Ukraine No. 1682-VII of 16.09.2014. ↗

315 Political Lustration: International Standards, Practices and Recommendations for Ukraine. Civil Network OPORA, 2025. ↗

In 2015, the Venice Commission prepared an opinion on the Law 'On Government Cleansing', in which it criticised a number of its provisions, in particular the extension of the Law to a broad list of positions, the unjustified period of holding office required for lustration restrictions to apply, as holding a position for one day was sufficient for lustration, the absence of clear criteria for lustration, the introduction of the principle of collective responsibility, namely holding positions in the Communist Party of the Soviet Union / Communist Party of Ukraine or the mere fact of holding a certain position between 2010 and 2014, the absence of proper procedural safeguards for protecting the rights of lustrated persons, the possibility of political abuse and selective enforcement and so on.[316] Some of these comments are also reflected in the European Court of Human Rights (ECtHR) judgment in Polyakh and Others v. Ukraine.[317]

In addition to the Law of Ukraine 'On Government Cleansing', the Venice Commission also considered a draft law directly concerning political lustration[318] — Draft Law No. 9081[319] and two alternative draft laws.[320] As with the Law of Ukraine 'On Government Cleansing', the Venice Commission emphasised that the draft laws effectively introduced the principle of collective responsibility, since the mere fact of nomination, rather than even membership or holding leadership positions in such a party, in elections by a party whose activities were subsequently banned was sufficient to deprive a person of the right to be elected, rather than, for example, cooperation with the Russian Federation (Russia) or encroachment on Ukraine's independence. Among other shortcomings, the Commission identified the lack of justification for the duration of the lustration restrictions, namely 10 years, as the period was set without taking into account the gravity of the violation, the absence of proper procedural safeguards for protecting the rights of persons whose registration was refused or cancelled and the possibility of political abuse, especially under martial law.[321]

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316 Final Opinion on the Law on Government Cleansing (Lustration Law) of Ukraine as Would Result from the Amendments Submitted to the Verkhovna Rada on 21 April 2015: adopted by the Venice Commission at its 103rd Plenary Session, Venice, 19–20 June 2015: CDL-AD(2015)012, Opinion No. 788/2014. European Commission for Democracy through Law (Venice Commission), 2015. ↗

317 Polyakh and Others v. Ukraine: Judgment of the European Court of Human Rights of 17.10.2019, applications Nos. 58812/15, 53217/16, 59099/16, 23231/18 and 47749/18. ↗

318 The draft law proposed prohibiting, in elections of MPs of Ukraine and local elections, for 10 years from the date of termination or cancellation of martial law, the nomination of citizens who, at the time martial law was introduced in Ukraine, were MPs, local council members or heads of communities from parties whose activities had been banned. In addition to the documents that, under the EC of Ukraine, a voter must submit to register as a candidate, the draft proposed imposing on prospective candidates an obligation to submit lustration declarations — statements that they had not been MPs, local council members or heads of communities from banned parties. If the relevant TEC, or in the case of elections of Members of Parliament of Ukraine — the CEC, established that false information had been included in the statement, it was required to adopt a decision refusing to register the candidate or cancelling their registration.

319 On Amendments to Certain Laws of Ukraine Regarding Restrictions on the Participation in State Governance of Persons Associated with Political Parties Whose Activities Are Banned: Draft Law of Ukraine, registration No. 9081 of 06.03.2023. ↗

320 On Amendments to Certain Legislative Acts of Ukraine Regarding Restrictions on the Participation in State Governance of Persons Associated with Political Parties Whose Activities Are Banned Pursuant to Law: Draft Law of Ukraine, registration No. 9081-1 of 07.03.2023 ↗; On Amendments to the Electoral Code of Ukraine and Certain Other Legislative Acts of Ukraine Regarding Restrictions on the Participation in State Governance of Persons Associated with Political Parties Whose Activities since the Proclamation of Ukraine's Independence Led to the Full-Scale Military Invasion of the Territory of Ukraine by the Aggressor State: Draft Law of Ukraine, registration No. 9081-2 of 20.03.2023. ↗

321 Joint Opinion on the Draft Law Amending Certain Legislative Acts Which Restrict the Participation in State Power of Persons Associated with Political Parties Whose Activities Are Prohibited by Law: approved by the Council for Democratic Elections at its 78th meeting, Venice, 5 October 2023, and adopted by the Venice Commission at its 136th Plenary Session, Venice, 6–7 October 2023: CDL-AD(2023)025, ODIHR-483/2023. European Commission for Democracy through Law (Venice Commission), OSCE Office for Democratic Institutions and Human Rights, 2023. ↗

Progress and issues

Need to update the legislation on political parties

A positive development was the registration in the Verkhovna Rada on 10 December 2025 of Draft Law 'On Political Parties' (registration No. 14289),[322] which provides for a comprehensive reform of party legislation, including on registration, membership, rules of internal party democracy, financing and accountability of political parties.[323] The draft resulted from the work of the Working Group established in May 2020 to prepare the draft Law on Political Parties.[324] The Working Group operated on an inclusive basis,[325] and the first version of the draft became the subject of the Joint Opinion of the Venice Commission and the OSCE/ODIHR of 23 March 2021.[326]

According to the FDI Roadmap, one of the target indicators is the entry into force, by the fourth quarter of 2027, of a Law of Ukraine ensuring that party legislation complies with key international standards and previous recommendations of the Venice Commission and the OSCE/ODIHR.[327] Taking into account the previous opinion of the Venice Commission and the OSCE/ODIHR,[328] the registration of Draft Law No. 14289 should be regarded as a preparatory legislative step towards the implementation of this indicator, while its fulfilment will be possible only after the law is adopted and enters into force.[329]

Compared with the current Law of Ukraine 'On Political Parties in Ukraine',[330] which in practice mainly uses a sanctions-based approach and provides for the possibility of cancelling a party's registration certificate if, for ten years, it has not nominated its candidates in presidential elections in Ukraine and parliamentary elections in Ukraine, or has failed to establish its regional organisations in the majority of regions of Ukraine, the cities of Kyiv and Sevastopol and the Autonomous Republic of Crimea (AR of Crimea),[331] Draft Law No. 14289 shifts the focus to prior verification of the party's institutional capacity to participate in nationwide elections. Draft Law No. 14289 provides for a requirement of 200 party founders and establishes that, within six months from the date of state registration, a party must ensure the establishment and registration of its regional organisations in at least five administrative-territorial units defined in Part 2 Article 133 of the Constitution of

322 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

323 OPORA Lawyer: the Draft Law on Political Parties Is Part of Our EU Integration Commitments, for Which We Have Only Two Years to Implement. Civil Network OPORA, 2025. ↗

324 Decision of the Committee of the Verkhovna Rada of Ukraine on Digital Transformation 'On the Establishment of a Working Group to Prepare the Draft Law on Political Parties'. Verkhovna Rada of Ukraine, 2020. ↗

325 Public Consultations on the Preparation of the Draft Law on Amendments to the Law of Ukraine 'On Political Parties in Ukraine'. 2020. ↗

326 Joint Opinion of the OSCE/ODIHR and the Venice Commission on the draft law on political parties, approved by the Council for Democratic Elections at its 71st meeting, online, 18 March 2021, and adopted by the Venice Commission at its 126th Plenary Session, online, 19–20 March 2021. ↗

327 Roadmap on the Functioning of Democratic Institutions, II.A Free and Fair Elections, pp. 5–6. ↗

328 Joint Opinion of the OSCE/ODIHR and the Venice Commission on the draft law on political parties, approved by the Council for Democratic Elections at its 71st meeting, online, 18 March 2021, and adopted by the Venice Commission at its 126th Plenary Session, online, 19–20 March 2021. ↗

329 OPORA Lawyer: The Draft Law on Political Parties Is Part of Our EU Integration Commitments, for Which We Have Only Two Years to Implement. Civil Network OPORA, 2025. ↗

330 On Political Parties: Law of Ukraine No. 2365-III of 05.04.2001. ↗

331 Ibid, Part 1 Article 24.

Ukraine.[332] In addition, the draft law links the right to participate in nationwide elections and to act as an entity nominating candidates to election commissions in such elections to the existence of at least 1,000 party members in at least five administrative-territorial units, information on whom must be entered into the electronic system for recording party members.[333]

The provisions of the draft law also help address the gap concerning terminated parties. The proposed amendments to electoral legislation provide that the nomination of candidates by a party whose activities have been banned or whose state registration has been cancelled, as well as by a party that has fewer than 1,000 members or has failed to submit to the NACP a report on property, income, expenses and financial liabilities two or more times in a row or three times during the last two reporting years, constitutes grounds for refusing to register candidates or for cancelling their registration. Such a party also cannot be an entity nominating candidates to election commissions.[334] In addition, it is provided that the replacement of an elected MP whose powers were terminated early, from a party whose activities have been banned or whose state registration has been cancelled, is not carried out, and the relevant parliamentary mandate remains vacant.[335]

At the same time, despite its progressive nature, Draft Law No. 14289 retains a number of controversial provisions that have been criticised by international experts. These concern the excessive powers of the Security Service of Ukraine (SSU) in state control over party activities and the absence of a system of 'intermediate' sanctions, which creates the risk of a binary choice between a simple warning and the full liquidation of a political force. These and other issues may become the subject of further discussions on the draft law during its preparation for the second reading.[336]

As of 31 July 2026, Draft Law No. 14289 is under consideration by the relevant committee of the Verkhovna Rada. However, no decisions of the relevant committee or parliamentary factions on its support or further development have yet been made public, and discussion of this draft law in Parliament is not in fact taking place. At the same time, on 30 December 2025, alternative Draft Law No. 14289-1 was registered, prepared by a group of MPs, including representatives of the parliamentary faction of the political party All-Ukrainian Union 'Batkivshchyna' in the Verkhovna Rada of Ukraine of the IX convocation (faction All-Ukrainian Union 'Batkivshchyna').[337]

Draft Law No. 14289-1, initiated by representatives of the faction of All-Ukrainian Union 'Batkivshchyna', is positioned as an instrument for protection against 'technical' parties and for ensuring national security. In practice, however, the document proposes a 'protective-bureaucratic' model that preserves the current system and creates excessive administrative barriers for new political actors. Unlike the main Draft Law No. 14289, which

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332 Ibid., Articles 9, 10.

333 Ibid., Part 1 Article 26.

334 On Political Parties: Law of Ukraine No. 2365-III of 05.04.2001, Section X. Final and Transitional Provisions, amendments to Article 190 of the Electoral Code of Ukraine. ↗

335 Ibid., Section X. Final and Transitional Provisions, amendments to Articles 11, 23, 104, 105, 140, 146, 159, 160, 190, 203, 204, 208, 230, 231 of the Electoral Code of Ukraine.

336 Comment on Draft Law of Ukraine No. 14289 'On Political Parties'. International Foundation for Electoral Systems (IFES), 04.02.2026. ↗

337 On Political Parties: Draft Law of Ukraine, registration No. 14289-1 of 30.12.2025. ↗

is aimed at liberalisation, the alternative draft law strengthens state control and preserves archaic registration procedures.[338]

Absence of proper legislative guarantees of internal party democracy and transparency in candidate nomination

The current regulation of candidate nomination preserves an excessive concentration of powers in the governing bodies of political parties, as the EC of Ukraine regulates the nomination procedure only in a fragmented manner. Key issues relating to the preparation and conduct of congresses, the selection of delegates, the formation of the list of prospective candidates and the communication of information about them to congress participants are in fact left to regulation by party statutes, which does not provide sufficient guarantees of internal party democracy.[339] The Venice Commission has emphasised that electoral legislation should not regulate the candidate nomination procedure in excessive detail. Instead, the law may provide that candidates are nominated in accordance with general democratic criteria and the party statute adopted on the basis of the law on political parties.[340]

Draft Law No. 14289 provides for the introduction of principles of internal party democracy, representativeness, transparency, an electronic membership record system, a mechanism for resolving internal party disputes and a code of ethics, as well as full digitalisation through the Unified State Register of Political Party Reports on Property, Income, Expenses and Financial Obligations (POLITDATA register) and strict limits on private contributions.[341]

The transparency of congresses and conferences for the nomination of candidates also remains unregulated, as information on the time and place of such events often did not correspond to the actual circumstances in which they were held. This complicated or prevented access for journalists and observers. The EC of Ukraine does not provide a clear answer as to whether such violations constitute a breach of the candidate nomination procedure and, accordingly, grounds for refusing registration.[342] By contrast, Draft Law No. 14289 provides that congresses (meetings, conferences) for the nomination of candidates must be open, allows for the use of internal party candidate selection procedures ('primaries'), requires notification of the time and place of such events, grants media representatives and official observers the right to be present, requires conditions to be created for the free discussion of candidates and provides for the publication of minutes in open data format.[343]

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338 Comment on Draft Law of Ukraine No. 14289 'On Political Parties'. International Foundation for Electoral Systems (IFES), 04.02.2026. ↗

339 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 69–70. ↗

340 Venice Commission Opinion on the Draft Electoral Code of Ukraine, CDL-AD(2010)047, para. 52 ↗; Venice Commission Opinion on Amendments to the Legislation on the Election of the President of Ukraine, CDL-AD(2009)040, para. 16. ↗

341 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025, Articles 3, 23, 24, 26. ↗

342 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 70–72 ↗; For more details, see the subsection 'Administration of Elections. Reform of the CEC. Election Observation', issue 'Limited access of observers and the media to party congresses and conferences for the nomination of candidates'.

343 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025, Article 25. ↗

Absence of the possibility for independent candidates to stand in elections held under the proportional system

The current regulatory framework continues to link participation in elections held under the proportional system exclusively to nomination by political parties. This narrows the opportunities for persons who do not intend or are unable to stand as candidates through parties to exercise their right to stand for election. At the same time, the Venice Commission positively assessed the possibility of self-nomination of candidates in the draft Electoral Code, while the OSCE/ODIHR recommended considering the possibility of allowing independent candidates to stand for elections, including those held under a proportional system.[344]

Excessive residence requirement for candidates

The current legislation retains the requirement for candidates in nationwide elections to have resided in Ukraine for the previous five years in the case of candidates for MPs of Ukraine and ten years in the case of candidates for the office of President. A person is deemed residing in Ukraine if his/her single trip abroad for private purposes did not exceed 90 days and the period of stay outside Ukraine did not exceed 183 days annually within overall residence period, except for the cases of travel for an official business trip, study, leave or medical treatment recommended by a medical institution.[345]

The Venice Commission noted that the 5-year residence requirement is excessive and unnecessary and should apply only to local or regional elections. In such cases, the residence requirement should not exceed six months. The Venice Commission and the OSCE/ODIHR[346] also emphasised that the fact that this requirement is enshrined in the Constitution does not release the state from its obligation to bring national legislation in line with its international commitments under Article 25 of the International Covenant on Civil and Political Rights (ICCPR)[347] and Article 3 of Protocol No. 1 to the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR).[348]

In its reports following the 2019 presidential and parliamentary elections, the OSCE/ODIHR assessed the five-year and ten-year residence requirements as unreasonably restrictive, while paragraph 15 of General Comment No. 25 to Article 25 of the ICCPR proceeds from the inadmissibility of unreasonable residence requirements as a condition for exercising the right to be elected.[349] At the same time, the complete abolition of the residence

344 Venice Commission Opinion on the Draft Electoral Code, CDL-AD(2010)047, para. 18 ↗; OSCE/ODIHR Final Report on Observation of the 25 October 2020 Local Elections in Ukraine, Rec. B14. ↗

345 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 2 Article 76, Part 2 Article 103 ↗; Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 4 Article 75, Part 4 Article 134. ↗

346 Venice Commission Opinion on the Draft Electoral Code of Ukraine, CDL-AD(2010)047, para. 56 ↗; Joint Opinion of the Venice Commission and the OSCE/ODIHR on the Draft Amendments to the Laws on Elections of People's Deputies of Ukraine, on the Central Election Commission and on the Draft Law on Repeat Elections, CDL-AD(2013)016, paras. 20–21. ↗

347 International Covenant on Civil and Political Rights of 16.12.1966. ↗

348 Protocol No. 1 to the Convention for the Protection of Human Rights and Fundamental Freedoms of 20.03.1952. ↗

349 O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 9–10. ↗

requirement in nationwide elections would require amendments to the Constitution of Ukraine,[350] which the Constitution itself does not permit under martial law.[351]

Lawful stay abroad during martial law was provided for as an exception to the residence requirement in Draft Laws No. 11300 and No. 11300-1. However, on 15 August 2024, the parliamentary subcommittee did not recommend either of them for adoption in the first reading and recommended that the committee draft a separate draft law on their basis.[352]

Subsequently, within the Working Group on the preparation of legislative proposals on elections in a special or post-war period, three approaches to regulating this issue were discussed. The first was the wording proposed by the CEC in its Resolution No. 1 of 07.01.2026, under which a person's lawful stay outside Ukraine for any reason during martial law is not considered a breach of the residence requirement. The second was to refrain from any special exceptions due to the impossibility of changing or expanding the content of the constitutional requirement of residence in Ukraine. The third was a compromise approach, which proposed excluding from the scope of the residence requirement only stays abroad caused by the war and undertaken in compliance with the law, with the introduction of a mandatory candidate declaration and verification of the relevant circumstances by state authorities.[353] Following the work of the thematic subgroup, no final consensus was reached on this issue and, as a result, the CEC wording remained the baseline in the draft proposals.[354] However, parliamentary support for this wording is not guaranteed, as discussions in the parliamentary subcommittee showed that this model currently lacks sufficient support in the Verkhovna Rada. The option of additional exceptions related to a person's stay outside Ukraine during martial law therefore requires further consultations.[355]

At the same time, the introduction of additional exceptions from the residence requirement for persons who were forced to stay abroad as a result of the armed aggression of the Russian Federation may be viewed not as a departure from the principle of equal suffrage, but as a permissible equalising measure aimed at ensuring a genuine opportunity to exercise the right to stand for election in conditions of factual inequality caused by the war.[356]

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350 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

351 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 2 Article 157. ↗

352 Parliamentary Subcommittee Rejected Both Draft Laws on Countering Sexism in Electoral Processes. Civil Network OPORA, 2024. ↗

353 Impact of Residence Abroad during the Full-Scale Invasion on the Exercise of Electoral Rights. Civil Network OPORA, 2026 ↗; On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

354 Analytical Update on Ukraine's Progress in Meeting the Indicators of the Roadmap on the Functioning of Democratic Institutions Based on the Work of Thematic Subgroups Preparing the Legislative Framework for the First Post-War Elections. Civil Network OPORA, 2026. ↗

355 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

356 Opinion on the Compliance with the Principle of Equal Suffrage of Procedures Establishing Different Procedures for the Exercise of Electoral Rights by Certain Categories of Voters. Civil Network OPORA, 2026. ↗

Conviction for an intentional criminal offence as an excessive restriction on the right to stand for election

Another unresolved problem related to the right to stand for election is the excessively broad wording of the restriction linked to a conviction for an intentional criminal offence. The Venice Commission and the OSCE/ODIHR recommended narrowing this restriction so that it applies only to persons who have committed clearly defined serious criminal offences for which disenfranchisement complies with the principle of proportionality. The Venice Commission also noted that cancelling a candidate's registration solely on the grounds of conviction for an intentional criminal offence, without considering its the nature and gravity, is not consistent with international standards.[357] However, given that the relevant restriction has a constitutional basis, its revision also goes beyond ordinary legislative procedures foreseen for changing the electoral legislation.

Lack of legally defined criteria for 'soft lustration' as grounds for permissible restrictions on the right to stand for election

The optimal model of political lustration in Ukraine should be determined with due regard to the Lustration Guidelines,[358] ECtHR case law and the Venice Commission's opinions on the Law of Ukraine 'On Government Cleansing'[359] and Draft Law No. 9081 of 6 March 2023,[360] which has been included on the agenda of the current session of the Verkhovna Rada. Lustration restrictions and general procedures for the lustration of public officials should be regulated by a new Law on Lustration or by a new version of the current Law of Ukraine 'On Government Cleansing', while amendments to the EC of Ukraine or a special law on the procedure for holding the first post-war elections should set out the specific features of lustration in relation to elected office.[361]

Most experts agree on a model under which lustration measures would be carried out in the form of declarations and lustration checks of the information set out in those documents for specific categories of persons[362] — so-called 'soft lustration'. However, the Working Group did not reach a final consensus on the content and scope of this mechanism.[363]

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357 Joint Opinion of the Venice Commission and the OSCE/ODIHR on the Draft Amendments to the Laws on Elections of People's Deputies of Ukraine, on the Central Election Commission and on the Draft Law on Repeat Elections, CDL-AD(2013)016, paras. 22, 64 ↗; Venice Commission Opinion on Amendments to the Legislation on the Election of the President of Ukraine, CDL-AD(2009)040, para. 14. ↗

358 Measures to Dismantle the Heritage of Former Communist Totalitarian Systems: Resolution 1096 (1996). Parliamentary Assembly of the Council of Europe. ↗

359 Interim Opinion on the Law on Government Cleansing (Lustration Law) of Ukraine, CDL-AD(2014)044. European Commission for Democracy through Law (Venice Commission), 2014 ↗; Final Opinion on the Law on Government Cleansing (Lustration Law) of Ukraine as would result from the amendments submitted to the Verkhovna Rada on 21 April 2015, CDL-AD(2015)012. European Commission for Democracy through Law (Venice Commission), 2015. ↗

360 Joint Opinion on the Draft Law Amending Certain Legislative Acts of Ukraine which Restrict the Participation in the State Power of Persons Associated with Political Parties whose Activities are Prohibited by Law, CDL-AD(2023)025. European Commission for Democracy through Law (Venice Commission) and OSCE/ODIHR, 2023. ↗

361 Political Lustration: International Standards, Practices and Recommendations for Ukraine. Civil Network OPORA, 2025. ↗

362 How Can Lustration Become One of the Tools for Overcoming the Consequences of Russian Armed Aggression against Ukraine? ZMINA, 2025. ↗

363 Analytical Update on Ukraine's Progress in Meeting the Indicators of the Roadmap on the Functioning of Democratic Institutions Based on the Work of Thematic Subgroups Preparing the Legislative Framework for the First Post-War Elections. Civil Network OPORA, 2026. ↗

The restrictions introduced must comply with the existing ECtHR case law on the lustration of candidates for elected office. Lustration restrictions for candidates must take into account the individual conduct of the person concerned and provide for the possibility of an effective appeal. However, politicians and candidates should take active steps, such as making public statements, to distance themselves from events and circumstances that pose a threat to democracy, while the absence of any response may confirm their support for them. From the perspective of proportionality, restrictions on the right to stand for election should not apply after a long period of time has passed since the circumstances that gave rise to their application ceased to exist.[364]

The Venice Commission and the OSCE/ODIHR directly stated that imposing a ban on standing for election on persons associated with banned political parties is permissible only where there is an individualised assessment of personal guilt, compliance with the principle of proportionality and proper procedural safeguards. Therefore, any model of 'soft lustration' must be based not on collective responsibility, but on an individualised approach.[365]

Excessive formalism in candidate registration requirements

Following the local elections of 25 October 2020, the OSCE/ODIHR drew attention to the unjustifiably severe consequences of inaccuracies and deficiencies in documents submitted for candidate registration and recommended introducing effective mechanisms for notifying candidates of errors or inaccuracies, with an opportunity to correct them in a timely manner.[366] The Venice Commission likewise emphasised that candidates should be given the opportunity to resubmit documents in good time where technical deficiencies are identified, while the grounds for clarifying documents should be clearly distinguished from the grounds for refusing registration.[367]

The CEC noted that the possibility of correcting or clarifying errors and inaccuracies is expressly provided only for documents submitted by candidates for the office of President, whereas the EC of Ukraine does not contain equivalent safeguards for elections of MPs of Ukraine or local elections. In this regard, the Commission proposed extending this approach to Articles 159 and 230 of the EC of Ukraine, also providing for mechanisms to notify candidates and parties of deficiencies identified in the documents submitted.[368]

Draft Law No. 11300, which was developed with the participation of experts through an inclusive process,[369] proposed to: (1) clearly distinguish between minor errors and

364 ECtHR Standards on the Right to Stand for Election: Lustration of Candidates and the Residency Requirement. Civil Network OPORA, 2026. ↗

365 Venice Commission and OSCE/ODIHR, Joint Opinion on the Draft Law Amending Certain Legislative Acts of Ukraine Which Restrict the Participation in State Power of Persons Associated with Political Parties Whose Activities Are Prohibited by Law, CDL-AD(2023)025, para. 57. ↗

366 OSCE/ODIHR Final Report on Observation of the 25 October 2020 Local Elections in Ukraine, Rec. B22. ↗

367 Venice Commission and OSCE/ODIHR, Opinion on Amendments to the Legislation on the Election of the President of Ukraine, CDL-AD(2009)040, para. 19. ↗

368 On Approval of Proposals for Improving Ukrainian Legislation in Connection with Taking into Account the Recommendations of OSCE/ODIHR Election Observation Missions: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

369 On Amendments to the Electoral Code of Ukraine on Countering Sexism in Electoral Processes and Ensuring Balanced Representation of Women and Men in the Verkhovna Rada of Ukraine and Local Councils: Explanatory Note to Draft Law of Ukraine, registration No. 11300 of 27.05.2024. ↗

inaccuracies in documents submitted by a party, which do not prevent the content from being understood and substantial breaches of the EC of Ukraine requirements, which should constitute unconditional grounds for refusing registration of all candidates nominated by the party; (2) provide for the obligation of the election commission to immediately inform the submitting entity of any deficiencies identified in the documents and provide an opportunity to remedy such deficiencies within a short timeframe by submitting corrected or other documents; and (3) require that if the corrected or other documents are not resubmitted by the legally established deadline, they are deemed missing, resulting in refusal of candidate(s) registration and, if party lists fail to comply with the EC of Ukraine, refusal to register the entire list.[370]

Shortcomings in ensuring gender-balanced representation[371]

One of the few aspects related to the right to stand for election in which noticeable legislative progress was achieved was the inclusion of enhanced requirements for gender-balanced representation in the EC of Ukraine, in particular, the so-called 'zipper system' (under which each group of five candidates on an party list must include at least two persons of each sex), as well as refusal of registration of all candidates on the respective party's lists for failure to comply with this requirement.[372]

The new regulation on gender quotas was tested in practice for the first time at the regular local elections. As a result, women's representation in local councils increased from 18.1 to 30.2 per cent and in regional councils from 15 to 27 per cent.[373]

However, law enforcement practice during the 2020 local elections revealed significant shortcomings in the current regulation. Some courts interpreted non-compliance with the gender quota as a technical error that could be corrected, some TECs registered lists in breach of the quota and some electoral stakeholders attempted to circumvent these requirements by encouraging women to withdraw as candidates or to renounce their mandates after the registration of the list.[374]

Although the OSCE/ODIHR identified the introduction of an increased gender quota for candidate lists to local councils in the new EC of Ukraine as one of the positive developments, following the 2020 local elections it recommended to ensure compliance with the gender quota for candidate lists at all stages of the electoral process, including during candidate nomination and registration.[375]

To address these recommendations and the problems identified during the 2020 local elections, a set of amendments was prepared in 2021, which later formed the basis for

370 On Amendments to the Electoral Code of Ukraine on Countering Sexism in Electoral Processes and Ensuring Balanced Representation of Women and Men in the Verkhovna Rada of Ukraine and Local Councils: Draft Law of Ukraine, registration No. 11300 of 27.05.2024. ↗

371 For more details, see the subsection 'Electoral Rights of Women'.

372 O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 13–14 ↗; Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 9 Article 154, Part 7 Article 219, Part 1 Article 159, Part 1 Article 230. ↗

373 OSCE/ODIHR Final Report on Observation of the 25 October 2020 Local Elections in Ukraine, p. 3, Rec. A8. ↗

374 O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 13–14 ↗; Final Report on the Results of Observation of the 2020 Local Elections. Civil Network OPORA, pp. 57, 59. ↗

375 OSCE/ODIHR Final Report on Observation of the 25 October 2020 Local Elections in Ukraine, p. 17, Rec. A8. ↗

Draft Laws No. 11300 and No. 11300-1. Their provisions are aimed at addressing gaps in ensuring gender-balanced representation and countering discrimination, including by maintaining gender balance on lists when candidates withdraw and mandates are filled and by prohibiting sexism in the electoral process.[376]

Excessive amount of the election deposit and questionable grounds for its return as a barrier to the exercise of the right to stand for election

The current legislation is based on the concept whereby the election deposit is considered not an electoral qualification, but rather a precondition for candidate registration. This concept was formulated in the Decision of the Constitutional Court of Ukraine (CCU) No. 2-rp/2002 of 30 January 2002, which states that an electoral qualification is a qualifying condition for the existence of electoral rights, whereas the election deposit is only a condition for candidate registration and is applied to ensure a responsible approach to participation in elections.[377] At the same time, the EC of Ukraine retains a substantial deposit amount — 650 minimum wages for candidates for the office of President and 1,000 minimum wages for parties nominating a list of candidates in parliamentary elections.[378]

The Venice Commission and the OSCE/ODIHR suggested to consider reducing the amount of the election deposit so that broader participation of parties and candidates in elections can be ensured.[379] The Venice Commission also noted that the amount of the deposit in presidential elections is very high and may unjustifiably restrict participation, primarily by candidates from small parties and independent candidates, while the rule under which the deposit is returned only to second-round candidates is excessive. In the same opinion, the Venice Commission positively assessed the legislative wording under which the election deposit had to be returned to all candidates who received at least seven per cent of votes, which enabled a more proportionate approach to determining the grounds for its return.[380]

The OSCE/ODIHR recommended considering the introduction of a vote threshold for returning the election deposit to candidates for the office of President of Ukraine. In addition, the OSCE/ODIHR noted that the law should be amended to clearly provide for the conditions for returning the deposit where elections are held in a single round.[381]

The OSCE/ODIHR also proposed, in relation to local elections, considering a further reduction in the amount of the monetary deposit to facilitate participation in elections by all persons entitled to do so.[382]

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376 Analysis of Draft Laws on Amendments to the Electoral Code to Counter Gender Discrimination. Civil Network OPORA, 2024. ↗

377 Decision of the Constitutional Court of Ukraine No. 2-rp/2002 of 30.01.2002. ↗

378 O. Kotsiuruba, P. Romaniuk, B. Mokhonchuk, V. Kobryn. Ensuring Electoral Rights: Compliance of National Mechanisms with EU Standards. Center for Civil Liberties, 2026, pp. 12–13. ↗

379 Joint Opinion of the Venice Commission and the OSCE/ODIHR on the Draft Amendments to the Laws on Elections of People's Deputies of Ukraine, on the Central Election Commission and on the Draft Law on Repeat Elections, CDL-AD(2013)016, para. 62. ↗

380 Venice Commission Opinion on Amendments to the Legislation on the Election of the President of Ukraine, CDL-AD(2009)040, para. 17. ↗

381 OSCE/ODIHR Final Report on Observation of the Early Presidential Election of 25 May 2014 in Ukraine, Rec. 16. ↗

382 OSCE/ODIHR Final Report on Observation of the 25 October 2020 Local Elections in Ukraine, Rec. B23. ↗

In view of the already mentioned OSCE/ODIHR recommendations regarding the reduction of the election deposit and the review of the grounds for its return, the deposit continues to prevent the nomination of a significant number of technical candidates. Therefore, any review should uphold this deterrence.[383]

Taking into account the OSCE/ODIHR recommendations, the CEC proposes considering the possibility of adding to the existing grounds for returning the election deposit a case where a candidate receives a high level of voter support, by establishing a vote threshold, for example 10 per cent. According to the data available to the CEC, candidates have passed this threshold on more than one occasion. Amendments to Article 101 of the EC of Ukraine would allow returning the election deposit to the respective candidate who met such a threshold.[384]

Incompatibility of the party-imperative mandate with the principle of the free parliamentary mandate

In its final report on the early parliamentary elections of 21 July 2019, the OSCE/ODIHR expressly stated that MPs elected on party lists lose their mandate if they fail to join or leave the parliamentary faction of the relevant political party, which is contrary to paragraph 7.9 of the 1990 OSCE Copenhagen Document and Recommendation 15. It emphasised that elected candidates should be duly installed in office and retain their mandates until the expiry of their terms or until their termination in a manner consistent with democratic parliamentary and constitutional procedures.[385]

Furthermore, in Decision No. 3-p/2017 of 21 December 2017, the Constitutional Court of Ukraine (CCU) formulated the constitutional concept of the free parliamentary mandate, noting that 'the principle of the free parliamentary mandate follows from the content of the oath of an MP of Ukraine and Articles 79–81 and 84 of the Constitution of Ukraine'. Under this concept, an MP of Ukraine, while exercising his/her powers, represents the entire Ukrainian people, rather than a particular political force.[386]

In the case of Tomenko v. Ukraine of 10 July 2025, the European Court of Human Rights concluded that the early termination of the powers of an MP in connection with his/her withdrawal from a faction violates Article 3 of Protocol No. 1 to the Convention. While substantiating its opinion in paragraph 116 of the court decision, the Court emphasised that an imperative mandate or similar practice is contrary to the principle of a free and independent mandate, which constitutes part of the European constitutional tradition.[387]

In the context of consistent criticism by the OSCE/ODIHR, the constitutional concept of the free mandate upheld by the CCU and the legal position of the ECtHR, the concept of MP's imperative mandate needs to be reviewed at the constitutional level. This should

383 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

384 On Approval of Proposals for Improving Ukrainian Legislation in Connection with Taking into Account the Recommendations of OSCE/ODIHR Election Observation Missions: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

385 OSCE/ODIHR Final Report on Observation of the Early Parliamentary Elections of Ukraine of 21 July 2019, pp. 7, 32, Rec. 15. ↗

386 Decision of the Grand Chamber of the Constitutional Court of Ukraine No. 3-p/2017 of 21.12.2017, fourth para. of subpara. 2.6 para. 2 of the reasoning part. ↗

387 Tomenko v. Ukraine ↗; The ECtHR in Tomenko v. Ukraine: the Mandate Belongs to the People, Not the Party. Civil Network OPORA, 2025. ↗

include removing the relevant ground for early termination of MP's powers from Article 81 of the Constitution of Ukraine and prohibiting the imperative mandate.[388]

Recommendations

1. The Draft Law 'On Political Parties' (registration No. 14289) should be considered and adopted by Parliament.
2. Drawing on Article 25 of Draft Law 'On Political Parties' (registration No. 14289), amendments should be introduced to the EC of Ukraine and legislation on political parties to establish minimum mandatory guarantees of internal party democracy in candidate nomination procedures, in particular regarding the openness and predictability of party congresses, the procedure for selecting candidates, access for the media and observers and clear legal consequences for breaches of the publicity requirements for such procedures.
3. Consideration should be given to enabling participation of independent candidates in elections under proportional system to expand the opportunities to stand for election regardless of party affiliation and to implement the relevant OSCE/ODIHR recommendations.
4. While drafting the special ad hoc law on the first post-war elections or amendments to the EC of Ukraine, it is advisable to draw on the approach proposed in Draft Law No. 11300 and in the CEC draft approved by CEC Resolution No. 1 of 7 January 2026, to provide for exceptions from the residence requirement for persons who were forced to stay abroad as a result of the armed aggression of the Russian Federation.
5. After the restrictions related to martial law cease to apply, consideration should be given to initiating a review of the constitutional and legislative regulation of restrictions on the right to be elected due to a conviction for an intentional criminal offence, narrowing it to cases involving clearly defined serious crimes for which such a restriction is justified and proportionate.
6. Future legislative regulation aimed at limiting the influence of the aggressor state on the electoral process through lustration of persons who cooperated with that state should be aligned with the Lustration Guidelines, ECtHR case law and the Venice Commission's opinions, taking into account the principle of proportionality and effective procedural safeguards. Therefore, any model of lustration must be based not on collective responsibility, but on individual guilt.
7. The prerequisites for excessive formalism in deciding on candidate's registration should be removed, drawing on the approaches suggested in Draft Law No. 11300 and in the CEC proposals (CEC Resolution No. 48 of 3 October 2025), by providing, for parliamentary and local elections, a mechanism for correcting minor errors and inaccuracies in registration documents, an obligation for election commissions to immediately notify parties and/or candidates of identified deficiencies and a realistic deadline for correcting them.

388 P. Romaniuk. Constitutional and Legal Foundations of the Institution of the Representative Mandate in Ukraine. 2019, pp. 114–115.

8. Drawing on the Draft Laws No. 11300 and No. 11300-1, legal amendments should be drafted and adopted to ensure compliance with the gender quota at all stages of the electoral process, including the nomination and registration of candidate lists, withdrawal of candidates, distribution of mandates, as well as to prevent the gender quota from being circumvented and candidates from being intimidated to force their withdrawal or renouncing their seats.
9. The amount of the election deposit and the grounds for its return should be reviewed, drawing on the CEC proposals formulated in Resolution No. 48 of 3 October 2025, as well as on further CEC work on amendments to Article 101 of the EC of Ukraine.
10. After the martial law restrictions on amending the Constitution of Ukraine cease to apply, a separate draft law amending Article 81 of the Constitution of Ukraine should be prepared to ensure that MP powers cannot be early terminated due to his/her failure to join the parliamentary faction of the political party on whose list he/she was elected, or his/her withdrawal from that faction so that the free nature of the parliamentary mandate is guaranteed at the constitutional level.

Election Campaigning and Information Coverage of Elections

State of play

Prior to the adoption of the EC of Ukraine,[389] issues related to election campaigning were regulated separately by each of the three electoral laws, which resulted in certain inconsistencies. A clear advantage of the adoption of the EC of Ukraine is the unification of the rules governing election campaigning across all types of elections.[390] These rules are set out in Book One, Chapter 8 of the EC of Ukraine. According to Part 1 Article 51 of the EC of Ukraine, election campaigning is defined as any activity aimed at encouraging voters to vote for or against a particular candidate or political party (or its organisation), as subjects of the electoral process. Such campaigning may be carried out in any form and by any means that do not contradict the Constitution of Ukraine or the laws of Ukraine. This means that, for specific forms or methods of campaigning to be considered unlawful, there must be a clear legal provision indicating the norm they violate. Otherwise, such forms or methods are deemed lawful.[391]

The specific features of information coverage of elections are regulated by Book One, Chapters 7 (general information support of elections), 19 (special information support in presidential elections), 29 (special information support in parliamentary elections) and 38 (special information support in local elections) of the EC of Ukraine.

389 Electoral Code of Ukraine: Code of Ukraine No. 396-IX of 19.12.2019. ↗

390 O. Hubska, D. Kovryzhenko, B. Mokhonchuk, N. Pysarenko, P. Romaniuk, M. Tsurkan. Local Elections 2020: a guide for judges / ed. by M. Tsurkan. Kyiv: AK-Group, 2020, p. 103 ↗; On Elections of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011 ↗; On Election of the President of Ukraine: Law of Ukraine No. 474-XIV of 05.03.1999 ↗; On Local Elections: Law of Ukraine No. 595-VIII of 14.07.2015. ↗

391 B. Mokhonchuk, A. Binus. Legal regulation of election campaigning in Ukraine: at the intersection of free elections, freedom of expression and legal certainty (concept, legal regime, restrictions on places, forms and means). Publichne Pravo, No. 4 (40), 2020, pp. 15–16. ↗

In its 2025 report on Ukraine, the European Commission emphasised the need to implement electoral reform, including in countering disinformation threats, by further strengthening a transparent system, enhancing the protection of media freedom, pluralism and editorial independence and reforming the rules on political advertising.[392]

The OSCE/ODIHR report on the 2020 local elections[393] noted that electoral subjects were generally able to campaign freely; however, cases of abuse of state resources and official positions, as well as widespread allegations of vote-buying, raised concerns. Private media failed to ensure consistently impartial and balanced coverage of electoral contestants, thereby limiting voters' ability to make a fully informed choice.[394] Media experts and politicians also highlighted the dominance of pro-Russian and politically affiliated media, as well as the state's limited capacity to counter their influence and the information operations of the aggressor state.[395]

Overall, the OSCE/ODIHR reports on the 2019–2020 elections highlight the following key recommendations:

1. Amend legislation to clarify the definition of electoral offences, including the misuse of administrative resources during election campaigns and vote-buying and to ensure the application of appropriate and proportionate sanctions.[396] In response, on 16 July 2020 the Verkhovna Rada adopted Law No. 805-IX introducing amendments to the EC of Ukraine, the Criminal Code of Ukraine (CC of Ukraine), the Code of Ukraine on Administrative Offences (CUAO) and the laws on the Central Election Commission and the State Register of Voters,[397] constituting significant progress in safeguarding citizens' electoral rights.[398]
2. Political activity prior to the official start of the election campaign should not be prohibited but should be regulated.[399]
3. Consider amending language legislation to enable national minorities to receive official voter information and electoral materials in their respective languages.[400]
4. To ensure access to ballots, including the participation of national minorities in local elections at all levels, the Law of Ukraine 'On Political Parties in Ukraine' should be

392 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

393 Local elections in 2020 were conducted under the rules of the Electoral Code of Ukraine, which entered into force in the same year.

394 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 1. ↗

395 Election campaign 2020: the state is unable to counter the dominance of pro-Russian forces in Ukraine's media space. Survey of experts and politicians. Part I. Detector Media, 2020. ↗

396 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 49 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 early parliamentary elections, p. 37. ↗

397 On Amendments to Certain Legislative Acts of Ukraine on Improving Electoral Legislation: Law of Ukraine No. 805-IX of 16.07.2020. ↗

398 Statement by OPORA on the adopted amendments to electoral legislation. Civil Network OPORA, 2020. ↗

399 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 48. ↗

400 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 48 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 early parliamentary elections, p. 38 ↗; For more details, see the subsection 'Ensuring electoral rights of national minorities/indigenous peoples'.

amended to allow for the establishment of regional political parties.[401] Draft Law No. 14289 (a new version of the law on political parties),[402] instead of allowing for regional political parties, proposes simplified procedure for establishing political parties, in particular by abolishing the requirement to collect at least 10,000 signatures of citizens of Ukraine and reducing the requirement to establish regional party organisations to five administrative-territorial units (instead of the majority of the regions, as required by Part 7 Article 11 of the current Law of Ukraine 'On Political Parties in Ukraine'[403]).

With the entry into force of the Law of Ukraine 'On Media',[404] the regulator has obtained expanded powers to impose sanctions for violations of the requirements of Ukrainian legislation on election campaigning and information coverage of elections. While most such violations are considered significant, the underlying provisions of electoral legislation defining these rules draw on 2009–2010 electoral framework, with numerous gaps and outdated definitions.[405]

In the FDI Roadmap, election campaigning is addressed in Section 'II.B Media in the electoral campaign'. In particular, the measures envisaged include the entry into force of amendments to electoral legislation concerning: the designation of the National Council of Ukraine on Television and Radio Broadcasting (National Council, media regulator) as a single regulator for all types of media in the electoral process; the extension of offline campaigning rules to online campaigning (including political advertising, content restrictions, financing from electoral funds of subjects of the electoral process and labelling); and the regulation of campaigning in non-linear audiovisual media (online cinemas, OTT services, etc.) in line with European Union acquis, in particular the European Media Freedom Act, the Digital Services Act and Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising. Other measures relate to streamlining the rules on political advertising, countering disinformation in the electoral process and foreign information manipulation and interference (FIMI), strengthening the institutional capacity of the National Council and ensuring a competitive media landscape in Ukraine.[406]

Issues related to political advertising during the pre-election period[407], countering external interference in the electoral process,[408] electoral rights of national minorities,[409] political

401 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 48 ↗; For more details, see the subsection 'Ensuring electoral rights of national minorities/indigenous peoples'.

402 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

403 On Political Parties in Ukraine: Law of Ukraine No. 2365-III of 05.04.2001. ↗

404 On Media: Law of Ukraine No. 2849-IX of 13.12.2022. ↗

405 Law on Media: amendments on election campaigning were removed from the text during the vote. Civil Network OPORA, 2022. ↗

406 Roadmap on the Functioning of Democratic Institutions. II.C Financing of political parties and election campaigns (including anti-corruption measures), pp. 6–7. ↗

407 For more details, see the subsection 'Election campaigning and political advertising: state of play and ways of harmonisation with the EU acquis'.

408 For more details, see the subsection 'Legal and institutional mechanisms for countering external interference in the electoral process'.

409 For more details, see the subsection 'Ensuring electoral rights of national minorities/indigenous peoples'.

party and election campaign finance[410] are covered in other sections of this report. This section focuses exclusively on election campaigning and information coverage of elections.

Progress and issues

The dispersion of certain restrictions on campaigning across different laws partially undermines the objective of codifying electoral legislation.[411] While most provisions on election campaigning are contained in Chapter 8 of the EC of Ukraine, the content of Part 1 Article 51 of the EC of Ukraine indicates that restrictions on election campaigning are not consolidated exclusively within this code — they may also be found in other laws.[412] Examples include Part 4 Article 18 of the Law of Ukraine 'On Ensuring the Functioning of the Ukrainian Language as the State Language',[413] Part 3 Article 31 of the Law of Ukraine 'On Education'[414] and Part 2 Article 125 of the Law of Ukraine 'On Media'.[415]

The initial version of the draft law on media provided for comprehensive amendments to the EC of Ukraine aimed at regulating campaigning in media and on the Internet.[416] However, all provisions related to elections were effectively removed from the text before the second reading at the insistence of certain parliamentary factions, and it was decided that amendments to electoral legislation would be introduced separately in another draft law.[417] In 2022, Draft Law No. 8310[418] was registered in the Parliament and, by Resolution No. 4775-IX of 10.02.2026, was included in the agenda.[419] While some of the proposed amendments require further discussion or refinement, overall they are designed to comprehensively address the problems and challenges related to election campaigning:

- **Covert campaigning.** Article 51 of the EC of Ukraine does not contain a definition or criteria for covert election campaigning, although it explicitly prohibits it.[420] This has led to the identification of its features in the case law of the Supreme Court (SC), in case No. 9901/324/20.[421] Draft Law No. 8310 introduces a definition of 'covert

410 For more details, see the subsection 'Private financing of political parties and election campaigns'.

411 Electoral legislation governing campaigning requires reform. Civil Network OPORA, 2023. ↗

412 B. Mokhonchuk, A. Binus. Legal regulation of election campaigning in Ukraine: at the intersection of free elections, freedom of expression and legal certainty (concept, legal regime, restrictions on places, forms and means). Publichne Pravo, No. 4 (40), 2020, pp. 26–27. ↗

413 On Ensuring the Functioning of the Ukrainian Language as the State Language: Law of Ukraine No. 2704-VIII of 25.04.2019. ↗

414 On Education: Law of Ukraine No. 2145-VIII of 05.09.2017. ↗

415 On Media: Law of Ukraine No. 2849-IX of 13.12.2022. ↗

416 On Media: Draft Law of Ukraine, registration No. 2693-d of 02.07.2020 (version prior to the adoption of Law No. 2849-IX). ↗

417 Law on Media: amendments on election campaigning were removed from the text during the vote. Civil Network OPORA, 2022. ↗

418 On Amendments to the Electoral Code of Ukraine on Improving the Regulation of Information Support of Elections and Election Campaigning: Draft Law of Ukraine, registration No. 8310 of 27.12.2022. ↗

419 On the Agenda of the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4775-IX of 10.02.2026. ↗

420 Electoral legislation governing campaigning requires reform. Civil Network OPORA, 2023 ↗; White Paper on the preparation and organisation of post-war elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 117–140. ↗

421 Judgment of the Grand Chamber of the Supreme Court of 25.10.2020 in case No. 9901/324/20. ↗

campaigning'. However, countering covert campaigning is closely linked to the issue of its shadow financing.[422]

- **Lack of regulation of online campaigning.** Campaigning on the internet and social media already constitutes a significant share of campaign materials.[423] The provisions of the current EC of Ukraine are based on approaches reflected in electoral laws of the early 2000s and do not take into account either the gradual decline in the role of traditional audiovisual and print media in Ukraine and globally, or the evolving regulatory approaches to new media that have gained prominence in the United States and the European Union in recent years.[424] Draft Law No. 8310 extends requirements regarding content, format, labelling, restrictions and sources of financing to election campaigning materials disseminated online and also provides the National Council with the authority to conclude agreements and memoranda of cooperation with providers of video-sharing platforms.[425]
- **Low threshold for the value of lawful campaign materials.** While adopting the EC of Ukraine, an error was made due to an incorrect interpretation of the non-taxable minimum income of citizens.[426] Consequently, pursuant to Part 6 Article 57 of the EC of Ukraine, the maximum value of branded campaign materials[427] is currently set at UAH 1.02 (which is clearly insufficient to produce even a single unit of any branded campaign item).[428] This led to the need for clarifications by the CEC,[429] which were adopted by Resolution No. 258[430] of 14 September 2020. Draft Law No. 8310 proposes to set the value of branded campaign materials at 5% of the minimum wage.[431]
- **Misuse of administrative resources.** The problem of misuse of administrative (including informational) resources by public officials and authorities in favour of certain parties and candidates, or by candidates holding public office themselves,

422 For more details, see the section 'Financing of political parties and election campaigning'.

423 The new Law on Media has left journalists with outdated rules for working during elections — OPORA. ZMINA, 2022. ↗

424 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 126. ↗

425 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023 ↗; White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 127–128. ↗

426 This is due to the fact that it has two meanings: generally, the amount of 17 hryvnias is used, except for the provisions of administrative and criminal legislation concerning the classification of administrative or criminal offences, for which the amount of the non-taxable minimum is set at the level of the tax social benefit.

427 If this amount is exceeded, it is considered voter bribery in accordance with the law.

428 Electoral legislation governing campaigning requires reform. Civil Network OPORA, 2023. ↗

429 According to the CEC's clarification, the value of such materials must not exceed 6 per cent of the amount of the tax social benefit — UAH 63.06. However, taking inflation into account, this amount is also insufficient for the production of most branded materials provided for in Part 6 Article 57 of the Electoral Code of Ukraine.

430 On the Clarification regarding the prohibition of providing funds or free of charge or on preferential terms goods, services, works, securities, loans, lotteries, or other material assets (indirect vote-buying) during the local elections of 25 October 2020: Resolution of the Central Election Commission No. 258 of 14.09.2020. ↗

431 As of 31 July 2026, this amounts to UAH 432.35.

has to varying degrees characterised all previous electoral campaigns, differing only in scale.[432]

Based on election observation missions in Ukraine, OSCE/ODIHR and the Venice Commission have consistently issued recommendations aimed at preventing the misuse of state resources for election campaigning purposes,[433] including: (1) ensuring a clear distinction between the roles of public officials and candidates during election campaigns;[434] (2) requiring public authorities, political parties and candidates to take additional measures to safeguard against the misuse of administrative resources during election campaigning;[435] (3) refraining from using projects of state institutions and publicly funded initiatives to gain undue electoral advantage during campaigns; and (4) requiring law enforcement authorities to make further efforts to effectively prevent and sanction the misuse of administrative resources during election campaigns.[436]

The causes of misuse of administrative resources include insufficiently clear restriction on the participation of civil servants and public officials in election campaigning 'during working hours (except where such a person is a candidate in the relevant elections)'.[437] Draft Law No. 8310 proposes to expand the list of entities whose participation in campaigning is restricted to include all state authorities, not only executive bodies (thus covering a broader range of persons, such as the President and MPs). It also clarifies that candidates who are public officials may campaign only on public holidays and non-working days or while on leave.[438] At the same time, there remains a need for a clearer distinction between the coverage of the activities of public authorities and officials and election campaigning.[439]

- **'Jeansa' and violations of campaigning rules in audiovisual media.** A significant share of election spending — both in Ukraine and internationally — is allocated to political advertising on television. Although its share has somewhat declined in recent years due to the development of new media, it still accounts for the largest portion of campaign expenditure[440] and therefore requires effective oversight and enforcement in cases of violations of campaigning rules. Draft Law No. 8310 provides that providers of linear audiovisual media services are required to make audio and video recordings of all programmes containing election campaigning and

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432 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 120.

433 Joint Opinion on the Draft Amendments to the Laws on Election of People's Deputies and on the Central Election Commission and on the Draft Law on Repeat Elections of Ukraine, adopted by the Council for Democratic Elections at its 45th meeting (Venice, 13 June 2013) and by the Venice Commission at its 95th Plenary Session (Venice, 14–15 June 2013).

434 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 23, Rec. A4; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 21, Rec. A4.

435 Final Report of the OSCE/ODIHR Election Observation Mission on the 2015 local elections, Rec. B16.

436 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 early parliamentary elections, Rec. B20.

437 Electoral legislation governing campaigning requires reform. Civil Network OPORA, 2023; para. 2 Part 1 Article 57 of the Electoral Code of Ukraine.

438 Prospects for improving electoral legislation on restrictions on election campaigning. Civil Network OPORA, 2023.

439 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 120–121.

440 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 131–132.

to retain such materials for 30 days following the official announcement (publication) of election results. However, this retention period should be extended to align with the time limits for liability.[441] Ukraine also faces a persistent problem of 'paid-for news' ('jeansa'),[442] including practices whereby candidates or their representatives are regularly invited to media programmes as purported experts.[443]

- **Insufficiently clear requirements for public opinion polls.** In many cases, such polls are conducted by little-known companies that do not adhere to recognised polling standards and/or were established shortly before the elections, or their results are disseminated during prohibited periods. From the published results, it is often unclear whether a poll was conducted at all or whether its results were fabricated.[444] Draft Law No. 8310 proposes to distinguish between representative and non-representative polls, introduces labelling requirements, and extends the publication ban period from the last 2 days to the last 6 days before election day. In addition, it proposes to extend this restriction to election day itself, as it is currently absent from Part 3 Article 50 of the EC of Ukraine.[445]

- **Unclear regulation of the 'right of reply'.** The current regulation lacks legal certainty, as the criteria for qualifying information as 'clearly unreliable' or 'knowingly unreliable' are not defined and may be determined at the discretion of political parties and candidates. At the same time, parties and candidates effectively act as judges in their own case, as they may independently assess the accuracy of information disseminated about them.[446] Draft Law No. 8310 extends the 'right of reply' to all media, rather than limiting it to the press and broadcasting,[447] and regulates the procedure for publication, the content of the reply and the grounds on which media may refuse to publish it.[448]

- **Absence of requirements for campaign materials other than printed materials.** Electoral legislation does not establish requirements for the dissemination of any forms of campaign materials other than printed ones (such as citylights, video and dynamic digital billboards, textile products, etc.).[449] Draft Law No. 8310 clarifies the requirements for imprint information for campaign materials placed on advertising structures, audiovisual works, and static campaign materials displayed on LED screens. However, these provisions require alignment with Article 212[13] of

441 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

442 The new Law on Media has left journalists with outdated rules for working during elections — OPORA. ZMINA, 2022. ↗

443 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

444 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 132. ↗

445 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

446 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 134–135. ↗

447 Ibid, p. 135.

448 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

449 Electoral legislation governing campaigning requires reform. Civil Network OPORA, 2023. ↗

the CUAO.[450] The draft law also proposes to define designated locations for the placement of election campaigning (on structures specifically equipped by public authorities or on advertising structures). At the same time, this provision requires further discussion and clarification,[451] as it would imply that campaigning is prohibited in all other locations.[452]

- **Insufficient supervisory powers of the media regulator (National Council)**.[453] Given the rapid pace of the electoral process and the significant impact of violations of campaigning rules by media as key disseminators of information on the formation of voters' will, the regulator must be able to respond promptly. Draft law No. 8310 proposes to grant the National Council the authority to address providers to stop violations of campaigning requirements, including by restricting access to such campaigning until the end of the electoral process.[454] It also provides that for identifying the violations in campaign materials disseminated in the media during elections, the National Council shall establish an Expert Council on Election Campaigning. However, the status of this body remains insufficiently defined.[455]

The issue of **'premature' campaigning** (conducted prior to the registration of candidates and not covered by legislative regulation)[456] has been highlighted by OSCE/ODIHR.[457] Various approaches to addressing it have been proposed:

- abolishing restrictions on election campaigning and its financing during the period prior to the registration of candidates;
- defining a specific period prior to the nomination of candidates (for example, 60–90 days) that would be considered part of the election campaign period and therefore subject to the applicable requirements and restrictions on campaign financing, as well as requiring political parties and individuals submitting documents for candidate registration in the relevant elections to declare the absence of expenditures during this period;
- requiring individuals intending to stand as candidates to submit applications for registration as prospective candidates for the relevant elective offices within a timeframe established by the EC of Ukraine prior to election day, including the opening of dedicated accounts and submission of financial reports, and extending

450 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

451 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 138. ↗

452 Prospects for improving electoral legislation on restrictions on election campaigning. Civil Network OPORA, 2023. ↗

453 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 115. ↗

454 Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

455 Prospects for improving electoral legislation on restrictions on election campaigning. Civil Network OPORA, 2023. ↗

456 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 145–146 ↗; Prospects for improving electoral legislation: innovations in the legal regulation of election campaigning. Civil Network OPORA, 2023. ↗

457 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 26 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, pp. 26–27. ↗

restrictions on the sources and amounts of contributions to electoral funds to contributions made to such accounts.[458]

At the same time, this issue may be addressed through the regulation of the status and requirements applicable to political advertising in line with EU regulations (Regulation (EU) 2024/900 on the transparency and targeting of political advertising[459]), as recommended by the European Commission in its 2025 report on Ukraine.[460]

Absence of specific regulation of election campaigning in the election district abroad.

As the war has led to the large-scale displacement of voters abroad, post-war elections will require additional safeguards to ensure their rights,[461] including the **right to campaign in the election district abroad**. The EC of Ukraine explicitly excludes such a possibility and prohibits its financing,[462] even though it constitutes a prerequisite for ensuring free elections and an informed choice. There will also be a growing need for **broader information provision** regarding new electoral procedures shaped by post-war challenges, for all categories of voters. The CEC's proposals in Resolution No. 1 on the legislative regulation of the organisation of post-war elections, in the part concerning election campaigning (Article 7), address the specific features of campaigning in the territory of a foreign state, while also introducing new provisions regarding information coverage of elections (Article 6). The CEC emphasises the need for timely, comprehensive and accessible information for voters as a necessary precondition for ensuring informed participation, public trust in the electoral process and the legitimacy of its outcomes.[463]

Within the framework of the parliamentary Working Group, the subgroup on information coverage of elections, information security and election campaigning discussed provisions on a special regime for election campaigning abroad.[464] It was proposed to provide that such campaigning would be permitted only in accordance with the rules of the EC of Ukraine, considering the law of the host state, exclusively at the expense of electoral funds and on a contractual basis. It was also proposed to introduce a complete prohibition on the involvement of foreigners and stateless persons in campaigning or the use of their image in campaign materials, as well as to establish an exhaustive list of permitted forms of campaigning abroad, including meetings with voters, debates, rallies, dissemination of materials in the media and on the internet and printed campaigning materials, accompanied by additional safeguards. These included, in particular, a prohibition on any financing or co-organisation by foreign states, their authorities, officials, political parties or legal entities; an obligation to provide prior written notification

458 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 145–146. ↗

459 Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising (Text with EEA relevance). ↗

460 Ukraine 2025 Report. Communication on EU enlargement policy. P. 22 ↗; For more details, see the subsection 'Election campaigning and political advertising: state of play and ways of harmonisation with EU acquis'.

461 For more details, see the subsection 'Electoral Rights of Forcibly Displaced Persons'.

462 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 131–132. ↗

463 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

464 Meeting of the Working Group on the preparation of comprehensive legislative proposals on the specific features of the organisation and conduct of elections in a special or post-war period in Ukraine, 25.03.2026. ↗

to the CEC and diplomatic missions regarding campaign events; restrictions on the use of symbols and outdoor advertising; requirements for transparency of the sponsors of online campaigning; and prior submission of layouts of printed materials to the CEC. Any other forms of campaigning abroad were proposed to be prohibited. The possibility of reproducing campaign materials in the language of the host state was also explicitly linked to compliance with the legislation on the state language.[465]

Fragmented state policy on countering disinformation and propaganda of the aggressor state in the electoral sphere.

Post-war elections may be characterised by a wide-scale **disinformation and Russian propaganda**,[466] an issue also highlighted by the European Commission.[467] At the end of 2025, within the framework of the Working Group on the preparation of legislative proposals regarding elections during a special or post-war period,[468] a Subgroup on information coverage of elections, information security and election campaigning was established.[469] During the presentation of its work in 2026, it was noted that legislative proposals of the CEC[470] had been reviewed (set out in the Resolution both as conceptual proposals and as specific draft provisions), as well as draft law No. 8310 (which contains primarily specific amendments prepared for the second reading). In addition, work was reported on provisions addressing the specific features of:

- countering external interference through the establishment of an inter-agency working group (to include representatives of law enforcement authorities, the CEC, the National Council and, potentially, other institutions; however, during discussions experts emphasised the fragmented nature of this regulation and the need for broader consultation on countering foreign interference);
- the use of artificial intelligence (campaign materials must include an appropriate disclaimer and the use of artificial intelligence in relation to natural persons without their consent is prohibited).[471]

Recommendations

1. Consolidate the restrictions and requirements governing election campaigning within the EC of Ukraine.

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465 Analytical update on Ukraine's progress in implementing the indicators of the Roadmap on the Functioning of Democratic Institutions based on the work of thematic subgroups on preparing the legislative framework for the first post-war elections. Civil Network OPORA, 2026. ↗

466 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 139 ↗; For more details, see the subsection 'Legal and institutional mechanisms for countering external interference in the electoral process'.

467 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

468 Meeting of the Working Group on the preparation of legislative proposals regarding elections in a special or post-war period. Verkhovna Rada of Ukraine, 2025. ↗

469 Seven subgroups established in the Verkhovna Rada to develop electoral legislation for the period of a special legal regime. Ukrinform, 2026. ↗

470 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

471 Working Group on the preparation of legislative proposals regarding elections in a special or post-war period. Rada TV channel (YouTube), 2026. ↗

2. Hold parliamentary discussions and adopt Draft Law No. 8310, considering proposals suggested by the expert community and within the Working Group on the reform of post-war electoral legislation.
3. Introduce legislative amendments aimed at regulating 'premature' campaigning (conducted prior to the registration of candidates) and/or political advertising, adapted to EU regulations (Regulation (EU) 2024/900 on the transparency and targeting of political advertising).
4. Hold parliamentary discussions and adopt amendments to electoral legislation based on the CEC's proposals (Resolution No. 1 of 01.01.2026) regarding information coverage of elections and the specific features of election campaigning in the territory of a foreign state, drawing on the work of the parliamentary Working Group.
5. Initiate a broad discussion involving key stakeholders and establish effective inter-institutional coordination on countering foreign information manipulation and interference (FIMI), including disinformation.
6. Following the adoption of legislative amendments, ensure the implementation of an information and awareness-raising campaign on the new rules.

Voting and Establishment of Election Results

State of play

The conduct of voting and the establishment of election results involve a significant number of procedures and are regulated by the EC of Ukraine.[472]

Several recommendations of international organisations had already been implemented during previous electoral reforms, including the removal of the 'against all' voting option and the introduction of the inclusion of candidates on the ballot based on a lottery rather than in alphabetical order.[473]

Observation of the voting and vote-counting process during the local elections held on 25 October 2020[474] showed that at 89.7% of polling stations (margin of error 2.71%) no violations of the voting process that could affect the results were identified. Significant violations with a potential impact on the results were recorded at 0.8% of PECs. Minor non-compliance with legal requirements governing the voting process was reported by observers at 9.4% of PECs. The limited scale of significant violations indicates that the voting process overall complied with legal requirements and was not accompanied by direct attempts to distort the will of voters. This conclusion is further supported by the number of incidents involving signs of ballot stuffing, which were recorded at only 0.64% of polling stations (compared to 1.5% in 2015).[475]

472 Electoral Code: Code of Ukraine No. 396-IX of 19.12.2019, Sections X, XXI, XXXI, XXXX. ↗

473 Joint Opinion on the Law on Amending some legislative acts on the election of the President of Ukraine adopted by the Verkhovna Rada of Ukraine on 24 July 2009 by the Venice Commission and the OSCE/ODIHR adopted by the Council for Democratic Elections at its 30th meeting (Venice, 8 October 2009) and by the Venice Commission at its 80th Plenary Session (Venice, 9–10 October 2009), CDL-AD(2009)040-e. Council of Europe. P.16. ↗

474 The 2020 local elections were conducted under the rules of the Electoral Code, which entered into force in the same year.

475 Final Report on the Observation of the 2020 Local Elections. Civil Network OPORA, 2025. ↗

At the same time, violations of the secrecy of the vote remain relatively common. During the 2020 local elections, voting outside polling booths, as well as direct and indirect attempts to breach ballot secrecy, including the display of ballots, were recorded by national observers at 7.52% of PECs, which is identical to the figure observed during the 2015 local elections. Attempts by voters to photograph their ballots may be of a personal nature or may serve as a mechanism for controlling voters' choices by organisers of vote-buying schemes. On 25 October 2020, observers recorded attempts to photograph ballots at 1.6% of polling stations across Ukraine. Compared to the 2015 elections, this figure remained virtually unchanged.[476]

Of note, despite legislative prohibitions, sessions on the establishment of voting results are not uninterrupted as legally required, while the receipt and processing of electoral documents remain prolonged and disorganised. In addition, the transfer of electoral documentation to higher-level commissions constitutes a significant challenge for PEC members, who may have to wait for hours or even days to submit protocols and packages of ballots.[477]

The most critical issue at this stage of the electoral process, repeatedly highlighted by observers, has been the practice of unlawfully rewriting or 'updating' protocols on the counting of votes at polling stations.[478]

With regard to the legal regulation of the grounds and procedures for the invalidation of election results, the Venice Commission and the ECtHR have developed a number of positions and recommendations.[479] The invalidation of election results and the holding of repeat elections or repeat voting constitute an exceptional measure for restoring violated electoral rights and should be applied proportionately, reasonably and cautiously where other remedies (such as a recount, repeat voting at a polling station or cancellation of candidate registration) cannot achieve the intended objective.

The EC of Ukraine provides for the possibility of declaring voting results at a polling station invalid if the PEC establishes violations of the Code's provisions during voting which make it impossible to reliably determine the voting results, including:

- cases of unlawful voting exceeding 5% of the number of voters who received ballot papers;
- the presence in ballot boxes of ballot papers exceeding by more than 10% the number of voters who received ballot papers;
- destruction or damage to a ballot box making it impossible to establish the content of the ballot papers, if the number of such ballot papers exceeds by more than 5% the number of voters who received ballot papers.[480]

476 Final Report on the Observation of the 2020 Local Elections, p. 128. Civil Network OPORA. ↗

477 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 192. ↗

478 Final Report on the Observation of the Early Parliamentary Elections of 21 July 2019. Civil Network OPORA, 2020. ↗

479 Code of Good Practice in Electoral Matters: Guidelines and Explanatory Report — Adopted by the Venice Commission at its 52nd session (Venice, 18–19 October 2002) in Ukrainian. Council of Europe ↗; Case of Davydov and Others v. Russia. The European Court of Human Rights. Application No. 75947/11. 30 May 2017. ↗

480 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 122, 177, 252. ↗

A decision to declare voting at a polling station invalid may be taken not only by the PEC but also by the DEC (TEC) if the grounds for such a decision are identified during a recount conducted by the respective commission at that polling station. In both cases, the decision to declare voting invalid is a right, not an obligation, of the PEC and the DEC (TEC).

Progress and issues

Impossibility of annulling election results and established thresholds of tolerance for violations for ordering a recount

The EC of Ukraine does not provide for the possibility of declaring election results or voting results in an electoral district invalid or annulling them, although such a possibility existed under previous electoral laws. In practice, election results were annulled either by the CEC (in 1998, 2002 and 2012) — in certain single-member constituencies — or by the Supreme Court of Ukraine (in 2004) — in full during the 2004 presidential election.[481]

Among the priority recommendations in the OSCE/ODIHR report following the 2020 local elections is the revision of legislative provisions governing the invalidation of election results and the ordering of recounts, to prevent arbitrary application and to ensure integrity and legal certainty.[482]

At the end of 2025, within the framework of the Working Group on the Preparation of Legislative Proposals on Elections in a Special or Post-War Period,[483] a Subgroup on Election Administration and Electoral Infrastructure[484] was established. During the presentation of its outputs in 2026, it was proposed to submit for further discussion amendments to the EC of Ukraine and the CAP of Ukraine concerning the invalidation of elections. It was proposed to assign the power to declare election results entirely invalid to the SC, after which the CEC would be required to call repeat elections. In addition, the proposals suggested to remove the provision allowing PECs to invalidate voting results at election precinct and to retain this power exclusively for DECs.[485] The issue of annulling the distorted election results was not conclusively resolved within the Working Group and was left for further separate discussion.[486]

The need for retaining in the EC of Ukraine the very possibility of declaring voting at election precinct invalid should be carefully considered, given that under current legislation such a decision does not provide effective remedies for restoring the electoral rights of

481 Invalidation of Voting at Polling Stations and Annulment of Election Results: International Standards, European Practice, Ukrainian Experience and Recommendations. Civil Network OPORA, 2025. ↗

482 Final Report of the OSCE/ODIHR on the Observation of the 2020 Local Elections, p. 46. ↗

483 Meeting of the Working Group on the Preparation of Legislative Proposals on Elections in a Special or Post-War Period Held. Verkhovna Rada of Ukraine, 2025. ↗

484 Seven subgroups established in the Verkhovna Rada to prepare legislation on elections during a special period. Ukrinform, 2026. ↗

485 Working Group on the Preparation of Legislative Proposals on Elections in a Special or Post-War Period. Rada TV Channel. YouTube, 2026. ↗

486 Analytical update on Ukraine's progress in implementing the indicators of the Roadmap on the Functioning of Democratic Institutions based on the work of thematic subgroups on the preparation of the legislative framework for the first post-war elections. Civil Network OPORA, 2026. ↗

voters who have voted without violating electoral law.[487] At the same time, such consideration should form part of a broader review of the grounds and procedure for declaring voting at election precinct invalid, as well as the legislative regulation of the procedure for invalidating election results.

If the possibility of declaring voting at an election precinct invalid is retained, consideration should be given to:

- removing the provisions from the EC of Ukraine that establish percentage thresholds of violations upon reaching which voting at election precinct is declared invalid;
- expanding the list of grounds for declaring voting invalid by including violations that occurred within the territory of the election precinct before, during and after voting and that affected the voting results or the genuine expression of the will of voters;
- transferring the power to determine whether the grounds for declaring voting at a polling station invalid existed from PECs to bodies responsible for establishing the results of the respective elections and/or to courts;
- training the members of PECs and DECs/TECs on how to identify, document and assess the violations of the electoral rules that may constitute grounds for invalidating voting results;
- establishing an obligation for PECs to record violations (by drawing up relevant reports) that may serve the grounds for declaring precinct voting results invalid by a higher-level election commission and to transmit such reports to bodies responsible for tabulating and establishing election results;
- granting voters, political parties, candidates and members of the relevant election commissions the right to initiate invalidation of the voting results;
- aligning the grounds for declaring voting at election precinct invalid with the grounds for annulling entire elections based on the substance of violations rather than solely on formal (percentage-based) criteria.[488]

With regard to the annulment of election results, consideration should be given to:

- assigning to the CEC and TECs (in local elections) the power to declare the impossibility of establishing voting results and election results based on the outcomes of consideration of vote-counting protocols following the review of vote counting and vote tabulation protocols in cases of violations of the principles of electoral law or the fundamentals of the electoral process established by the Constitution of Ukraine or the EC of Ukraine;
- defining in the CAP of Ukraine specific procedural rules for declaring voting invalid and annulling election results, including extended deadlines for filing lawsuits and for the consideration of cases on the annulment of election results by the relevant administrative courts;

487 Invalidation of Voting at Polling Stations and Annulment of Election Results: International Standards, European Practice, Ukrainian Experience and Recommendations. Civil Network OPORA, 2025. ↗

488 Invalidation of Voting at Polling Stations and Annulment of Election Results: International Standards, European Practice, Ukrainian Experience and Recommendations. Civil Network OPORA, 2025. ↗

- training the members of election commissions and judges on the procedures and grounds for declaring voting at an election precinct invalid and annulling election results, including international standards, the case law of the ECtHR and the approaches of European states to the annulment of voting and election results.[489]

Difficulties in processing electoral documents during uninterrupted sessions

Following the 2012 parliamentary elections, the OSCE/ODIHR emphasised the need to simplify the procedure for establishing voting results, increase the number of persons entering data at DECs, grant the CEC and DECs the authority to correct obvious errors and inaccuracies in protocols and establish clear deadlines in the law for determining election results.[490] In their joint opinion of 2013, the Venice Commission and the OSCE/ODIHR noted that only part of these recommendations had been implemented.[491]

In 2019, the OSCE/ODIHR noted that the practical aspects of vote counting and the establishment of voting results require revision in order to facilitate the receipt and processing of electoral materials on election night and to ensure the simultaneous processing of documents from multiple PECs. At the same time, transparency of this process must be ensured.[492] For local elections, as an alternative, consideration could be given to amending legislation to allow the phased submission of PEC protocols to avoid queues at TECs. At the same time, protocols and the relevant documentation should be subject to additional safeguards prior to their delivery to TECs.[493] In this context, the CEC considers it appropriate to amend Articles 123, 178 and 253 of the EC of Ukraine to provide that documents from PECs are received sequentially, where possible based on prior notification of readiness for transport, which would help minimise the simultaneous submission of vote-counting protocols from multiple PECs.[494]

Absence of the 'Elections' Information and Analytical System at the lower level creates challenges for the digitalisation of protocols, data verification and the publication of electoral documentation

The publication of protocol data is essential for effective observation and transparency of the electoral process. As emphasised by the Venice Commission and the OSCE/ODIHR in their joint opinion of 2013 (para. 96), all data from PEC and DEC protocols, regardless of subsequent updates, should be published on the CEC website. This would significantly

489 Invalidation of Voting at Polling Stations and Annulment of Election Results: International Standards, European Practice, Ukrainian Experience and Recommendations. Civil Network OPORA, 2025. ↗

490 Final Report of the OSCE/ODIHR on the Observation of the Parliamentary Elections in Ukraine of 28 October 2012. ↗

491 Joint Opinion of the Venice Commission and the OSCE/ODIHR on Draft Amendments to the Laws on the Election of People's Deputies of Ukraine and on the Central Election Commission and on the Draft Law on Repeat Elections, CDL-AD(2013)016, paras. 94–95. ↗

492 Final Report of the OSCE/ODIHR on the Observation of the Presidential Election in Ukraine 2019, pp. 50–51 ↗; Final Report of the OSCE/ODIHR on the Observation of the Early Parliamentary Elections in Ukraine 2019, p. 38 ↗; Final Report of the OSCE/ODIHR on the Observation of the Local Elections 2020, p. 49. ↗

493 Final Report of the OSCE/ODIHR on the Observation of the Local Elections 2020, p. 49. ↗

494 On the Approval of Proposals for Improving the Legislation of Ukraine in Connection with Taking into Account the Recommendations of OSCE/ODIHR Election Observation Missions: Resolution of the Central Election Commission No. 48 of 03.10.2025. ↗

enhance transparency and public trust in the electoral process.[495] Despite some progress at the national level in publishing aggregated data on voting results[496] and information on vote counting at election precincts based on final updated protocols, it remains impossible to track changes made during the process of updating protocols,[497] as initial protocol data are not published on the CEC website. Informing voters on precinct voting results during local elections also remains an outstanding issue.

In its report following the 2020 local elections, the OSCE/ODIHR also recommended considering the simplification of procedures for closing polling stations, counting votes and reconciliation procedures. It proposed to:

- introduce compiling the protocols in electronic form, which would contribute to reducing the number of protocols returned for updates due to minor technical errors;
- ensure that the CEC publishes preliminary voting results at election precincts in a timely manner in line with international standards;
- consider adapting the CEC's 'Elections' Information and Analytical System and its use during local elections.[498]

In this context, several areas for improvement can be identified:

- introducing automated compiling of protocols and their preliminary verification, both through the system used to compile them and by DECs or TECs. If the protocols are prepared in compliance with the law, electoral documentation could be accepted more quickly for the establishment of voting results, which would significantly reduce queues at DECs;
- determining the sequence for the transfer of ballots to DECs or TECs by each PEC. This would allow PEC members to avoid waiting for hours or days at DEC or TEC premises and instead remain at the polling station until their designated time;
- designating locations for the storage of electoral documentation at DEC or TEC premises prior to its consideration by the respective commission. This would also reduce queues during the submission process but would require mechanisms to ensure that PEC members arrive at a designated time for submission and that the documentation is properly secured prior to its receipt or consideration by the CoEC or TEC.[499]

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495 Joint Opinion on the Draft Amendments to the Laws on Election of People's Deputies and on the Central Election Commission and on the Draft Law on Repeat Elections of Ukraine, adopted by the Council for Democratic Elections at its 45th meeting (Venice, 13 June 2013) and by the Venice Commission at its 95th Plenary Session (Venice, 14–15 June 2013). CDL-AD(2013)016-e. ↗

496 Voting results by constituencies. Early Parliamentary Elections of 2019. Central Election Commission ↗; Presidential Election of Ukraine 2019. Central Election Commission. ↗

497 For example: Data on voting results at polling stations in single-member constituency No. 11 (Vinnytsia region). Parliamentary elections ↗; Voting results at polling stations in the nationwide constituency. Parliamentary elections. Vinnytsia region, constituency No. 11 ↗; Territorial constituency No. 11 (Vinnytsia region). Parliamentary elections. ↗

498 Final Report of the OSCE/ODIHR on the Observation of the Local Elections 2020, p. 49. ↗

499 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 192. ↗

Limited accessibility of polling stations restricts equal opportunities for participation in elections

The EC of Ukraine provides that from 1 January 2025 all regular polling stations must be accessible to persons with disabilities.[500] A 2019 study of the accessibility of polling premises found that only 15 (3%) of the 500 election precincts included in the sample were fully accessible.[501] As of 28 July 2026, the CEC had access to information on the accessibility of 26,946 election precincts and had no such information for 6,204 precincts. Of the 26,946 election precincts, 6.6% fully met the needs of voters with visual impairments, 4.6% the needs of voters with hearing impairments, 4.2% the needs of voters who use wheelchairs and 6.1% the needs of voters with reduced mobility (older persons and persons using walking sticks or crutches). Of the same 26,946 election precincts, 6.5% did not meet at all the needs of voters with visual impairments, 25.1% those of voters with hearing impairments, 7.4% those of voters who use wheelchairs and 8.5% those of voters with reduced mobility (older persons and persons using walking sticks or crutches).[502]

In the election day-related conclusions of the 2019–2020 OSCE/ODIHR election observation reports, it was recommended to take additional measures to further facilitate access to polling stations and participation in elections for voters with disabilities.[503] Where possible, compliance with the principles of universal design and reasonable accommodation should also be ensured.[504]

Violation of the secrecy of the vote

The OSCE/ODIHR has consistently recommended strengthening safeguards for the secrecy of the vote, through proper voter information at polling stations and by considering the introduction of mandatory folding of ballot papers.[505]

In this context, the CEC considers it appropriate to provide in the EC of Ukraine that a voter, before placing a ballot paper in the ballot box, must fold it in such a way as to prevent disclosure of the content of their vote (amendments to Part 6 Article 118, Part 9 Article 173 and Part 10 Article 248 of the EC of Ukraine).[506]

The main concerns in this regard are: (1) the risk of artificially creating a perception of widespread violations, (2) the difficulty of ensuring compliance with such a requirement, (3) the likelihood that voters will simply forget to comply with it and (4) the lack of convincing evidence that such a requirement in itself would significantly strengthen the protection

500 Electoral Code of Ukraine: Code of Ukraine No. 396-IX of 19.12.2019, Para. 7 Section XLII 'Final and Transitional Provisions'.

501 Accessibility of Polling Premises in Ukraine. Civil Network OPORA. 2020.

502 Letter of the Central Election Commission No. 21-17-2202 of 28.07.2026 in response to an information request from Civil Network OPORA.

503 For more details, see subsection 'Electoral Rights of Persons with Disabilities'.

504 Final Report of the OSCE/ODIHR on the Observation of the Presidential Election in Ukraine 2019, pp. 50–51; Final Report of the OSCE/ODIHR on the Observation of the Early Parliamentary Elections in Ukraine 2019, p. 38; Final Report of the OSCE/ODIHR on the Observation of the Local Elections 2020, p. 49.

505 Final Report of the OSCE/ODIHR on the Observation of the Presidential Election in Ukraine 2019, rec. 22; Final Report of the OSCE/ODIHR on the Observation of the Local Elections 2015, rec. 26.

506 On the Approval of Proposals for Improving the Legislation of Ukraine in Connection with Taking into Account the Recommendations of OSCE/ODIHR Election Observation Missions: Resolution of the Central Election Commission No. 48 of 03.10.2025.

of the secrecy of the vote.[507] In this connection, alongside the possible introduction of mandatory folding of ballot papers, it is advisable to consider other measures to ensure ballot secrecy, including the proper placement of voting booths and ballot boxes, a ban on the display of ballot papers, effective measures to prevent their photographing, improvements to ballot design and proper training of PEC members.[508]

Non-compliance of the ballot paper format with requirements of clarity, accessibility and cost-efficiency

Under current legislation, the ballot paper used in parliamentary elections at regular and special election precincts includes not only the names of all parties that have nominated candidates, but also the surnames of candidates placed in the first nine positions of the nationwide candidate list, as well as the surnames and initials of all candidates included in each party's regional list.[509] The inclusion of such a volume of information in each ballot paper significantly increases its length and the overall cost of ballot printing covered from the state budget, may require the installation of additional stationary ballot boxes at polling stations and complicates or even prevents the use of ballot templates by voters with disabilities. A significant length of the ballot paper and the large amount of information it contains also mean that voters need more time to find the name of the party or local party organisation and the surname of the candidate in the relevant party list for whom they intend to vote, thereby increasing the time required for each voter to fill out a ballot.[510]

Any changes to the format, text of ballot papers and/or the procedure for their filling out should be preceded by quantitative and qualitative public opinion research and pilot (experimental) voting, including prior assessment of the proposed changes in terms of their perception, potential errors in filling out ballot papers and associated risks.[511] In 2021, a study was conducted on voters' perception of different ballot paper formats, including variations in the layout of the text. Certain ballot designs providing for a significant reduction in length received a positive response from the focus group participants in terms of the intuitive understanding of how to fill them out.[512]

Non-uniform practice in the use of the 'Withdrawn' stamp

The regulation of the use of the 'Withdrawn' stamp across different elections — and even within the same electoral process — is not uniform. In case of cancelation of candidate's registration on the regional party list, changes using this stamp are made

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507 Information provided by Respondent No. 31 based on the results of a survey conducted on 25.03.2026.
Information provided by Respondent No. 32 based on the results of a survey conducted on 25.03.2026.
Information provided by Respondent No. 33 based on the results of a survey conducted on 26.03.2026.
Information provided by Respondent No. 35 based on the results of a survey conducted on 28.03.2026.
Information provided by Respondent No. 38 based on the results of a survey conducted on 30.03.2026.
Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.
Information provided by Respondent No. 43 based on the results of a survey conducted on 31.03.2026.
Information provided by Respondent No. 45 based on the results of a survey conducted on 02.04.2026.

508 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

509 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 4 Article 168. ↗

510 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 181. ↗

511 Ibid, p. 183.

512 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 181 ↗; Perception of Different Types of Ballot Papers by Voters to Improve the Electoral Process. Civil Network OPORA, 2021. ↗

not to the ballot paper but to the party's information booklet,[513] while in out-of-country vote in parliamentary elections[514] and in presidential elections, such changes are made directly to ballot papers.[515] Under certain conditions, the absence of a uniform approach to the use of the 'Withdrawn' stamp may distort the results of voters' expression of will (for example where a voter casts a vote for a candidate included in the ballot whose registration was cancelled after the ballots were printed). In the context of future post-war elections, the form of the stamps and the ink used to make such changes is also of importance.[516] In the absence of the possibility of promptly reprinting ballot papers and other informational materials, it remains difficult to identify a fully viable alternative to the use of the 'Withdrawn' stamp.[517]

In 2009, the Venice Commission recommended (para. 57) that, in the event of a candidate's withdrawal, the PEC should publicly announce this information in writing and verbally before the start of voting and in polling premises during voting.[518] If the provisions on the content, format and procedure for filling out ballot papers remain unchanged (that is the requirement to include information on candidates), the 'Withdrawn' stamp should be used exclusively to make changes to ballot papers rather than to information posters or booklets. If such information is not included in ballot papers, the 'Withdrawn' stamp should instead be used to make changes to informational posters and booklets. The CEC should, by adopting an appropriate resolution, provide for the use of special fluorescent ink for the 'Withdrawn' stamp. The size of the stamp should ensure accuracy and correctness in its application as well as the possibility for voters to clearly identify its use, depending on whether it is applied to ballot papers or to posters or booklets. Given the significant number of errors and violations associated with the use of stamps, information on the procedure for their use should be included in training programmes for PEC members.[519]

Recommendations

1. Review the provisions of the EC of Ukraine and the CAP of Ukraine concerning the invalidation of voting at polling stations, the ordering of recounts and the annulment of election results, by establishing legally defined, uniform and proportionate grounds for the application of such mechanisms and clearly delineating the powers of election commissions and courts in this regard.
2. Improve the legislative regulation of procedures for the receipt, verification and processing of electoral documents after the completion of voting, by simplifying reconciliation procedures, streamlining uninterrupted sessions of election commissions, introducing mechanisms for the phased transfer of documentation

513 Electoral Code of Ukraine: Code of Ukraine No. 396-IX of 19.12.2019, Article 164. ↗

514 Ibid, Part 7 Article 169.

515 Ibid, Part 7 Article 114.

516 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 186. ↗

517 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

518 Joint Opinion on the Law on Amending some legislative acts on the election of the President of Ukraine adopted by the Verkhovna Rada of Ukraine on 24 July 2009 by the Venice Commission and the OSCE/ODIHR adopted by the Council for Democratic Elections at its 30th meeting (Venice, 8 October 2009) and by the Venice Commission at its 80th Plenary Session (Venice, 9–10 October 2009), CDL-AD(2009)040-e. Council of Europe. ↗

519 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 187. ↗

and establishing additional safeguards for its integrity and proper storage until its consideration by a higher-level commission.

3. Introduce at the legislative level the possibility of preparing, preliminarily verifying and checking vote counting and tabulation protocols in electronic form, ensure the adaptation of the CEC's 'Elections' Information and Analytical System to the relevant procedures and provide for the full and timely publication on the CEC website of all data from election commission protocols, including updated protocols.
4. Take additional organisational and legal measures to ensure unhindered access for voters with disabilities to polling premises and their full participation in the electoral process, guided by the principles of universal design, reasonable accommodation and proper material and technical arrangements of polling stations.
5. Conduct a professional discussion on ways to strengthen guarantees of the secrecy of the vote and to identify additional mechanisms to protect the secrecy of voters' expression of will beyond the introduction of mandatory folding of ballot papers before they are placed in the ballot box.
6. Review legislative requirements for the content, format and structure of ballot papers to ensure their clarity, convenient filling out and accessibility for voters with disabilities and to reduce the risk of errors during voting, ensuring that such changes are based on prior research into voters' perception of ballot papers.
7. Standardise, at the level of the EC of Ukraine and CEC regulations, the procedure for using the 'Withdrawn' stamp across all types of elections, clearly defining the cases, documents, method and technical conditions of its application, the procedure for informing voters of a candidate's withdrawal and specific requirements for the form of the stamp, the ink used and the training of election commission members in its use.

Election Disputes Resolution and Liability for Violations of Election Legislation

State of play

Violations of election legislation, unless they contain elements of criminal offences or administrative offences, may be challenged before election commissions[520] or directly before a court.[521] If a complaint submitted to an election commission indicates that criminal offences or administrative offences have been committed, the commission does not consider it, but instead refers it to law enforcement agencies to verify the circumstances set out in the complaint and take measures to stop the violations, of which the relevant law enforcement agencies must inform the election commission.[522]

520 Complainants are a candidate, a party/local party organisation that is an electoral process subject, an official observer, including from a civil society organisation and a voter, provided that their electoral rights and legitimate interests regarding participation in the election process have been violated. This list is exhaustive. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 1 Article 65. ↗

521 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 1 Article 63. ↗

522 Ibid, Part 12 Article 72; On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 10.17. ↗

Since 2011, the powers of election commissions to resolve election disputes have been steadily narrowed[523] and, under the EC of Ukraine, they consider complaints on a limited range of issues:

- The CEC considers complaints only against omissions, but not decisions or actions, of DECs and TECs that establish the results of local elections;[524]
- DECs at nationwide elections consider complaints against decisions, actions and omissions of PECs of an election precinct within the relevant TC, as well as against actions and omissions of their members;[525]
- TECs at local elections, depending on whether they establish voting results or election results, may consider complaints against decisions, actions and omissions of lower-level TECs, that is TECs that establish voting results, decisions, actions and omissions of PECs, while the TEC that formed the relevant PEC may also consider complaints against actions and omissions of a member of that PEC.[526]

The EC of Ukraine sets out the time limits for submitting complaints and detailed requirements for their form,[527] non-compliance with which constitutes grounds for leaving a complaint *without consideration*.[528] A complaint submitted to an election commission is left *without consideration on the merits* if it is: (1) submitted by an improper complainant, (2) submitted in breach of the time limits for submitting complaints, (3) submitted to an improper body responsible for considering complaints or (4) resubmitted without correcting the deficiencies or with new deficiencies, where it had previously been left without consideration.[529]

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523 For example, under the Law 'On Elections of People's Deputies of Ukraine' of 2004 (in the version of the Law that was in force before the adoption on December 10, 2011, of the new Law of Ukraine No. 4061-VI 'On the Election of People's Deputies of Ukraine'), election commissions could consider complaints against decisions, actions and omissions of lower-level election commissions and their members; decisions, actions and omissions of state and local self-government bodies and their officials; decisions and actions of parties, electoral blocs and associations of citizens; actions and omissions of the media and their employees and candidates for MP. The Law of Ukraine 'On Elections of People's Deputies of Ukraine', in the version in force before the adoption of the EC of Ukraine, significantly narrowed the powers of election commissions to consider complaints: under that Law, only omissions of election commissions could be challenged before the CEC, but not their decisions or actions or the actions or omissions of DEC members; challenges against decisions, actions and omissions of state and local self-government bodies and their officials, the media and their employees were also removed from the competence of election commissions, as were actions of proxies of candidates, authorised representatives of parties and official observers, except for violations committed by them on election day, which could be challenged before a PEC. On Election of People's Deputies of Ukraine: Law of Ukraine No. 1665-IV of 25.03.2004, Article 112–116 ↗; On Election of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011, Pars 5-9 Article 108, Part 6 Article 111. ↗

524 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 3 Article 65. ↗

525 Ibid, Part 5 Article 65.

526 Ibid, Part 4 Article 65.

527 The exhaustive list of these requirements is set out in Article 67 of the EC of Ukraine. A complaint is submitted in writing and must contain: (1) the name of the election commission to which the complaint is submitted, (2) information about the complainant and (3) the subject of challenge, although such information may not always be known, for example the subject's place of residence or contact number, (4) the substance of the issue raised, (5) a statement of the circumstances and indication of evidence, (6) clearly formulated demands indicating the substance of the decision to be adopted by the election commission, (7) a list of documents and materials attached to the complaint and (8) the complainant's signature and the date of signing. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Parts 1, 2 and 3 Article 66, Part 1 Article 67. ↗

528 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 1 Article 68. ↗

529 On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, paras. 6.13, 10.6. ↗

One of the innovations introduced by the EC of Ukraine was the possibility of submitting complaints in electronic form. However, for an election commission to consider such a complaint, it must be certified by a qualified electronic digital signature; otherwise, the election commission considers it only after receiving the complaint in paper form.[530] Although the EC of Ukraine provides for the possibility for the CEC to introduce electronic services for submitting complaints to election commissions,[531] these have never been implemented. Nor has the CEC created an electronic administration system or complaints register that would allow any interested person or body, including a court where an administrative claim in an election dispute is filed with it, to establish the fact, date and place of submission of a complaint, the stages and results of its consideration, the complainants, the subject matter of the complaint and the bodies or persons whose decisions, actions or omissions are being challenged, among other things.

CEC resolutions on the consideration of complaints are published on the CEC website without delay.[532] At the same time, decisions to leave complaints without consideration are formalised not by CEC resolutions, but by letters,[533] which are not subject to mandatory publication. DEC resolutions on the consideration of complaints must be sent to the CEC through the automated information and analytical system, as a general rule by 11:00 on the following day, and the CEC must ensure their immediate publication.[534] In addition to stands displaying the commission's official materials, TECs must publish resolutions on their own websites, where available, on the websites of the relevant local councils, where available, or 'in another manner', which the EC of Ukraine does not clearly define.[535]

In practice, the CEC only summarises statistics[536] on the consideration of complaints that it has considered directly, but not its own legal positions arising from their consideration or the practice of complaint consideration by lower-level election commissions. The practice of considering complaints at local elections is not summarised by any state authority, as TECs are not required to send resolutions on the consideration of complaints to the CEC, which precludes their further analysis.

Courts may resolve all categories of election disputes,[537] including matters falling within the competence of election commissions. An election dispute is a dispute that 1) arises

530 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 9 Article 67. ↗

531 Ibid, Part 10 Article 67.

532 On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 10.20. ↗

533 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 3 Article 68. ↗

534 On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 10.20. ↗

535 On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 10.20. ↗

536 The statistics includes the distribution of complaints by types of complainants, subject matter of challenge and outcomes of consideration. Presidential Election of Ukraine of 31 March 2019. Analytical Report. Central Election Commission, pp. 27–29 ↗; Elections of Members of Parliament of Ukraine of 21 July 2019. Analytical Report, pp. 39–41. ↗

537 They include challenges concerning inaccuracies in voter lists, decisions, actions and omissions of election commissions and their members; actions and omissions of public associations, candidates, parties/local party organisations, proxies, authorised representatives, representatives of parties/candidates at the CEC and official observers from parties and candidates; decisions, actions and omissions of public authorities and their officials, the media and news agencies. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 2 Article 64. ↗

within the election process and 2) concerns the preparation and conduct of elections.[538] In such cases, it is considered under the special procedure set out in Articles 273–278 of the CAP of Ukraine. If the dispute does not meet one of these two conditions, it is considered under the general procedure for resolving public-law disputes. Unlike the general procedure for resolving public-law disputes, election disputes are subject to special rules on the parties entitled to bring claims, shortened time limits for filing claims, their consideration and appeals,[539] among other matters.

Judicial resolution of election disputes is carried out by local general courts[540] and district administrative courts;[541] certain categories of election disputes are resolved at first instance by the Sixth Administrative Court of Appeal[542] or the SC.[543] Appeals are available for all categories of election disputes resolved by courts.[544]

The EC of Ukraine and CAP of Ukraine establish short time limits for filing complaints in election disputes, for the consideration of cases by an election commission or court and for appeals.[545] There is a practice of exceeding the time limits for considering claims in election disputes, but it is not systemic.[546]

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538 On the Practice of Application by Administrative Courts of the Provisions of the Code of Administrative Procedure of Ukraine when Considering Disputes Concerning Legal Relations Related to the Election Process: Resolution of the Plenum of the Higher Administrative Court of Ukraine No. 15 of 01.11.2013. ↗

539 For each type of election dispute provided for in Articles 273–277 of CAP of Ukraine, a separate list of claimants and the specific features of the proceedings in that dispute are defined. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Articles 273–278. ↗

540 Local general courts consider cases concerning the correction of voter lists, decisions, actions and omissions of PECs and their members, actions and omissions of media entities, enterprises, institutions and organisations and their officials, as well as actions and omissions of candidates for council members of village and settlement councils, candidates for village and settlement heads and their proxies. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 5 Article 273, Article 274, Part 3 Article 275, Part 4 Article 276. ↗

541 District administrative courts consider cases concerning decisions, actions and omissions of TECs and DECs and their members; decisions, actions and omissions of executive authorities and local self-government bodies and their officials; actions and omissions of parties, local party organisations, their officials and authorised representatives, official observers and candidates in elections, except candidates and proxies whose actions and omissions are challenged before a local general court. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 4 Article 273, Part 3 Article 275, Parts 1 and 5 Article 276. ↗

542 The Sixth Administrative Court of Appeal, acting as a court of first instance, considers cases concerning decisions, actions and omissions of the CEC, except those related to the CEC's establishment of election results, as well as actions of candidates for the office of President of Ukraine and their proxies. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 3 Article 273, Part 7 Article 277. ↗

543 The Supreme Court, acting as a court of first instance, considers cases concerning decisions, actions and omissions of the CEC relating to the establishment of election results. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 3 Article 273. ↗

544 Judgments of local general courts and district administrative courts may be appealed before the relevant administrative courts of appeal; judgments of the Sixth Administrative Court of Appeal — before the Supreme Court; and judgments of the Supreme Court — before the Grand Chamber of the Supreme Court. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 3 Article 278. ↗

545 A complaint to an election commission may be submitted within two days from the date of adoption of the decision, performance of the action or allowance of the omission. If the violation was committed on the day before election day or on election day, this time limit is even shorter. The complaint is considered no later than the third day after it is received by the election commission and, if the violation was committed on the day before election day, the time limit for consideration may be as short as two hours after receipt of the complaint. The general time limit for filing a statement of claim in election disputes is five days from the date of adoption of the decision, performance of the action or allowance of the omission; the time limit for its consideration is two days from receipt of the claim and the general time limit for appeal is two days from the pronouncement of the judgment of the court of first instance. For certain categories of cases, even shorter time limits are provided for filing claims, their consideration by courts of first instance and appeals. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Parts 1, 2 and 3 Article 66, Parts 1, 2 and 3 Article 68 ↗; Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Parts 6, 7, 8 and 11 Article 273, Articles 274–277, Part 2 Article 278. ↗

546 Information provided by Respondent No. 36 based on the results of a survey conducted on 28.03.2026.

Following its observation of the 2019 parliamentary elections in Ukraine and the 2020 local elections, OSCE/ODIHR recommended considering the expansion of voters' rights to challenge election violations, including the possibility for voters to challenge election results even where their electoral rights and legitimate interests in the election process have not been violated.[547] Implementation of this recommendation is problematic given the prevalence in Ukraine of abuse of the right to challenge and of procedural rights.[548] Accordingly, granting any voter the right to challenge in court any decisions, actions or omissions relating to elections could significantly increase the duration of judicial resolution of election disputes and of the establishment of election results by the CEC and the relevant TECs at local elections.

Liability for violations of election legislation is provided for by the CC of Ukraine[549] and CUAO.[550] Despite the continuous strengthening of sanctions and improvement of the wording of certain elements of offences to eliminate gaps in the regulation of liability for violations of election legislation and to increase the effectiveness of holding offenders liable,[551] in many cases the sanctions are not proportionate, effective or dissuasive.[552] The effectiveness of these sanctions is further reduced by the ineffective process of holding offenders liable.[553]

Progress and issues

Ineffectiveness of complaints due to the absence of guarantees of impartial and professional consideration of complaints by election commissions

DECs and TECs are formed on the basis of nominations by parties and, at local elections, by local party organisations and candidates. They are therefore not politically impartial bodies. The possibility for the subjects that nominated commission members to replace them at any time[554] increases members' dependence on those subjects and has an adverse effect on the effectiveness of election training, including on complaints, since where such replacements take place shortly before election day, the relevant commission member can no longer undergo election training.

Following the 2020 regular local elections, the OSCE/ODIHR election observation mission noted that TECs in local elections did not ensure effective legal protection due

547 OSCE/ODIHR Final Report on the 2020 regular local elections, p. 34 ↗; OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 28. ↗

548 Abuse of Procedural Rights in Administrative Proceedings. Ukrainian National Bar Association, 2023 ↗; Collection of Legal Positions of the Supreme Court on the Protection of Electoral Rights. Supreme Court, 2021, p. 63. ↗

549 Criminal Code of Ukraine No. 2341-III of 05.04.2001, Articles 157–160. ↗

550 Code of Ukraine on Administrative Offences No. 8073-X of 07.12.1984, Articles 212^{7}–212^{24}. ↗

551 In July 2020, significant amendments were made to the CC of Ukraine and the CUAO, restating the provisions of both codes on liability for violations of election legislation and supplementing them with new elements of violations and crimes, including liability for voter bribery. On Amendments to Certain Legislative Acts of Ukraine on Improving Election Legislation: Law of Ukraine No. 805-IX of 16.07.2020. ↗

552 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 195–196 ↗; OSCE/ODIHR Final Report on the 2020 regular local elections, p. 37 ↗; OPORA's Legal Brief on Problems of Legislative Regulation of Campaigning and Information Support for Elections, para. 16. Civil Network OPORA, 2021. ↗

553 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 200–201. ↗

554 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 89, 146, 208. ↗

to insufficient training, frequent replacement of members and the politicised decision-making, while the CEC's role in resolving election disputes at local elections is limited.[555] The absence of guarantees for impartial and professional consideration of complaints by election commissions effectively deprives the system of administrative appeals in election disputes of any meaning, since without such guarantees it is easier for a person whose electoral rights have been violated to seek protection of his/her rights directly before a court.

Although ensuring impartial and professional consideration of complaints by election commissions requires comprehensive changes, including restrictions on the right of nominating subjects to replace commission members and the introduction of mandatory prior training for commission members, the effectiveness of resolving election disputes by commissions could be partly improved through periodic analyses and summaries by the CEC of the practice of complaint consideration by DECs and TECs, at least those established by the CEC.[556] However, for the CEC to be able to summarise such practice, legislation would need to ensure that all resolutions of election commissions at nationwide and local elections on the consideration of complaints are transmitted to the CEC, as well as provide for the CEC's obligation to carry out such summaries following elections and prepare the relevant clarifications. The EC of Ukraine does not provide for such an obligation. Transmission of resolutions on the consideration of complaints to the CEC is provided for only in respect of DECs at nationwide elections.[557] Moreover, in practice, DECs do not always transmit resolutions on the results of complaint consideration to the CEC.[558] This problem could be addressed comprehensively by introducing an electronic complaints administration system that would provide open access to complaints, information on the progress of their consideration, including decisions to leave them without consideration or without consideration on the merits, and all decisions adopted following their consideration.

Ineffectiveness of out-of-court appeals due to formalism in the consideration of complaints by election commissions

During elections, a significant share of complaints, or even the majority of them, are left by the CEC and other election commissions without consideration or without consideration on the merits,[559] meaning that they are effectively rejected on formal grounds. Accordingly, even where the information set out in a complaint could make it possible to establish the

555 OSCE/ODIHR Final Report on the 2020 regular local elections, p. 34. ↗

556 At local elections, the CEC forms the composition of regional, district and district-in-the-cities of Kyiv and Sevastopol election commissions. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 4 Article 203. ↗

557 After the establishment of the CEC's territorial offices, all DECs and TECs will be required to send their decisions to those offices for publication on the websites of such offices. However, such offices have not been established and the prospects for their establishment remain uncertain. On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 10.20. ↗

558 OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 29. ↗

559 In the 2019 presidential election in Ukraine, between 1 January and 30 April 2019, the CEC received 238 complaints for consideration, 206 of which were left without consideration. The CEC considered only 16 complaints and adopted resolutions based on the results of their consideration. In the 2019 early parliamentary elections in Ukraine, the CEC left half of the complaints without consideration. In the 2020 local elections, it was impossible to establish the number of complaints left without consideration, but the OSCE/ODIHR election observation mission found that there were 'many' such complaints. Final Report on Observation of the 2019 Presidential Election in Ukraine. ENEMO, 2019, p. 65 ↗; OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 29 ↗; OSCE/ODIHR Final Report on the 2020 regular local elections, p. 36. ↗

fact of a violation and the circumstances in which it was committed, as well as to restore the violated electoral rights, these facts are not established, and the violated rights are not restored. This is because, after identifying deficiencies in the form of a complaint, the chair of the election commission or his/her deputy returns the complaint without consideration by letter to the complainant so that the identified deficiencies in its form can be remedied.[560] In the 2019–2020 elections, as in previous elections, the CEC did not approve or publish on its website model complaint templates or instructions on how to prepare complaints, which is not in line with the Venice Commission's Code of Good Practice in Electoral Matters.[561] The absence of such templates increases the risk that complaints will be prepared incorrectly, for example by voters without legal training or experience of challenging violations before election commissions.

If a complaint is to be left without consideration on the merits, because it was submitted by an improper complainant, to an improper body responsible for considering complaints or after the expiry of the time limit for submitting a complaint, the election commission is generally not obliged to consider the facts set out in the complaint. The exception to this rule is the CEC, which may consider the relevant facts on its own initiative, although doing so is a right rather than an obligation of the CEC.[562] Thus, even where a complaint sets out facts indicating violations and provides evidence of them, they will be ignored solely because the complaint was submitted with procedural violations.

Such a formalistic approach to complaint consideration significantly reduces the role of election commissions in resolving election disputes.

Reduced role of courts in resolving election disputes due to non-enforcement of court judgments by election commissions

The practice of election commissions ignoring court judgments remains widespread;[563] moreover, following its observation of the early parliamentary elections, OSCE/ODIHR drew attention to cases of non-enforcement of court judgments even by the CEC.[564] Given the fast-moving nature of the election process, non-enforcement of a court judgment in an election dispute deprives a person who has sought protection of their violated rights of effective mechanisms for protecting and restoring their electoral rights.

The EC of Ukraine does not provide for sufficient legal measures against election commissions in the event of their non-enforcement of court judgments. The powers of an entire commission may be terminated by the election commission that formed it, on its own initiative or on the basis of a court judgment, in the event of a systematic or one-off gross violation by the commission of the Constitution of Ukraine, the EC of Ukraine or

560 On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 6.12. ↗

561 According to the Explanatory Report to the Code of Good Practice in Electoral Matters, the appeal procedure in election matters should be simple and provide voters with complaint templates.
OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 29 ↗; Code of Good Practice in Electoral Matters: Guidelines, Explanatory Report and Interpretative Declarations. Venice Commission, p. 39. ↗

562 On the Procedure for Consideration of Complaints by Election Commissions in Presidential Elections of Ukraine, Elections of MPs of Ukraine and Local Elections: Resolution of the Central Election Commission No. 192 of 21.08.2020, para. 10.7. ↗

563 OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 29 ↗; OSCE/ODIHR Final Report on the 2020 regular local elections, p. 34. ↗

564 OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 29. ↗

other laws, or non-compliance with a decision of a higher-level election commission.[565] At the same time, termination of the powers of such a commission is a right rather than an obligation of the commission that formed it,[566] while the EC of Ukraine does not provide a clear answer as to whether non-enforcement of a court judgment or adoption of a decision that essentially reproduces a decision annulled by a court constitutes a gross violation of the EC of Ukraine.

Impossibility of effectively challenging election-related decisions adopted outside the election process

Since an election dispute is only a dispute that arises within the election process and concerns the preparation and conduct of elections, while certain decisions related to the election process may also be adopted outside the election process, public-law disputes concerning such decisions do not fall within the category of election disputes.[567] Such decisions may include, in particular, decisions for which the EC of Ukraine does not define[568] time limits for adoption, decisions on amendments to CEC resolutions on election matters previously approved by the CEC, as such resolutions may be amended by the CEC at any time, including outside the election process, decisions of bodies maintaining the SVR on voter registration[569] and other decisions. Since all of them are adopted outside the election process, they may be challenged only under the general procedure established for any other public-law disputes. If a special law on the procedure for holding the first post-war elections provides for a certain organisational stage of election preparation preceding the start of the election process, any decisions adopted during the relevant preparatory period, whether by the CEC or by other state authorities, will not be subject to challenge under the procedure established for election disputes. Meanwhile, under the general appeal procedure, the period between filing a claim and the entry into force of a court judgment may be 125 days or more.[570] This means that consideration of a claim against an election-related decision adopted outside the election process may last longer than the election process to which it relates. Even if such a decision is declared unlawful by a court, once the election results have been established, it will no longer be possible to effectively restore the claimant's violated electoral rights.

565 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 89, 146, 208. ↗

566 Ibid.

567 On the Practice of Application by Administrative Courts of the Provisions of the Code of Administrative Procedure of Ukraine when Considering Disputes Concerning Legal Relations Related to the Election Process: Resolution of the Plenum of the Higher Administrative Court of Ukraine No. 15 of 01.11.2013. ↗

568 For example, the procedure for establishing territorial election constituencies, CEC decisions on their establishment or changes to their boundaries, decisions on the establishment or liquidation of election precincts, requirements for PEC premises and polling premises, the procedure for organising the work of election commissions, the procedure for receiving and registering complaints and other documents by election commissions, the procedure for producing and requirements for vote-counting protocols, the procedure for record-keeping by election commissions and so on. Electoral Code of Ukraine No. 396-IX of 19.12.2019, Parts 1, 2 and 7 Article 27, Parts 1, 2, 7 and 8 Article 28, Parts 1, 16 and 17 Article 36, Part 1 Article 37. ↗

569 On the State Voter Register: Law of Ukraine No. 698-V of 22.02.2007, Parts 5, 6 and 10 Article 19. ↗

570 The time limit for opening proceedings in a case is five days from the date of filing the administrative claim, the time limit for commencing consideration of the case on the merits is 60 days from the date of opening proceedings, the time limit for considering the case on the merits is 30 days from the date on which consideration on the merits begins and the time limit for appeal is 30 days from the pronouncement of the judgment of the court of first instance. Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Articles 171, 173, 193, 295. ↗

Ineffectiveness of complaints due to the possibility of simultaneous consideration of the same election dispute by a court and an election commission

Since the EC of Ukraine and CAP of Ukraine provide for the possibility of resolving certain election disputes by election commissions and all disputes, including those whose resolution falls within the competence of election commissions, by courts, there is a likelihood that the same dispute may be considered simultaneously by both a court and an election commission. This parallelism of jurisdictions has repeatedly been criticised by the Venice Commission and OSCE/ODIHR election observation missions as contrary to international standards, increasing the functional workload of courts and election commissions and potentially leading to mutually contradictory decisions by courts and election commissions.[571]

The EC of Ukraine and CAP of Ukraine address this problem to some extent by requiring the court to notify the CEC or another election commission of the receipt of a statement of claim, the opening of proceedings in the case or the refusal to open proceedings, so that, where a complaint is submitted to the commission on the same grounds, by the same complainant and concerning the same subject matter of challenge, the commission may leave the complaint without consideration.[572] In practice, courts comply with this obligation.[573] At the same time, the EC of Ukraine does not impose a similar obligation on election commissions to notify the relevant court of the receipt of a complaint. This preserves the risk that the dispute may be resolved simultaneously by both an election commission and a court.

The current Constitution of Ukraine[574] does not allow the conflict of jurisdiction between courts and election commissions to be fully eliminated, as it guarantees a person's right to apply directly to a court for the protection of violated rights without using the available mechanisms of administrative appeal. Moreover, any draft amendments to the Constitution that would provide for the possibility of applying to a court only after administrative appeal mechanisms have been exhausted may be regarded as contrary to Article 157 of the Constitution of Ukraine[575] and therefore could not be considered and adopted by Parliament. On the other hand, the advisability of fully depriving election commissions of the right to consider complaints concerning violations of election legislation, which would eliminate the risk of parallel consideration of cases, is also questionable. Administrative resolution through election commissions resolution is less formalised, provides for simpler procedures for considering cases and does not require additional expenses on the part of the complainant, unlike judicial appeal procedures.[576]

The likelihood of the same dispute being resolved by several bodies at the same time could be significantly reduced by imposing an obligation on election commissions to

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571 Opinion on the Draft Election Code of the Verkhovna Rada of Ukraine. Venice Commission, 2010, para. 15, p. 4 ↗; OSCE/ODIHR Final Report on the 2020 regular local elections, p. 34 ↗ ; OSCE/ODIHR Final Report on the 2020 regular local elections, p. 36. ↗

572 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 4 Article 63 ↗; Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 10 Article 273. ↗

573 OSCE/ODIHR Final Report on the 2019 Early Parliamentary Elections in Ukraine, p. 29. ↗

574 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 55. ↗

575 The Constitution may not be amended if the amendments provide for the abolition or restriction of human and citizens' rights and freedoms. Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 157. ↗

576 Information provided by Respondent No. 36 based on the results of a survey conducted on 28.03.2026.

inform the court competent to resolve the relevant category of election dispute of the receipt of a complaint, its submission for consideration at a commission meeting and the results of its consideration. Coordination in resolving election disputes would also be facilitated by the CEC introducing an electronic complaint administration system for all election commissions, with judges having simultaneous access to all information in such a system and the ability to search it.

Inconsistency of judicial practice in resolving election disputes

Although the SC plays a certain role in systematising the practice of courts' consideration of election disputes,[577] there have been a number of cases in which courts adopted inconsistent or contradictory decisions in certain categories of cases, including cases related to the application of gender quotas in the nomination of candidates, the payment of election deposits, the formation of election constituencies at local elections and other matters.[578] Inconsistency of judicial practice in election disputes contradicts the principles of legal certainty and foreseeability, which are components of the broader principle of the rule of law, as well as the principle of equality before the law.[579] All these principles are enshrined both in the Constitution of Ukraine[580] and in international instruments.[581]

The absence of unity in judicial practice is caused both by a number of systemic factors, including the SC's excessive caseload, the absence of a strategy for ensuring the unity of judicial practice, the structural fragmentation of the SC, limited communication among SC judges and between them and judges of other court instances, the absence of mechanisms for administrative courts of appeal to submit preliminary references to the SC and other factors,[582] as well as by the specific features of appeals in election disputes.

In particular, the SC, as a court of first instance, considers only cases concerning challenges to decisions, actions and omissions of the CEC regarding the establishment of the results

577 Between 2008 and 31 July 2026, the Plenum of the Higher Administrative Court adopted three resolutions on the practice of resolving election disputes, including on the application of the procedural provisions of CAP of Ukraine, consideration of disputes concerning changes to electoral address and place of voting, correction of voter lists and specific features of proceedings in voter bribery cases. Cases considered by the Judicial Chamber for Cases Concerning the Election Process and Referendum, as well as the Protection of Citizens' Political Rights, are included as a separate category in regular reviews and digests of the case law of the Administrative Cassation Court within the Supreme Court. A search form has also been created on the Supreme Court website to search for the Supreme Court's positions, including on election matters, through contextual search. In addition, in 2021 and 2024, the Supreme Court published two collections summarising the Supreme Court's practice in resolving election disputes. On the Practice of Application by Administrative Courts of the Provisions of the Code of Administrative Procedure of Ukraine when Considering Disputes Concerning Legal Relations Related to the Election Process: Resolution of the Plenum of the Higher Administrative Court of Ukraine No. 15 of 01.11.2013 ↗; On the Summary of the Practice of Resolving by Administrative Courts of Disputes Concerning Changes to Electoral Address and Place of Voting and Correction of Voter Lists: Resolution of the Plenum of the Higher Administrative Court of Ukraine No. 9 of 12.09.2014 ↗; Summary of Practice on the Specific Features of Proceedings in Voter Bribery Cases: Resolution of the Plenum of the Higher Administrative Court of Ukraine No. 5 of 05.02.2016 ↗; Information on Published Digests and Reviews. Supreme Court ↗; Supreme Court Legal Positions Database. Supreme Court ↗; Collection of Legal Positions of the Supreme Court on the Protection of Electoral Rights. Supreme Court, 2021 ↗; Collection of Legal Positions of the Supreme Court on the Protection of Civil and Political Rights of Humans and Citizens. Supreme Court, 2024. ↗

578 Final Report on Observation of the 2020 Local Elections. Civil Network OPORA, 2021 ↗; OSCE/ODIHR Final Report on the 2020 regular local elections, p. 35. ↗

579 Unity of Judicial Practice in the Context of Quality Standards of Criminal Procedure Legislation of Ukraine: monograph edited by O. Shylo. Kharkiv, 2021, pp. 113–114. ↗

580 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 8, 24. ↗

581 Report on the Rule of Law. Venice Commission, 2011. Paragraphs 50, 51. ↗

582 Shadow Report on Chapter 23 'Justice and Fundamental Rights' and Chapter 24 'Justice, Freedom and Security' of the European Commission's Ukraine Progress Report within the European Union Enlargement Package 2024, pp. 63–65, 69–70. ↗

of nationwide elections. As a court of appeal, it considers appeals against judgments of the Sixth Administrative Court of Appeal in cases challenging all other decisions, actions and omissions of the CEC and its members adopted, performed or allowed during the election process, as well as cases challenging actions of candidates for the office of President and their authorised representatives.[583] Consideration of all other categories of election disputes on appeal ends at the level of administrative courts of appeal.[584]

This is why collections of the SC's legal positions on the protection of electoral and political rights mainly[585] contain positions in those categories of cases considered by the Administrative Cassation Court within the SC and the Grand Chamber of the Supreme Court.[586] Judicial training on election matters could play a certain role in ensuring the unity of judicial practice. However, such training is conducted only during election processes, subject to funding from international technical assistance, and is primarily aimed at judges of district and administrative courts of appeal rather than judges of local general courts.[587]

Creating conditions for violations of election legislation due to sanctions being inconsistent with the principles of proportionality, effectiveness and prevention

The sanctions provided for by the CUAO in the form of small fines do not meet the requirements of effectiveness, proportionality and deterrence and are unlikely to prevent new violations either by the offender or by other persons.[588] In particular, for producing or ordering election campaign materials without imprint information, the fine, which has never been changed despite inflation, ranges from UAH 170 to UAH 510 (EUR 3.32–9.95),[589] and for officials from UAH 850 to UAH 1,190 (EUR 16.58–23.21). For distribution of such materials, the fine ranges from UAH 51 to UAH 85 (EUR 0.99–1.66) and for officials from UAH 340 to UAH 510 (EUR 6.63–9.95).[590] Amendments to the CUAO strengthening liability for certain administrative offences are introduced unsystematically:

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583 Code of Administrative Procedure of Ukraine No. 2747-IV of 06.07.2005, Part 3 Article 273, Part 7 Article 277. ↗

584 Ibid, Article 278.

585 Certain legal positions were also expressed in relation to aspects of the election process that are not subject to challenge, including appeal, before the Supreme Court, but are related to categories of cases considered by the Supreme Court, for example the nomination and registration of candidates at local elections. For more detail, see: Collection of Legal Positions of the Supreme Court on the Protection of Electoral Rights. Supreme Court, 2021, p. 61. ↗

586 Collection of Legal Positions of the Supreme Court on the Protection of Electoral Rights. Supreme Court, 2021, p. 61 ↗; Collection of Legal Positions of the Supreme Court on the Protection of Civil and Political Rights of Humans and Citizens. Supreme Court, 2024, pp. 48–51. ↗

587 In summer 2019, the National School of Judges of Ukraine, together with the International Foundation for Electoral Systems (IFES) and with the support of USAID and other donors, conducted training sessions on the judicial resolution of election disputes and published the manual '2019 Presidential Election in Ukraine: Judicial Resolution of Election Disputes'. At the same time, due to constant changes in election legislation, with the most significant amendments to the EC of Ukraine adopted in 2020, and the development of judicial practice, such manuals require periodic updating. In 2020, during the election process for the regular local elections, the National School of Judges of Ukraine, together with IFES, also held practical seminars on new developments in election legislation and the specific features of resolving election disputes. The National School of Judges of Ukraine does not provide continuous training for judges on election matters during the inter-election period. Judges of the Eighth Administrative Court of Appeal Took Part in Training Sessions on New Developments in Election Legislation and the Specific Features of Resolving Election Disputes ↗; Judges of the Zhytomyr District Administrative Court Are Participating in the Training '2019 Parliamentary Elections in Ukraine: Judicial Resolution of Election Disputes' ↗; Trainers of the Training Course ' 2019 Parliamentary Elections in Ukraine' Completed the Relevant Training. ↗

588 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 195–196. ↗

589 EUR 1 — UAH 51.2747. Official hryvnia exchange rate against foreign currencies as of 31.07.2026. ↗

590 Code of Ukraine on Administrative Offences No. 8073-X of 07.12.1984, Article 212^{13}. ↗

for some violations, fines are set at levels higher than those provided even for criminal misdemeanours, while administrative offences comparable in terms of their social danger or unlawfulness are punishable by minimal fines that have never been revised.[591] Certain sanctions provided for by the CC of Ukraine also fail to meet the requirements of proportionality, effectiveness and deterrence. For example, the intentional making or receiving of unlawful contributions or support, as well as the submission of knowingly inaccurate information in financial reports, is punishable by a fine of UAH 1,700 to UAH 5,100 (EUR 33.15–99.46),[592] while if such actions are committed repeatedly, the sanction provides for a fine of UAH 5,100 to UAH 8,500 (EUR 99.46–165.77).[593] Such fines are disproportionate to the amounts of funds spent by political parties and candidates, especially at the nationwide level.[594]

Impunity due to the ineffectiveness of holding offenders liable for violations of election legislation

The effectiveness of sanctions for violations of election legislation is significantly reduced by the ineffectiveness of holding offenders liable for violations committed. For example, following the 2020 local elections, 491 criminal proceedings were opened under Articles 157–160 of the CC of Ukraine, concerning crimes against citizens' electoral rights. However, notices of suspicion were served in only 64[595] of the 491 proceedings and indictments were submitted to court in only six criminal proceedings. In certain categories of cases, for example cases concerning violations of the secrecy of the vote, no convictions were delivered at all following the 2020 local elections, despite the relative prevalence of such violations.[596] The application of administrative sanctions is also ineffective.[597]

The main reasons for the ineffectiveness of the sanctions provided for by the CUAO are: (1) the impossibility of drawing up reports on administrative offences in absentia, that is in the absence of the offender; (2) the ambiguity of judicial practice regarding the possibility of amending or revising reports on administrative offences — in some cases, courts close administrative cases documented by reports on administrative offences that do not meet the established requirements, while in others they return such reports to the bodies that drew them up for revision; (3) the widespread practice of closing administrative offence cases on grounds of insignificance; (4) short limitation periods for imposing administrative liability, drawing up reports after the person who committed the offence has been identified and considering administrative offence cases; (5) deficiencies in the wording of the elements of the offences themselves, which lead to cases being closed because the offence was committed by a legal entity; (6) the impossibility for collegial bodies, such as the National Council or election commissions, authorised representatives, proxies, candidates and official election observers, among others, to

591 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 196. ↗

592 EUR 1 — UAH 51.2747. Official hryvnia exchange rate against foreign currencies as of 31.07.2026. ↗

593 Criminal Code of Ukraine No. 2341-III of 05.04.2001, Parts 1 and 3 Article 159[1]. ↗

594 For more detail, see the subsection 'Financing of Political Parties and Election Campaigning'.

595 In these 64 proceedings, notices of suspicion were served on 91 persons.

596 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 202. ↗

597 Money and Politics: Why Is Liability for Violations of Political Finance Rules Ineffective? Civil Network OPORA, 2023. ↗

draw up reports on administrative offences; and (7) the impossibility for the body that drew up the administrative report to lodge an appeal, among other issues.[598]

The reasons for the ineffectiveness of holding offenders criminally liable are: (1) gaps in communication between the bodies that monitor compliance with election legislation, namely election commissions and the National Agency on Corruption Prevention (NACP, Agency), and the National Police of Ukraine (NPU); (2) the difficulty of proving intent in certain categories of cases; (3) the absence in the Criminal Procedure Code of Ukraine (CPC of Ukraine) of a specific list of documents required to open criminal proceedings and initiate a pre-trial investigation; (4) law enforcement agencies' disregard of their obligation to inform the body that sent them materials for verification of possible violations of legislation about the results of that verification; (5) the NPU's failure to fulfil its obligations to collect evidence during pre-trial investigations in criminal proceedings, as well as more complex reasons — (6) staff shortages and investigators' workload; (7) investigators' lack of competence in certain categories of cases and (8) short time limits for conducting pre-trial investigations.[599]

Recommendations

1. Establish deadlines and clear, restrictive grounds for replacing members of election commissions before election day, as well as limit the possibility of repeated rotations by the same nominating subject.
2. Introduce a mandatory system of prior training and certification for members of election commissions and create a national register of persons who have completed the relevant training; ensure the establishment and full functioning of the Training Centre for Participants in Election Processes as a legal entity under public law by integrating it into a sustainable system of professional training for members of election commissions.
3. Introduce an electronic complaint administration system covering all complaints submitted to election commissions, information on the progress and results of their consideration and decisions adopted following their consideration, with access granted to all interested persons, including judges.
4. Provide for the CEC's obligation to analyse and summarise, within a time limit established by law after nationwide and local elections, the practice of case consideration by DECs and TECs that it forms.
5. Provide for mandatory consideration by election commissions of complaints which, although not prepared in accordance with the requirements established by the EC of Ukraine or submitted by an improper complainant, contain sufficient evidence of the unlawfulness of decisions, actions and/or omissions and were submitted to the proper body responsible for considering complaints within the established time limits for appeal.

598 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 197, 199 ↗; Money and Politics: Why Is Liability for Violations of Political Finance Rules Ineffective? Civil Network OPORA, 2023. ↗

599 Application of Sanctions for Violations of Campaign Finance Rules in the 2019 Elections: Assessment of Effectiveness. International Foundation for Electoral Systems, 2021, pp. 18–20 ↗; Money and Politics: Why Is Liability for Violations of Political Finance Rules Ineffective? Civil Network OPORA, 2023.↗

6. Provide for the mandatory publication by the CEC on its website of templates for complaints to election commissions and claims to courts in election disputes, instructions for completing them and online assistance in completing complaints or claims, for example using bots and/or artificial intelligence.

7. Provide for the mandatory early termination of the entire composition of an election commission where it fails to enforce a court judgment that has entered into force, as well as where it re-adopts a decision that essentially repeats a decision annulled or declared unlawful by a court.

8. Amend the CAP of Ukraine to provide for the possibility of challenging decisions, actions and omissions adopted, performed or allowed outside the election process, but relating to the preparation and conduct of elections, under the procedure for resolving election disputes.

9. Provide in the EC of Ukraine for the mandatory notification by an election commission of the court competent to resolve the relevant category of election disputes of the receipt of a complaint, its submission for consideration at a commission meeting and the results of its consideration.

10. Provide mechanisms for harmonising judicial practice, by introducing a preliminary reference, and consider imposing on the SC an obligation to summarise the practice of resolving election disputes not only by the SC, but also, at a minimum, by district and administrative courts of appeal.

11. Introduce mandatory training, at least online, for judges on the judicial resolution of election disputes during the inter-election period under a programme approved by the National School of Judges of Ukraine and ensure annual funding for such a programme from the State Budget of Ukraine (State Budget).

12. Conduct a comprehensive assessment of the wording of the elements of administrative offences and crimes against citizens' electoral rights, as well as the sanctions for committing them, and amend the CC of Ukraine and the CUAO to introduce proportionate, effective and dissuasive sanctions for committing the relevant criminal and administrative offences.

13. Amend the procedural provisions of the CUAO to provide for: 1) sufficient limitation periods for imposing administrative liability, drawing up reports on administrative offences and considering administrative offence cases; 2) the possibility of drawing up reports on administrative offences in absentia; 3) the consequences of drawing up reports on administrative offences in breach of the established requirements for their form; 4) depriving collegial bodies, including election commissions, and subjects not vested with public authority, such as candidates in elections, their proxies and observers, of the right to draw up reports on administrative offences and transferring this right to authorised persons of internal affairs bodies; 5) clarification of the list of grounds for closing cases on grounds of insignificance.

14. Ensure the inevitability of administrative and criminal liability for persons who have violated election legislation, in particular by defining a clear mechanism for interaction between the NPU and election commissions in connection with the consideration of materials transmitted by election commissions concerning whether violations contain elements of crimes and/or administrative offences and by defining in the

CPC of Ukraine the list of documents required to open criminal proceedings and initiate a pre-trial investigation.

15. Introduce mandatory training programmes during the inter-election period for investigators, police officers and prosecutors on responding to violations of election legislation and ensuring public order during the preparation and conduct of elections, investigating crimes and documenting administrative offences that infringe citizens' electoral rights; ensure proper annual funding for such training programmes.

Safeguarding the Electoral Rights of Specific Categories of Voters

Electoral Rights of Forcibly Displaced Persons

State of play

As of 31 July 2026, the SVR recorded 34,120,593 voters, of whom only 32,646,041 had an electoral address, while 1,474,552 were marked as departured; 558,370 voters were registered in the EDA, only 380,873 of whom had an electoral address.[600] According to Eurostat, as of 31 May 2026, 4.38 million people who had left Ukraine as a result of the war were under temporary protection in EU countries[601] — meaning that, according to the SVR database, the number of voters in the EDA differs from the actual number of voters in that constituency by almost eight times. The total number of IDPs in Ukraine is 4.652 million.[602]

Voters who, on the day of the first post-war elections, are in the territory of foreign states will be able to exercise their right to vote at election precincts abroad established at Ukraine's diplomatic missions abroad[603] — provided that they register their electoral addresses in the relevant foreign states. IDPs may exercise their right to vote in Ukraine by: 1) voting at the precinct to which the IDP's electoral address is assigned, for which the voter would need to return to the community from which they were forced to move; 2) voting at any regular precinct in Ukraine under the procedure for changing the place of voting without changing the electoral address; and 3) voting at the precinct to which their new electoral address is assigned, if it was changed after forced displacement.

Before the 2020 regular local elections, the procedure for changing an electoral address and place of voting was complicated. A voter had to personally submit an application to change his/her place of voting without changing his/her electoral address to the SVR maintenance body; this change had to be confirmed by documents, for example, a copy of a housing lease agreement. Such documents were not required only from residents of temporarily occupied territories.[604] To change their electoral address to their actual

600 Information on the Number of Voters within the Autonomous Republic of Crimea, Regions, the Cities of Kyiv and Sevastopol and the Foreign Constituency as of 31.07.2026. State Voter Register. ↗

601 Temporary protection for persons fleeing Ukraine – monthly statistics. Eurostat, 10.02.2026. ↗

602 Internally Displaced Persons. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

603 For details, see the subsection 'Territorial Organisation of Elections'.

604 On Ensuring the Temporary Change of a Voter's Place of Voting without Changing Their Electoral Address: Resolution of the Central Election Commission No. 893 of 13.09.2012 (repealed). ↗

place of residence, the voters also had to provide supporting documents to the SVR maintenance body. It was precisely because such documents were absent that IDPs were, in most cases, unable to vote in the 2015 local elections: in local elections, the procedure for changing the place of voting without changing the electoral address does not apply and IDPs lacked supporting documents to change their electoral addresses. According to some estimates, the number of IDPs who were unable to vote in the 2015 local elections was around 1 million voters.[605]

After the fact of discrimination against IDPs on the grounds of place of residence was recognised by the ECtHR,[606] the procedures for changing the place of voting without changing the electoral address and for changing the electoral address itself were substantially revised and simplified.

Since 2019, a voter may submit an application to change his/her place of voting at any time from the start of the election process and no later than five days before election day; such a change may be made simultaneously for both rounds of presidential elections, rather than only for the first round, if the change of place of voting is made in presidential elections; the application may be submitted either electronically or in paper form, personally or through an authorised person; and no documents confirming the need for such a change are required.[607] In 2020,[608] a number of amendments were introduced to the EC of Ukraine and other laws simplifying the procedure for changing an electoral address: an application to change an electoral address may be submitted personally, through an authorised person or online no later than the fifth day after the start of the election process and no earlier than one year after the previous change of electoral address; and changing an electoral address to the address of the actual place of residence does not require documentary confirmation, such as a housing lease agreement.[609]

In 2025, the European Commission identified the protection of the electoral rights of IDPs as one of the most pressing issues for Ukraine's first post-war elections.[610] Given the significant number of voters who left Ukraine after the start of Russia's full-scale invasion and the absence of information about them in the SVR, ensuring their rights is no less urgent.

605 Elections 2015 and 'inconvenient' IDPs: thoughts aloud. ZMINA, 2015. ↗

606 Case of Selygenenko and Others v. Ukraine (Applications Nos. 24919/16 and 28658/16): Judgment of the European Court of Human Rights of 21.10.2022. ↗

607 On the Procedure for the Temporary Change of a Voter's Place of Voting without Changing Their Electoral Address: Resolution of the Central Election Commission No. 1969 of 02.12.2019. ↗

608 On Amendments to Certain Legislative Acts of Ukraine to Improve Electoral Legislation: Law of Ukraine No. 805-IX of 16.07.2020. ↗

609 On the State Voter Register: Law of Ukraine No. 698-V of 22.02.2007, Articles 8, 20. ↗

610 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

Progress and issues

Complications in the exercise of electoral rights by internally displaced persons due to the mismatch between the size of election precincts and the actual number of voters assigned to them, the destruction of electoral infrastructure and insufficient deadlines for submitting applications to change the place of voting and electoral address

The system of regular and permanent special precincts was established before the start of Russia's full-scale invasion of Ukraine.[611] It is based on data from the SVR, which is used to determine the size of a precinct, but this data is outdated[612] and does not reflect the increase in the number of voters in some communities and the corresponding decrease in others.

As of 28 July 2026, 33,150 election precincts were functioning in Ukraine, located in 30,261 buildings. Of these buildings, 1.3% had been completely destroyed and were beyond repair, 0.3% had been destroyed as a result of deterioration over time, 3.1% had been damaged but could be restored, 2% had been damaged but had already been restored and 19% were located in the temporarily occupied territories of Ukraine and/or the CEC had no information on their condition.[613] If there are no premises suitable for organising voting within the territory of an election precinct, voting there may either be organised in temporary premises, such as tents or other collapsible structures, or the relevant precinct should be dissolved altogether, with the voters assigned to it redistributed among adjacent precincts, provided that the state of their electoral infrastructure allows this. A comprehensive assessment of the state of electoral infrastructure has not been carried out due to hostilities and the constantly changing security situation.

On 7 January 2026, the CEC approved proposals for legislative regulation of the specific arrangements for organising and conducting national elections after the termination or cancellation of martial law in the form of the Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine',[614] which provides for certain mechanisms to optimise the territorial organisation of elections at the next national elections in Ukraine.[615] It provides for an initial assessment of the readiness of territories to organise and conduct voting within one month from the date of termination of martial law.[616] However, the draft does not specify which body would carry out such an initial assessment, the criteria according to which it would be conducted, the territorial boundaries within which it would

611 On the Establishment of Regular and Special Election Precincts on a Permanent Basis: Resolution of the Central Election Commission No. 117 of 25.06.2020. ↗

612 For more detail, see the subsection 'Voter Registration and Voter Lists, Updating and Auditing the State Voter Register'.

613 Letter of the Central Election Commission No. 21-17-2202 of 28.07.2026 in response to an information request from Civil Network OPORA.

614 On Proposals for Legislative Regulation of the Specific Features for Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

615 The draft was discussed as part of the work of the Working Group for the Preparation of Comprehensive Legislative Proposals on Specific Arrangements for Organising and Conducting Elections during a Special Period and/or Post-War Elections in Ukraine, established on 22.12.2025 by the Chairman of the Verkhovna Rada of Ukraine. However, as of 31 July 2026, the Working Group had not developed agreed amendments to electoral legislation.

616 On Proposals for Legislative Regulation of the Specific Features for Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

take place, what exactly it would include, the document or documents in which its results should be recorded or whether the results of such an assessment could be challenged in court.[617] It does not impose an obligation on the CEC to conduct a comprehensive review of the system of election precincts.

If IDPs change their electoral addresses and place of voting after the CEC has reviewed the system of election precincts, which will take place outside the election process, their number at precincts may exceed the capacity and organisational capability of those precincts, making voting more difficult or impossible. For example, if, after the establishment of a medium-sized election precinct with up to 1,500 voters, 5,000 voters are assigned to the voter lists at that precinct as a result of changes to electoral addresses and the place of voting, the proper organisation of voting at that precinct will become virtually impossible. This is because the quantitative composition of the PEC, the requirements for the polling station premises at that precinct, the number of ballot boxes and the number of voting booths in those premises will be calculated specifically for a medium-sized precinct.[618] Moreover, the EC of Ukraine limits the maximum number of voters at a precinct to 2,500 and does not answer the question of where surplus voters above that limit should be assigned if the limit is exceeded after the precincts have already been established.[619]

This problem becomes even more relevant given that applications to change the place of voting may be submitted as late as five days before election day. This means that a significant increase in the number of voters at a precinct may occur immediately before election day and after ballot papers have already been printed for the relevant precincts. In such circumstances, if turnout is high, there may not be enough ballot papers for voters at that precinct. The EC of Ukraine does not impose a clear obligation on the CEC to conduct information campaigns on the procedures for changing the place of voting and electoral address, the deadlines for submitting the relevant applications or the consequences of submitting them late.

Following the 2020 regular local elections, OSCE/ODIHR recommended extending the deadlines for submitting applications to change an electoral address and carrying out voter education activities on this procedure.[620]

The CEC draft law provides for: (1) changes in the territorial organisation of elections;[621] (2) submission of an application to change an electoral address no later than 30 days before election day and an application to change the place of voting no later than 15 days before election day; (3) consideration of applications to change an electoral address or the place of voting by the SVR maintenance body within three days of their receipt; and (4) immediate notification of the voter of the change of electoral address or place of voting by an electronic message sent to the email address indicated in the application or to the Diia mobile application.

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617 Analysis of the Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine'. Civil Network OPORA, 2026. ↗

618 For details, see the subsection 'Territorial Organisation of Elections'.

619 Ibid.

620 OSCE/ODIHR Final Report on Observation of the 2020 Local Elections, Recommendation A7, pp. 17, 46. ↗

621 For more details on the changes proposed by the draft law regarding the territorial organisation of elections, see the subsection 'Territorial Organisation of Elections'.

At the same time, if voters submit applications to change their electoral address or place of voting in the final days of the deadlines provided for in the draft law, this will not resolve the problem of excessive numbers of voters at precincts, as they will be established before the start of the election process for the first post-war elections, when the actual number of voters at a precinct will be unknown. By contrast, extending these deadlines even further could result in voters not having enough time to change their place of voting or electoral address and, accordingly, to vote in the elections.

To address the mismatch between the size of an election precinct and the number of voters who will vote there, the draft law provides for the CEC to establish an additional precinct within a regular election precinct and assign to it the excess voters of that regular precinct, if the total number of voters there exceeds 3,500. However, under the draft law, such additional precincts would be established late — 12 days before election day[622] — only at the initiative of mayors and Heads of district state administrations, rather than on the CEC's own initiative, and only if the number of voters at a precinct exceeds 3,500. Thus, the draft does not effectively resolve the problem of the mismatch between the size of a precinct and the number of voters assigned to it: the establishment of additional precincts is not guaranteed, while organising voting for a large number of voters may become significantly more difficult because the number of PEC members, the size of polling premises, the number of voting booths and the number of ballot boxes may not correspond to the actual number of voters. In view of this, the need for the CEC to conduct an information campaign for voters who plan to vote at their place of actual residence becomes particularly relevant. Such a campaign should explain the need to change their electoral address/place of voting as early as possible so that they are able to vote at their place of actual residence and the size of precincts corresponds to the actual number of voters assigned to them. At the same time, informing voters about the new procedures for changing the place of voting and electoral address will remain difficult until special legislation on post-war elections is adopted.[623]

To address the destruction or damage of electoral infrastructure within election precincts, the CEC draft law proposes imposing an obligation on local executive authorities and local self-government bodies to provide PECs with temporary structures, such as tents, pavilions and similar facilities. The draft does not define the procedure or timeframe for procurement related to the use of such structures, nor does it identify the sources of funding for the relevant costs. Accordingly, if such structures are not provided to PECs, or if the structures provided do not comply with the applicable standards, organising voting at the relevant precincts will be impossible, especially given that the draft does not provide for any alternatives to temporary structures.

Although the CEC draft law is being discussed within the parliamentary Working Group on the preparation of comprehensive legislative proposals on the specific procedure for organising and conducting elections during a special period and/or post-war elections

622 The late establishment of a precinct also means the late formation of the PEC for that precinct, limited time to train PEC members on election matters, limited time to inform voters that they have been assigned to a new additional precinct and the late compilation of voter lists. All this may negatively affect the organisation of voting or complicate the exercise of voting rights due to potential inaccuracies in voter lists and the inability to challenge them in court, as well as the failure to provide voters with information that they will be voting at additional precincts.

623 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

in Ukraine,[624] it has still not been formalised as a legislative initiative agreed by the participants of the Working Group that could be submitted to Parliament.

Impossibility of proper exercise of electoral rights by voters who were forced to leave Ukraine under the existing system of election precincts abroad

Under the EC of Ukraine, voters who reside or stay in the territory of a foreign state on election day may exercise their right to vote exclusively at an election precinct abroad established at a diplomatic mission of Ukraine abroad.[625]

As of 31 July 2026, 558,370 voters were recorded in the EDA, of whom only 380,873 had an electoral address.[626] As of 31 May 2026, the number of people who left Ukraine as a result of the war and are under temporary protection in EU Member States is 4.38 million.[627] Since tens of thousands of voters had been registered at some EPAs even before the start of Russia's full-scale invasion of Ukraine, the manyfold increase in the number of such voters outside the country may make it impossible to ensure voting rights for many of them, even if the traditionally low turnout in the EDA remains at 7–15%. At the same time, the EC of Ukraine does not provide for the establishment of EPAs outside Ukrainian diplomatic missions. Nor does it provide for the possibility of establishing several EPAs at one diplomatic mission.

The Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine', prepared by the CEC, provides for optimising the procedures for establishing EPAs[628] and allows both several EPAs to be established at one diplomatic mission and EPAs to be established outside diplomatic missions. At the same time, if tens of thousands of voters are registered at an EPA, creating several precincts at one diplomatic mission will not remove the difficulties in exercising voting rights, as the capacity of the diplomatic mission will remain limited. Under the draft, the creation of additional EPAs outside diplomatic missions requires voters themselves to initiate their establishment through active registration,[629] but the draft does not guarantee that such precincts will be established.[630] In addition, it does not clearly define the timeframe for the Ministry of Foreign Affairs of Ukraine (MFA) to take steps related to initiating the creation of additional EPAs, such as holding negotiations with the competent authorities of the foreign state on the possibility of establishing such EPAs, the conditions for their operation and related matters.

624 A Working Group Was Established in the Rada to Prepare Legislation on Elections during Wartime and the Post-War Period. Novynarnia, 2025. ↗

625 For details, see the subsection 'Territorial Organisation of Elections'.

626 Information on the Number of Voters within the Autonomous Republic of Crimea, Regions, the Cities of Kyiv and Sevastopol and the Foreign Constituency as of 31.07.2026. State Voter Register. ↗

627 Temporary protection for persons fleeing Ukraine – monthly statistics. Eurostat, 2026. ↗

628 On Proposals for Legislative Regulation of the Specific Features for Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

629 For more detail, see the subsection 'Voter Registration and Voter Lists, Updating and Auditing the State Voter Register'.

630 Analysis of the Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine'. Civil Network OPORA, 2026. ↗

Potential impossibility of participating in voting due to the absence of documents required to receive a ballot paper

In the context of hostilities, the problem of passports and other documents being lost by forcibly displaced persons always becomes particularly acute.[631] It is impossible to establish the exact number of identity documents lost by citizens of Ukraine as a result of forced displacement or hostilities. However, the fact that in Ivano-Frankivsk Region alone 1,834 lost passports were restored in 2025, while from the start of the full-scale invasion to February 2024, 5.7 million passports for travel abroad and more than 2.6 million ID cards were issued, may indirectly indicate the scale of the problem.[632]

At the same time, the EC of Ukraine defines[633] a clear and exhaustive list of documents certifying a voter's citizenship and identity that serve as the basis for issuing a ballot paper on election day: at regular and special election precinct, a voter must present only a passport of a citizen of Ukraine, a temporary certificate of a citizen of Ukraine or a military ID card for conscript service members, while at an election precinct abroad — only a passport of a citizen of Ukraine for travel abroad, a diplomatic passport or a service passport.

Following the 2015 local elections, the OSCE/ODIHR recommended allowing the use of a passport for travel abroad as a valid identity document.[634]

To ensure equal access for voters to the exercise of their electoral rights in post-war conditions, in particular given the possible loss of documents as a result of destruction of property or other war-related reasons, as well as to unify the procedure for identifying voters at all election precincts, the CEC draft law provides for the use, at all election precincts, of all documents specified by the EC of Ukraine: passport of a citizen of Ukraine; temporary certificate of a citizen of Ukraine, for persons recently admitted to Ukrainian citizenship; passport of a citizen of Ukraine for travel abroad; diplomatic passport; service passport and military ID.[635]

There were also no significant objections in the parliamentary Working Group to allowing any document that serves as proof of identity under the EC of Ukraine to be used to obtain a ballot paper at any polling station.[636]

Potential impossibility of standing in nationwide elections due to the failure of voters forcibly displaced outside Ukraine to meet the residence requirement

Current legislation establishes a requirement for candidates in nationwide elections to have resided in Ukraine for the last five years for candidates for MPs and ten years for

631 The Displacement Crisis in Ukraine: Key Legal Issues. Groupe d'études géopolitiques, 2023. ↗

632 How Many Lost Passports Were Restored in Ivano-Frankivsk Region in 2025. Suspilne Ivano-Frankivsk, 2025 ↗; More Than 5.7 Million Passports for Travel Abroad Have Been Issued in Ukraine during the Full-Scale War. Ukrinform, 2024. ↗

633 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 8. ↗

634 OSCE/ODIHR Final Report on the Observation of the 2015 Local Elections, Rec. B12. ↗

635 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

636 Analytical Update on Ukraine's Progress in Implementing the Indicators of the Roadmap on the Functioning of Democratic Institutions Based on the Work of Thematic Subgroups on Preparing the Legal Framework for the First Post-War Elections. Civil Network OPORA, 2026. ↗

candidates for the office of President.[637] It is obvious that a significant number of voters who were forced to leave Ukraine after the start of Russia's full-scale invasion and did not return to Ukraine do not meet these requirements and, accordingly, will be unable to stand in the first post-war nationwide elections unless the special law on the procedure for holding the first post-war elections expands the list of exceptions to the residence requirement.

Recommendations

1. Provide in the special law on the procedure for holding the first post-war elections for longer deadlines for changing the electoral address and place of voting, in line with the proposals of the CEC on improving the legislation on the first post-war elections.
2. Introduce separate voter information programmes on the need to register in the SVR as soon as possible, update personal data in the Register, including changing the electoral address to the actual place of residence, change the place of voting, the procedure for inclusion in voter lists and the procedure for exercising electoral rights. Ensure proper and timely financing of such programmes from the State Budget of Ukraine and/or international technical assistance funds.
3. In the special law determining the procedure for holding the first post-war elections in Ukraine, provide for an obligation of the CEC to review the existing system of regular and special precincts and to establish a new system of such precincts based on the update and audit of the State Register of Voters and on a pre-election audit to be conducted by the CEC, which should include an assessment of the state of electoral infrastructure at all election precincts.
4. In the special law determining the procedure for holding the first post-war elections in Ukraine, clearly define the procedure for establishing additional regular election precincts, provide for the possibility of their establishment on the CEC's own initiative and determine the procedure for informing voters assigned to such precincts that they have been included in the voter lists at those precincts.
5. If the first post-war elections are called and based on the assessment of the state of electoral infrastructure, provide funding from the State Budget of Ukraine for expenditure related to supplying PECs with temporary structures. The special law determining the procedure for holding the first post-war elections in Ukraine should also provide for the possibility of making available to PECs premises which do not comply with the established standards, but which can be repaired and brought into compliance with those standards.
6. In the special law determining the procedure for holding the first post-war elections in Ukraine, clearly define the timeframes for the Ministry of Foreign Affairs to take actions related to initiating the establishment of additional EPAs outside diplomatic missions, the grounds and procedure for establishing such EPAs and effective mechanisms for informing voters that they have been included in the voter lists at additional EPAs.

637 For details, see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

7. Provide for the possibility of receiving a ballot paper at the first post-war elections on the basis of any of the documents confirming Ukrainian citizenship and the voter's identity provided for by the EC of Ukraine.

8. In the special ad hoc law on the first post-war elections or in amendments to the EC of Ukraine, it would be advisable to draw on the approaches set out in Draft Law No. 11300[638] and in the draft prepared by the CEC and approved by CEC Resolution No. 1 of 7 January 2026, providing for exceptions from the residence requirement for persons who were forced to stay abroad as a result of the armed aggression of the Russian Federation.

Electoral Rights of Service Members

State of play

Information on the exact number of service members,[639] including those involved in combat missions, is classified as restricted-access information. However, their total number is estimated at 880,000–900,000,[640] of whom approximately 300,000[641] serve in units directly involved in combat actions.

Service members serving in Ukraine vote at regular election precincts located outside military units/formations — for this purpose, they are granted leave of at least four hours during voting hours.[642] In this case, a service member votes either at the polling station to which his/her electoral address is assigned or at any other regular polling station — under the procedure for changing the place of voting without changing the electoral address. If voting outside a military unit/formation is impossible, for example due to the specific nature of service, the EC of Ukraine allows, as an exception, the establishment of a temporary SEP directly within the military unit/formation. Such a temporary SEP is established by the CEC upon a submission from the Ministry of Defence of Ukraine (MoD) no later than 10 days before election day.[643] The voter list for such election precinct is compiled directly by the PEC no later than seven days before election day, based on information on service-member voters submitted by the commander of the relevant military unit/formation.[644] Outside Ukraine, service members vote at EPAs established

638 On Amendments to the Electoral Code of Ukraine on Countering Sexism in Electoral Processes and Ensuring Balanced Representation of Women and Men in the Verkhovna Rada of Ukraine and Local Councils: Draft Law of Ukraine, registration No. 11300 of 27.05.2024. ↗

639 For the purposes of this subsection, here and below, service members should be understood as all persons who are part of the Security and Defence Forces — not only those performing military service, but also persons serving in security and defence sector bodies, the composition of which is defined by Article 12 of the Law of Ukraine 'On National Security of Ukraine', including the Ministry of Defence of Ukraine, the Ministry of Internal Affairs of Ukraine, the National Police of Ukraine, the National Guard of Ukraine, the State Border Guard Service, the Security Service of Ukraine, the Department of State Protection of Ukraine and others. On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018. ↗

640 What is the strength of the AFU in 2025: how many service members are at the front. Fakty, 2025 ↗; Zelenskyy named the total strength of the Ukrainian army. Fakty, 2025. ↗

641 Army at a crossroads: the mobilisation and organisational crisis of the Defence Forces of Ukraine. Centre for Eastern Studies, 2025. ↗

642 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 14. ↗

643 Ibid, Part 5 Article 30.

644 Ibid, Part 9 Article 45.

at the locations of military units or formations in the respective foreign states.[645] In local elections, conscripts in compulsory/basic military service do not vote at all, as they are considered not to belong to any territorial community and not to be voters in any local elections.[646] The EC of Ukraine does not establish any specific rules for the exercise by service members of their right to be elected — their standing as candidates in national elections is governed by the general procedure.

In the 2019 presidential election in Ukraine, the CEC established 80 temporary SEPs in the territory of military units or formations as an exceptional measure in the Joint Forces Operation area, in Donetsk and Luhansk regions.[647] This enabled 47,000 service members to exercise their right to vote.[648] In the early parliamentary elections, such polling stations were not established at all, as the Law of Ukraine 'On Elections of People's Deputies of Ukraine' in force at the time of those elections did not provide for their establishment, unlike the Law of Ukraine 'On Elections of the President of Ukraine',[649] under which the 2019 presidential election was conducted.[650] Although the EC of Ukraine harmonised the relevant electoral procedures, ensuring the exercise of active and passive electoral rights by service members under these procedures will be difficult.[651] In 2025, the European Commission identified ensuring the electoral rights of service members as one of the most pressing issues for Ukraine's first post-war elections.[652]

Progress and issues

Impossibility of organising voting for a significant share of service members at regular polling stations outside the locations of military units and formations

Service members serving in rear military units will be able to take part in voting in the first post-war elections under the procedures established by the EC of Ukraine, that is, to obtain leave and vote at a regular election precinct. For most or a significant share of the total number of service members, approximately 300,000, deployed near the line of contact, this voting mechanism may be unavailable due to the absence of nearby settlements, as a result of their remoteness or large-scale destruction, where regular polling stations could otherwise be established, the possible cancellation of elections in a certain territory due to the absence of conditions for holding them or the suspension of an electoral process that has already begun, as well as the impossibility of granting leave to a large number of service members simultaneously on election day.[653] The impossibility of ensuring their active electoral right at regular election precincts requires the search

645 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 3 Article 31. ↗

646 Ibid, Part 7 Article 7.

647 On the Establishment, in an Exceptional Case, of Special Election Precincts on the Territory of Military Units or Formations in the Regular Election of the President of Ukraine on 31 March 2019 and the Relevant Precinct Election Commissions for the Election of the President of Ukraine: Resolution of the Central Election Commission No. 554 of 14.03.2019. ↗

648 Protection of the Electoral Rights of Service Members. Civil Network OPORA, 2020. ↗

649 On Elections of the President of Ukraine: Law of Ukraine No. 474-XIV of 05.03.1999, Part 2 Article 20. ↗

650 Ibid.

651 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

652 Ukraine 2025 Report. Communication on EU enlargement policy, p. 22. ↗

653 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

for alternative ways of exercising this right. Given the uncertainty around the timing of the demobilisation of service members and the impossibility, in Ukraine's circumstances, of using postal voting, internet voting or proxy voting,[654] the only possibility to organise voting for service members deployed near the line of contact is to organise such voting at temporary SEPs established at the locations of military units/formations.

The Venice Commission's Code of Good Practice in Electoral Matters generally does not encourage voting by service members on the territory of military units: as a general rule, they should vote at their place of registration or, if it is impossible for them to return to their military unit on election day, at the polling stations nearest to the place of deployment, while voting in the territory of a military unit should be allowed only where election precincts are located at a considerable distance from permanent places of deployment. In all cases, special commissions should be established within the military unit to prevent situations in which commanders impose specific electoral preferences on their subordinates.[655]

Risks of abuse and lack of transparency in organising voting by service members at SEPs located at the places of deployment of military units/subunits

The EC of Ukraine does not clearly define the procedure and grounds for establishing SEPs at the places of deployment of military units/formations, that is, it does not define the 'exceptional case' in which they should be established. Accordingly, the establishment of such polling stations may become not an exception but a general practice, since their establishment only requires the MoD to submit the relevant request and the CEC to adopt a decision establishing such polling stations. Under the EC of Ukraine, the procedure for organising voting and determining its results at such polling stations is no different from the organisation of voting at any other regular or special polling stations. At the same time, the territory of a military unit/formation is a restricted-access facility, and therefore opportunities to observe voting, vote-counting, overall PEC operations and compliance with restrictions on campaigning in its territory are limited — as is physical access to the territory of such a unit itself.[656]

On 7 January 2026, the CEC approved proposals for legislative regulation of the specific arrangements for organising and holding national elections after the termination or cancellation of martial law, in the form of the Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine'.[657] Despite certain progressive provisions,[658] the

654 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

655 Code of Good Practice in Electoral Matters. Venice Commission, 2002. Paragraph 3.2.2.2, p. 29. ↗

656 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

657 On Proposals for Legislative Regulation of the Specific Arrangements for Organising and Conducting Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗
The draft was discussed within the framework of the Working Group on the Preparation of Comprehensive Legislative Proposals on the Specific Arrangements for Organising and Conducting Elections during a Special Period and/or Post-War Elections in Ukraine, established on 22.12.2025 by the Chairman of the Verkhovna Rada of Ukraine. However, as of 31.07.2026, the Working Group had still not developed agreed amendments to electoral legislation.

658 The draft law (Article 14) defines, in greater detail than the EC of Ukraine, the procedure for voting by service members at their place of actual stay on the territory of a military unit/formation, where a service member is unable to vote in polling premises due to the performance of service duties; provides for accreditation/permission by the Ministry of Defence for candidates, observers, proxies/authorised representatives of parties and candidates and media representatives to obtain access to the territory of a military unit and observe preparations for voting and its conduct and so on.

draft law generally preserves the same shortcomings in ensuring service members' right to vote as the current EC of Ukraine:

- it does not define the list of exceptional cases in which SEPs may be established at the places of deployment of military units/formations and does not contain clear requirements for the content of the submission by the MoD on the establishment of such polling stations. This may lead to the large-scale and unjustified establishment of such polling stations, turning voting outside military units at regular polling stations from the general practice into an exception, and narrowing opportunities for service members to vote at regular polling stations. This, in turn, would be contrary to international standards and would create risks of non-transparency and abuse linked to the restricted-access nature of such polling stations;[659]
- although the draft law provides for the possibility of service members voting at the place of their actual stay, that is, not in the polling premises of a SEP, it does not define the grounds for such voting and contains no safeguards for the transparency of its organisation, for example, it does not provide for the presence during such voting of anyone other than PEC members organising the voting. This may lead to service members voting on a large scale outside polling premises, make it more difficult to observe such voting and the exercise of the right to vote[660] and create a risk of potential pressure on service members by PEC members who would organise voting at the place of their stay;[661]
- the draft law allows service members to vote at regular election precincts outside the territory where the military unit/formation is deployed. However, service members do not have the right to choose such regular precincts themselves — they would be included in voter lists upon a submission by the commander of the relevant unit/formation, without the service member's consent. This not only increases the likelihood of abuse, including coercion and violation of the secrecy of the vote, but may also adversely affect the organisation of voting at the relevant regular election precincts, including queues and voters filling out ballots outside voting booths.[662]

Lack of effective legislative guarantees for the exercise by service members of the right to be elected in national elections

The EC of Ukraine does not provide for any specific arrangements for service members to exercise the right to be elected; they exercise this right under the same procedure as other voters. Since the mass demobilisation of service members before the first post-war elections is unlikely to take place,[663] they may face a number of impediments in exercising the right to be elected. To submit documents for registration as a candidate in elections, conduct a fundraising campaign, including to collect the election deposit, the amount of

659 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

660 When voting at the place of stay of voters is organised, the EC of Ukraine does not provide for the possibility of replacing a spoiled ballot paper with a new one, unlike voting in polling premises, where such a possibility is provided for, or for voters to familiarise themselves with information posters and booklets about parties/candidates — such posters and booklets are displayed only in polling premises.

661 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

662 Ibid.

663 Recommendations on Ensuring the Electoral Rights of Vulnerable Categories of Voters in the Context of the Recommendations of the European Commission, the Office for Democratic Institutions and Human Rights and the Venice Commission. Civil Network OPORA, 2026. ↗

which is significant,[664] and potentially challenge a refusal to register them as a candidate, service members would need to obtain leave. The procedure for granting such leave and its duration, as well as the very possibility of granting it, are not provided for by the EC of Ukraine.

A condition for standing in national elections is the permanent residence of a potential candidate in the territory of Ukraine for 10 years before the election in the case of presidential elections in Ukraine[665] or five years before the election in the case of elections of MPs of Ukraine.[666] Since the introduction of martial law in Ukraine, a significant number of service members have found themselves outside the country, either voluntarily or involuntarily, in connection with being held in captivity, carrying out special/military operations, for example in the territory of Kursk region of the Russian Federation, undergoing training or receiving medical treatment/rehabilitation.[667] Without revising the exceptions to the 10-year or five-year residence requirement, they will not be able to stand in national elections.

The Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine',[668] prepared by the CEC, provides for the obligation of commanders/heads of military units to create proper conditions for service members to stand as candidates, the granting of unpaid leave of at least five calendar days to submit documents for registration as a candidate in elections and a prohibition on refusing to release service members from the performance of military service duties for the period from their registration as a candidate in national elections until the end of the electoral process or cancellation of registration — for this period, the service member is granted unpaid leave. Despite the inclusion of these provisions in the draft law, it does not provide for exceptions to the residence requirement,[669] while its other requirements need further improvement:

- the minimum duration of leave for submitting documents for the registration of a service member as a candidate in national elections is too short and does not take into account the potential need to raise funds through a fundraising campaign to pay the election deposit, the need to correct documents submitted for candidate registration, the need to challenge a refusal to register as a candidate in court and so on;[670]
- an alternative to granting leave to submit documents for the registration of a service member as a candidate and to make clarifications to them could be to provide for the possibility of submitting such documents through electronic services or the Diia application. However, the draft law, as well as the EC of Ukraine, does not provide for such a possibility;

664 For more details, see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

665 Electoral Code of Ukraine No. 396–IX of 19.12.2019, Article 75. ↗

666 Ibid, Article 134.

667 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

668 On Proposals for Legislative Regulation of the Specific Features for Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

669 For more details on the residence requirement — see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

670 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

- the obligation of commanders to create proper conditions for service members to stand as candidates is too general to be implemented effectively. The CEC draft law does not define mechanisms for interaction between service members and the military command of units in relation to the exercise of their passive electoral right: the procedure for submitting applications or reports, the time limits for their consideration, the procedure for responding to them and the consequences of late consideration or failure to adopt decisions following the consideration of applications.[671]

Unless these shortcomings are addressed, the ability of service members to stand in elections will be significantly complicated.

Possibility of violations of service members' electoral rights due to the absence of mechanisms for responding to violations of their electoral rights

According to the Venice Commission's Code of Good Practice in Electoral Matters, to ensure the proper exercise by service members of their electoral rights, special commissions should be established in military units to prevent situations in which commanders impose specific electoral preferences[672] on their subordinates. Neither the current EC of Ukraine nor the CEC draft law provides for the establishment of effective mechanisms for responding to violations of service members' electoral rights — either in general or on the territory of military units/formations where temporary SEPs may be established in exceptional cases.[673] Given the special regime governing the functioning of such units and limited access to their territory, the absence of such mechanisms may create conditions both for obstructing free expression of the will of voters and for violating service members' right to stand in elections.

Recommendations

1. In the special law that will determine the procedure for holding the first post-war elections, define an exhaustive list of grounds for establishing temporary SEPs on the territory of military units/formations, in particular in connection with the impossibility of organising voting for service members at regular polling stations and where it is also impossible to redeploy the military unit/formation; establish a clear list of requirements for the content of submissions by the MoD of Ukraine on the establishment of such polling stations.
2. In the special law on the procedure for holding the first post-war elections, provide that, where it is possible to organise safe voting for service members at regular polling stations near the places of deployment of military units/formations, the CEC must determine the list of such polling stations and service members must have the right to vote at them on the basis of applications submitted by them and their inclusion in the voter lists for those polling stations.
3. In the special law on the procedure for holding the first post-war elections, define an exhaustive list of grounds for service members to vote at their place of stay at a temporary SEP on the territory of a military unit/formation and provide for the mandatory presence, during the organisation and conduct of such voting, of

671 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

672 Code of Good Practice in Electoral Matters. Venice Commission, 2002. Paragraph 3.2.2.2, p. 29. ↗

673 Ensuring the Exercise of Electoral Rights by Service Members. Civil Network OPORA, 2026. ↗

candidates, their proxies, authorised representatives of parties, official observers, media representatives and other persons who, under the EC of Ukraine,[674] have the right to be present at meetings of election commissions without permission or invitation.

4. Provide proper safeguards for the exercise by service members of the right to be elected: 1) granting service members sufficient unpaid leave/release from duties to raise funds for the election deposit, submit documents for registration as candidates in elections, make corrections to the submitted documents and challenge refusals of registration; 2) include, among the exceptions to the residence requirement in national elections, cases where a service member was outside Ukraine after 24 February 2022 due to captivity, training, rehabilitation or the performance of combat/special missions; and 3) define mechanisms for interaction between service members and the military command of the relevant units/formations in relation to the exercise of their passive electoral right: the procedure for submitting applications/reports, the time limits for their consideration, the procedure for responding to them, the consequences of late consideration or failure to adopt decisions following their consideration, among other issues.

5. Amend the EC of Ukraine to provide for the possibility of submitting documents, including corrected documents, for the registration of candidates through the electronic services of the CEC and/or using the Diia application, while preserving the possibility of submitting such documents in paper form.

6. In the special law on the procedure for holding the first post-war elections, impose on the military ombudsman, the Ukrainian Parliament Commissioner for Human Rights (Ombudsman, Commissioner) and the leadership of the Security and Defence Forces the obligation to develop and approve, before the start of the electoral process for the first post-war elections, coordinated inter-agency mechanisms for interaction aimed at preventing, identifying and responding to violations of service members' electoral rights during the preparation and conduct of the first post-war elections.

Electoral Rights of Women

State of play

Since 2013, Ukrainian legislation has been amended on several occasions to ensure more balanced representation of women and men in elected bodies:

- parties have been required to include in their statutes provisions defining the minimum level of representation of women and men among the candidates nominated in the SNC in parliamentary elections and in MMCs in local council elections. This level must be at least 30% of the total number of candidates in the respective elections;[675]

674 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 8 Article 36. ↗

675 The requirement was introduced in 2013 for elections of MPs of Ukraine and in 2015 for elections of local council members. On Political Parties in Ukraine: Law of Ukraine No. 2365-III of 05.04.2001, paragraph 8 Part 1 Article 8. ↗

- since 2015, 10% of the annual amount of state funding for parties has been distributed equally among parties eligible for state funding of their statutory activities, provided that, in the most recent regular or early parliamentary elections, the share of representatives of one sex among the elected MPs from those parties who assumed office does not exceed two thirds of the total number of MPs elected from the relevant party;[676]
- with the adoption of the EC of Ukraine, gender quotas[677] were introduced for elections to Parliament and local councils: a party, or its local organisation in local elections, must include at least two candidates of each sex[678] in every group of five candidates on each list it nominates under the proportional system. In elections to local councils under the majoritarian system in MMCs, it must ensure representation of at least 30% of persons of one sex among the total number of candidates for local council members nominated by it.[679]

Liability for violating the gender quota is clearly defined only for parliamentary elections: if the gender quota is not complied with when candidates are nominated, the CEC refuses to register all candidates nominated by the party and included in its nationwide and regional lists.[680] In local elections, liability for non-compliance is defined less clearly: the EC of Ukraine provides for refusal to register candidates in the event of a violation of the candidate nomination procedure, but does not give a clear answer as to whether failure to comply with the gender quota constitutes a violation of that procedure and serves the grounds for refusal of registration.[681]

The EC of Ukraine provisions on gender quotas have been applied in elections only once — during the regular local elections of 2020, as no national elections have been held in Ukraine after 2019 due to the introduction of martial law. In the early 2019 parliamentary elections, the voluntary gender quotas provided for by the Law 'On Political Parties in Ukraine'[682] applied. At the same time, two parties, 'Holos' and 'European Solidarity', received additional state funding for their statutory activities amounting to 10% of the total annual state funding for all eligible parties that were divided equally between them,[683] for ensuring that not more than two thirds of the total number of MPs of Ukraine elected from those parties were representatives of one sex.

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676 On Political Parties in Ukraine: Law of Ukraine No. 2365-III of 05.04.2001, paragraph 1 Part 1 Article 17^5. ↗

677 For more details on gender quotas — see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

678 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Part 12 Article 154, Part 9 Article 219. ↗

679 Ibid, Part 7 Article 220.

680 Ibid, paragraph 1 Part 1 Article 159.

681 Ibid, paragraph 1 Part 1 Article 230.

682 Under the Law of Ukraine 'On Political Parties in Ukraine', each party had to provide in its statute for representation of candidates of one sex in elections of MPs of Ukraine at a level of at least 30%. At the same time, however, the order in which candidates of each sex were included in the lists was determined by the party itself when nominating candidates. Accordingly, a party could include all women at the end of its electoral list, which would minimise their chances of being elected to Parliament. In addition, the Law of Ukraine 'On Elections of People's Deputies of Ukraine', under which the 2019 early elections of MPs were held, did not provide for refusal to register candidates nominated by a party if it violated even this voluntary quota. On Political Parties in Ukraine: Law of Ukraine No. 2365-III of 05.04.2001, paragraph 8 Part 1 Article 8 ↗; On Elections of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011, Article 60. ↗

683 The NACP distributed state funding to parliamentary parties. National Agency on Corruption Prevention, 2020. ↗

Overall, legislative incentives for parties to ensure more balanced representation of women and men in elected bodies have had a positive impact on the level of women's representation in Parliament and certain local councils. In particular, in the 2019 parliamentary elections, 87 women were elected to the Verkhovna Rada, accounting for 20.52% of the total number of elected MPs, which was almost twice as many as in the 2014 parliamentary elections, when 47 women were elected.[684] Following the 2020 regular local elections, the share of women was 28% in regional councils, 33–34% in district councils, 32–33% in councils of communities with 10,000 voters or more, 41–42% in councils of small communities and 18% among community mayors.[685]

Progress and issues

Negative impact of failure to comply with gender quotas while nominating candidates and quota violation after candidate registration on the level of women's representation in elected office

The EC of Ukraine requires compliance with gender quotas only while nominating candidates for elections. Before election day, once candidates have been registered, a party or, in local elections, its local organisation has the right to initiate the cancellation of registration of any nominated candidate before the deadline established by the EC of Ukraine.[686] After election day, a party or local party organisation may also force any candidate on its list to abstain from getting a seat or renounce a mandate as the EC of Ukraine fails to effectively prevent such practices.[687]

In addition, even during candidate nomination, the consequences of failure to comply with quotas differ depending on the type of election. While in elections of MPs of Ukraine non-compliance with the quota is an unequivocal ground for refusing registration of all candidates nominated by a party, in local elections the consequences of such a violation are not clearly defined. Although a TEC must refuse to register candidates if nomination procedure was violated, in practice some courts and TECs treated non-compliance with quotas not as a violation of that procedure, but as inaccuracies in the documents submitted for candidate registration, which could be corrected and resubmitted to the relevant TECs.[688] In some cases, TECs ignored violations of gender quotas in local elections altogether — quotas were violated 17% of the lists of registered candidates in the elections.[689]

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684 The Number of Women MPs Increased in the New Rada. Ukrainska Pravda, 2019. ↗

685 Ensuring the Exercise of the Rights of Vulnerable Groups of Voters: Women. Civil Network OPORA, 2026. ↗

686 In local elections, a local party organisation may apply to the TEC to cancel the registration of any candidate it has nominated 19 days before election day. In elections of MPs, a party may submit a similar application 26 days before election day. Women accounted for 63% of candidates in elections to the city councils of Kyiv and regional centres who withdrew after registration and before election day in the local elections. Electoral Code of Ukraine No. 396–IX of 19.12.2019, paragraph 2 Part 1 Article 160, paragraph 2 Part 1 Article 231 ↗ ; Advantages and Challenges of Applying the Gender Quota during the 2020 Local Elections in Ukraine. Ilko Kucheriv Democratic Initiatives Foundation, 2021. ↗

687 Daryna Dvornichenko. Breaking Barriers to Women's Participation in Politics in Georgia, Moldova and Ukraine: Policy Paper. The German Marshall Fund of the United States, 2022, p. 10. ↗

688 Ensuring the Exercise of the Rights of Vulnerable Groups of Voters: Women. Civil Network OPORA, 2026 ↗; Analytical Review of Judicial Practice in Resolving Disputes on Compliance with the Gender Quota during the 2020 Local Elections. Council of Europe, 2021, pp. 17–32, 35–36. ↗
For more details — see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

689 Advantages and Challenges of Applying the Gender Quota during the 2020 Local Elections in Ukraine. Ilko Kucheriv Democratic Initiatives Foundation, 2021. ↗

The possibility of ignoring gender quota while nominating candidates, its violation after candidate registration or after the election results have been established significantly reduces its effectiveness. Following the 2020 regular local elections, the OSCE/ODIHR recommended making compliance with the gender quota mandatory for candidate lists at all stages of the electoral process, including during nomination and registration.[690]

On 27 May 2024 a group of women MPs submitted to Parliament Draft Law No. 11300[691] aimed at increasing the effectiveness of gender quotas. It expressly provides that failure to comply with gender quotas serves the grounds for refusal to register all party/local party organisation lists in the respective elections, prohibits treating quota violations as errors or inaccuracies in candidate registration documents and changes the rules for replacing candidates in the nationwide/single list of candidates in elections if a candidate or elected council member withdraws: such a candidate/council member must be replaced by the next candidate on the list of the same sex.

Although this draft law was developed in cooperation with civil society organisations and experts,[692] it has not even been adopted at the first reading — even though in February 2026 Parliament included it in the agenda of the regular session of the Verkhovna Rada.[693]

Absence of proper mechanisms to counter sexism in the electoral process

The EC of Ukraine prohibits only discrimination on the grounds of sex, but does not contain a direct prohibition of sexism in election campaigning.[694] Unlike discrimination on the grounds of sex,[695] the concept of sexism is not defined at the legislative level. In substance, it is broader and includes not only direct and indirect discrimination, but also gender-based violence and the spread of gender stereotypes.[696] During the 2020 local elections, a number of cases were recorded of cyberbullying, cyberstalking, sexist comments on the public social media pages of women candidates, ageism, appearance-based discrimination (lookism), sexist journalistic materials and television programmes and sexist political advertising — while no cases of sexism against men were recorded.[697]

A number of draft laws have been submitted to the Verkhovna Rada that provide for defining sexism in general legislation on gender equality, namely Draft Laws No. 4598,[698]

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690 Final OSCE/ODIHR Report on the observation of the 2020 regular local elections. Recommendation A 8, p. 46. ↗

691 On Amendments to the Electoral Code of Ukraine on Countering Sexism in Electoral Processes and Ensuring Balanced Representation of Women and Men in the Verkhovna Rada of Ukraine and Local Councils: Draft Law of Ukraine, registration No. 11300 of 27.05.2024. ↗

692 Ensuring the Exercise of the Rights of Vulnerable Groups of Voters: Women. Civil Network OPORA, 2026. ↗

693 On the Agenda of the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4775-IX of 10.02.2026. ↗
For more details on this draft law and its consideration by Parliament — see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

694 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Articles 7, 12, 47. ↗

695 On Ensuring Equal Rights and Opportunities for Women and Men: Law of Ukraine No. 2866-IV of 08.09.2005. ↗

696 General Recommendation No. 28 on the core obligations of States parties under Article 2 of the Convention on the Elimination of All Forms of Discrimination against Women. Committee on the Elimination of Discrimination against Women. CEDAW, 2010. ↗

697 Advantages and Challenges of Applying the Gender Quota during the 2020 Local Elections in Ukraine. Ilko Kucheriv Democratic Initiatives Foundation, 2021. ↗

698 On Amendments to Certain Legislative Acts of Ukraine on Prohibiting Manifestations of Sexism in Society: Draft Law of Ukraine, registration No. 4598 of 15.01.2021. ↗

No. 4598-1[699] and No. 4598-2,[700] or directly in the EC of Ukraine, namely Draft Law No. 11300,[701] establishing administrative liability for sexism, namely Draft Laws No. 4599,[702] No. 4599-1[703] and No. 4599-2,[704] prohibiting sexism in election campaigning and/or the dissemination of materials containing signs of sexism or incitement to sexism, namely Draft Laws No. 8310[705] and No. 11300. Although all of them have been included in the agenda of the regular session of the Verkhovna Rada,[706] none has been adopted even in the first reading.

Absence of effective financial incentives for parties to increase the number of women beyond the gender quota.

The financial incentive mechanisms provided for by the Law of Ukraine 'On Political Parties in Ukraine' to encourage parties to secure the election of more women in parliamentary elections were designed for the application of the 30% gender quota for candidate nomination in parliamentary elections established by that Law.[707] However, the EC of Ukraine introduced a 40% gender quota for elections held under the proportional system. Accordingly, after the next regular elections of MPs of Ukraine are held under the new EC of Ukraine, it is quite likely that all parties that pass the electoral threshold and obtain the right to state funding of their statutory activities will have at least 40% representatives of one sex elected from them. Under such conditions, 10% of the annual amount of state funding for parties will be distributed equally among all or most such parties, and the funds received by them will be too insignificant to encourage them to nominate a larger number of women, beyond the gender quota, in future parliamentary elections.

Absence of legislative incentives to ensure balanced representation of women and men in the governing and other bodies of parties/local party organisations.

The Law of Ukraine 'On Political Parties in Ukraine' does not provide for the introduction of gender quotas or other positive measures to ensure balanced representation of women and men in the governing and other bodies, including oversight bodies, of parties and their local organisations. Given entrenched gender stereotypes, if party policy is shaped and

699 On Amendments to the Law of Ukraine 'On Ensuring Equal Rights and Opportunities for Women and Men' on Defining the Concept of 'Sexism': Draft Law of Ukraine, registration No. 4598-1 of 02.02.2021. ↗

700 On Amendments to Certain Legislative Acts of Ukraine on Prohibiting Manifestations of Sexism in Society: Draft Law of Ukraine, registration No. 4598-2 of 02.02.2021. ↗

701 On Amendments to the Electoral Code of Ukraine on Countering Sexism in Electoral Processes and Ensuring Balanced Representation of Women and Men in the Verkhovna Rada of Ukraine and Local Councils: Draft Law of Ukraine, registration No. 11300 of 27.05.2024. ↗

702 On Amendments to the Code of Ukraine on Administrative Offences on Establishing Liability for Manifestations of Sexism in Society: Draft Law of Ukraine, registration No. 4599 of 15.01.2021. ↗

703 On Amendments to the Code of Ukraine on Administrative Offences on Strengthening Liability for Gender-Based Violence and Manifestations of Sexism in Society: Draft Law of Ukraine, registration No. 4599-1 of 02.02.2021. ↗

704 On Amendments to the Code of Ukraine on Administrative Offences on Establishing Liability for Public Manifestations of Sexism: Draft Law of Ukraine, registration No. 4599-2 of 02.02.2021. ↗

705 On Amendments to the Electoral Code of Ukraine on Improving Regulation of Information Support for Elections and Election Campaigning: Draft Law of Ukraine, registration No. 8310 of 27.12.2022. ↗

706 On the Agenda of the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4775-IX of 10.02.2026. ↗

707 The condition for providing such state funding is the acquisition of mandates by representatives of one sex accounting for no more than two thirds of the total number of MPs of Ukraine elected in the single multi-mandate election constituency, that is, by a larger number of MPs than the gender quota established by the Law of Ukraine 'On Political Parties in Ukraine'.

implemented by bodies composed mainly of men, and men dominate among delegates to party congresses, meetings and conferences, women's chances of being nominated in elections decrease.[708]

On 10 December 2025, a group of MPs of Ukraine submitted to Parliament a draft new version of the Law 'On Political Parties in Ukraine' (registration No. 14289),[709] which provides for certain steps towards addressing this problem: mandatory inclusion in party statutes and codes of ethics of provisions on ensuring equal rights and opportunities for women and men, preventing sexism, bias, harassment and other forms of discrimination, as well as introducing a 40% gender quota in the formation of party governing bodies, with the possibility for a party to increase it to 50%. At the same time, the 40% gender quota provided for by the draft law would apply only to the formation of governing bodies, not all statutory bodies of a party, and would not extend to the governing and other bodies of local party organisations. The draft law was included in the agenda of the regular session of the Verkhovna Rada[710] and is under consideration by the Verkhovna Rada Committee on Legal Policy.

Recommendations

1. Amend the EC of Ukraine to take into account the provisions proposed by Draft Law No. 11300 on improving the effectiveness of gender quotas in elections of MPs of Ukraine and local elections, defining the concept of sexism and prohibiting sexism in election campaigning.
2. Amend the Law of Ukraine 'On Political Parties in Ukraine' to provide for the distribution of 10% of the annual amount of state funding for political parties equally among parties that have obtained the right to state funding of their statutory activities and whose electoral lists in the single multi-mandate election constituency resulted in the election of representatives of one sex accounting for no more than 55% of the total number of MPs elected from their lists.
3. Amend the Law of Ukraine 'On Political Parties in Ukraine' and include in Draft Law 'On Political Parties' (registration No. 14289) provisions introducing gender quotas of 40% in the formation of all statutory bodies of parties and their local organisations or, at a minimum, providing for additional state funding, within the total annual amount of state funding for parties, for parties that enshrine such quotas in their statutes.

708 Ensuring the Exercise of the Rights of Vulnerable Groups of Voters: Women. Civil Network OPORA, 2026. ↗

709 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗
For more details on this draft law — see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

710 On the Agenda of the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4775-IX of 10.02.2026. ↗

Electoral Rights of Persons with Disabilities

State of play

Before the start of Russia's full-scale invasion of Ukraine, the number of persons with disabilities in Ukraine stood at 2.7 million.[711] After the invasion began, it increased significantly — to 3.4 million as of June 2026[712] — and, given the ongoing hostilities and shelling of civilian infrastructure, continues to grow.

The EC of Ukraine contains several provisions on ensuring the electoral rights of voters with disabilities. In particular, it: 1) prohibits discrimination and provides for the principle of equal suffrage; 2) guarantees the right of voters with disabilities to be provided with reasonable accommodation in line with their individual needs; 3) allows a ballot paper to be marked and placed in the ballot box with the assistance of another person; 4) provides that PEC premises and polling premises must comply with accessibility requirements, with at least one polling booth for secret voting adapted for wheelchair users and other persons with reduced mobility; and 5) establishes the obligation of public authorities to organise barrier-free access to premises that do not meet accessibility requirements.[713]

In addition, the EC of Ukraine also provides for the adaptation of information materials and election campaign materials to the needs of voters with disabilities: 1) information posters and booklets of parties/local party organisations and candidates in elections must be produced in accessible formats; 2) information materials in polling premises must be displayed with due regard to access for voters with disabilities; and 3) election campaign materials in audiovisual media must be translated into sign language, while the subjects of electoral process must ensure the accessibility of election campaign materials and bring their official websites into line with accessibility standards.[714]

The implementation of most of these provisions required the adoption of secondary legislation setting out the procedure for their implementation. These acts were adopted by the Government[715] and the CEC[716] immediately before the regular local elections. In 2025, after those elections had already been held, the CEC approved the procedure for

711 Study of the Needs of Persons with Disabilities in Livelihoods and Access to the Labour Market in Wartime in Ukraine. League of the Strong, 2025, p. 5. ↗

712 War increases number of people with disabilities in Ukraine by 600,000, Ombudsman representative tells UN. Ukrinform. 2026. ↗

713 Electoral Code of Ukraine No. 396–IX of 19.12.2019, Articles 7, 17, 62. ↗

714 Ibid, Articles 47, 51, 53, 106, 116, 162, 163, 171, 246.

715 On the Approval of Accessibility Criteria for Persons with Disabilities and Other Persons with Reduced Mobility for Premises Provided to Precinct Election Commissions of Regular Election Precincts for Organising Their Work and Conducting Voting: Resolution of the Cabinet of Ministers of Ukraine No. 962 of 09.10.2020. ↗

716 On Requirements for Election Commission Premises and Polling Premises, Standards for Arranging Precinct Election Commission Premises and Polling Premises, the List and Norms for Providing Election Commissions with Vehicles, Means of Communication, Equipment, Inventory and Other Material Assets, and the Types of Services and Works That May Be Procured by Constituency and Territorial Election Commissions at the Expense of the State Budget of Ukraine or the Relevant Local Budget for Organising the Preparation and Conduct of the Relevant Elections: Resolution of the Central Election Commission No. 164 of 08.08.2020 ↗; On the Procedure for Information Support for Elections for Persons with Health Impairments Due to Disability, Temporary Health Disorder or Age: Resolution of the Central Election Commission No. 385 of 15.10.2020. ↗

providing reasonable accommodation, including assistive devices, to voters with health impairments in polling premises.[717]

Following the 2020 regular local elections, the OSCE/ODIHR identified several key issues in ensuring the electoral rights of persons with disabilities: the disenfranchisement of persons recognised by a court as legally incapacitated; the automatic inclusion of persons with disabilities in extracts from voter lists for voting at their place of stay, rather than in polling premises, as a practice that stigmatises voters; and the inaccessibility of polling stations for voters with disabilities, either because of their remoteness or because polling premises do not meet accessibility requirements.[718]

Progress and issues

Difficulties in exercising the right to vote in elections due to the geographical or architectural inaccessibility of polling stations.

Although, under the EC of Ukraine, the executive bodies of village, settlement, city and city district councils were obliged to ensure the accessibility of all polling stations for voters with disabilities by 1 January 2025, the results of civil society monitoring of polling station accessibility in July–August 2020 showed that only 3% of polling stations were fully accessible, while more than 40% were completely inaccessible.[719] The most typical accessibility restrictions included: 1) the absence of parking spaces; 2) the unsatisfactory condition of the road surface in the area adjacent to the PEC premises; 3) the absence of ramps and handrails at the vast majority of polling stations; 4) the location of sanitary facilities outside the PEC premises or their complete inaccessibility; and 5) obstacles to wheelchair access in polling premises, among other impediments.[720]

As of 28 July 2026, 33,150 election precincts were functioning in Ukraine, located in 30,261 buildings. Of these buildings, 1.3% had been completely destroyed and were beyond repair, 0.3% had been destroyed as a result of deterioration over time, 3.1% had been damaged but could be restored, 2% had been damaged but had already been restored and 19% were located in the temporarily occupied territories of Ukraine and/or the CEC had no information on their condition.[721]

The destruction or significant damage of electoral infrastructure has further limited the accessibility of polling stations, while the lack of proper funding to bring polling stations into compliance with accessibility criteria as a result of Russia's full-scale invasion is unlikely to facilitate accessibility of polling stations after the 2020 local elections. The inaccessibility of polling stations, in turn, does not encourage more active participation of voters with disabilities in national and local elections.

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717 On the Procedure for Providing Reasonable Accommodation (Assistive Devices) to Voters with Health Impairments Due to Disability, Temporary Health Disorder or Age in Polling Premises: Resolution of the Central Election Commission No. 16 of 24.04.2025. ↗

718 Final OSCE/ODIHR Report on the observation of the 2020 regular local elections, pp. 16, 19, 40, 47, 49. ↗

719 Expert View on the Key Risks to the Exercise of Active and Passive Electoral Rights by Persons with Disabilities as a Vulnerable Group of Voters. Civil Network OPORA, 2024. ↗

720 The State of Accessibility of Polling Premises in Ukraine. Civil Network OPORA, 2020. ↗

721 Letter of the Central Election Commission No. 21-17-2202 of 28.07.2026 in response to an information request from Civil Network OPORA.

On 7 January 2026, the CEC approved proposals for legislative regulation of the specific arrangements for organising and holding national elections after the termination/cancellation of martial law, in the form of the Draft Law 'On Specific Arrangements for Ensuring the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine'.[722] The draft law proposes imposing on local executive authorities and local self-government bodies the obligation to provide PECs with temporary structures, such as tents, pavilions and other structures, which must be located with due regard to the need to ensure accessibility for persons with disabilities and other persons with reduced mobility. However, the draft law fails to specify the procedure and deadlines for procurement related to the use of such structures, nor does it envision the sources of funding to cover the respective expenses. If, as of 2020, only 3% of PEC premises located in permanent structures met accessibility requirements, temporary structures are unlikely to be significantly more accessible, given the absence of sources of funding for the costs of purchasing/renting such structures, will not increase significantly even if the CEC proposals are approved. The CEC draft law also provides for a preliminary assessment of the readiness of territories for organising and conducting voting in elections,[723] but it does not require an accessibility audit of election commission premises and polling premises to be carried out as part of this assessment.

Stigmatisation of persons with disabilities and restrictions on their electoral rights as a result of procedural inaccessibility

In addition to the architectural and geographical inaccessibility of polling stations, the inconsistency of several requirements and procedures provided for by the EC of Ukraine with international standards remains a significant challenge to the exercise of active electoral rights by persons with disabilities.

Voters with disabilities are included in the extract from the voter list for voting at their place of stay automatically, without their consent, based on a disability marker in the database of the SVR. In addition to the fact that the automatic separation of voters with disabilities into a distinct group of voters without their consent constitutes a form of stigmatisation,[724] during the 2020 regular local elections there were recorded cases in which such voters were unable to vote at all because the PEC had not organised voting at their place of stay.[725]

The EC of Ukraine does not provide for informing voters about the accessibility of a particular polling station or the availability of reasonable accommodation there. Accordingly, even where accessible polling stations equipped with the necessary reasonable accommodation exist in a community, voters do not know about them and cannot change their place of voting without changing their electoral address to such a polling station.[726]

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722 On Proposals for Legislative Regulation of the Specific Features for Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

723 For more details — see the subsection 'Territorial Organisation of Elections'.

724 Final OSCE/ODIHR Report on the observation of the 2020 regular local elections, p. 19. ↗

725 Political Participation and Ensuring the Electoral Rights of Persons with Disabilities. Survey Results. National Assembly of People with Disabilities of Ukraine, 2020, p. 14. ↗

726 Expert View on the Key Risks to the Exercise of Active and Passive Electoral Rights by Persons with Disabilities as a Vulnerable Group of Voters. Civil Network OPORA, 2024. ↗

The requirements for arranging polling premises do not comply with the principle of universal design and provide, in practice, for the segregation of voters with disabilities — one separate polling booth must be allocated for them to vote, while other booths are not equipped according to their needs, for example with low tables, additional lighting and so on.[727] The EC of Ukraine also does not provide for the use of stencils or adaptive ballot paper overlays, which significantly complicates voting for voters with visual impairments.

Although the EC of Ukraine uses the concepts of reasonable accommodation and assistive devices, it does not define them. Since the procedure and cases for the use of reasonable accommodation are determined by the CEC,[728] the latter has broad discretion in deciding these issues, which may directly affect the exercise of the right to vote by voters with disabilities.

A separate problem remains the lack of effective communication between voters with disabilities and PEC members, who have an insufficient understanding of the needs of this category of voters.[729]

In December 2025, the CEC prepared proposals[730] to improve the accessibility of electoral procedures for persons with disabilities, in the form of draft amendments to the EC of Ukraine. This draft contains a number of progressive provisions: 1) defining the concept of reasonable accommodation; 2) imposing an obligation on election commissions to inform voters about the reasonable accommodation available in polling premises; 3) requiring a PEC to designate a commission member responsible for organising voting for voters with health impairments/disabilities; 4) providing PECs with adaptive stencils/overlays for ballot papers; and 5) placing a QR code on posters explaining the voting procedure, linking to accessible ballot paper formats that provide for translation of the information displayed into Ukrainian Sign Language, the reproduction of information in audio format and in a special digital text format accessible to persons with visual impairments.

At the same time, the draft law effectively preserves the segregation of voters and provides for voters with disabilities to vote in separate booths, the number of which is not limited. It does not provide voters with disabilities with alternatives in voting, whether in polling premises or at their place of stay, the use of plain language in election-related information materials for voters with intellectual disabilities, centralised information on the accessibility of polling stations and the extent to which they are provided with reasonable accommodation, among other issues. As of 31 July 2026, the CEC proposals had not been formalised as a draft law and submitted to Parliament by any subject of the right of legislative initiative.

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727 Electoral Code of Ukraine No. 396–IX of 19.12.2019, Article 62 ↗; On Requirements for Election Commission Premises and Polling Premises, Standards for Arranging Precinct Election Commission Premises and Polling Premises, the List and Norms for Providing Election Commissions with Vehicles, Means of Communication, Equipment, Inventory and Other Material Assets, and the Types of Services and Works That May Be Procured by Constituency and Territorial Election Commissions at the Expense of the State Budget of Ukraine or the Relevant Local Budget for Organising the Preparation and Conduct of the Relevant Elections: Resolution of the Central Election Commission No. 164 of 08.08.2020. ↗

728 Electoral Code of Ukraine No. 396–IX of 19.12.2019, Article 62. ↗

729 Political Participation and Ensuring the Electoral Rights of Persons with Disabilities. Survey Results. National Assembly of People with Disabilities of Ukraine, 2020, p. 27. ↗

730 On Proposals to Improve Ukrainian Legislation Aimed at Providing Voters with Reasonable Accommodation (Assistive Devices): Resolution of the Central Election Commission No. 71 of 23.12.2025. ↗

Incompatibility with international standards of disenfranchising voters recognised as legally incapacitated

Under the Constitution of Ukraine, persons recognised by a court as legally incapacitated do not have the right to vote in elections.[731] Ukraine has around 34,000 persons with intellectual and psychosocial disabilities who have been recognised by a court as legally incapacitated.[732]

The complete automatic disenfranchisement of citizens recognised as legally incapacitated is contrary to both international standards and the case law of the European Court of Human Rights.[733] Under Article 12 of the UN Convention on the Rights of Persons with Disabilities, States Parties recognise that persons with disabilities enjoy legal capacity on an equal basis with others in all aspects of life. States must also take appropriate measures to provide persons with disabilities with access to the support they may require in exercising their legal capacity.[734] Following the 2020 regular local elections, the OSCE/ODIHR recommended that, in line with Ukraine's international obligations, all restrictions on electoral rights on the basis of intellectual or mental disability be removed.[735]

Despite certain initiatives aimed at reforming the institution of legal incapacity as a whole, in particular its civil law and civil procedure aspects,[736] no draft laws aimed at revising Article 70 of the Constitution of Ukraine and/or the provisions of the EC of Ukraine based on this article have been registered in the Verkhovna Rada.[737] In December 2025, only an expert discussion[738] was held on the problems of ensuring the electoral rights of persons with intellectual disabilities.

Recommendations

1. Provide in the EC of Ukraine and in the special law on the procedure for holding the first post-war elections, as part of the pre-election audit to be carried out by the CEC: 1) mandatory monitoring, before the start of each electoral process, by local executive authorities and local self-government bodies of the accessibility of polling stations for voters with disabilities, in accordance with a methodology to be approved by the CEC; 2) timely determination, during the period between elections, of the amount of funding needed for measures to ensure their accessibility and the

731 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 70. ↗

732 Lifelong Dependence or Expanded Rights: What Changes New Draft Laws Propose for Legally Incapacitated Persons. ZMINA, 2025. ↗

733 Recommendations on Ensuring the Electoral Rights of Vulnerable Categories of Voters in the Context of the Recommendations of the European Commission, the Office for Democratic Institutions and Human Rights and the Venice Commission. Civil Network OPORA, 2026. ↗

734 Convention on the Rights of Persons with Disabilities of 13.12.2006, Article 12. ↗

735 Final OSCE/ODIHR Report on the observation of the 2020 regular local elections. Recommendation B 18, p. 47 ↗; Final OSCE/ODIHR Report on the observation of the 2019 early elections of MPs of Ukraine. Recommendation A 5, p. 35. ↗

736 Lifelong Dependence or Expanded Rights: What Changes New Draft Laws Propose for Legally Incapacitated Persons. ZMINA, 2025. ↗

737 Although the Constitution of Ukraine itself prohibits amendments to it under martial law or a state of emergency, this does not preclude the possibility of submitting a draft law amending it to the Verkhovna Rada — such a draft law may be adopted as a law after martial law in Ukraine is cancelled/terminated.

738 Ukraine Needs to Improve Legislation So That Persons with Intellectual Disabilities Can Vote — Ombudsman. ZMINA, 2025. ↗

implementation of such measures; and 3) designation of premises for the operation of election commissions with due regard to architectural and territorial accessibility requirements.

2. Amend the EC of Ukraine to oblige the CEC to inform voters about accessible polling stations and the extent to which they are provided with reasonable accommodation, for example by placing on the CEC website an interactive map with information on the accessibility of any polling station and its provision with reasonable accommodation, including the possibility to search for the nearest accessible polling station by the voter's place of stay and so on.
3. Enshrine in the special law on the procedure for holding the first post-war elections the possibility of locating PECs in temporary structures, in the absence of accessible permanent structures, which must meet accessibility requirements; consider the possibility of creating mobile additional special polling stations for voting by voters with disabilities, provided that there are no accessible polling stations within the relevant community.
4. Bring the CEC requirements for arranging polling premises into line with the principle of universal design, which should provide, in particular, for the possibility for a voter with a disability to vote in any polling booth and to exercise their electoral rights on an equal basis with other voters, without segregation or discrimination.
5. Define the concepts of reasonable accommodation and assistive device in the EC of Ukraine, taking into account the definitions proposed by the CEC.
6. Provide in the EC of Ukraine for the mandatory designation by election commissions, from among their members, of persons responsible for interaction with voters with disabilities and for ensuring the exercise of their right to vote, as well as mandatory prior training for such commission members on communication with such voters and ensuring the exercise of their rights in the electoral process, as part of general training programmes for election commission members.
7. Provide in the EC of Ukraine for the obligation of the CEC to ensure the production of adaptive stencils/overlays for ballot papers, at least two for each polling station, and their transfer to PECs.
8. Enshrine in the EC of Ukraine the mandatory use of accessible formats and plain language in information materials on elections and electoral procedures, as well as ensuring the accessibility of electoral materials, including the use of QR codes on information posters and booklets linking to an accessible format of the ballot paper and an audio version of the poster or booklet, the creation of audio versions and sign-language versions of materials, duplicating non-textual information in text form and vice versa and so on.
9. Exclude from the EC of Ukraine the provisions on the automatic inclusion of voters with disabilities in extracts from voter lists for voting at their place of stay and provide for informing such voters about the procedures for exercising their electoral rights if such automatic inclusion is cancelled.
10. After the cancellation/termination of martial law in Ukraine, amend Article 70 of the Constitution of Ukraine and the relevant provisions of the EC of Ukraine to abolish automatic disenfranchisement on the grounds of legal incapacity; provide for the

voter to be given a plain-language explanation of their rights when a ballot paper is issued; introduce into the electoral process a system of supported decision-making, meaning personal voting with the right to receive explanations or assistance and the possibility to make decisions independently, without the involvement of a guardian or another person.

Electoral Rights of National Minorities (Communities) and Indigenous Peoples

State of play

Since the most recent population census in Ukraine was conducted in 2001 (another census was scheduled for 2020 but has never been carried out), accurate information on the total number of persons belonging to national minorities is unavailable. According to the Robert Schuman Foundation's 2025 data, the main ethnic groups in Ukraine are Ukrainians (77.8%), Russians (17.3%), Belarusians (0.6%), Moldovans and Crimean Tatars (0.5% each), Bulgarians (0.4%), Hungarians, Romanians and Poles (0.3% each), Jews (0.2%) and representatives of other groups (1.8%).[739] These data raise certain doubts, as public opinion surveys conducted in June 2024 presented a different picture: 95% of respondents identified themselves as Ukrainians, 2% as Russians and 2% as representatives of other minorities. Hence, there is no reliable information on the actual number of national minorities.[740]

The concept of legislation on national minorities (communities) in Ukraine is based on the principle of voluntary self-identification of persons belonging to minorities rather than on the statutory recognition of specific ethnic or linguistic groups.[741] In addition to national minorities, legislation also separately defines the status of indigenous peoples. The key distinction between indigenous peoples and national minorities is that they do not have their own state formations outside Ukraine, while their list (Crimean Tatars, Karaites and Krymchaks) and the territory of their formation (the Crimean Peninsula) are clearly defined by law.[742]

The political rights of national minorities and indigenous peoples are defined in legislation only in general terms — it does not provide for any positive measures[743] aimed at ensuring

739 Country Sheet: Ukraine. Robert Schuman Foundation, updated on July 9th, 2025. ↗

740 The Identity of Ukrainian Citizens: Trends of Change. Razumkov Centre, 2024. ↗

741 A national minority is a stable group of citizens of Ukraine who are not ethnic Ukrainians, reside in the territory of Ukraine within its internationally recognised borders, are united by common ethnic, cultural, historical, linguistic and/or religious characteristics, are aware of their belonging to it and demonstrate a desire to preserve and develop their linguistic, cultural and religious identity. On National Minorities (Communities) of Ukraine: Law of Ukraine No. 2827-IX of 13.12.2022, Article 1. ↗

742 On Indigenous Peoples of Ukraine: Law of Ukraine No. 1616-IX of 01.07.2021, Article 1.↗

743 Framework Convention for the Protection of National Minorities. Council of Europe, 2023. Article 15 ↗; International Convention on the Elimination of All Forms of Racial Discrimination. UN General Assembly Resolution 2106 (XX), 1965. Articles 1 (4), 2 (2). ↗

their political rights, including electoral rights.[744] The EC of Ukraine makes no mention of national minorities or indigenous peoples at all, although before its adoption, the Law of Ukraine 'On Elections of People's Deputies of Ukraine' required[745] to take into account areas of compact residence of national minorities while establishing the SMC boundaries. With the introduction of a proportional electoral system for parliamentary elections, which provides for voting in the SNC and in electoral regions that largely coincide with the boundaries of administrative regions,[746] the need for such consideration ceased to exist altogether.

The procedure for the use of the languages of national minorities and indigenous peoples in campaigning is determined by the Law of Ukraine 'On Ensuring the Functioning of Ukrainian as the State Language'. It provides for the possibility of disseminating materials in these languages, provided that they are duplicated in the state language, while the language of operation of election commissions, election documentation and ballot papers is exclusively the state language.[747] Under this Law, the procedure and conditions for the use of the languages of national minorities and indigenous peoples during election campaigning are to be determined by laws on the procedure for exercising the rights of national minorities and indigenous peoples. The Law of Ukraine 'On Indigenous Peoples of Ukraine'[748] does not define such procedure and conditions, whereas the Law of Ukraine 'On National Minorities (Communities) of Ukraine' allows the dissemination of election campaign materials in the languages of national minorities, duplicated in Ukrainian, only in settlements where persons belonging to national minorities have traditionally resided or where they constitute a majority.[749] The list of such settlements was approved by the Cabinet of Ministers of Ukraine in December 2025.[750]

On 14 May 2025, the Government approved the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine. Under this plan, the Verkhovna Rada, the CEC, the MoJ and the State Service of Ukraine for Ethnopolitics and Freedom of Conscience (DESS) are to develop and adopt, by the end of 2027, a draft law amending electoral legislation to expand opportunities for representatives of national minorities to be elected to Parliament, taking into account the practices of EU Member States and the Council of Europe. By the end of 2025, they are also to develop and adopt a draft law amending legislation on the use of the languages of national minorities during

744 In the Law of Ukraine 'On National Minorities (Communities) of Ukraine', the political rights of national minorities are defined in one article 9 and include the right to participate in elections, to freely elect and be elected to state authorities and local self-government bodies (that is, the same rights guaranteed to any citizen of Ukraine). The Law of Ukraine 'On Indigenous Peoples of Ukraine' declares the state's obligation to promote the representation of indigenous peoples of Ukraine in the Verkhovna Rada of Ukraine, the Verkhovna Rada of the Autonomous Republic of Crimea (ARC) and local self-government bodies of the ARC and the city of Sevastopol but does not specify what such promotion entails (Part 4 Article 2).

745 On Elections of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011, para. 3 Part 2 Article 18. ↗

746 For more details, see the subsections 'Electoral System' and 'Territorial Organisation of Elections'.

747 On Ensuring the Functioning of Ukrainian as the State Language: Law of Ukraine No. 2704-VIII of 25.04.2019, Article 18. ↗

748 On Indigenous Peoples of Ukraine: Law of Ukraine No. 1616-IX of 01.07.2021. ↗

749 On National Minorities (Communities) of Ukraine: Law of Ukraine No. 2827-IX of 13.12.2022, Part 9 Article 10. ↗

750 On Approval of the List of Settlements Where Persons Belonging to National Minorities (Communities) of Ukraine Have Traditionally Resided or Where Such Persons Constitute a Significant Part of the Population: Resolution of the Cabinet of Ministers of Ukraine No. 1682 of 17.12.2025. ↗

election campaigning in national and local elections.[751] The second of these measures was not implemented in 2025.

Progress and issues

Lack of effective mechanisms to ensure the representation of national minorities (communities) and indigenous peoples in elected bodies

Following its observation of national and local elections in Ukraine, the OSCE/ODIHR has repeatedly recommended improving mechanisms to ensure the representation of national minorities — both at the level of Parliament and at the level of local councils. In particular, it has recommended taking into account areas of compact residence of national minorities when determining the boundaries of election constituencies, following consultations with representatives of national minorities and well in advance of the start of the electoral process,[752] ensuring the possibility for independent candidates[753] (that is, candidates nominated through self-nomination) to stand in elections at all levels of local councils and providing in the Law of Ukraine 'On Political Parties in Ukraine' for the possibility of establishing regional political parties.[754]

Although the Law of Ukraine 'On Political Parties in Ukraine' does not provide for the possibility of establishing regional parties or parties of national minorities, such parties exist de facto. For example, the regular local elections of 2020 were contested by the parties 'AU "Cherkashchany"', 'Rivne Together', 'Dnipro Team', 'Kyiv Community', 'Our Home — Odesa', 'Bila Tserkva Together' and others.[755] Parties representing the interests of the Hungarian national minority are also registered in Ukraine — the Democratic Party of Hungarians of Ukraine and the Party of Hungarians of Ukraine. All of them have nationwide status and, in accordance with the Law of Ukraine 'On Political Parties in Ukraine', have established their regional organisations. At the same time, in their programme documents or actual activities, they focus on addressing local issues, representing the interests of national minorities and/or effectively limit their activities to certain regions.[756]

Despite the fact that regional parties exist de facto in Ukraine, the idea of legalising this practice (that is, amending the Law of Ukraine 'On Political Parties in Ukraine' to expressly provide for the possibility of registering regional parties) is viewed critically by experts. The main risks of such legalisation are considered to be: 1) threats of separatism

751 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. Operational Objective 2.4, tasks 1, 2 of the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine, p. 19. ↗

752 OSCE/ODIHR Final Report on the Observation of the Early Elections of People's Deputies of Ukraine in 2019. Recommendation B 23, p. 38. ↗

753 OSCE/ODIHR Final Report on the Observation of the 2015 Local Elections. Recommendation A 6, p. 38. ↗

754 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections. Recommendation B 26, p. 48. ↗

755 Regional parties with nationwide status or 'We ourselves are (not) local'. Civil Network OPORA, 2020. ↗

756 What is Wrong with the 'Party Market'. Civil Network OPORA, 2021 ↗; Dnipro Team — Programme, Candidacy, Statistics, Political Campaigning. PolitHub ↗ ; Programme of the Political Party 'Rivne Together' and Viktor Shakyrzian – Political Party 'Rivne Together' ↗ ; Official website of the Democratic Party of Hungarians of Ukraine. ↗
According to Civil Network OPORA, in the regular local elections of 2020, a significant number of parties were regional projects. 112 political forces (77.8%) nominated their candidates in only five or fewer regions of Ukraine: 73 parties (50.7%) — only in one region, 18 (12.5%) — in two, 10 (6.9%) — in three, 5 (3.5%) — in four and 6 (4.2%) — in five. What is Wrong with the 'Party Market'. Civil Network OPORA, 2021. ↗

and to the integrity of the state,[757] 2) the use of such parties as 'agents of influence' by foreign governments to promote their own interests in Ukraine, 3) lobbying for the interests of local elites contrary to national interests[758] and 4) further destabilisation of the party system.[759] Similar arguments (threats to national security and separatism, the regionalisation of politics and risks of external interference in Ukraine's internal affairs) are also put forward against enshrining in legislation the possibility of registering parties of national minorities.[760]

Given the prevalence in Ukraine of the practice of purchasing parties to secure the participation of certain politicians or representatives of business elites in elections, as well as the relative simplicity of the procedure for their registration (re-registration),[761] the legalisation of regional parties and parties of national minorities is unlikely to have a significant impact on their representation in elected bodies — that is, it would carry far more risks than benefits. Merely the only advantage of ensuring the possibility of registering parties of national minorities in Ukraine's political context could be an opportunity to set lower electoral thresholds for them to increase the chances of their representatives being elected to Parliament and the relevant local councils. However, given the absence of objective criteria for determining affiliation with minorities and/or the expression of their interests, granting this possibility would only increase the risk of parties changing their names and programme documents on a mass scale (to associate themselves with national minorities) or reorganising themselves into 'parties of national minorities' in order to overcome the lower electoral threshold(s) in elections and secure the election to elected bodies of deputies who have no connection whatsoever with minorities or their interests.

Representation of minorities in elected bodies could also be ensured through the statutory recognition of specific minorities (for example, Crimean Tatars, Hungarians, Romanians, Moldovans and others) and the allocation to each of them of a certain number of seats in the Verkhovna Rada, with elections of the relevant representatives of minorities and indigenous peoples held in SMCs. Similar practice exists in a number of EU Member States[762] and is encouraged by the Venice Commission,[763] but its application in Ukraine would face a number of obstacles:

1. Although the introduction of reserved seats in elected bodies is a positive measure (affirmative action) to ensure the representation of minorities/indigenous peoples and is not regarded in international law as a violation of the principle of equality

757 The CVU explained why 'regional parties' may pose a threat to the territorial integrity of the state. UNIAN, 2015. ↗

758 Dmytro Sinchenko. Parties of Regional Elites. Ukrainska Pravda, 2015 ↗; Mariia Karmazina. Regional political regimes in Ukraine: grounds for formation, specific features of functioning, features of transformation. I. F. Kuras Institute of Political and Ethnic Studies of the National Academy of Sciences of Ukraine. Scientific Notes. Issue 1 (93), pp. 49–50. ↗

759 Regional Parties Are a Mistake, Says Expert. DailyLviv.com, 2014. ↗

760 Orban's Agents in Zakarpattia. Hungarian Parties and Organisations in Ukraine. Argument, 2024 ↗; The CVU explained why 'regional parties' may pose a threat to the territorial integrity of the state. UNIAN, 2015. ↗

761 How much does it cost to buy a political party? CHESNO study. CHESNO Movement, 2025 ↗; The spectre of elections. How and who sells political parties in Ukraine. Ukrainska Pravda, 2025. ↗

762 Croatia, Slovenia, Romania.
Croatia. Croatian Parliament. IPU Parline: global data on national parliaments ↗; Minority representatives confirmed in Slovenia's new parliament. EURAC Research, 2026 ↗; Romania. Chamber of Deputies. IPU Parline: global data on national parliaments. ↗

763 Report on electoral rules and affirmative action for national minorities' participation in decision-making process in European countries. Venice Commission, 2025. Paragraph 68, p. 16. ↗

before the law or the principle of equal suffrage,[764] in light of the requirements of the Constitution of Ukraine, it could still be declared unconstitutional by the CCU — not only because of a violation of the principles of equality of citizens before the law and equal suffrage, but also because of the unequal weight of the votes of minorities themselves.[765]

2. The exact number of representatives of each minority (as well as citizens' affiliation with each of them) is unknown, which makes it impossible to determine the number of reserved seats for them.

3. Not all minorities have clearly defined areas of compact residence, which would make it impossible to create separate constituencies for voting for their representatives.

4. The creation of constituencies for the election of representatives of national minorities presupposes that representatives of these national minorities would vote in such constituencies. However, in the absence of clear criteria for identifying such representatives, such voting would create risks of manipulation (for example, through fictitious self-identification as belonging to a particular minority) and/or would make it impossible to determine who exactly has the right to vote in such a constituency.

In view of the application of the proportional electoral system in elections of Members of Parliament of Ukraine, an effective mechanism for ensuring the representation of national minorities and indigenous peoples in Parliament could be to grant the relevant minorities the right to representation in Parliament through a corresponding number of seats (for each of the statutorily recognised minorities) and to allocate part of the annual amount of state funding for political parties to those parties that ensured their election to the Verkhovna Rada.[766] The EC of Ukraine and the Law of Ukraine 'On Political Parties in Ukraine' do not provide for such a mechanism. Nor is it provided for in the draft new version of the Law of Ukraine 'On Political Parties in Ukraine',[767] which is under consideration by the Verkhovna Rada.

Since the Government has approved the list of settlements where persons belonging to national minorities have traditionally resided or where they constitute a majority,[768] the opportunities for ensuring minority representation in local councils are much broader than at the national level. They may include a mandatory requirement, when forming MMCs

764 Framework Convention for the Protection of National Minorities, Article 15 ↗; International Convention on the Elimination of All Forms of Racial Discrimination, Articles 1 (4), 2 (2). ↗

765 For example, if the numerical composition of one minority exceeds that of another minority by one and a half times, the law would have to either reserve one seat in Parliament for each of them or allocate two seats in Parliament to the larger minority — the principle of equality of representatives of minorities would be violated in both cases and the relevant legislative provisions could be declared unconstitutional due to their inconsistency with Article 24 of the Constitution of Ukraine.

766 Recommendations on Ensuring the Electoral Rights of Vulnerable Categories of Voters in the Context of the Recommendations of the European Commission, the Office for Democratic Institutions and Human Rights and the Venice Commission. Civil Network OPORA, 2026. ↗
A similar mechanism is applied to encourage parties to nominate women. For more details, see the subsection 'Electoral Rights of Women'.

767 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗
For more details on this draft law, see the subsection 'Political Parties in Elections. Candidate Nomination and Registration'.

768 On Approval of the List of Settlements Where Persons Belonging to National Minorities (Communities) of Ukraine Have Traditionally Resided or Where Such Persons Constitute a Significant Part of the Population: Resolution of the Cabinet of Ministers of Ukraine No. 1682 of 17.12.2025. ↗

under the majoritarian electoral system and TCs[769] under the proportional system, to take into account the boundaries of such settlements. This would increase the chances of representatives of national minorities (communities) being elected to local councils in such constituencies. Another step towards ensuring the representation of national minorities in local councils whose elections are held under the proportional system with open lists could be to provide in the EC of Ukraine for the possibility of self-nomination of lists of candidates under this system.[770] The current version of the EC of Ukraine provides neither for self-nomination of candidates under the proportional system in local elections nor for taking into account areas of compact residence of national minorities when forming MMCs and TCs.

Lack of effective guarantees for national minorities and indigenous peoples to use their languages in electoral processes

In one of its opinions on previous amendments to Ukrainian electoral legislation in 2013, the Venice Commission recommended ensuring that official electoral information is available in the languages of national minorities in areas where such languages are widely used, irrespective of whether a party or candidate has requested that such information be published in the relevant languages.[771] Following its observation of national and local elections in 2015 and 2020, the OSCE/ODIHR recommended allowing national minorities to receive official information on elections and election materials in their national languages[772] and providing for the printing of ballot papers in the languages of national minorities.[773]

The possibility of producing campaign materials in the languages of national minorities is not provided for in the EC of Ukraine but is ensured by the Law of Ukraine 'On Ensuring the Functioning of Ukrainian as the State Language', which allows the dissemination of campaign materials in minority languages, provided that they are duplicated in the state language.[774] By contrast, the production of election documentation and ballot papers in the languages of national minorities and indigenous peoples is expressly prohibited by law — they are produced exclusively in the state language.[775]

Ukraine officially recognises the following languages of national minorities: Belarusian, Bulgarian, Gagauz, Hebrew, Yiddish, Karaim, Crimean Tatar, Krymchak, German, Modern Greek, Polish, Romani, Rumeika, Romanian, Slovak, Hungarian, Urum and Czech.[776]

Implementation of the Venice Commission and OSCE/ODIHR recommendations on the translation of campaign materials, election documents (including ballot papers,

769 For more details on the procedure for forming territorial and multi-mandate election constituencies in local elections, see the subsection 'Territorial Organisation of Elections'.

770 For more details, see the subsection 'Electoral System'.

771 Joint Opinion on the Draft Amendments to Legislation on Election of Peoples' Deputies of Ukraine. Venice Commision and OSCE/ODIHR, 2013. Paragraph 56. ↗

772 OSCE/ODIHR Final Report on the Observation of the 2020 Local Elections. Recommendation B 25, p. 48. ↗

773 OSCE/ODIHR Final Report on the Observation of the 2015 Local Elections. Recommendation B 22, p. 40. ↗

774 On Ensuring the Functioning of Ukrainian as the State Language: Law of Ukraine No. 2704-VIII of 25.04.2019, Article 18. ↗

775 Ibid.

776 On Amendments to Certain Laws of Ukraine in Connection with the Update of the Official Translation of the European Charter for Regional or Minority Languages: Law of Ukraine No. 4699-IX of 03.12.2025. ↗

vote count protocols, etc.) and official election-related materials (information posters, leaflets, explanations regarding liability for violations of electoral legislation, etc.) is entirely possible, provided that several preconditions are met, including:

- allocation from the State Budget of funds for the CEC to carry out official translations of election-related information documents (information posters, leaflets and explanations of electoral procedures), ballot papers and other documentation into officially recognised languages; imposing on the CEC the obligation to ensure that such official translations are carried out within the timeframe established by the EC of Ukraine and published on the CEC website, with QR codes[777] leading to the relevant translations on the CEC website included in information posters produced in Ukrainian for election precincts within settlements where persons belonging to national minorities have traditionally resided or where they constitute a majority — where such minorities use languages officially recognised by Ukraine;[778]
- retaining the requirement that all campaign materials produced using the languages of national minorities and indigenous peoples (including those not officially recognised) be duplicated in Ukrainian — if such materials are produced exclusively in the languages of national minorities, it will be practically impossible to verify whether the information contained in them complies with the requirements of the EC of Ukraine and other laws: neither judges nor members of election commissions responsible for overseeing compliance with electoral legislation can objectively be expected to know all the languages of national minorities used in Ukraine;
- producing ballot papers and vote count protocols in minority languages officially recognised by Ukraine (with the information simultaneously duplicated in the state language) for precincts in settlements where such languages are used by minorities that have traditionally resided in such settlements or constitute a majority there, with their text simultaneously duplicated in the state language (rather than using two separate monolingual ballot papers or vote count protocols at the precinct at the same time).[779]

As of 31 July 2026, no draft law had been registered in the Verkhovna Rada that would regulate the procedure for the use of the languages of national minorities and indigenous peoples in electoral processes.

Recommendations

1. Define in the Law of Ukraine 'On National Minorities (Communities) of Ukraine' the list of minorities whose right to representation in the Verkhovna Rada is recognised by Ukraine and, after determining the numerical composition of such minorities, the

777 This approach was also proposed by the CEC to ensure the electoral rights of persons with disabilities. For more details, see the subsection 'Electoral rights of persons with disabilities'.

778 Producing posters and leaflets for the relevant precincts in two languages (the state language and the relevant language of a national minority) would be problematic given the potentially limited space in polling premises, which may preclude the placement of information posters in the premises in a manner that would allow voters to properly familiarise themselves with them (font size, distance from the voter, etc.).

779 Producing several types of ballot papers for one precinct would create a number of problems: (1) the need to record each type in acts, protocols and other documentation, (2) the separate counting of votes for each type of ballot paper and (3) the separate recording of their numbers in vote count protocols. The use of different ballot papers prepared in different languages would also increase the cost of their production and the risk of violating the secrecy of voting, for example, at small precincts where ballot papers in the languages of national minorities may be used by only a small proportion of voters.

recommended (target) quota for such representation; provide for a representation quota in the Verkhovna Rada for each of the three indigenous peoples defined by the Law of Ukraine 'On Indigenous Peoples of Ukraine'.

2. Amend the Law of Ukraine 'On Political Parties in Ukraine' and provide in Draft Law No. 14289 for the allocation of part of the total annual state funding for political parties (for example, 0.5–1%) to those parties from which representatives of national minorities were elected, where such minorities are underrepresented according to the recommended (target) quota for representation of the relevant minority in Parliament; amend the EC of Ukraine to define the criteria under which a candidate on a list would be considered a representative of a national minority (community).
3. Provide in the EC of Ukraine for the mandatory consideration of areas of compact residence of national minorities (settlements where minorities have traditionally resided or constitute a majority) when forming MMCs and TCs in elections to local councils.
4. Provide in the EC of Ukraine for the possibility of self-nomination of candidates in elections to local councils held under the proportional electoral system.
5. Within the framework of the Working Group on the preparation of comprehensive legislative proposals on the specific features of the procedure for organising and holding elections during a special period and/or post-war elections in Ukraine, hold discussions on further areas and mechanisms for ensuring the electoral rights of national minorities (communities) and indigenous peoples of Ukraine.
6. Define in the EC of Ukraine the list of election-related materials (which should include information posters and leaflets transferred to PECs and other materials defined by the CEC) whose translation into minority languages officially recognised by Ukraine is to be ensured by the Central Election Commission; ensure proper and timely funding of such translations from the State Budget; provide for their publication on the CEC website and the inclusion of QR codes linking to such translations in the Ukrainian versions of such materials to be transferred to PECs in settlements where minorities using the relevant translation language have traditionally resided or constitute a majority.
7. Provide in the EC of Ukraine and the Law of Ukraine 'On Ensuring the Functioning of Ukrainian as the State Language' for the production of bilingual ballot papers and vote count protocol forms (in the state language and duplicated in one of the officially recognised languages of national minorities) for PECs in settlements where minorities using the relevant ballot paper language have traditionally resided or constitute a majority.

Election Campaigning, Countering Cyberattacks and Disinformation

Election Campaigning and Political Advertising: State of Play and Paths for Harmonisation with EU Acquis

State of play

The legal regulation of election campaigning and political advertising has a long history; however, as twenty years ago, it remains oriented towards traditional forms of media — television, radio and the press. Such regulation covered general requirements for campaigning, as well as specific requirements for campaigning in these types of media. Since the Revolution of Dignity, media legislation has gradually evolved: several amendments were introduced to the Law of Ukraine 'On Television and Radio Broadcasting',[780] the Law of Ukraine 'On Public Television and Radio Broadcasting'[781] was adopted, and reform of the municipal print media was implemented.[782] With the adoption of the Law of Ukraine 'On Media',[783] which aimed to harmonise[784] legislation with the EU Audiovisual Media Services Directive[785] and to establish unified rules for different types of media, the system of media and media regulation was reformed, which, in the electoral context, was also in line with OSCE/ODIHR recommendations.[786] These changes were also intended to affect electoral legislation; however, due to political disagreements,[787] the package of amendments to the EC of Ukraine was removed from the Draft Law of

780 On Television and Radio Broadcasting: Law of Ukraine No. 3759-XII of 21.12.1993. ↗

781 On Public Media of Ukraine: Law of Ukraine No. 1227-VII of 17.04.2014. ↗

782 On Reform of State and Municipal Printed Media: Law of Ukraine No. 917-VIII of 24.12.2015. ↗

783 On Media: Law of Ukraine No. 2849-IX of 13.12.2022. ↗

784 Association Agreement between Ukraine, of the one part, and the European Union, the European Atomic Energy Community and their Member States, of the other part, of 24.12.2015 No. 917-VIII. Chapter 15 'Audiovisual Policy'. ↗

785 Directive 2010/13/EU of the European Parliament and of the Council of 10.03.2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive). ↗

786 Final Report of the OSCE/ODIHR Election Observation Mission on the early parliamentary elections of 21 July 2019. Recommendation 22. ↗

787 Statement by MP M. Poturaiev, 17:06:08. Verbatim record of the Verkhovna Rada of Ukraine session of 13.12.2022. ↗

Ukraine 'On Media'.[788] These amendments were subsequently registered as a separate Draft Law No. 8310,[789] which has been under consideration in Parliament since 2022 but has not been adopted.

The 2019 EC of Ukraine regulates exclusively election campaigning,[790] as the concept of political advertising was removed following the adoption of Law No. 3136-IX, which amended the Law of Ukraine 'On Media' and the Law of Ukraine 'On Advertising' in 2023.[791] The Code uses outdated media-related terminology: it provides only for traditional types of media and does not regulate the online environment (including social networks). It also does not incorporate the EU legislative framework[792] regarding the definition of political advertising.

The conclusions and recommendations of the Venice Commission and the OSCE/ODIHR on elections since 2015 have been partially implemented at the level of media legislation, in particular with regard to municipal media.[793]

At the same time, several recommendations remain unimplemented: the OSCE/ODIHR recommended removing restrictions on commenting on campaign materials within 20 minutes,[794] ensuring the institutional and financial independence of the media regulator[795] and the public service broadcaster,[796] as well as ensuring financial reporting on advertising in social networks.[797]

Internet penetration in Ukraine stands at 89.6%.[798] There are 23 million social media users.[799] News consumption is predominantly online, with 37% of users consuming news exclusively via social media. Smartphones are the leading device, with 91% of respondents

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788 On Media: Draft Law of Ukraine No. 2693-d of 02.07.2020. ↗

789 On Amendments to the Electoral Code of Ukraine on Improving the Regulation of Information Support of Elections and Election Campaigning: Draft Law of Ukraine, registration No. 8310 of 27.12.2022. ↗

790 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Section VIII. ↗

791 On Amendments to the Law of Ukraine 'On Advertising' and Other Laws of Ukraine on the Implementation of Certain Provisions of European Union Legislation into National Legislation of Ukraine in the Field of Audiovisual Advertising (European Convention on Transfrontier Television, Directive 2010/13/EU of the European Parliament and of the Council of 10.03.2010 on Audiovisual Media Services, as amended by Directive (EU) 2018/1808 of 14.11.2018): Law of Ukraine No. 3136-IX of 30.05.2023. ↗

792 Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising. ↗

793 In 2015–2018, a reform of printed media established by state authorities and local self-government bodies was carried out. Final Report of the OSCE/ODIHR Election Observation Mission on the local elections of 25 October and 15 November 2015. Recommendation 19. ↗

794 Provide any information regarding the relevant candidate or party (organisation of a party) within 20 minutes before and after the television or radio broadcast of the candidate's or party's (organisation of a party) election campaigning programme.
Joint Opinion of the Venice Commission and the OSCE/ODIHR on draft amendments to the laws on the election of people's deputies of Ukraine, on the Central Election Commission and the draft law on repeat elections, CDL-AD(2013)016, Recommendation 71 ↗; Opinion of the Venice Commission on draft amendments to the legislation on the election of people's deputies of Ukraine, CDL-AD(2013)026, Recommendation 52. ↗

795 National Council of Ukraine on Television and Radio Broadcasting. Final Report of the OSCE/ODIHR Election Observation Mission on the early parliamentary elections of 21.07.2019. Recommendation 22. ↗

796 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections. Recommendation 29. ↗

797 Ibid, Recommendation 30.

798 Data are calculated based on the total population according to UN data — 39.3 million.

799 Global Digital Report: Ukraine. ↗

using them to access news. Over the past decade, television news consumption has declined from 85% to 33%, radio from 35% to 13% and print media from 31% to 4%.[800] A total of 72% of users consume news via Telegram, exceeding by 12% the combined news consumption on YouTube, X and Meta platforms.

Since the EC of Ukraine regulates only traditional media and does not provide for the regulation of online media and online platforms, it does not reflect the above-mentioned changes in media consumption. This creates a problem of unequal conditions for different actors, as some are subject to regulation while others are not. It also creates risks of disinformation spreading in the online environment. As a result, the EC of Ukraine is unable to ensure elections conducted in accordance with the principles of fair competition among electoral stakeholders and the free formation of voters' will.

Changes in the structure of media consumption confirm that the current electoral legislation does not reflect the state of the media market and is not prepared for the conduct of post-war elections.

The course of the Russian-Ukrainian war, ongoing since February 2014, and the full-scale invasion since 24 February 2022 do not allow for predicting its possible end; however, the holding of elections is a test of the country's democracy and its ability to return to post-war life. In 2022, the CEC analysed[801] the challenges of future elections and concluded that electoral legislation requires amendments. Over four years of the full-scale Russian invasion of Ukraine, the context for regulating political advertising has changed fundamentally due to new trends in media consumption in Ukraine and the limited effectiveness of the application of the new EU regulation on political advertising. Following the adoption of the Regulation on the transparency of political advertising, major technology companies — Google and Meta — have refused to place political advertising in the EU.[802]

The FDI Roadmap contains a number of measures aimed at improving the regulation of media activities during election campaigns.[803] In particular, by the fourth quarter of 2026 it is planned to adopt legislation to designate the National Council of Ukraine on Television and Radio Broadcasting as the single regulator for all types of media in the electoral process; to extend the rules on offline campaigning to online campaigning (political advertising, content restrictions, financing from electoral funds of electoral stakeholders, labelling); and to regulate campaigning in non-linear audiovisual media (online cinemas, OTT services, etc.) in accordance with EU legislation. It is also planned to adopt a law strengthening the guarantees of institutional capacity of the media regulator and ensuring its adequate funding. By the fourth quarter of 2027, it is envisaged to streamline the rules on political advertising to eliminate existing inconsistencies between different laws and ensure overall transparency.

800 Ukrainian Media: News Consumption and Trust in 2025. Internews-Ukraine, 2025. ↗

801 On Proposals for Improving the Legislation of Ukraine Aimed at Ensuring the Preparation and Conduct of Elections after the Termination or Lifting of Martial Law in Ukraine: Resolution of the Central Election Commission No. 102 of 27.09.2022. ↗

802 An update on political advertising in the European Union. 14.11.2024. ↗

803 Roadmap on the Functioning of Democratic Institutions. Section II.B. ↗

The Ukraine Facility Plan[804] for 2024–2027 notes that Ukraine intends to implement the Digital Services Act (DSA) and the Digital Markets Act (DMA). In addition, pursuant to Resolution of the Cabinet of Ministers No. 438,[805] it is planned by January 2028 to adopt legislation transposing the main provisions of Regulation (EU) 2022/2065 and Regulation (EU) 2022/1925.[806]

On 7 January 2026, the Central Election Commission adopted a Resolution on the specific features of organising the first post-war elections.[807] The Resolution notes that the challenges facing the state are unprecedented, due to the migration of Ukrainian citizens abroad. The CEC proposes the adoption of a *lex specialis*, annexed to the Resolution, for the conduct of the first post-war elections, which defines procedures for preparation prior to the start of the electoral process, specific features of information support for national elections, specific features of the exercise of electoral rights by Ukrainian citizens abroad and provisions on the specific features of election campaigning in the territory of a foreign state.

Progress and issues

In December 2025, the Chairman of the Verkhovna Rada (Chairman, Chairman of the Verkhovna Rada, Chairman of the Parliament) signed an order establishing a Working Group to prepare a draft law on elections under martial law. The working group commenced its activities in January 2026[808]. At the same time, seven thematic subgroups were established,[809] one of which focused on *information support for elections, information security and election campaigning*. The working group is expected to strike a balance between the formal refinement of Draft Law No. 8310 and the implementation of the provisions of Regulation (EU) 2024/900[810] on the transparency of political advertising. In this context, the Committee of the Verkhovna Rada on Ukraine's Integration into the European Union (Committee on EU Integration) issued an opinion on the draft law,[811]

804 Ukraine Facility Programme of the European Union. ↗

805 On Approval of the National Programme for the Approximation of the Legislation of Ukraine to the EU acquis: Resolution of the Cabinet of Ministers of Ukraine No. 438 of 01.01.2026. ↗

806 Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) ↗; Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act). ↗

807 On Proposals for Legislative Regulation of the Specific Features of Organising and Holding Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

808 A working group is being formed in the Verkhovna Rada to address the issue of holding presidential elections during martial law — David Arakhamia. Suspilne News, 2025 ↗; The law on elections during wartime will be applied once — Ruslan Stefanchuk. Suspilne News, 2025. ↗

809 Subgroups have been established in the Verkhovna Rada to prepare electoral legislation. Suspilne News, 2026 ↗; Constitutional and legal limits of organising elections in a special or post-war period: meeting of the Working Group held. Verkhovna Rada of Ukraine, 2026. ↗

810 Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising. ↗

811 On Amendments to the Electoral Code of Ukraine on Improving the Regulation of Information Support of Elections and Election Campaigning: Opinion (European integration expertise) on the Draft Law of Ukraine No. 8310 of 27.12.2022. ↗

emphasising the need to incorporate the provisions of Regulation (EU) 2024/900[812] and Regulation (EU) 2022/2065 on digital services in Draft Law No. 8310.

Inconsistency between the Electoral Code of Ukraine and media legislation

During the preparation of the Law 'On Media', its final and transitional provisions envisaged amendments to the EC of Ukraine and the Law of Ukraine 'On the All-Ukrainian Referendum' concerning changes to terminology, information support and election campaigning. However, the final version of the adopted Law of Ukraine 'On Media' provided for only one of these amendments to the EC of Ukraine, namely that *media service providers are not liable for the content of election campaigning*. The remaining amendments envisaged in the initial version of the Law of Ukraine 'On Media' were not reflected in the EC of Ukraine in the version adopted by Parliament. At the same time, the Law of Ukraine 'On the All-Ukrainian Referendum'[813] provides for more advanced regulation: it establishes rules for conducting election campaigning using various forms (setting up tents, holding meetings, placing outdoor advertising, etc.), as well as in the media. It also contains rules for placing campaign materials in linear audiovisual media (Article 98), in print media (Article 99), in online media and non-linear audiovisual media (Article 99[1]), as well as restrictions on campaigning (Article 100). Thus, unlike the EC of Ukraine, this law regulates campaigning across most modern media services.

The EC of Ukraine[814] still regulates the general procedure for the use of mass media (Article 54), the procedure for the use of electronic (audiovisual) mass media (Article 55) and the procedure for the use of print mass media (Article 56). However, its terminology and scope of regulation (in particular, the absence of provisions governing campaigning in online media and online platforms) are not aligned with the Law of Ukraine 'On the All-Ukrainian Referendum' and the Law of Ukraine 'On Media'. This inconsistency and the lack of regulation may in practice result in the impossibility of placing election campaign materials, as well as in the inability of the media regulator to effectively oversee their placement.

Inconsistencies in the definition of media sector actors

In regulating election campaigning, the EC of Ukraine relies on the conceptual framework of laws that governed different types of mass media prior to 2023, but which have since been repealed.[815] The Law of Ukraine 'On Media', adopted in December 2022, fundamentally changed the approach to the understanding of media, their types and the actors producing them. Print media replaced the concept of printed means of mass information (MMI). Audiovisual (electronic) MMI were replaced by the concepts of radio broadcasting (linear audio media service), television broadcasting (linear audiovisual media service), as well as on-demand audio media services (non-linear audio media service) and on-demand audiovisual media services (non-linear audiovisual media service). In

812 Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising (Text with EEA relevance). ↗

813 On the All-Ukrainian Referendum: Law of Ukraine No. 1135-IX of 26.01.2021, Section IX, Articles 94–100. ↗

814 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Section VIII. ↗

815 On Television and Radio Broadcasting: Law of Ukraine No. 3759-XII of 21.12.1993 (ceased to have effect on 31.03.2023) ↗; On Printed Mass Media (Press) in Ukraine: Law of Ukraine No. 2782-XII of 16.11.1992 (ceased to have effect on 31.03.2023) ↗ ; On Information Agencies: Law of Ukraine No. 74/95-VR of 28.02.1995 (ceased to have effect on 31.03.2023). ↗

addition, the concepts of online media, video-sharing platforms[816] and information-sharing platforms were introduced.[817] The EC of Ukraine has not been aligned with the Law of Ukraine 'On Media', and these changes have not been reflected in it.

The application of the provisions of the EC of Ukraine to the new media ecosystem is theoretically possible, as the Law of Ukraine 'On Media' equates the former concept of 'mass media' with 'media' (para. 30 Part 1 Article 1) to align legislation, in particular codes, with the provisions of the law. This is why the definition of media includes a reference to mass media. However, such application would require clarifications from the National Council and the CEC and does not resolve the problem of the absence of regulation of non-linear audio and audiovisual media, online media and online platforms.[818]

As of 31 July 2026, the Subgroup on Information Support for Elections, Information Security and Election Campaigning agreed that the provisions of Draft Law No. 8310 would serve as the basis for improving the EC of Ukraine with regard to the rules governing the dissemination of election campaigning in online media and non-linear audiovisual media. However, several issues remain under discussion, in particular the feasibility and appropriateness of implementing EU legal acts at this stage in national legislation, including the introduction of the concept of political advertising and the regulation of online platforms.

Absence of a clear definition of political advertising and uncertainty as to its relationship with election campaigning

The concept of election campaigning in the EC of Ukraine encompasses various forms of activity (such as rallies, meetings, concerts, etc.) aimed at encouraging voters to vote for or against a particular subject of the electoral process (a political party, a local party organisation, or a candidate in the relevant national or local elections).[819] One of the forms of election campaigning used to be *political advertising*, which was disseminated through print and audiovisual (electronic) mass media.[820] Political advertising was regulated simultaneously by electoral and advertising legislation. The Law of Ukraine 'On Advertising'[821] established advertising quotas (including for political advertising), while the election laws in force prior to the adoption of the EC of Ukraine contained a definition of political advertising. In particular, the Law of Ukraine 'On the Election of People's Deputies of Ukraine'[822] defined political advertising as the placement or dissemination of election campaign materials using advertising means. At the same time, the concept of advertising means was not defined in legislation. In practice, political advertising functioned as a form of campaigning in the format of short advertising clips lasting 30–60 seconds.[823] On 31 March 2023, the Law of Ukraine 'On Media' entered into force. It removed the definition

816 Platforms within the jurisdiction of Ukraine analogous to YouTube, Vimeo and TikTok.

817 Social networks.

818 Working Group on the Preparation of Legislative Proposals on Elections in a Special or Post-War Period. Rada TV Channel, YouTube, 2026. ↗

819 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 51. ↗

820 Under the current legislation, these are printed media, audio media and audiovisual media.

821 On Advertising: Law of Ukraine No. 270/96-VR of 03.07.1996. ↗

822 On the Election of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011. ↗

823 Compilation of political advertising during the 2006 elections by the OPORA Civil Network on the social network Facebook. ↗

of political advertising and excluded election campaigning from the scope of the Law of Ukraine 'On Advertising'.[824] As a result, despite being mentioned among the forms of campaigning, the definition and regulation of political advertising have since been entirely absent from legislation. The absence of a legal definition of political advertising creates legal uncertainty as to the distinction between such advertising and commercial advertising, as well as the applicable requirements for its labelling and dissemination.

Under Regulation (EU) 2024/900,[825] political *advertising is defined as advertising by, on behalf of, or at the direction of a political actor*. It is not limited to the electoral period (the election process period) and constitutes a broader concept compared to the traditional understanding of political advertising in Ukrainian legislation. Aligning Ukrainian legislation with this Regulation will require substantial amendments to the Law of Ukraine 'On Advertising', which sets out the principles of advertising activity in Ukraine and regulates relations arising in the production, dissemination and consumption of advertising,[826] as well as to the EC of Ukraine.

One of the key observations[827] of the Committee on Integration of Ukraine into the European Union regarding Draft Law No. 8310 is its inconsistency with EU legislation, in particular as regards the comprehensive legal regulation of political advertising, the proper regulation and strengthening of tools for monitoring the dissemination of political advertising in the online environment, including through very large online platforms and ensuring transparency of political advertising and rules on targeting, including the prohibition of the use of sensitive personal data. In addition, the Committee on Integration of Ukraine into the European Union emphasised the need to distinguish between election campaigning and the expression of opinion, which constitutes a form of exercising the right to freedom of expression and should not be classified as political advertising.

However, despite the Committee's recommendations, no political decision has yet been taken within the framework of the Working Group regarding the introduction into the EC of Ukraine of the concept of political advertising in line with the acquis communautaire.[828]

Inadequate funding of the regulator

The situation of the media regulator and its financing remains under constant scrutiny by the European Commission. In its 2025 Report on Ukraine,[829] the European Commission notes that additional legal safeguards for the independence of the regulator must be introduced, and that adequate financial and human resources must be ensured. These observations logically build on earlier recommendations by the OSCE/ODIHR, which emphasised the need to guarantee the independence of the National Council, including

824 On Advertising: Law of Ukraine No. 270/96-VR of 03.07.1996, Article 2. ↗

825 Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising. ↗

826 On Advertising: Law of Ukraine No. 270/96-VR of 03.07.1996. ↗

827 On Amendments to the Electoral Code of Ukraine on Improving the Regulation of Information Support of Elections and Election Campaigning: Opinion (European integration expertise) on the Draft Law of Ukraine No. 8310 of 27.12.2022. ↗

828 Analytical update on Ukraine's progress in implementing the indicators of the Roadmap on the Functioning of Democratic Institutions based on the work of thematic subgroups on preparing the legislative framework for the first post-war elections. OPORA Civil Network, 2026. ↗

829 Ukraine 2025 Report. Communication on EU enlargement policy. ↗

both institutional and financial independence.[830] The Law of Ukraine 'On Media' provides for guarantees[831] of funding for the National Council through a separate budget line in the State Budget. However, in practice, the application of Article 89 of the Law of Ukraine 'On Media', insofar as it concerns state provision of adequate funding for the National Council, is suspended each year by the Law of Ukraine 'On the State Budget', including the most recent Law of Ukraine 'On the State Budget for 2026'.[832] This problem stems from the provisions of the Budget Code of Ukraine, which establishes the principle of budget balance, effectively undermining such guarantees.[833] Resolving this issue is a matter of political decision-making, and the situation currently remains unchanged.

Lack of regulation of information-sharing platforms (social networks)

The main challenge in aligning Ukrainian legislation with the EU acquis lies in the fact that the European Union itself does not provide instruments for the transitional period — from the granting of candidate status to full EU membership. At present, the EU does not require[834] Ukraine to implement Regulation (EU) 2022/2065, as its mechanisms are not accessible to non-EU states.

In 2024, Draft Law No. 11115 on the regulation of information-sharing platforms through which mass information is disseminated was registered in the Verkhovna Rada of Ukraine.[835] The introduction of this draft law responds to the current situation with online platforms, particularly Telegram, which serves not only as a leading source of news but also as a channel for disinformation and the recruitment[836] of minors.

Draft Law No. 11115 proposes to impose obligations on platform providers to ensure the presence of a representative in Ukraine, disclose their ownership structure and sources of financing, and, in cases of non-compliance or lack of transparency, to prohibit state authorities and local self-government bodies from using such platforms. It also proposes to grant the media regulator powers over these platforms, including the authority to require the restriction of the dissemination within Ukraine of programmes and/or user-generated content, including user-generated video, that violates provisions concerning restrictions

830 Final Report of the OSCE/ODIHR Election Observation Mission on the early parliamentary elections of 21.07.2019. Recommendation 22. ↗

831 Article 89 of the Law of Ukraine 'On Media' (No. 2849-IX of 13.12.2022) provides that the state ensures adequate funding of the National Council, which guarantees its independence. Funding is provided as a separate line in the State Budget of Ukraine and amounts to no less than 0.022 per cent of the revenues of the general fund of the State Budget of Ukraine for the previous year. ↗

832 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, Part 3 of the Final Provisions. ↗

833 Paragraph 2 Part 1 Article 17 of the Budget Code of Ukraine (No. 2456-VI of 08.07.2010) establishes the principle of balance, according to which budget expenditure powers must correspond to the volume of budget revenues for the relevant budget period. ↗

834 Within the framework of a TAIEX (Technical Assistance Information Exchange) workshop Ukraine was advised not to proceed with full implementation of the DSA due to the risk of legal inconsistencies, despite the need for significant preparatory work on establishing a national digital coordinator and ensuring its capacity.
Information provided by Respondent No. 46 during an interview conducted on 05.04.2026.

835 On Amendments to Certain Laws of Ukraine on Regulating the Activities of Information-Sharing Platforms through which mass information is disseminated: Draft Law of Ukraine, registration No. 11115 of 25.03.2024. ↗

836 'It's not worth it — you'll either end up in prison or be blown up': Ukrainian teenagers recruited for sabotage against their own country. BBC Ukraine, 2025. ↗

on the dissemination of information that poses a threat to the state, a threat to minors, and specific requirements applicable during martial law.[837]

On 25 March 2026, the Committee of the Verkhovna Rada on Humanitarian and Information Policy recommended the adoption of the draft law at first reading.[838] The draft aims to introduce regulation of information-sharing platforms, which is currently absent and to establish mechanisms for interaction between the regulator and online platforms.

The Law of Ukraine 'On Media' and the Law of Ukraine 'On the All-Ukrainian Referendum' grant the National Council powers to conclude agreements and memoranda of cooperation with foreign legal entities — providers of information-sharing platforms. This form of cooperation allows for ensuring compliance with requirements and restrictions concerning information disseminated on such platforms, cooperation in countering disinformation and ensuring transparency of campaigning.[839] However, since the entry into force of the Law of Ukraine 'On Media', such cooperation with online platform providers has not been formalised through agreements or memoranda.[840]

The main challenge of Draft Law No. 11115 is the lack of jurisdiction of Ukraine, that is, the absence of effective control over companies such as Alphabet, Meta, ByteDance and especially Telegram. The requirements proposed to amend the Law of Ukraine 'On Media' regarding online platforms are unlikely to be enforceable in practice, as the only effective regulatory tool would be the complete blocking of such platforms, which may provoke social tensions.[841] Moreover, the adoption of the Regulation on the transparency of political advertising has already had practical implications:[842] in November 2024, Google announced that it would cease political advertising from October 2025 due to legal uncertainties and operational challenges, and in July 2025 a similar statement was made by Meta.[843] TikTok's position on political advertising remains independent of the Regulation; as early as 2019,[844] TikTok announced that paid political advertising would not be permitted on the platform.

As of 31 July 2026, Draft Law No. 11115 had not been adopted even at first reading. Accordingly, the problem of the absence of legislative regulation of information-sharing platforms remains unresolved.

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837 On Media: Law of Ukraine No. 2849-IX of 13.12.2022, Articles 36, 42, 119. ↗

838 Transcript of the meeting of the Committee of the Verkhovna Rada of Ukraine on Humanitarian and Information Policy of 25.03.2026. ↗

839 On the All-Ukrainian Referendum: Law of Ukraine No. 1135-IX of 26.01.2021, Article 89 ↗; On Media: Law of Ukraine No. 2849-IX of 13.12.2022, Article 90. ↗

840 Information provided by Respondent No. 46 during an interview conducted on 05.04.2026.

841 Seventy-six per cent of respondents oppose the complete blocking of Telegram in Ukraine. Attitudes of Ukrainians towards blocking Telegram. Rating Group, 2026. ↗

842 An update on political advertising in the European Union. Google will stop serving political advertising in the EU ahead of new regulation in October 2025. Google, 2024. ↗

843 Ending Political, Electoral and Social Issue Advertising in the EU in Response to Incoming European Regulation. Meta, 2025. ↗

844 Understanding our policies around paid ads. TikTok, 2019. ↗

Inability to lawfully pay for political advertising on online platforms and the lack of transparency in political advertising

A separate issue concerns the transparency of political advertising and the ability to pay for it lawfully. During the 2019 election campaign, electoral subjects were unable to pay directly for campaign advertising on Facebook to the service provider, as Meta is not established in Ukraine and the law does not allow payments from an election fund to non-residents or via payment systems such as Visa or Mastercard. As a result, electoral subjects relied on various intermediary arrangements to place such advertising.[845] On 1 April 2026, a first step towards addressing this issue was taken: amendments to legislation on accounting and financial reporting entered into force,[846] introducing an invoice-based standard. This significantly facilitates cooperation with platforms, which do not operate under the post-Soviet 'invoice–acceptance act' system. However, enabling payments from election funds to non-resident platforms for political advertising will still require further legislative amendments.

Impossibility of publishing price lists for election campaign advertising

The current version of the EC of Ukraine provides that the right to place election campaign materials is granted only subject to the prior publication of the price of one minute (second) of airtime or of print space. MMI outlets were required to publish such price lists in the newspapers Holos Ukrainy and Uriadovyi Kurier, while regional and local outlets were to publish them in the relevant print media.[847]

Following the adoption of the Law of Ukraine 'On Media', a direct prohibition was introduced on the ownership of media by state authorities, local self-government bodies and legal entities established by them. A number of exceptions to this prohibition were provided for, allowing such media to exist where explicitly provided for by law, including in the field of foreign broadcasting.[848] Former print MMI established by state authorities and local self-government bodies were required to transform into official print publications,[849] which are not newspapers and do not employ journalists. As a result, neither Holos Ukrainy nor Uriadovyi Kurier is included[850] in the register of media entities and cannot be registered as print media, although both continue to operate in an undefined legal status,[851] positioning themselves simultaneously as newspapers and as official publications.

Without legislative amendments, the placement of campaign materials in print, audio and audiovisual media will become impossible.

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845 How to pay for social media advertising from an election fund and how to report it. CHESNO Movement, 2020. ↗

846 On Amendments to Article 9 of the Law of Ukraine 'On Accounting and Financial Reporting in Ukraine' on Simplifying the Preparation of Primary Documents for the Provision of Services: Law of Ukraine No. 4791-IX of 24.02.2026. ↗

847 Articles 55 and 56 of the Electoral Code of Ukraine (No. 396-IX of 19.12.2019) expressly prohibit the placement of campaign materials where pricing rates have not been published. ↗

848 Foreign broadcasting is regulated by a specific law. On the System of Foreign Broadcasting of Ukraine: Law of Ukraine No. 856-VIII of 08.12.2015. ↗

849 The activities of official publications are regulated by Article 15^1 of the Law of Ukraine 'On Access to Public Information' (No. 2939-VI of 13.01.2011). ↗

850 List of entities in the media sector as of 01.06.2026. ↗

851 About 'Uryadovyi Kurier'. ↗ ; 'Holos Ukrainy' newspaper — official printed publication. ↗

Incompatibility of the prohibition on commenting and evaluating election programmes with democratic standards on freedom of expression

Article 57 of the EC of Ukraine prohibits MMI outlets, their officials and employees, as well as creative staff, during the election process, from using materials or broadcasts not covered by agreements on the placement of campaigning/political advertising to campaign for or against candidates or parties (party organisations), to evaluate their election programmes, or to give them any form of preferential treatment. Article 55 further prohibits commenting on or evaluating the content of election campaign programmes or providing any information about the relevant candidate or party (party organisation), for 20 minutes before and after the broadcast of a candidate's or party's election campaign programme on television or radio.

These provisions of the EC of Ukraine have repeatedly been subject to negative assessment by the OSCE/ODIHR, both in terms of editorial independence of public service broadcasting and as excessive restrictions affecting broadcasters' freedom of expression. They also contradict the Law of Ukraine 'On Media', which defines the objectives of state policy in the media sphere as *ensuring the accuracy and balance of information and guaranteeing free and open discussion of matters of public importance*.[852]

Recommendations

1. Introduce comprehensive and consistent amendments to the EC of Ukraine, the Law of Ukraine 'On Advertising' and the Law of Ukraine 'On Media' to establish a coherent framework for regulating election campaigning and harmonise the conceptual framework relating to media services.
2. Launch a comprehensive revision of existing legislation on the regulation of political advertising in line with the model set out in Regulation (EU) 2024/900 on the transparency and targeting of political advertising.
3. Amend the EC of Ukraine to extend the rules on election campaigning and political advertising to online media and video-sharing and information-sharing platforms.
4. Provide in the EC of Ukraine for the possibility of direct payments from election funds to non-resident platforms for political advertising.
5. Ensure the financial independence of the media regulator by providing adequate annual funding in line with its budgetary requests.
6. Amend the Law of Ukraine 'On Media' with regard to interaction with online platforms, considering the limitations of Ukraine's jurisdiction and the transitional period prior to EU accession.
7. Conduct negotiations with online platforms to establish formalised cooperation arrangements for the election period, prior to the commencement of the electoral process of the first post-war elections, to ensure effective interaction mechanisms between the CEC and the National Council of Ukraine on Television and Radio Broadcasting in exercising their statutory powers.

852 On Media: Law of Ukraine No. 2849-IX of 13.12.2022, Article 5. ↗

8. Eliminate inconsistencies regarding the publication of campaign price lists by introducing digital disclosure mechanisms, following the approach set out in the Law of Ukraine 'On the All-Ukrainian Referendum'.
9. Remove restrictions on commenting on and evaluating election campaigning, in line with standards on freedom of expression.

Legal and Institutional Mechanisms for Countering External Interference in the Electoral Process

State of play

Ukraine has been facing manifestations of hybrid warfare since the beginning of the Russian Federation's invasion of Ukraine in 2014. This has included direct cyberattacks, such as the NotPetya virus, hacking of television news feeds and attacks on media websites.[853] Russia has financed both proxy media disseminating pro-Kremlin narratives and the active use of bot farms and anonymous Telegram accounts.[854]

Media consumption studies indicate that Telegram is one of the main channels for news consumption and personal communication.[855] At the same time, Telegram effectively functions as a 'dark net' within the conventional internet environment. It lacks community standards typical of most platforms,[856] does not disclose where data are processed, and has no meaningful level of engagement with Ukrainian institutions. Numerous publications by Ukrainian media and researchers highlight the risks associated with Telegram.[857]

The current isolationist internet policy of the Russian Federation suggests that Telegram is increasingly becoming a one-directional tool for the dissemination of FIMI among Ukrainian audiences, particularly in light of the declared[858] restriction of Telegram within the territory of the Russian Federation from 1 April 2026.

Since the start of the full-scale invasion, the Doppelganger[859] operation has been actively conducted on Facebook by the Social Design Agency based in Saint Petersburg and

853 The largest cyberattack in history, NotPetya, was carried out by Russia against Ukraine — United States. Detector Media, 2018. ↗ ; Russian hackers attacked the satellite signal of several Ukrainian channels. Broadcasting was restored. Detector Media, 2024. ↗ ; The website of the media outlet 'Nakypilo' was subjected to a serious DDoS attack. Institute of Mass Information, 2025. ↗

854 From Russia with Love. The Anonymous Empire of Pavel Durov. Liga, 2020. ↗

855 Ukrainian Media: News Consumption and Trust in 2025. Internews-Ukraine, 2025. ↗ ; Media Consumption of Ukrainians: The Third Year of the Full-Scale War. OPORA Civil Network, 2024. ↗

856 Official Telegram website. FAQ section. ↗

857 Eight Pieces of Evidence of the Dangers of Telegram — One of the Most Successful Russian Projects. Texty.org.ua, 2024. ↗ ; 'You cannot keep the enemy in your pocket': Will the Russian messaging app Telegram be banned and when could this happen? Explainer. Espreso, 2026. ↗ ; Myths about Telegram that we believe. CEDEM, 2024. ↗

858 Pressure on Durov: Russia announces a date for the 'final blocking' of Telegram. NV, 2026. ↗

859 Talking points, memes and a 'register of fakes and distorted realities': how a Kremlin contractor agency for disinformation operates. Radio Svoboda, 2024 ↗ ; How Russia attacks Ukraine with disinformation through Facebook advertising: a study by the Centre for Strategic Communications, 2024. ↗

linked to Russian intelligence services. Another network, Pravda, which imitates local media outlets in various countries, targets major AI systems.[860]

The Information Security Strategy[861] adopted in 2021, which provided for the assessment of threats and challenges to information security and set strategic objectives, including countering disinformation and information operations, primarily by the aggressor state, as well as enhancing media culture and media literacy, expired in 2025. No new Strategy has been adopted. As a result, as of 31 July 2026, a legal vacuum has emerged in the regulation of information security.

In the field of cybersecurity, the key framework documents are the Cybersecurity Strategy of Ukraine, adopted in 2021,[862] and the Law of Ukraine 'On the Basic Principles of Ensuring Cybersecurity of Ukraine'.[863] One of the objectives defined by the Strategy is the establishment of a permanent working group for cooperation with leading IT companies, global digital service providers and social networks to counter hybrid threats, the spread of disinformation and to enable the application of sanctions in accordance with Ukrainian law.

A Joint Cyber Incident Response Group, comprising representatives of the National Cybersecurity Coordination Centre, the State Service of Special Communications and Information Protection of Ukraine (SSSCIP), the SSU, the NPU and other key actors of the national cybersecurity system, operates as a coordination mechanism among these institutions.[864]

The Law of Ukraine 'On the Basic Principles of Ensuring Cybersecurity of Ukraine' provides for the establishment of the State Cyber Protection Centre and the Centre for Active Counteraction to Aggression in Cyberspace, as well as the national Computer Emergency Response Team, CERT-UA (the national CSIRT),[865] which ensures the technical detection of and response to cyberattacks, including those targeting state information resources. CERT-UA operates within the SSSCIP. The SSSCIP is tasked[866] with collecting and analysing data on cyber incidents, providing practical assistance to owners of cyber protection objects and cooperating with foreign and international organisations on cyber incident response. Certain powers to counter disinformation and external interference in Ukraine's internal affairs are also vested in the Security Service of Ukraine. It is authorised[867] to carry out counterintelligence measures aimed at preventing, detecting, stopping and investigating any forms of intelligence and subversive activities

860 What does 'Pravda' have to do with TikTok? Researchers uncover a Russian network of fake media. Radio Svoboda, 2025. ↗

861 On the Decision of the National Security and Defence Council of Ukraine of 15.10.2021 'On the Information Security Strategy': Decree of the President of Ukraine No. 685/2021 of 28.12.2021. ↗

862 On the Decision of the National Security and Defence Council of Ukraine of 14.05.2021 'On the Cybersecurity Strategy of Ukraine': Decree of the President of Ukraine No. 447/2021 of 26.08.2021. ↗

863 On the Basic Principles of Cybersecurity of Ukraine: Law of Ukraine No. 2163-VIII of 05.10.2017. ↗

864 Procedure for Interaction between Cybersecurity Stakeholders during Response to Cyber Incidents/Cyberattacks. ↗

865 About CERT-UA. Official website CERT-UA ↗; Computer Emergency Response Team of Ukraine; Computer Security Incident Response Team.

866 On the Basic Principles of Cybersecurity of Ukraine: Law of Ukraine No. 2163-VIII of 05.10.2017, Article 8. ↗

867 On the Security Service of Ukraine: Law of Ukraine No. 2229-XII of 25.03.1992. ↗

against Ukraine. The CEC is not vested with powers to counter information and cyber threats in the electoral process.

In 2021, to achieve the objectives of countering current and anticipated threats to Ukraine's national security and national interests in the information sphere, the Centre for Countering Disinformation[868] was established[869] under the National Security and Defence Council of Ukraine (NSDC). It is responsible for ensuring Ukraine's information security and for effectively countering propaganda, destructive disinformation influences and campaigns. The Centre combines educational and analytical functions with the identification of threats. It also cooperates with international platforms such as Google and TikTok. This cooperation includes blocking resources of the aggressor state within Ukraine, removing cloned content and countering attempts to remove content of Ukrainian information resources.

In addition to state institutions, several non-governmental think tanks in Ukraine are engaged in countering disinformation.[870] Their activities in this area include fact-checking, cooperation with online platforms to combat disinformation and other harmful practices and awareness-raising.

One of the mechanisms for strengthening resilience to FIMI is the promotion of media literacy among citizens. This function is assigned to two institutions: the National Council and the Ministry of Culture of Ukraine (Ministry of Culture).[871] The Ministry of Culture is responsible for shaping and implementing state policy in this area while the National Council cooperates with media on media literacy initiatives. In 2025 a set of media literacy guidelines for media was developed.[872] One of the Ministry's flagship initiatives is the National Media Literacy Project 'Filter',[873] known, inter alia, for its annual National Media Literacy Test.[874]

Eighty-four per cent of social media news consumers are subscribed[875] to bloggers such as Sternenko (2.1 million subscribers), Lachen (1.5 million subscribers) and others. This audience is comparable to that of national media outlets such as Radio NV (1.5 million) and Suspilne News (1.1 million) and significantly exceeds that of local media outlets such as Kordon Media (36,000), Gvara Media (66,000) and Tsukr (36,800).[876]

868 Centre for Countering Disinformation. ↗

869 On the Decision of the National Security and Defence Council of Ukraine of 11.03.2021 'On the Establishment of the Centre for Countering Disinformation': Decree of the President of Ukraine No. 106/2021 of 19.03.2021. ↗

870 Including the Centre for Strategic Communications and Information Security (Spravdi), the StopFake initiative, VoxCheck, 'Ne staty Ovochem', the Institute of Mass Information, Detector Media, the Centre for Democracy and Rule of Law and others.

871 On Media: Law of Ukraine No. 2849-IX of 13.12.2022, Article 6, paragraph 59 Part 1 Article 90. ↗

872 The National Council, with the support of the OSCE, developed and presented the Guidelines on Media Literacy for Media. National Council of Ukraine on Television and Radio Broadcasting, 2025. ↗

873 National Media Literacy Project 'Filter'. ↗

874 More than 34,000 Ukrainians have fully completed the National Media Literacy Test. Institute of Mass Information, 2025. ↗

875 According to the study 'Ukrainian Media: News Consumption and Trust in 2025'. ↗

876 Data are presented for the largest audiences on Telegram, YouTube, Facebook and Instagram.

Progress and issues

Fragmentation of regulation and the absence of legal mechanisms for countering disinformation

The legal framework for countering external interference in the electoral process in Ukraine is fragmented and primarily focused on the field of cybersecurity, while the informational dimension of interference, particularly the regulation of countering disinformation/FIMI through platforms, is not integrated into a unified system of regulation and threat response.

The EC of Ukraine does not contain provisions specifically aimed at countering external interference, apart from general rules prohibiting certain forms of unlawful campaigning (for example, the prohibition on the participation of foreigners, foreign journalists and media with foreign ownership in campaigning). Ukrainian legislation does not establish a clearly defined regime for addressing phenomena that, at the level of the European Union, are described as FIMI.[877] As a result, disinformation campaigns coordinated from abroad, such as Doppelganger, are not covered by specialised response procedures and remain within the scope of general regulation of information activities, criminal law or cooperation instruments with the EU, such as the East StratCom Task Force and EUvsDisinfo. At the same time, the EU has developed a range of instruments, including the EU Code of Practice on Disinformation, the European External Action Service (EEAS) FIMI Toolbox and the Strategic Compass[878] action plan for strengthening EU security and defence by 2030, including in the field of countering FIMI. These instruments may be used as a basis for developing a national toolkit to counter FIMI.

Lack of institutional coordination

The existing ecosystem of state institutions responsible for ensuring information security and cyber resilience lacks an institutionalised coordination centre for countering threats. As a result, disinformation narratives on socially sensitive issues continue to spread actively within the national information space, particularly those related to mobilisation[879] and narratives opposing state authorities.

In its Resolution of 7 January 2026, the CEC proposes[880] to draw on EU experience in establishing a coordination body for countering threats and to create, under the Cabinet of Ministers of Ukraine, an **Interagency Working Group on Countering External Interference in the Electoral Process**, whose activities would be aimed at ensuring coordination of measures to counter FIMI. It is proposed to enshrine the provisions on such a group at the level of the law on the first post-war elections (Article 35 of the draft). This group would be tasked with developing and coordinating an action plan for:

- identifying, preventing and countering disinformation and information manipulation by foreign actors;

877 Combating foreign interference in elections. European Parliament, 2024. ↗

878 A Strategic Compass for Security and Defence. EEAS. ↗

879 AI-generated fakes targeting Territorial Recruitment and Social Support Centres: examples. Centre for Countering Disinformation, 2026. ↗

880 On Proposals for Legislative Regulation of the Specifics of Organising and Conducting Nationwide Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

- detecting and neutralising instances of foreign financing of election campaigns, including through emerging technologies, and coordinating the actions of state authorities, including law enforcement bodies, electoral administration bodies and electoral stakeholders, in countering external interference in the electoral process.

The version of Article 35 of the draft proposed by the CEC requires further refinement. According to expert recommendations, it is necessary to clearly define the status, powers, timeframes for establishment and operation, principles of formation and procedures for formalising (bringing into force) the decisions of the Interagency Working Group on Countering External Interference in the Electoral Process and its operational groups.[881] The Interagency Working Group should be entrusted with the authority to approve security protocols, conclusions, recommendations and other documents in the field of election security and the prevention of external interference. It should also be provided that key documents on election security are to be approved by the Group prior to the commencement of the electoral process, and that the principles of interaction between the Interagency Working Group and the operational groups are clearly defined. In addition, provisions should be introduced to ensure interaction, coordination of activities and exchange of experience, within the scope of their competences, with relevant institutions of the European Union, the Council of Europe, foreign states and international organisations in the field of preventing common threats related to election security and external interference in the electoral process.

Within the framework of the parliamentary Working Group, subgroup 'Election Administration and Electoral Infrastructure' has further refined the provisions on the Interagency Working Group on Countering External Interference in the Electoral Process. The revised version provides for the establishment of such a body under the Cabinet of Ministers of Ukraine, sets out the principles governing its activities (legality, political neutrality, impartiality and transparency), defines a broader composition and expands its functions, including countering disinformation, unlawful foreign financing and cyberattacks, consolidating information on threats and preparing proposals for improving legislation. At the same time, no clear timeframe is established for the creation of this body following the termination of martial law, and its decisions are defined as advisory in nature.[882] However, the version revised by the subgroup was never approved by the Working Group.

Uncertainty regarding the legal status of individuals engaged in information influence (influencers)

One of the unresolved issues at present concerns the legal status of influencers (bloggers and vloggers). The Law of Ukraine 'On Media' does not regulate influencers. It provides for voluntary registration of individuals who regularly disseminate mass information on social media[883] under a procedure similar to that applicable to online media, and this mechanism is actively used,[884] particularly in connection with regulatory requirements in the field of gambling. However, the existing provisions applicable to this category constitute soft

881 Analysis of the Draft Law 'On the Specifics of Ensuring the Organisation and Conduct of Nationwide Elections after the Termination or Lifting of Martial Law in Ukraine'. OPORA Civil Network, 2026. ↗

882 Analytical update on Ukraine's progress in implementing the indicators of the Roadmap on the Functioning of Democratic Institutions based on the work of thematic subgroups on preparing the legislative framework for the first post-war elections. OPORA Civil Network, 2026. ↗

883 On Media: Law of Ukraine No. 2849-IX of 13.12.2022, Part 3 Article 16. ↗

884 Annual Report of the National Council of Ukraine on Television and Radio Broadcasting for 2025, p. 21. ↗

law, and the voluntary nature of registration during the electoral period creates unequal conditions, whereby some bloggers remain outside any regulatory framework and are not even subject to the requirements of the Code of Journalistic Ethics.[885] The issue of influencers is currently under public discussion in the EU in the context of proposed amendments[886] in 2026 to the Audiovisual Media Services Directive.

The issue of bloggers had already been the subject of professional debate[887] during the preparation of the Law of Ukraine 'On Media' in 2019–2022 and remains unresolved. At the same time, the experience of Romania, where a candidate won the first round largely due to a social media campaign, demonstrates the influence of influencers and the potential for their use in foreign interference in elections. It was on this basis that the Constitutional Court of Romania annulled[888] the election results, finding that the promotion of this politician on social media had been carried out by Russia.

The Committee on Integration of Ukraine into the European Union also points[889] to the problem of the lack of adequate legal regulation of individuals with large audiences on social media and online platforms who formally present their activities as the expression of personal opinion and therefore fall outside the rules governing election campaigning. This increases the risks of covert political advertising, disinformation and manipulative influence on the electoral process, which may have a decisive impact on election results. To identify possible solutions, the media regulator is currently examining the experience[890] of European countries with a view to developing proposals for national regulation. At the same time, no draft laws addressing this issue have been submitted to the Verkhovna Rada.

Recommendations

1. Introduce into legislation a definition and legal framework for countering FIMI, including the designation of authorities responsible for the collection, analysis and countering of FIMI and for coordinating activities among such institutions.
2. Adopt an Information Security Strategy for 2026–2031 that reflects current challenges, including FIMI and the role of information-sharing platforms.
3. Continue media literacy measures within the competences of the Ministry of Culture and the National Council, in partnership with non-governmental organisations, to strengthen societal resilience, including among vulnerable groups (such as adolescents, older persons and veterans), to information influence during elections.

885 Code of Ethics of the Ukrainian Journalist. Approved by the Plenum of the National Union of Journalists of Ukraine, 2013. ↗

886 Commission seeks views and information for the evaluation of the Audiovisual Media Services Directive. European Commission, 2025. ↗

887 The Law 'On Media': clear rules for all or a threat to freedom of speech and the internet? Radio Svoboda, 2020. ↗

888 Romania's Constitutional Court annulled the results of the first round of the presidential election. DW, 2024. ↗

889 On Amendments to the Electoral Code of Ukraine on Improving the Regulation of Information Support of Elections and Election Campaigning: Opinion (European integration expertise) on the Draft Law of Ukraine No. 8310 of 27.12.2022. ↗

890 European experience in regulating influencers and vloggers: what Ukraine needs to know. National Council of Ukraine on Television and Radio Broadcasting, 2025. ↗

4. Establish a permanent coordination body at the level of the Cabinet of Ministers of Ukraine to counter external interference, including during the electoral process, define the timeframe for its establishment and vest it with powers to inform electoral stakeholders about identified threats and instances of foreign interference in elections, provide practical recommendations for preventing such threats and mitigating their consequences, in particular in the field of cyber protection, and ensure interaction, coordination of activities and exchange of experience, within its competences, with relevant institutions of the European Union, the Council of Europe, foreign states and international organisations in preventing common threats related to election security and external interference in the electoral process.
5. Integrate existing cybersecurity response mechanisms with information security response mechanisms into a unified system for countering threats during elections, with the involvement of the CEC and the National Council.
6. Strengthen cooperation with EU mechanisms for countering disinformation and information operations.
7. Regulate the legal status of influencers and establish basic transparency requirements for them during the electoral process.

Financing of Political Parties and Election Campaigning

Private Financing of Political Parties and Election Campaigns

State of play

The regulatory framework governing private financing of political parties and election campaigning includes the Law of Ukraine 'On Political Parties in Ukraine',[891] the EC of Ukraine[892] and, predominantly, secondary legislation adopted by the NACP[893] and the CEC.[894]

The FDI Roadmap includes a separate subsection 'II.C Financing of political parties and election campaigns (including anti-corruption measures)', the measures of which are to be implemented by the fourth quarter of 2026. These include measures aimed at increasing the transparency of election campaign financing and reducing the influence of individuals and legal persons (financial-industrial groups) on political parties and election campaigns, improving the mechanisms for public funding of the statutory activities of political parties in line with the recommendations of the OSCE/ODIHR and the Venice Commission on the regulation of political party activities and conducting an information and awareness-raising campaign on the new rules. A separate measure under subsection 'II.A Free and fair elections' provides for the entry into force of the law on political parties by the fourth quarter of 2027.[895] The need for a comprehensive update of legislation on political parties, including with regard to procedures for holding political parties liable for violations of financing rules, is also emphasised in the EC's 2025 report on Ukraine.[896]

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891 On Political Parties in Ukraine: Law of Ukraine No. 2365-III of 05.04.2001. ↗

892 Electoral Code of Ukraine: Law of Ukraine No. 396-IX of 19.12.2019. ↗

893 Secondary legislation of the NACP is available on its official website. Regulatory framework. Prevention of political corruption. National Agency on Corruption Prevention. ↗

894 On the CEC website, a separate section titled 'Financing' is available within the search for normative legal acts; however, in addition to documents on the financing of election campaigns by candidates and political parties, it also includes acts related to the organisational financing of elections. Search for normative acts. Central Election Commission. ↗

895 Roadmap on the Functioning of Democratic Institutions. II.C Financing of political parties and election campaigns (including anti-corruption measures), pp. 7–10. ↗

896 Ukraine 2025 Report. Communication on EU enlargement policy, p. 23. ↗

Progress and issues

A major challenge is the **covert financing of election campaigning by third parties outside electoral funds** (through proxy contributions, for example in the form of media support, payment for office rental services and financing the production of campaign materials).[897] Campaign finance legislation does not apply to third parties, leaving such expenditures unregulated and unaccountable.[898] For example, in 2020, violations related to the financing of a political party were identified in the amounts of UAH 1.7 million, UAH 900,000 and UAH 296,000 (a total of UAH 2.896 million), provided by individuals who, during the period from 2017 to 2020, did not have sufficient income to finance a party at such levels.[899] Proxy intermediaries are often natural persons, as legislation does not restrict contributions by individuals who lack sufficient lawful income to make such contributions. Legislation does not establish any correlation between the size of contributions made by natural persons to political parties and their verifiable income, nor does it prohibit contributions by individuals acting on behalf of others, including representatives of financial-industrial groups or oligarchs. In addition, there are widespread practices of channelling funds through foundations, associations, charitable organisations, religious organisations and other non-profit entities, which are subsequently used for the benefit of political parties or election campaigns, as these entities are not required to report on their sources of funding. The use of cryptocurrencies and fictitious business transactions to conceal financial contributions is also prevalent.[900]

Significant expenditures by political parties and candidates from electoral funds (on outdoor advertising and campaigning in audiovisual media) raise concerns regarding transparency, the origin of such contributions and potential risks of political corruption.[901] The absence of an upper limit on campaign spending runs counter to established international practice. The OSCE/ODIHR and the Venice Commission of the Council of Europe have previously recommended considering the introduction of campaign expense limits in elections in Ukraine.[902]

In 2024–2025, Draft Law No. 11462 (on improving the rules on financing of election campaigns and oversight of electoral funds)[903] and Draft Law No. 14289 (a new version

897 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 143 ↗; Report based on in-depth interviews on political party financing, revenues and use of electoral funds. Civil Network OPORA, 2022. ↗

898 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 26. ↗

899 Why do the rules on political financing and reporting require reform? Civil Network OPORA, 2025 ↗; In 2020, the NACP suspended funding of two parliamentary political parties. Claims of 'political pressure' by the NACP are unfounded. National Agency on Corruption Prevention. ↗

900 Kotsiuruba O. Experience of reforming political party financing rules in Ukraine: key achievements and outstanding commitments. Ukrainian Journal of Constitutional Law, 2023, No. 3(28), pp. 40–41. ↗

901 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, p. 143 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 25 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, pp. 21–22 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, pp. 26–28. ↗

902 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, pp. 3, 26–27 ↗; Guidelines on Political Party Regulation (195, 196). OSCE/ODIHR, Venice Commission. 2010 ↗; Recommendation Rec(2003)4 of the Committee of Ministers to member states on common rules against corruption in the funding of political parties and electoral campaigns. Council of Europe. 2003. ↗

903 On Amendments to Certain Legislative Acts of Ukraine on Improving the Rules on Financing of Election Campaigns and Oversight of Electoral Funds: Draft Law of Ukraine, registration No. 11462 of 05.08.2024. ↗

of the law on political parties)[904] were registered, aiming to take into account part of the recommendations of the EC, the FDI Roadmap and the OSCE/ODIHR, in particular with regard to: (1) preventing excessive spending on election campaigns; (2) ensuring more competitive conditions[905] and limiting the influence of money on electoral processes;[906] (3) introducing restrictions on the use of own funds by political parties or candidates;[907] and (4) countering third-party financing.[908] However, these draft laws directly affect political actors (as of 31 July 2026), and there has been no substantive parliamentary discussion on their adoption. As a result, a key concern is the high likelihood that they will not be adopted within the timeframes set out in the FDI Roadmap (comprehensive reform of party legislation by the fourth quarter of 2027 and reform of political financing and reporting by the fourth quarter of 2026).

Draft Law No. 11462[909] proposes the introduction of a formula for determining the maximum size of an electoral fund based on expenditure per voter. In particular, this is set at UAH 20 per voter for presidential elections; for parliamentary elections — UAH 20 for a political party and UAH 10 for an MP candidate (included in the relevant regional party list); and for local elections — UAH 1, UAH 1.5, UAH 15 and UAH 20, depending on the type of local election and the entity forming the electoral fund. The formula also takes inflation into account.

The key restrictions proposed by Draft Law No. 11462 provide that the total amount of contributions to electoral funds may not exceed twice the maximum annual contribution permitted in support of a political party. Specifically: (1) for presidential elections — the total amount of a candidate's own funds that may be contributed to their electoral fund is capped; (2) for parliamentary elections — a limit is established on the amount of a candidate's own funds that may be contributed to their personal electoral fund; and (3) for local elections — the amount of a party organisation's own funds that may be transferred to its electoral fund or to the electoral fund of its nominated candidate is limited. At the same time, the own funds of a political party that has nominated a list of MP candidates, when transferred to its electoral fund or to the electoral fund of its nominated MP or presidential candidate, are limited only by the overall size of the electoral fund.[910]

In turn, the new version of the law on political parties (Draft Law No. 14289)[911] proposes to limit the amount of private contributions to political parties depending on the income of donors,[912] establish clear rules for sponsorship contributions and increase the

904 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

905 Among candidates and political parties (party organisations) during the electoral process.

906 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 26 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 36. ↗

907 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, pp. 26-27. ↗

908 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 27 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 22 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 26. ↗

909 On Amendments to Certain Legislative Acts of Ukraine on Improving the Rules on Financing of Election Campaigns and Oversight of Electoral Funds: Draft Law of Ukraine, registration No. 11462 of 05.08.2024, Articles 96, 152, 215. ↗

910 Ibid.; Reform of Election Campaign Financing: Which Recommendations from International Election Observation Missions Have Been Implemented? Civil Network OPORA, 2024. ↗

911 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

912 Information provided by Respondent No. 42 based on the results of a survey conducted on 30.03.2026.

transparency of financial flows by strengthening the role of banks and the NACP. It also introduces an updated model of public funding of political parties, including increased support for non-parliamentary parties, a mixed allocation principle[913] and clear grounds for the suspension or termination of such funding.[914] In order to counter third-party financing, the draft law establishes a prohibition on both direct and indirect financing of political parties by charitable, religious and public organisations, as well as an obligation to notify a political party in advance of the provision of sponsorship contributions made without its prior consent (including the financing of activities or events in support of the party).[915]

For a long time, Ukraine has faced the issue of so-called **'premature' campaigning**[916] **(conducted prior to the registration of candidates and not subject to legislative regulation)**,[917] which has been highlighted by the OSCE/ODIHR. It has recommended ensuring that financial reports on the use of electoral funds cover all types of income and expenditure, including those incurred prior to the official start of the election campaign.[918]

Recommendations

1. Introduce legislative amendments aimed at reducing the risks of covert financing of political parties and election campaigns (including sponsorship, proxy donations and third-party financing outside political party accounts and electoral funds).
2. Introduce legislative amendments aimed at reducing the scale of campaign financing from the own funds of political parties or candidates.
3. Hold parliamentary discussions and adopt draft law No. 11462, in particular with regard to revising the size of electoral funds across different types of elections.
4. Undertake a comprehensive update of legislation on political parties, including by holding parliamentary discussions and adopting Draft Law No. 14289.
5. Introduce legislative amendments aimed at regulating political advertising and/or 'premature' campaigning (conducted prior to the registration of candidates).
6. Following the adoption of legislative amendments, align secondary legislation (acts of the NACP and the CEC) and ensure the implementation of an information and awareness-raising campaign on the new rules.

913 70% of public funding allocated based on the number of votes received, 20% distributed equally among parties entitled to public funding and 10% allocated to parties in which at least 40% of elected MPs are of the opposite sex.

914 OPORA lawyer: the draft law on political parties is part of Ukraine's EU integration commitments, which must be fulfilled within two years. Civil Network OPORA, 2025. ↗

915 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

916 For details, see the subsection 'Election Campaigning and Information Coverage of Elections'.

917 White Paper on the Preparation and Organisation of Post-War Elections. Centre of Policy and Legal Reform, Civil Network OPORA, 2025, pp. 145–146 ↗; Prospects for Improving Electoral Legislation: Innovations in the Legal Regulation of Election Campaigning. Civil Network OPORA, 2023. ↗

918 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 48. ↗

Financial Reporting by Political Parties, Managers of Election Funds and the POLITDATA Register

State of play

Transparency of political financing was significantly undermined by the suspension of mandatory financial reporting under the 2020 law,[919] initially justified by the spread of the coronavirus disease (COVID-19) and subsequently by the legal regime of martial law. Such a postponement appeared unjustified following the introduction of remote (online) reporting through the POLITDATA system. After the adoption of the 2023 law,[920] the obligation for political parties to submit reports was restored after an almost four-year interruption.[921] According to the NACP, 131 parties failed to submit financial reports for the fourth quarter of 2025 and 114 parties for the first quarter of 2026.[922]

A positive development is the launch of the POLITDATA system,[923] which, on the one hand, has simplified the process of submitting party reports on assets, income, expenditure and financial liabilities and, on the other hand, by making these reports available on the NACP website in a machine-readable format, has significantly enhanced the effectiveness of public oversight and enabled the creation of independent tools for analysing party reporting and expenditures.[924] At the same time, the NACP continues to improve the party reporting system and, on 1 July 2025, launched its upgraded version (POLITDATA 2.0), accompanied by a dedicated training module and guidance materials.[925]

Progress and issues

The procedure for financial reporting during elections remains outdated (in contrast to the POLITDATA register introduced for party reporting), as it requires managers of electoral fund accounts to submit reports in both paper and electronic formats.[926] The OSCE/ODIHR has highlighted the limited capacity to conduct effective oversight and to provide voters with meaningful information when publishing analyses of such reports,[927] as well as the need to ensure cooperation with financial institutions and the tracing of

919 On Amendments to Certain Legislative Acts of Ukraine Aimed at Ensuring Additional Social and Economic Guarantees in Connection with the Spread of Coronavirus Disease (COVID-19): Law of Ukraine No. 540-IX of 30.03.2020. ↗

920 On Amendments to Certain Legislative Acts of Ukraine on Improving Public Funding and Oversight of Political Parties: Law of Ukraine No. 3337-IX of 23.08.2023. ↗

921 Why do the rules on political financing and reporting require reform? Civil Network OPORA, 2025. ↗

922 Letter of the National Agency on Corruption Prevention No. 205-02/50849-26 of 27.07.2026 in response to an information request from Civil Network OPORA.

923 Unified State Register of Political Party Reporting. National Agency on Corruption Prevention. ↗

924 For example — Gold of Parties. A tool for convenient analysis of political finances. CHESNO. ↗

925 The NACP launched an updated version of the POLITDATA 2.0 register. National Agency on Corruption Prevention, 2025. ↗

926 Information provided by Respondent No. 42 based on the results of a survey conducted on 30.03.2026.

927 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, pp. 26–27. ↗

financial transactions.[928] The lack of access to timely and detailed data on contributions and transactions from electoral fund accounts significantly weakens the effectiveness of monitoring election financing.[929]

The FDI Roadmap provides for the need to introduce legislative amendments to:

- expand the functional capabilities of the POLITDATA register as an electronic system for the submission, verification (including automated verification) and publication of reports on the receipt and use of electoral funds across all types of elections;
- ensure voter access to information on the movement of funds, including the receipt and use of electoral funds across all types of elections, through the public interface of the POLITDATA register;
- introduce a risk-based approach to the analysis of reports on the receipt and use of electoral funds of candidates in parliamentary and local elections, considering risks related to financial, economic and other activities.[930]

At the same time, the EC of Ukraine provides for the possibility of submitting reports through electronic services (Part 9 Article 97, Part 12 Article 153, Part 11 Article 212) and, by Resolution No. 90 of 12.08.2022, the CEC supported the proposal of the NACP to introduce such a model through the POLITDATA system.[931] However, the EC of Ukraine does not specify the modalities of reporting and informing voters via electronic services.

Draft Law No. 11462 is aimed at implementing these recommendations.[932] Its core objective is to introduce a procedure for submitting reports on the receipt and use of electoral funds for all types of elections to an information and communication system administered by the NACP. The system is envisaged to carry out automated logical and arithmetic checks of the accuracy of reports, enable fund managers to conduct additional verification of the reliability of reported information using data from other state registers with which it is integrated and allow for the generation of official electronic documents (letters, requests, notifications, etc.). An important element is ensuring voter access to information on the movement of funds and to reports on the receipt and use of electoral funds, which are to be made available in the public interface of the information and communication system.[933]

A similar approach is envisaged in the new version of the law on political parties (draft law No. 14289), which introduces an obligation for banks holding accounts of political parties (and their structural units) to submit, on a monthly basis, information on the receipt and use of funds in such accounts to the NACP in electronic form. In turn, the NACP will be

928 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, pp. 22, 36. ↗

929 Why do the rules on political financing and reporting require changes? Civil Network OPORA, 2025 ↗; White Paper on the Preparation and Organisation of Post-War Elections. Centre for Policy and Legal Reform, Civil Network OPORA, 2025, p. 144. ↗

930 Roadmap on the Functioning of Democratic Institutions. II.C Financing of Political Parties and Election Campaigns (including anti-corruption measures), p. 8. ↗

931 On Certain Issues of Submission of Financial Reports on the Receipt and Use of Electoral Funds of Political Parties, Their Local Organisations and Candidates in National and Local Elections as Provided for by the Electoral Code of Ukraine: Resolution of the Central Election Commission of 12.08.2022 No. 90. ↗

932 Information provided by Respondent No. 39 based on the results of a survey conducted on 30.03.2026.

933 On Amendments to Certain Legislative Acts of Ukraine on Improving the Rules for Financing Election Campaigns and Oversight of Electoral Funds: Draft Law of Ukraine, registration No. 11462 of 05.08.2024. ↗

required to publish information on the receipt and use of funds of political parties (and their structural units), including in the form of open data, separately from the parties' submitted reports, within five working days of receiving such information from the bank.[934] This would enable citizens to access timely information on party revenues and expenditures without having to wait for quarterly reports and the NACP's conclusions following their review.

Recommendations

1. Ensure the launch into full operational use, well in advance of the next elections, of an information and communication system for reporting by managers of electoral funds (an analogue or module of POLITDATA).
2. Hold parliamentary discussions and adopt Draft Law No. 11462, in particular with regard to introducing a procedure for submitting reports on the receipt and use of electoral funds for all types of elections to an information and communication system (an analogue or module of POLITDATA) and ensuring timely voter access to information on the movement of electoral fund resources.
3. Undertake an update of legislation on political parties, including by holding parliamentary discussions and adopting Draft Law No. 14289, in particular as regards introducing an obligation for banks holding accounts of political parties (and their structural units) to provide monthly information on the receipt and use of funds and for the NACP to promptly publish such information in the form of open data, separately from submitted reports.
4. Following the adoption of legislative amendments, align secondary legislation (acts of the NACP and the CEC) and ensure the implementation of an information and awareness-raising campaign on the new rules.

Oversight of Political Party/Election Campaign Financing and Liability for Violations

Progress and issues

The absence of proportionate, effective and dissuasive sanctions for violations in election campaign financing is one of the key problems highlighted in OSCE/ODIHR reports[935] and by the expert community.[936] Criminal liability for breaches of political

934 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

935 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, pp. 27, 48 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, pp. 23, 37 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, pp. 24, 46. ↗

936 Roadmap for Ensuring the Organisation of Post-War Elections (revised and supplemented). Civil Network OPORA, p. 24 ↗; White Paper on the Preparation and Organisation of Post-War Elections. Centre for Policy and Legal Reform, Civil Network OPORA, 2025, p. 144. ↗

financing and reporting rules is provided for by Article 159[1] of the CC of Ukraine,[937] while administrative liability is set out in Articles 212[15] and 212[21] of the CUAO.[938]

Evidence of deficiencies in the construction of criminal offences is reflected in the fact that, throughout the entire period of application of Article 159[1] of the CC of Ukraine, only one conviction is recorded in the Unified State Register of Court Decisions (USRCD) (it was established that a person intentionally and in prior conspiracy with others made contributions in support of a political party without having the right to do so), following the approval of a plea agreement.[939] The lack of convictions in this category of cases is attributable to shortcomings in legislative design (in particular, the requirement of intent as a mandatory element of the offence) and to investigative challenges (most offences, except for Part 4, are investigated by the police in the form of inquiry rather than pre-trial investigation).[940] A further issue is that inquiry officers operate under strict time constraints due to a high caseload across various categories of offences and may lack the necessary expertise and specialised knowledge to effectively investigate such violations.[941]

Fines for violations of political financing rules raise serious concerns in terms of proportionality. In particular, Article 212[15] of the CUAO provides for a fine of UAH 1,190 to 1,700 (EUR 23.21–33.15),[942] for individuals and UAH 1,700 to 2,210 (EUR 33.15–43.10) for officials for making or receiving unlawful contributions or support. Violations of reporting requirements are punishable under Article 212[21] of the CUAO by fines ranging from UAH 5,100 to 6,800 (EUR 99.46–132.62). Sanctions for criminal offences (Article 159[1] of the CC of Ukraine) appear even more paradoxical, as in some cases they are lower than administrative penalties, despite the greater gravity of criminal offences. Thus, the intentional making or receiving of unlawful contributions or support, as well as the submission of knowingly false information in financial reports, is punishable by a fine ranging from UAH 1,700 to 5,100 (EUR 33.15–99.46). If such acts are committed repeatedly, the sanction increases to UAH 5,100 to 8,500 (EUR 99.46–165.77). These fines are clearly disproportionate to the scale of financial resources used by political actors, particularly at the national level (for instance, UAH 865.5 million[943] is allocated for public funding of parliamentary parties in 2026 alone). As a result, the risk of financial penalties does not serve as an effective deterrent for political parties and politicians.[944]

In addition, there are legislative shortcomings in the construction of offences under Articles 212[15] and 212[21] of the CUAO: (1) the insufficient three-day time limit for the consideration of administrative cases under Article 212[15]; (2) the designation of a political party as a legal entity as the subject of liability under Article 212[21], whereas only natural persons

937 Criminal Code of Ukraine: Law of Ukraine No. 2341-III of 05.04.2001. ↗

938 Code of Ukraine on Administrative Offences: Law of Ukraine No. 8073-X of 07.12.1984. ↗

939 Judgment of the Savran District Court of Odesa Region of 18.04.2019 in case No. 512/246/19. ↗

940 Money and Politics: Why Liability for Violations of Political Financing Rules Is Ineffective? Civil Network OPORA, 2023. ↗

941 Report Based on In-Depth Interviews on Political Party Financing, Receipts and Use of Electoral Fund Resources. Civil Network OPORA, 2022. ↗

942 EUR 1 = UAH 51.2747. Official exchange rate of the hryvnia against foreign currencies as of 31.07.2026. National Bank of Ukraine. 2026. ↗

943 How Much Funding Will Political Parties Receive from the State Budget in 2026? CHESNO, 2025. ↗

944 Money and Politics: Why Liability for Violations of Political Financing Rules Is Ineffective? Civil Network OPORA, 2023. ↗

may be held administratively liable; (3) inconsistent approaches to determining jurisdiction for the examination of such cases; and (4) difficulties in the confiscation of unlawful contributions. More broadly, the CUAO suffers from systemic deficiencies, including: (1) the impossibility of drawing up protocols in absentia (i.e. without the presence of the offender); (2) inconsistent approaches to the referral of protocols and case materials for further consideration or to the competent jurisdiction; and (3) the practice of closing proceedings due to the absence of socially harmful consequences, particularly material damage, which by definition does not arise in offences with a formal composition.[945]

Reports of OSCE/ODIHR election observation missions recommend that, to enhance transparency, strengthen oversight and ensure accountability in the financing of election campaigns, an independent supervisory body with regional representation should be vested with powers to monitor compliance with campaign finance legislation and be provided with sufficient resources to carry out this function.[946] The NACP has been proposed as such a body,[947] with particular emphasis on the duplication of its powers with those of the CEC.[948] In addition, the OSCE/ODIHR and domestic election observation organisations[949] have highlighted the limited capacity of TECs to effectively oversee election financing and to conduct professional analysis of reports in the context of local elections.

Draft Law No. 11462 seeks to address these recommendations by transferring oversight powers to the NACP which, although lacking regional offices, would be able to exercise more effective control over reports on the receipt and use of electoral funds through the introduction of a dedicated information and communication system. Furthermore, the draft law contains provisions enabling the NACP to engage qualified specialists and experts on a voluntary basis, including on a contractual basis, with remuneration for their services financed from budgetary funds allocated for the preparation and conduct of elections.[950]

The analysis of financial reports (both party reports and those of electoral funds) is largely 'technical' in nature, which creates challenges for effective oversight of election financing. This issue has also been highlighted by OSCE/ODIHR observers. No supervisory body bears responsibility for, or is vested with investigative powers to identify, circumvention of legal provisions on transparency, including third-party and in-kind financing or the misuse of administrative resources.[951] The NACP may identify third-party financing within the framework of state oversight, in particular by: (1) analysing information received from natural and legal persons, as well as civil society organisations;

945 Proposals by OPORA on Reforming the Rules of Political Financing and Liability for Their Violations. Civil Network OPORA, 2023 ↗; Y. Salzberg, V. Kostrytskyi, et al. Consideration by Courts of Cases on Violations of the Rules on Financing of Political Parties and Election Campaigns: a training and practical manual for judges. 2022, pp. 37–91. ↗

946 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 29. ↗

947 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 23. ↗

948 Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, pp. 25, 27. ↗

949 Why Do the Rules on Political Financing and Reporting Require Changes? Civil Network OPORA. ↗

950 On Amendments to Certain Legislative Acts of Ukraine on Improving the Rules for Financing Election Campaigns and Oversight of Electoral Funds: Draft Law of Ukraine, registration No. 11462 of 05.08.2024. ↗

951 Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 27 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2019 presidential election, p. 22 ↗; Final Report of the OSCE/ODIHR Election Observation Mission on the 2020 local elections, p. 26. ↗

and (2) carrying out preparatory steps for the verification of reports using information from open sources and the media.[952] However, the most difficult forms of financing to detect and assess are non-monetary contributions, such as volunteer and expert services, undervalued rent or freelance work, concealed political advertising ('jeansa'), payments made directly by third parties or transfers to accounts of third parties.[953] In practice, oversight of electoral funds is largely limited to the verification of submitted reports, while the actual scale of campaign financing, including unlawful financing, often remains outside scrutiny. Verification of actual expenditures is rather the exception — for example, it is indirectly carried out by the National Police of Ukraine, notably when officers identify instances of distribution of printed campaign materials without required imprint data and examine related contracts and information about their customer. However, officers of the National Police of Ukraine are not authorised to draw up administrative offence reports under Articles 212^{15} and 212^{21} of the CUAO.[954]

A serious challenge to Ukraine's sovereignty is the risk of foreign (including financial) interference in elections and in the activities of political parties, through which third countries (in particular the Russian Federation) seek to influence domestic politics, as highlighted in European Parliament Resolution 2024/2696(RSP)[955] and Resolution 2593 of the PACE.[956] The United Kingdom, Australia and Moldova have already introduced specific measures to counter foreign interference, including in the financing of political parties and election campaigns.[957] There is also a need for additional measures at the EU level, which are equally relevant for Ukraine, in particular restrictions on third-party financing.[958] Ukraine should take steps to mitigate the influence of the aggressor state on the electoral process in the area of political financing,[959] including by introducing specific offences to be investigated by law enforcement bodies with sufficient institutional capacity. Effective investigation of complex schemes of shadow financing (including foreign interference) requires close coordination between the NPU, the SSU, the NACP and financial monitoring authorities.[960]

Within the work of the subgroups on the draft law concerning the organisation and conduct of post-war elections, the establishment of an Interagency working group to counter external interference in electoral processes has been proposed. Such a group would

952 Information provided by Respondent No. 42 based on the results of a survey conducted on 30.03.2026.

953 Information provided by Respondent No. 42 based on the results of a survey conducted on 30.03.2026.

954 Proposals by OPORA on Reforming the Rules of Political Financing and Liability for Their Violations. Civil Network OPORA, 2023. ↗

955 European Parliament resolution of 25 April 2024 on new allegations of Russian interference in the European Parliament, in the upcoming EU elections and the impact on the European Union (2024/2696(RSP)). ↗

956 Foreign interference: a threat to democratic security in Europe. Parliamentary Assembly of the Council of Europe. ↗

957 Countering Foreign Financing of Political Parties and Elections: International Regulation (Experience of the United Kingdom, the United States, Australia, Moldova and Romania). Civil Network OPORA, 2025. ↗

958 Legal loopholes and the risk of foreign interference. In-Depth Analysis requested by the ING2 Special Committee, 2024. ↗

959 Roadmap for Ensuring the Organisation of Post-War Elections. Civil Network OPORA, p. 22. ↗

960 Report Based on In-Depth Interviews on Political Party Financing, Receipts and Use of Electoral Fund Resources. Civil Network OPORA, 2022 ↗; Information provided by Respondent No. 42 based on the results of a survey conducted on 30.03.2026.

include representatives of law enforcement agencies, the CEC, the National Council of Television and Radio Broadcasting and potentially other institutions.[961]

The FDI Roadmap highlights the need to increase the effectiveness of accountability for offences in political party and election campaign financing. The NACP is designated as the main responsible body for drafting the relevant legislative amendments, with a deadline set for the fourth quarter of 2026. To this end, it is envisaged to introduce legislative amendments providing for:

- more proportionate (balanced) and effective sanctions for administrative and criminal offences;
- clearly defined legal elements of offences which, depending on the degree of social harm, fall within the scope of administrative or criminal liability, with a clear designation of the liable subject.[962]

For the purpose of drafting a law on improving legal liability for violations of political financing and reporting rules, working groups were initiated involving the NACP, the CEC, law enforcement authorities, non-governmental organisations, experts and other stakeholders. The preliminary outcomes of this work were presented at a roundtable on 16 February 2026.[963] It is proposed that violations of financing restrictions (such as exceeding contribution limits or participation of donors involved in public procurement) should entail administrative liability, while criminal liability should be established for financing a political party or election campaign at the request, instruction or demand of a third party, using assets provided by such a third party (either directly or through another person), as well as for foreign financial interference.[964] Similar proposals have been advanced by participants of the working group and during public discussions.[965]

Amendments aimed at improving legal liability should be introduced through a separate draft law (as required by Part 6 Article 3 of the CC of Ukraine and Part 4 Article 2 of the CUAO). However, the relevant offences are of a blanket nature and refer to electoral and political party legislation and therefore constitute a natural continuation of the amendments envisaged in draft laws No. 11462[966] and No. 14289.[967] At the same time, effective oversight of political financing and reporting requires not only legislative changes, but also:

961 An Interagency Working Group May Become a Tool in Countering External Interference in Elections — Vice Speaker of the Verkhovna Rada. Interfax-Ukraine, 2026. ↗

962 Roadmap on the Functioning of Democratic Institutions. II.C Financing of Political Parties and Election Campaigns (including anti-corruption measures), p. 10. ↗

963 Transparent Rules, Effective Liability for Violations and Strengthening Party Competition — Experts Discussed the Draft Law on Political Financing. Civil Network OPORA, 2026. ↗

964 Information provided by Respondent No. 42 based on the results of a survey conducted on 30.03.2026.

965 Criminal and Administrative Legislation Requires Amendments in the Area of Political Financing. Civil Network OPORA, 2026 ↗; Transparent Rules, Effective Liability for Violations and Strengthening Party Competition — Experts Discussed the Draft Law on Political Financing. Civil Network OPORA, 2026 ↗; Deputy Chairman of the Verkhovna Rada: Russia Will Use Third Countries to Interfere in Ukrainian Elections. Civil Network OPORA, 2026. ↗

966 On Amendments to Certain Legislative Acts of Ukraine on Improving the Rules for Financing Election Campaigns and Oversight of Electoral Funds: Draft Law of Ukraine, registration No. 11462 of 05.08.2024. ↗

967 On Political Parties: Draft Law of Ukraine, registration No. 14289 of 10.12.2025. ↗

- strengthening the institutional capacity of law enforcement bodies (including training, adequate staffing and resources and safeguards against political pressure[968]);
- improving the political and legal culture of citizens (according to a 2024 survey, willingness to report such violations remains limited: 42% of respondents are not willing to do so, 21% have no defined position, 25% would do so only under conditions of confidentiality and anonymity and only 12% are willing to report without any conditions[969]);
- developing intra-party democracy (which requires comprehensive party reform);
- increasing public trust in political parties as civic institutions (according to a 2025 survey, 77% of respondents do not trust political parties[970]).

Recommendations

1. Amend the CC of Ukraine (especially, Article 159[1]) by clearly distinguishing the most serious offences, including third-party financing (outside the accounts of political parties and electoral funds), proxy donations (not made in one's own name), organised forms of political financing and foreign interference and by providing for proportionate, effective and dissuasive sanctions.
2. Amend procedural legislation to ensure that serious criminal offences in the field of political financing are investigated in the form of pre-trial investigation (rather than inquiry) by a law enforcement body with adequate capacity (resources, safeguards and training).
3. Introduce substantive and procedural amendments to the CUAO, by refining existing offences (including the definition of the subject and the objective elements), decriminalising offences that do not pose significant social harm and establishing proportionate, effective and dissuasive sanctions.
4. Strengthen inter-institutional cooperation to effectively counter foreign (including financial) interference in elections and the activities of political parties.
5. Hold parliamentary discussions and adopt Draft Law No. 11462, to eliminate the dualism of oversight powers between the CEC and TECs and transfer these powers to the NACP, as well as to grant it the authority to engage qualified specialists and experts on a voluntary basis.
6. Carry out a comprehensive update of political party legislation by holding parliamentary discussions and adopting Draft Law No. 14289, particularly with regard to regulating sponsorship contributions (financing of activities or events in support of political parties), countering proxy donations (not made in one's own name) and introducing other restrictions on contributions.
7. Following the adoption of legislative amendments, align secondary legislation (acts of the NACP and the CEC) and ensure the implementation of an information and awareness-raising campaign on the new rules.

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968 Information provided by Respondent No. 34 based on the results of a survey conducted on 27.03.2026. Information provided by Respondent No. 41 based on the results of a survey conducted on 30.03.2026.

969 Financing of Political Parties and Practices of Political Corruption in Ukraine. Civil Network OPORA, 2024, p. 15. ↗

970 Assessment of the Situation in the Country, Trust in Social Institutions, Politicians, Public Officials and Public Figures, Attitudes towards Elections during the War and Belief in Victory (February–March 2025). Razumkov Centre, 2025. ↗

Agency for Legislative Initiatives

Parliament



Assessing the work of the Verkhovna Rada of Ukraine as a democratic institution is a challenging task. Ukraine is facing Russia's full-scale war of aggression, which creates extraordinary conditions for the work of the Ukrainian Parliament. The ninth convocation of the Verkhovna Rada is already the longest-serving convocation of Parliament with continuing powers in the entire history of independent Ukraine. Despite working under conditions of full-scale war for the fifth year, the Verkhovna Rada remains functional, legitimate and legally constituted. This is a key achievement of Parliament and a safeguard for democratic governance in Ukraine, despite all the problems and challenges described in the Shadow Report. In addition, the Verkhovna Rada has continued to make significant efforts to improve its own work, including through the adoption of a number of fundamental laws, in particular the laws of Ukraine 'On Public Consultations' and 'On Law-Making Activity', which, however, will be put into effect one year after the termination or cancellation of martial law.

Parliament operates with a reduced number of MPs: due to the temporary occupation of part of Ukraine's territory and the subsequent prohibition on holding elections under martial law, the current composition of the Verkhovna Rada has 390 MPs — the lowest number of MPs throughout Ukraine's independence.

The Verkhovna Rada has made limited progress in implementing the recommendations set out in the Roadmap of the European Parliament Mission. Resolution No. 1035-VIII on parliamentary reform, adopted in 2016, has exhausted its relevance and requires substantial updating.

Parliamentary legislation lacks mutually consistent provisions on the rights and obligations of the coalition and the opposition.

The Rules of Procedure of the Verkhovna Rada of Ukraine do not comply with the Constitution of Ukraine and also need to be aligned with the Law of Ukraine 'On Law-Making Activity'. No amendments have been made to the Rules of Procedure to regulate the work of Parliament under martial law. This has contributed to the practice of MPs systematically violating the Rules of Procedure.

The Constitution retains an element of the imperative mandate — the early termination of an MP's powers if they leave the faction of the party on whose list they were elected. The level of financial support for MPs' activities remains low and needs to be reviewed. At the same time, the Parliament's internal anti-corruption mechanisms are not sufficiently effective, while the current regulation of conflicts of interest and the receipt of gifts by MPs remains inadequate. The rules of ethical conduct for Ukrainian parliamentarians are outdated and fragmented, and the Code of Ethics has still not been adopted.

The existing problems in the legislative process remain relevant: the low quality of draft laws and their accompanying documents, 'legislative spam', the lack of in-depth analysis and consultations during the development of legislative initiatives. The practice of the President not signing laws adopted by the Verkhovna Rada substantially limits the Parliament's legislative function.

In July 2025, the Verkhovna Rada updated the composition of the Government, but the Parliament did not approve its Programme of Activities, leaving it without a political instrument for assessing the Government's performance. In July 2026, the Verkhovna Rada changed the composition of the Cabinet of Ministers of Ukraine for the second time

during martial law. Reporting by ministries to the Verkhovna Rada remains non-unified, and the institution of interpellation has still not been introduced.

The Secretariat of the Verkhovna Rada has developed a Strategic Executive Framework providing for a conceptual update of its structure and functions, but its implementation will require support from MPs. The draft law on parliamentary service, adopted as a basis in January 2021, has still not been submitted for consideration in the second reading.

At the same time, both wartime challenges and the problems the Verkhovna Rada faces in improving its own work require a comprehensive assessment, so that they can be examined in a timely manner, optimal solutions identified and Ukrainian parliamentarism strengthened. Unfortunately, the functioning of democratic institutions does not have EU accession criteria that are as clearly defined as those in most other negotiating chapters. Therefore, the assessment of the Verkhovna Rada's activities was based on several documents that set out the indicators, criteria, standards and objectives for the work of a functional and democratic legislature:

1. **Indicators for Democratic Parliaments**,[971] developed by the Inter-Parliamentary Union. This is a comprehensive and generally recognised tool for assessing parliaments across the dimensions of effectiveness, accountability, transparency, responsibility, inclusiveness, participation and representativeness.
2. **Updated Benchmarks for Democratic Legislatures**, developed by the Commonwealth Parliamentary Association.[972] The benchmarks consist of minimum and additional standards. The assessment of the Verkhovna Rada did not take the additional standards into account and was limited to the minimum standards only.
3. **Roadmap on the Functioning of Democratic Institutions**.[973] The section 'Functioning of Parliaments in a Democratic System' contains five strategic results and 26 measures and aims to strengthen the institutional capacity and improve the effectiveness of the Verkhovna Rada.
4. **Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine**,[974] prepared by the European Parliament's Needs Assessment Mission (European Parliament Mission) led by Pat Cox, President of the European Parliament from 2002 to 2004. In 2016, the Verkhovna Rada recognised the recommendations of the Report and Roadmap as the basis for parliamentary reform by adopting the relevant Resolution of the Verkhovna Rada. Since the new Strategic Executive Framework had not been approved as of 31 July 2026, the 2016 Resolution remains the key document in this area.

971 Indicators for Democratic Parliaments. ↗

972 Updated Benchmark for Democratic Legislatures. Commonwealth Parliamentary Association. ↗

973 Roadmap on the Functioning of Democratic Institutions. ↗

974 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016. ↗

The Verkhovna Rada and Its Bodies

Main Functions of the Verkhovna Rada: Impact of Martial Law

The Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament) of the IX convocation commenced its work on 29 August 2019 and continues to operate to date, making it the longest serving fully empowered convocation of the Parliament in the history of independent Ukraine. Moreover, this convocation of the Parliament has operated under martial law for a longer period (1,619 days[975]) than under peacetime conditions (911 days). The Verkhovna Rada continues its work into the fifth year of the full-scale war, maintaining its functionality, legitimacy and legality. This constitutes a key guarantee of the functioning of democratic institutions in Ukraine. When assessing the challenges and issues in the work of the Ukrainian Parliament, it is important to consider the extraordinary conditions under which the Verkhovna Rada operates, as well as its central role in preserving the democratic system in Ukraine.

The Verkhovna Rada performs three main functions: legislative, representative and oversight.

The Parliament is the sole legislative authority in Ukraine, which means that only the Verkhovna Rada may adopt laws.[976] The introduction of **martial law has had the least impact on the exercise of the legislative function**: since 24 February 2022, the Verkhovna Rada has adopted more than 1,000 laws.[977] At the same time, existing problems in the legislative process remain relevant, including the low quality of draft law texts and accompanying documents, violations of the Law of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine' No. 1861-VI of February 10, 2010 (Rules of Procedure, Rules of Procedure of the Verkhovna Rada), and the lack of thorough analysis and consultations with key stakeholders in the development of legislative initiatives. The practice of the President of Ukraine (President) not signing adopted laws significantly limits the legislative function of the Parliament.

975 As of 31.07.2026.

976 Constitution of Ukraine of 28.06.1996 No. 254k/96-VR, Article 75. ↗

977 According to calculations based on information available on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

The representative function of the Parliament is constrained due to the armed aggression of the Russian Federation. As of 31 July 2026, the actual composition of the Verkhovna Rada comprises 390 Members of Parliament (MPs).[978] Due to the temporary occupation of the Autonomous Republic of Crimea (AR Crimea) and parts of Donetsk and Luhansk regions, early parliamentary elections in 2019 were not held in single-member constituency (SMC) in these territories, meaning that 26 MPs were not elected to the Parliament. Subsequently, the introduction of martial law and the legislative prohibition of elections[979] mean that, where an MP elected in a SMC resigns or loses the mandate, the seat in the Verkhovna Rada remains vacant. For various reasons, during the IX convocation, 71 MPs[980] have lost their mandates,[981] including 27 elected in SMC. This results in a situation where a **portion of voters are not represented in the Verkhovna Rada**.

The traditionally weak **oversight function of the Verkhovna Rada** has been adversely affected by martial law. The regular 'Government's Question Hour', which had previously served as one of the main channels of communication between the Verkhovna Rada and the Cabinet of Ministers of Ukraine (Government), was reinstated only in May 2024; however, some MPs express scepticism regarding the topics presented by ministers.[982] During the first months of the full-scale invasion, meetings with representatives of the Government were held informally, at the level of faction leaders or representatives of the coalition.[983]

In July 2025, the Verkhovna Rada renewed the composition of the Government; however, the Parliament did not approve Programme of Activities of the Cabinet of Ministers (Government Programme, the PACM).[984] In July 2026, the Verkhovna Rada changed the composition of the Government for the second time during martial law. At the same time, Parliament neglects certain other oversight powers (for example, hearing reports on the execution of the State Budget, as well as reports and briefings of other state authorities).

At the same time, MPs make use of other instruments of parliamentary oversight, such as the establishment of temporary investigative commissions and the submission of parliamentary appeals and inquiries.

During the period of martial law, the format and organisation of the Verkhovna Rada's work have undergone significant changes. The Parliament began operating in the format of a single continuous plenary sitting. From 24 February 2022 to September 2025, plenary sittings were held without live broadcasts (recordings were published only after a break in the sitting was announced) and during the first plenary days also without the use of

978 Members of Parliament of Ukraine. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

979 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 19. ↗

980 Former Members of Parliament of Ukraine. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

981 According to calculations based on information available on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

982 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 27 February 2026. ↗

983 War Parliamentarism: Specific Features of the Work of the Verkhovna Rada of Ukraine under Martial Law. Parliament Journal, Issue 1/2022–2023. Agency for Legislative Initiatives, 2023, p. 62. ↗

984 On the Programme of Activities of the Cabinet of Ministers of Ukraine: draft Resolution, registration No. 14069 of 23.09.2025. ↗

the electronic voting system;[985] however, the venue of sittings remained unchanged, and MPs continued to vote in person in the building of the Verkhovna Rada.

The adaptation of the Verkhovna Rada to martial law has been semi-formal. The Parliament adopted several resolutions[986] establishing specific rules for its work under martial law. However, the core document — the Rules of Procedure of the Verkhovna Rada[987] — has not undergone significant amendments. Some of its provisions have been effectively disregarded by MPs due to their incompatibility with wartime requirements (for example, the omission of debates during the consideration of certain draft laws or adjustments to the parliamentary calendar).

Over several sessions since the beginning of the full-scale invasion, the Verkhovna Rada has effectively developed a new legislative agenda: the overwhelming majority of adopted laws were registered after 24 February 2022 and were aimed at addressing challenges arising from the invasion. The share of laws related to national security, public finance and foreign policy has increased significantly.[988]

The extension of the Parliament's term has led to a deterioration in its institutional capacity. A significant number of MPs, including those from the parliamentary majority, are reportedly willing to resign their mandates.[989] Recent legislative activity also indicates a considerable slowdown in the adoption of draft laws — on average, it takes the Verkhovna Rada more than one year to adopt a draft law at second reading.[990] MPs attribute this to the lack of communication between the Parliament and the Government,[991] criminal proceedings against MPs[992] and the excessive influence of the President.[993]

985 This refers to the first four plenary days during which sittings were held. The electronic voting system was used to calculate the total number of votes; however, information on the voting results of individual MPs is not available on the website. Voting statistics for the selected period (03.03.2022–14.04.2022). Verkhovna Rada of Ukraine. ↗

986 On the Organisation of the Work of the Verkhovna Rada of Ukraine in Connection with the Act of Armed Aggression of the Russian Federation against Ukraine on 24 February 2022: Resolution of the Verkhovna Rada of Ukraine No. 2103-IX of 24.02.2022. ↗ ; On Certain Issues of the Organisation of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation during the Eighth Session under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2558-IX of 06.09.2022. ↗ ; On Certain Issues of the Organisation of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2912-IX of 07.02.2023. ↗

987 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

988 Monitoring of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation during the 7th Session. Agency for Legislative Initiatives, 2022. ↗

989 'Fatigue, confusion and fear'. The Rada 'has broken down', and MPs are not voting for draft laws agreed with the IMF and the EU, allegedly due to the NABU case, claims MP Andrii Motovylovets (bonus – NABU comment). Forbes Ukraine, 2026. ↗

990 Monitoring of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation during the 14th Session. Agency for Legislative Initiatives, 2026. ↗

991 'The Rada has broken down': Danylo Hetmantsev on what is happening in Parliament. Interfax Ukraine, 2026. ↗ Publication by Anastasiia Radina on the social network Facebook, 2024. ↗ ; 'Mono-majority crisis'. An MP from 'Servant of the People' explains why the faction is disrupting important votes. Glavkom, 2026. ↗

992 'Fatigue, confusion and fear'. The Rada 'has broken down', and MPs are not voting for draft laws agreed with the IMF and the EU, allegedly due to the NABU case, claims MP Andrii Motovylovets (bonus – NABU comment). Forbes Ukraine, 2026. ↗

993 'The situation is difficult but not critical': what is known about the crisis in Parliament and who benefits. Espreso TV, 2026. ↗

Parliamentary Reform

State of play

In September 2015 – February 2016, the European Parliament Mission, prepared a Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine (Roadmap of the European Parliament Mission).[994] The European Parliament Mission prepared 52 recommendations across seven areas of the Verkhovna Rada's work. The Verkhovna Rada undertook to implement these recommendations by adopting the relevant Resolution No. 1035-VIII,[995] in which it also recommended that the Chairman of the Verkhovna Rada of Ukraine (Chairman, Chairman of the Verkhovna Rada, Chairman of the Parliament) approve an action plan aimed at ensuring the implementation of the recommendations.

Parliament made limited progress in implementing the recommendations set out in the Roadmap. The least progress was observed on recommendations that required the involvement of MPs (through decision-making in the plenary hall) in changing established patterns of behaviour and attitudes towards procedures and the institution. On numerous occasions, draft laws could not be included on the agenda at the first attempt and most of the registered draft laws were never submitted for first reading, although they had been registered as early as 2016. As a result of work during the eighth convocation, the Verkhovna Rada managed to fully implement only 1 of the 52 points of the Roadmap — on short-term internships in the Secretariat of the Verkhovna Rada of Ukraine (Secretariat, Secretariat of the Verkhovna Rada).[996]

During the ninth convocation, the Roadmap was neither reviewed nor updated, although in some areas it had become outdated and lost its relevance. In December 2019, the composition of the Working Group on Parliamentary Reform, established during the previous convocation, was updated by an Order of the Head of the Verkhovna Rada. In addition, at one of its meetings, instruction was given to develop a new action plan for the implementation of the reform.[997]

Overall, the renewal of the Verkhovna Rada to some extent 'reset' the status of implementation of the recommendations of the Parliamentary Reform Roadmap. Some dialogue platforms of the eighth convocation ceased to exist and most of the draft laws developed during the previous convocation were not re-registered. As of mid-2021, only five recommendations had been fully implemented, all of them concerning the Secretariat

994 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015–February 2016. ↗

995 On Measures to Implement Recommendations on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1035-VIII of 17.03.2016. ↗

996 Assessment of the Implementation of Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. Agency for Legislative Initiatives, 2019. ↗

997 The Long Road to Completing Parliamentary Reform. Assessment of the Implementation of Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. Agency for Legislative Initiatives, 2022. ↗

of the Verkhovna Rada.[998] The Working Group continued its work during the full-scale invasion.[999]

Some recommendations were implemented indirectly through other measures. For example, due to the introduction of martial law, the Conciliation Council of parliamentary factions (parliamentary groups) in the Verkhovna Rada of Ukraine (Conciliation Council) switched to a closed format for its meetings.[1000] At the same time, such changes are only temporary and should be enshrined in the Rules of Procedure of the Verkhovna Rada to remain in force after martial law ends.

The adoption of the Law of Ukraine 'On Law-Making Activity'[1001] also affected progress in implementing the Roadmap recommendations. This Law provides for the introduction of white papers[1002] and establishes requirements for the law-making process, which covers virtually all stages of preparing draft normative legal acts 'from start to finish'.[1003] The Law reflects the cyclical nature of law-making: it does not end with the adoption of an act, but provides for the subsequent evaluation of its effectiveness. Based on the results of such evaluation, a decision may be taken to review the act, thereby initiating a new cycle of law-making.[1004]

There is no single specifically designated body in the Verkhovna Rada responsible for developing parliamentary reform. Instead, this process takes place within various working groups. For example, at the end of November 2016, the Working Group on Parliamentary Reform was established, consisting of representatives of all parliamentary factions and groups. During one of its first meetings, the Working Group chose the formula 'one recommendation — one draft law', with the aim of increasing the chances of reaching compromise between different political forces on each specific issue.[1005] In addition, the Jean Monnet Dialogues format was proposed to coordinate the positions of parliamentary political forces on individual recommendations and a number of civil society organisations contributed to the implementation of the recommendations.[1006]

998 Reform of the Verkhovna Rada of Ukraine: Status and Implementation Potential. Parliament Journal No. 2/2022–2023. Agency for Legislative Initiatives, 2024. ↗

999 The Working Group on Preparing Comprehensive Proposals for Amendments to the Laws of Ukraine in the Field of Parliamentary Law Will Hold a Series of Presentations with the Participation of International Partners. Information Department of the Secretariat of the Verkhovna Rada of Ukraine. 2022 ↗; A Presentation Was Held on the Implementation of Measures to Carry Out Recommendations on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2022. ↗

1000 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015–February 2016. Recommendation No. 11. ↗

1001 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023. ↗

1002 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015–February 2016. Recommendation No. 2. ↗

1003 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015–February 2016, p. 15, Recommendation No. 1. ↗

1004 Law-Making on New Foundations: How the Laws 'On Law-Making Activity' and 'On Public Consultations' Will Change the Quality of Governance in Ukraine. Agency for Legislative Initiatives, 2025. ↗

1005 Reform of the Verkhovna Rada of Ukraine: Status and Implementation Potential. Parliament Journal No. 2/2022–2023. Agency for Legislative Initiatives, 2024. ↗

1006 Assessment of the Implementation of Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. Agency for Legislative Initiatives, 2019. ↗

In November 2021, a similar Working Group was established to prepare legislative changes in the field of parliamentary law.[1007] Five subgroups began operating within this Working Group, each responsible for a specific area: the legislative process, interaction between the Verkhovna Rada and the Government, institutional capacity, the code of parliamentary ethics and the status of the opposition. Some of the developments produced by this Working Group also formed the basis of the Ukraine Recovery Plan,[1008] which was presented at the International Ukraine Recovery Conference in Lugano.

The Working Group developed a concept in which it defined two areas of work: regulating issues that would not require amendments to the Constitution (for example, an ethics code) and regulating issues that require constitutional entrenchment (the legal status of the opposition). The format of the subgroups' work provided for the active involvement of experts from civil society organisations. Positions were usually agreed at subgroup level; contentious issues were referred for discussion at the level of the Working Group.

The most effective subgroup was the one responsible for developing the code of parliamentary ethics, as a result of whose work the relevant draft law was registered.[1009] In turn, the subgroup dealing with institutional capacity prepared a draft new Resolution on parliamentary reform, but it was not registered.[1010]

A significant part of the work also concerns strengthening interaction between the legislative and executive branches of power. Thus, in addition to the subgroup's preparation of a concept for reforming this area, at the end of 2023 an Interagency Working Group on improving draft law work, legislative impact assessment and the effectiveness of law implementation was established. At the inaugural meeting of this group, representatives of Parliament, the Government and civil society organisations discussed interaction between the Verkhovna Rada and the executive authorities in the processing of draft laws aimed at aligning Ukrainian legislation with the EU Acquis, improving the procedure for the submission of draft laws by the Government and strengthening the role of the Cabinet of Ministers of Ukraine in preparing proposals for the agenda of plenary sittings of the Verkhovna Rada.[1011]

Within the Working Group, representatives of different factions and groups may freely propose and discuss ideas and proposals, as well as involve expert support. On the other hand, this is a less formal mechanism and, in the case of the Working Group on Parliamentary Law, this sometimes led to some MPs ignoring or not attending Working Group meetings, while the results presented and the outputs of the subgroups were not reflected in registered documents.

1007 The Chairman of the Verkhovna Rada of Ukraine Signs an Order Establishing the Working Group on the Preparation of Comprehensive Legislative Proposals on Amendments to Laws of Ukraine in the Field of Parliamentary Law. Information Department of the Secretariat of the Verkhovna Rada of Ukraine, 2021. ↗

1008 Ukraine Recovery Plan. ↗

1009 On Amendments to Certain Laws of Ukraine on the Ethics of Members of Parliament of Ukraine: Draft Law of Ukraine, registration No. 8327 of 30.12.2022. ↗

1010 Information provided by Respondent No. 63 during an interview conducted on 21.04.2026.

1011 Oleksandr Korniienko: Our task is to build an administrative system that will meet European Union standards. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2023. ↗

For a long time, meetings of both Working Groups were barely held (the most recent meetings took place at the end of 2024).[1012]

Parliament endorsed the Common Principles for Support to Parliaments of the Inter-Parliamentary Union.[1013] They set out the key principles for planning and implementing programmes to strengthen parliaments and for involving civil society organisations in supporting institutional development. Civil society organisations and experts are actively involved in parliamentary reform activities, but the suspension of international assistance has had a negative impact on the organisation of the Verkhovna Rada's work.[1014]

Progress and issues

The Strategic Executive Framework for the Activities of the Secretariat of the Verkhovna Rada for 2026–2030 has been developed. It contains five objectives, the achievement of which will be ensured through the implementation of mutually integrated projects, forming a system focused on managing limited resources with an emphasis on people, results, innovation and meeting the needs of society:

- Objective No. 1: Ensuring a higher level of Parliament's institutional capacity;
- Objective No. 2: Openness of the Verkhovna Rada of Ukraine;
- Objective No. 3: Digital Parliament;
- Objective No. 4: Continuity of Parliament's work during martial law and in peacetime;
- Objective No. 5: Human resources quality management — the institution of parliamentary service and staff development (HR).[1015]

The Strategic Executive Framework is at the approval stage with the leadership of the Verkhovna Rada. The implementation of some of its projects will require the support of MPs (for example, the establishment of a separate parliamentary service or amendments to the structure of the Secretariat of the Verkhovna Rada).

The Resolution of the Verkhovna Rada on parliamentary reform has lost its relevance. The current Resolution No. 1035-VIII can no longer serve as a benchmark for developing the capacity of the Verkhovna Rada, given that some recommendations have already been implemented and require updating, while others, such as the idea of introducing the institution of parliamentary ushers, are unlikely to remain relevant.[1016] Moreover, the Resolution, approved in 2016, does not have broad political support among MPs of the ninth convocation. Therefore, this Resolution cannot effectively serve as a strategic framework for parliamentary reform. Updating the Resolution is an obligation of the

1012 Information provided by Respondent No. 63 during an interview conducted on 21.04.2026.

1013 The Verkhovna Rada of Ukraine is included in the list of parliaments of states that have endorsed the Common Principles for Support to Parliaments. Common Principles for Support to Parliaments. Inter-Parliamentary Union. ↗

1014 For example, the 'Rada: Next Generation' Programme was supposed to continue until September 2026, but in practice ceased its work in January 2025, while some other institutions even ceased their activities. International Republican Institute winds down its activities in Ukraine. Detector Media, 2025. ↗

1015 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

1016 MPs are Working to Increase the Institutional Capacity of the Verkhovna Rada. Holos Ukrainy, 2023. ↗

Verkhovna Rada enshrined in the Roadmap on the Functioning of Democratic Institutions (the FDI Roadmap).[1017]

The Verkhovna Rada does not ensure continuity in the implementation of recommendations. For example, following the expiry of the Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada of Ukraine until 2022,[1018] no new strategy was approved after 2022. The same applies to the E-Parliamentarism Strategy for 2018–2020[1019] and the Communication Strategy of the Verkhovna Rada of Ukraine for 2017–2021,[1020] which were not updated after the end of their implementation period. One-off implementation of recommendations does not allow the Verkhovna Rada to track progress and set new objectives. Although attempts were made in the Verkhovna Rada to update them,[1021] they did not produce the proper result, remaining at the level of concepts and working groups. The approval and implementation of the Communication Strategy for 2025–2028 and the Strategy for Developing an Innovative Digital Parliament for 2025–2028 are tasks under the FDI Roadmap.[1022]

Parliament has not designated a permanent body responsible for implementing parliamentary reform measures. As a result, Parliament's institutional development is non-linear and fragmented, while actions by different bodies within Parliament (different working groups) are uncoordinated, which may lead to inconsistencies in proposals on parliamentary reform. In the absence of a management centre that would determine priorities and consistent steps, the implementation of reform measures is often postponed. In addition, parliamentary reform lacks clearly expressed political leadership. As a result, coordination of reform measures and initiatives, as well as communication of the reform's role and significance, are dispersed among different actors within Parliament who do not coordinate their positions with one another.

The process of developing and implementing parliamentary reform is not accompanied by regular evaluation, review and updating. As a result, a significant part of the reform measures is outdated and no longer relevant. Instead, new initiatives to improve the work of the Verkhovna Rada remain unsystematic. Thus, the strategic framework for the reform is becoming blurred, losing support and has limited prospects for effective implementation.

Recommendations

1. The Verkhovna Rada should develop and adopt an updated Resolution on parliamentary reform in line with the recommendations of the European Parliament Mission and taking into account the challenges in organising the work of the Verkhovna Rada related to the military aggression of the Russian Federation and its consequences. Representatives of all political forces in the Verkhovna Rada, as

1017 Roadmap on the Functioning of Democratic Institutions. Measure 1 of Strategic Result 1 of Section III.C. ↗

1018 On the Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada of Ukraine until 2022: Order of the Chief of Staff of the Secretariat of the Verkhovna Rada of Ukraine No. 3359-k of 05.12.2019. ↗

1019 On Approval of the E-Parliamentarism Strategy for 2018–2020: Order of the Chairman of the Verkhovna Rada of Ukraine No. 278 of 05.07.2018. ↗

1020 On Additional Measures to Implement the Declaration on Parliamentary Openness: Order of the Chairman of the Verkhovna Rada of Ukraine No. 486 of 21.11.2017. ↗

1021 Parliament Must be an Example of Openness. Holos Ukrainy, 2019. ↗

1022 Roadmap on the Functioning of Democratic Institutions. Measures 3, 4 of Strategic Result 1 of Section III.A. ↗

well as representatives of civil society, should be involved in developing the new Resolution, which should serve as a long-term benchmark and strategic framework for the development of Parliament. The new strategic framework for the reform should include measures to monitor and evaluate progress in its implementation, provide for timeframes and ensure regular review.

2. The Verkhovna Rada should make the approval of strategic plans for sectoral development a regular practice. Documents such as the Communication Strategy, the Strategy for Building the Human Resources Capacity and the Strategy for the Development of Digital Parliamentarism should be evaluated and updated on a regular basis.

3. The Verkhovna Rada should designate or establish a permanent body responsible for updating, implementing measures and monitoring parliamentary reform. A person who has the support of the majority of factions and groups and who will bear political responsibility for the implementation of parliamentary reform should be designated in Parliament or within this body. The Secretariat of the Verkhovna Rada should provide administrative support for the implementation of the tasks of this body and the responsible person.

Parliamentary Autonomy

Parliamentary autonomy refers to the right of Parliament to establish its own rules (the doctrine of interna corporis), to implement them and to resolve disputes arising from their application independently, without the involvement of any external body.[1023] Within the constitutional framework, Parliament has the right to regulate its internal affairs independently of other branches of government. This principle functions as a structural guarantee safeguarding the proper functioning of representative democracy.[1024]

State of play

Institutional autonomy

The Constitution of Ukraine provides that the sole body of legislative power in Ukraine is the Parliament — the Verkhovna Rada of Ukraine.[1025]

The Constitution also stipulates that certain aspects of the activity of the Verkhovna Rada are regulated by law, including the organisation and procedures of its committees, temporary special commissions and temporary investigative commissions,[1026] as well as the organisation and procedures of the Verkhovna Rada itself.[1027] The legal basis for the regulation of parliamentary procedures is the Law of Ukraine 'On the Rules of Procedure

1023 Amicus curiae. Brief on three legal questions concerning the constitutional review of the law-making procedures in Parliament, Venice Commissions, CDL-AD(2021)016-t, para. 19. ↗

1024 Urgent amicus curiae brief for the European Court of Human Rights in Grande Oriente d'Italia v. Italy on Procedural Guarantees in the Exercise of Powers by Parliamentary Inquiry Committees, Venice Commission, CDL-AD(2025)033-e, para. 71. ↗

1025 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 75. ↗

1026 Ibid, Article 89.

1027 Ibid, para. 21 Part 1 Article 92.

of the Verkhovna Rada of Ukraine'.[1028] Parliamentary autonomy, at least in this aspect of the activity of the Verkhovna Rada, is somewhat limited, as amendments to the Rules of Procedure can be introduced only through the adoption of a relevant law under a procedure that includes the requirement for the law to be signed by the President. As of 31 July 2026, five draft laws[1029] relating, in one way or another, to the work of the Verkhovna Rada or its bodies remain unsigned by the President.

The Verkhovna Rada independently determines the list of committees and elects their members, establishes temporary special and temporary investigative commissions and sets the agenda. At the same time, the balance of power following the full-scale invasion has shifted significantly towards the executive branch and the President, who has expanded his influence informally,[1030] for example through shaping the Parliament's agenda.[1031] The President also limits parliamentary autonomy by not signing laws: nearly half of all laws adopted during the 14th session were subject to violations of the time limits provided for by the Constitution of Ukraine.[1032]

Procedural autonomy

The Rules of Procedure of the Verkhovna Rada establish the procedure for the preparation and conduct of sessions of the Verkhovna Rada, its sittings, the formation of state bodies, define the legislative procedure and the procedure for the consideration of other matters within its competence, as well as the procedure for exercising the control functions of the Verkhovna Rada.[1033] At the same time, since the Rules of Procedure of the Verkhovna Rada are adopted as a law, amendments may be introduced only in the form of a law and must therefore follow the relevant legislative procedure and be signed by the President.

Several provisions of the Rules of Procedure of the Verkhovna Rada enshrine the principle of equality, for example during debates or in relation to participation in the 'Government's Question Hour'.[1034] Such provisions are intended to ensure the uniform application of the Rules of Procedure to all factions and groups. In practice, Members of Parliament have not raised significant complaints regarding unequal interpretation or application of

1028 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

1029 On Amendments to Certain Laws of Ukraine: Draft Law of Ukraine No. 2260 of 11.10.2019. ↗; On Amendments to Certain Legislative Acts of Ukraine on Improving the Procedure for Appointment and Dismissal of Members of the Cabinet of Ministers of Ukraine: Draft Law of Ukraine No. 3195 of 10.03.2020. ↗; On Amendments to the Law of Ukraine 'On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine' on Ensuring Proper Conditions for the Work of Temporary Investigative and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Draft Law of Ukraine No. 3681 of 18.06.2020. ↗; On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine on the Publication of Decisions of the Verkhovna Rada of Ukraine: Draft Law of Ukraine No. 4334 of 06.11.2020. ↗; On Amendments to the Law of Ukraine 'On the Status of People's Deputy of Ukraine': Draft Law of Ukraine No. 7002 of 01.02.2022. ↗

1030 Wartime Parliamentarism: Features of the Work of the Verkhovna Rada of Ukraine under Martial Law. Parliament Journal No. 1/2022–2024. Agency for Legislative Initiatives, 2024. ↗

1031 Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

1032 Monitoring of the Work of the Verkhovna Rada of the IX Convocation during the 14th Session. Agency for Legislative Initiatives, 2026. ↗

1033 For more details on the Rules of Procedure of the Verkhovna Rada, see the section 'Rules of Procedure of the Verkhovna Rada'.

1034 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, para. 9 Part 1 Article 27, Part 6 Article 230. ↗

parliamentary rules,[1035] which allows the conclusion that parliamentary procedures are applied impartially to representatives of different parliamentary factions and groups.

The body of legislation also includes a number of regulatory legal acts which, although formally still in force, are no longer applied because they have become obsolete. In June 2026, MPs registered Draft Resolution No. 15361,[1036] which provides for the repeal of 44 resolutions of the Presidium of the Verkhovna Rada and the Verkhovna Rada.

Budgetary autonomy

The Constitution of Ukraine provides that the powers of the Verkhovna Rada include approval of its budget.[1037] The Rules of Procedure of the Verkhovna Rada further specify that the budget for the following year is approved by the Verkhovna Rada during the adoption of the draft law on the State Budget of Ukraine, based on the conclusions of the committees responsible for rules of procedure and budgetary matters.[1038] The Verkhovna Rada of the IX convocation complies with the provisions of the Rules of Procedure and approves its budget together with the State Budget.

At the same time, the funds allocated in the budget do not fully cover the activities of the Verkhovna Rada. The budget covers expenditure on salaries and partially on official foreign visits, in particular participation of Verkhovna Rada representatives in permanent delegations. However, the level of expenditure is insufficient for major repairs of Verkhovna Rada buildings, implementation of development projects or engagement of external paid expertise. The Secretariat of the Verkhovna Rada prepares the draft budget considering expenditure needs within the expenditure ceilings set by the Ministry of Finance of Ukraine (MoF).[1039] The amount of expenditure approved in the budget of the Verkhovna Rada corresponds to the amount of expenditure provided for in the State Budget under the Administrative Office of the Secretariat of the Verkhovna Rada as the chief administrator of budget funds.

Expenditure of the Verkhovna Rada is carried out under three budget programmes,[1040] however the reallocation of expenditure within the overall budgetary appropriations is decided by the Government.[1041] Information on the budget, reports on its implementation, budget requests and internal audit plans is available on the website of the Verkhovna Rada of Ukraine.[1042]

1035 Information obtained from the analysis of transcripts of plenary sittings of the Verkhovna Rada of Ukraine. ↗

1036 On Declaring Certain Resolutions of the Verkhovna Rada of Ukraine and the Presidium of the Verkhovna Rada of Ukraine No Longer in Force: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15361 of 28.06.2026. ↗

1037 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, para. 35 Part 1 Article 85. ↗

1038 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 7. ↗

1039 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.
Information provided by Respondent No. 51 during an interview conducted on 26.03.2026.

1040 0111010 'Legislative Activity of the Verkhovna Rada of Ukraine', 0111020 'Servicing and Organisational, Information and Analytical, Material and Technical Support of the Activities of the Verkhovna Rada of Ukraine', 0111090 'Coverage of the Activities of the Verkhovna Rada of Ukraine by a Subject in the Field of Parliamentary Broadcasting and Financial Support for the Publication of the Newspaper "Holos Ukrainy"'.

1041 On the Reallocation of Certain State Budget Expenditures Allocated to the Administrative Office of the Secretariat of the Verkhovna Rada of Ukraine for 2025: Order of the Cabinet of Ministers of Ukraine No. 1010 of 22.09.2025. ↗

1042 Financial and Economic Activity. Verkhovna Rada of Ukraine. ↗

One of the recommendations of the Roadmap of the European Parliament Mission[1043] was to conduct an audit of the budget of the Verkhovna Rada and its execution by the Accounting Chamber. The Accounting Chamber carried out such an audit for the first time in 2020.[1044] In 2024, the Accounting Chamber conducted another audit of the effectiveness of the management of state-owned assets with financial implications for the State Budget and of public procurement carried out by bodies supporting the activities of the Verkhovna Rada of Ukraine.[1045] In the same audit, the Accounting Chamber provided consolidated data on the implementation of the recommendations of the previous audit conducted in 2020 and determined that approximately 80% of the recommendations had been implemented.

The audit conducted by the Accounting Chamber identified several issues: some immovable property and land plots lack registered ownership rights or title documents, creating risks of loss or inefficient use, while certain public procurements were carried out in breach of procedures and without sufficient competition.[1046] As of June 2026, implementation had been initiated for 8 of the 14 recommendations resulting from the audit.[1047]

Administrative autonomy

Parliamentary administrative autonomy is defined at the constitutional level. In particular, the Verkhovna Rada has the power to determine the structure of its Secretariat and to appoint and dismiss the Head of the Secretariat of the Verkhovna Rada.[1048]

The appointment and dismissal of the Head of the Secretariat fall within the exclusive competence of the Verkhovna Rada of Ukraine, which takes such decisions by a majority vote. The Rules of Procedure of the Verkhovna Rada provide that the candidate for the position of the Head of the Secretariat is determined and proposed by the Chairman of the Verkhovna Rada.[1049] In November 2021, the Verkhovna Rada appointed Viacheslav Shtuchnyi as Head of the Secretariat of the Verkhovna Rada.[1050] The right to initiate dismissal lies with the Head of the Secretariat (by personal request), the Chairman of the Verkhovna Rada or no fewer than one third of Members of Parliament. The Head of the Secretariat is accountable to and reports to the Verkhovna Rada. The main duties of the Head of the Secretariat of the Verkhovna Rada are set out in the Regulation on the Secretariat of the Verkhovna Rada.

1043 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 15, Recommendation No. 35. ↗

1044 Report on the Results of the Audit of the Efficiency of the Use of State Budget Funds and Management of State Property by the Secretariat of the Verkhovna Rada of Ukraine with Financial Implications for the State Budget: Decision of the Accounting Chamber No. 20-1 of 04.08.2020. ↗

1045 Report on the Results of the Audit of the Effectiveness of the Management of State-Owned Assets with Financial Implications for the State Budget and of Public Procurement Carried out by Bodies Supporting the Activities of the Verkhovna Rada of Ukraine: Decision of the Accounting Chamber No. 56-3 of 17.12.2024. ↗

1046 Ibid.

1047 Secretariat of the Verkhovna Rada Begins Streamlining Property Management in Implementation of Accounting Chamber Recommendations. Accounting Chamber. ↗

1048 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, para. 35 Part 1 Article 85. ↗

1049 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 8. ↗

1050 On the Appointment of Shtuchnyi V.V. as Head of the Secretariat of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1863-IX of 04.11.2021. ↗

The current Regulation on the Secretariat of the Verkhovna Rada[1051] was approved by an Order of the Chairman of the Verkhovna Rada in August 2011, however in breach of the applicable requirements, as the version of the Rules of Procedure in force at the time provided that the Regulation on the Secretariat should be approved by a resolution of the Verkhovna Rada. In 2022, amendments to the Rules of Procedure[1052] transferred the power to approve the Regulation on the Secretariat to the Chairman, thereby regularising the status of the current Regulation.

The structure of the Secretariat[1053] was approved by the Verkhovna Rada as early as 2000. The most recent amendments, introduced in 2020,[1054] provided for the establishment of a Press Service, a Department for Citizens' Appeals (replacing a unit) and an Anti-Corruption Unit. At the same time, there is a view among Members of Parliament that a new structure of the Secretariat should be adopted.[1055]

The Secretariat of the Verkhovna Rada is developing proposals to update its structure. For example, a Concept for improving legal, expert and research support to the activities of the Verkhovna Rada has been developed, which provides for the establishment of a single expert unit within the Secretariat of the Verkhovna Rada.[1056]

There are two categories of staff within the Secretariat of the Verkhovna Rada: civil servants and patronage staff. The former are subject to the Law of Ukraine 'On Civil Service'[1057] and include staff of the secretariats of parliamentary committees as well as staff of departments and units of the Secretariat of the Verkhovna Rada. Patronage staff positions include staff of the secretariats of the Chairman of the Verkhovna Rada of Ukraine, the First Deputy Chairperson and the Deputy Chairperson, as well as staff of the secretariats of parliamentary factions and groups. Such staff are appointed for the term of office of the respective official or for the duration of the activity of the parliamentary faction or group to which they are assigned.[1058]

Another dimension of administrative autonomy is independence from the executive branch in the context of having a separate mechanism for recruiting parliamentary staff. The establishment of a separate parliamentary service is one of the recommendations of the European Parliament Mission.[1059] In January 2021, the Verkhovna Rada adopted as

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1051 On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769 of 25.08.2011. ↗

1052 On Amendments to Certain Legislative Acts of Ukraine Regarding Specific Features of Proceedings in Cases on Establishing the Fact of Birth or Death of a Person under Martial Law or a State of Emergency and in Temporarily Occupied Territories: Law of Ukraine No. 2345-IX of 01.07.2022. ↗

1053 On the Structure of the Secretariat of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1678-III of 20.04.2000. ↗

1054 On Amendments to Paragraph 2 of the Resolution of the Verkhovna Rada of Ukraine 'On the Structure of the Secretariat of the Verkhovna Rada of Ukraine': Resolution of the Verkhovna Rada of Ukraine No. 723-IX of 18.06.2020. ↗

1055 Halyna Tretiakova: 'It is extremely important to ensure the independence of the functioning of the Verkhovna Rada'. Chesno Movement, 2025. ↗ ; Zahoruyko: Heads of secretariats are the 'grey cardinals' of committees. Chesno Movement, 2026. ↗

1056 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

1057 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015. ↗

1058 Ibid, Article 92. For more details on human resources policy, see the section 'Secretariat of the Verkhovna Rada of Ukraine'.

1059 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 15, Recommendation No. 41. ↗

a basis Draft Law No. 4530,[1060] which establishes specific features of civil service in the Secretariat of the Verkhovna Rada; however this draft law has not yet been submitted for second reading. To further refine the draft law, the main committee[1061] has established a dedicated working group.[1062]

The legal framework governing property used to support the activities of the Verkhovna Rada is set out in a separate Law No. 594/96-VR[1063] adopted in 1996. This Law obliges the Parliament to determine the procedure for managing state property under the authority of the Verkhovna Rada and used to ensure its functioning. Law No. 594/96-VR also provides that the Verkhovna Rada may independently decide on the transfer of such property. The Verkhovna Rada of the IX convocation has adopted such decisions twice, most recently in November 2023 when the Parliament transferred 24 motor vehicles to the Ministry of Defence (MoD).[1064]

Progress and issues

The Verkhovna Rada does not consider the report on the implementation of its budget. The Chairman of the Verkhovna Rada is required to ensure that a report on the implementation of the budget of the Verkhovna Rada for the previous year is submitted for consideration by the Verkhovna Rada.[1065] However, such a report has not been considered even once by the Verkhovna Rada of the IX convocation, while in practice the report on budget implementation is reviewed by the Committee on Rules of Procedure.[1066]

The Parliament does not consider the draft law on the parliamentary service. The establishment and functioning of a parliamentary service capable of effectively supporting the work of the Verkhovna Rada is an obligation of the Parliament under the Roadmap on the Functioning of Democratic Institutions.[1067] The current regulatory framework does not take into account the specific features of civil service in the sole legislative body and places the human resources policy of the Secretariat of the Verkhovna Rada in a position of dependence on the executive branch. It is the Government that determines competition procedures and standards, approves the salary scale, while internal acts of the Secretariat of the Verkhovna Rada are based on model acts of the Government.[1068]

1060 On the Parliamentary Service: Draft Law of Ukraine No. 4530 of 21.12.2020. ↗

1061 The main committee for the preliminary consideration and preparation of Draft Law No. 4530 is the Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning.

1062 Report on the Implementation of the Roadmap on the Functioning of Democratic Institutions, approved by the Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, for Q4 2025.

1063 On the Legal Regime of Property Used to Support the Activities of the Verkhovna Rada of Ukraine: Law of Ukraine No. 594/96-VR of 13.12.1996. ↗

1064 On the Transfer of Certain Property Used to Support the Activities of the Verkhovna Rada of Ukraine to the Management of the Ministry of Defence of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 3490-IX of 22.11.2023. ↗

1065 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, para. 24 Part 1 Article 78. ↗

1066 Decision of the Committee on Rules of Procedure, Parliamentary Ethics and Organisation of the Work of the Verkhovna Rada of Ukraine on the Report of the Administrative Office of the Secretariat of the Verkhovna Rada of Ukraine on the Implementation of the Budget of the Verkhovna Rada of Ukraine for 2025. ↗

1067 Roadmap on the Functioning of Democratic Institutions. Measure 8 of Strategic Result 1 of Section III.C. ↗

1068 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

The Verkhovna Rada has not established the procedure for managing state property used to support its activities. This complicates managerial decision-making and prevents the Administrative Office [of the Secretariat of the Verkhovna Rada] from applying modern mechanisms and forms of management of state-owned assets used to support the Verkhovna Rada, including attracting investment for the modernisation or reconstruction of such assets.[1069] A draft of the relevant procedure has already been presented to Members of Parliament in the format of the Conciliation Council by the leadership of the Secretariat of the Verkhovna Rada.[1070]

Recommendations

1. Introduce the practice of considering reports on the implementation of the budget at plenary sittings of the Verkhovna Rada of Ukraine, which would strengthen the accountability of the Secretariat of the Verkhovna Rada to the Parliament.
2. Resume consideration of Draft Law No. 4530 on establishing a separate parliamentary service.
3. Regulate the mechanisms for property management by adopting the relevant procedure in accordance with the requirements of Law No. 594/96-VR.

Leadership of the Verkhovna Rada

State of play

Chairman, First Deputy Chairperson and Deputy Chairperson of the Verkhovna Rada of Ukraine

The powers, role and procedure for the election of the Chairman of the Verkhovna Rada of Ukraine are defined by the Constitution of Ukraine and the Rules of Procedure of the Verkhovna Rada of Ukraine. The Verkhovna Rada elects from among its members the Chairman, the First Deputy Chairperson and the Deputy Chairperson of the Verkhovna Rada of Ukraine and may dismiss them from these positions.

The Chairman of the Verkhovna Rada is elected from among MPs by a majority vote of the constitutional composition of the Parliament for the term of office of the Verkhovna Rada. Decisions on candidates for the position of Chairman of the Verkhovna Rada are taken following discussion, by open roll-call voting, and the powers of the Chairman of the Verkhovna Rada commence immediately upon election.[1071] The Chairman of the Parliament and the Deputy Chairpersons must be non-factional,[1072] which is intended to create institutional preconditions for an equally impartial procedural role vis-à-vis all parliamentary factions and groups.

1069 The Accounting Chamber assessed the effectiveness of the management of property used to support the activities of the Verkhovna Rada of Ukraine. Accounting Chamber, 2024. ↗

1070 Information provided by Respondent No. 59 during an interview conducted on 16.04.2026.

1071 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 74–75. ↗

1072 These rules were introduced prior to 2010 and do not correspond to the constitutional design restored in 2014, which gives rise to inconsistencies, such as with the factional affiliation of Dmytro Razumkov after his dismissal from the position of Chairman of the Verkhovna Rada.

In the event of a gross or systematic violation of the Rules of Procedure of the Verkhovna Rada by the presiding officer, he or she may be removed[1073] from chairing plenary sittings for a period of up to two plenary days by a majority vote of MPs.[1074]

The Rules of Procedure of the Verkhovna Rada also provide for the possibility of the early dismissal[1075] of the Chairman of the Verkhovna Rada at any time upon request, as well as in connection with unsatisfactory performance in this position or other circumstances that render the performance of duties impossible. The decision to dismiss the Chairman of the Verkhovna Rada is adopted by open roll-call voting by a majority of MPs from the constitutional composition.[1076]

The practice of the IX convocation demonstrates that the mechanisms for dismissal and removal of the presiding officer provided for by the Rules of Procedure of the Verkhovna Rada may be used as effective instruments of parliamentary response. In 2021, the Verkhovna Rada dismissed the Chairman of the Parliament, Dmytro Razumkov, from office.[1077]

The main constitutional powers of the Chairman of the Verkhovna Rada include: (1) presiding over plenary sittings of the Parliament; (2) organising its work (ensuring compliance with the agenda of plenary sittings and preparing matters for consideration); (3) signing acts of the Parliament; (4) representing the Parliament in relations with other state authorities and the authorities of other states; and (5) organising the work of the Secretariat of the Verkhovna Rada of Ukraine.[1078] The Rules of Procedure of the Verkhovna Rada further expand these powers and provide that the Chairman of the Verkhovna Rada also takes measures to ensure the security and protection of the Verkhovna Rada, exercises control over the timely submission and consideration of parliamentary inquiries, issues Orders on matters related to the official travel of Members of Parliament, etc.[1079] All procedural decisions of the Chairman of the Verkhovna Rada adopted during a plenary sitting are reflected in the transcripts of the Verkhovna Rada of Ukraine, which are publicly available on its website.[1080]

To maintain order during plenary sittings, the presiding officer may announce a break in the sitting, deprive MPs of the right to speak, terminate a speech or switch off the microphone. An analysis of the transcripts of plenary sittings of the Verkhovna Rada for the period from February 2025 to July 2026 indicates that the presiding officer generally ensures that sittings are conducted in accordance with the requirements of the Rules of

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1073 Upon the proposal of two factions or parliamentary groups, one third of Members of Parliament (MPs) of the constitutional composition, or the Committee on Rules of Procedure.

1074 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 29. ↗

1075 Proposals for dismissal may be submitted by MPs on the basis of a conclusion of the Committee on Rules of Procedure in the event of removal from chairing plenary sittings three or more times during one session, or by not less than one third of MPs of the constitutional composition. The Chairman of the Verkhovna Rada prepares a report on work performed and on the execution of the budget of the Verkhovna Rada, which is submitted to MPs.

1076 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 76–77. ↗

1077 On the Dismissal of D.O. Razumkov from the Position of Chairman of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1802-IX of 07.10.2021. ↗

1078 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 88. ↗

1079 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 78. ↗

1080 Ibid, Articles 54–55.
Official website of the Verkhovna Rada of Ukraine. Transcripts of plenary sittings. ↗

Procedure of the Verkhovna Rada. At the same time, the transcripts also record verbal altercations between MPs and the Chairman of the Verkhovna Rada[1081] which, however, did not result in formal disciplinary consequences. A violation of the Rules of Procedure of the Verkhovna Rada during the sitting of 22 July 2025, at which Law No. 4555-IX[1082] was adopted, prompted two parliamentary factions to initiate the removal of Ruslan Stefanchuk from chairing the sitting; however, this proposal was not supported.[1083]

The First Deputy Chairperson and the Deputy Chairperson of the Verkhovna Rada exercise certain powers of the Chairman of the Verkhovna Rada in accordance with the distribution of responsibilities[1084] determined by the Chairman of the Verkhovna Rada. For example, ensuring the coordinated work of parliamentary committees is divided among the leadership of the Verkhovna Rada. The election and dismissal of the First Deputy Chairperson and the Deputy Chairperson of the Verkhovna Rada are carried out in accordance with the procedure established for the Chairman of the Verkhovna Rada. The re-election of the Chairman of the Verkhovna Rada of Ukraine does not constitute grounds for a mandatory review of the tenure of the First Deputy Chairperson and the Deputy Chairperson of the Verkhovna Rada of Ukraine.[1085] According to established practice, the position of Deputy Chairperson of the Verkhovna Rada is held by a Member of Parliament representing the opposition.

Organisational, legal and analytical support for the activities of officials of the Verkhovna Rada of Ukraine, including the Chairman, is provided by the Secretariat of the Verkhovna Rada of Ukraine. Within its structure, specialised units operate to support the activities of the parliamentary leadership, including the secretariats of the Chairman of the Verkhovna Rada[1086] and the Deputy Chairpersons. As of 31 July 2026, the Secretariat of the Chairman of the Verkhovna Rada consists of 10 staff members,[1087] while the secretariats of the First Deputy Chairperson and the Deputy Chairperson consist of eight staff members respectively,[1088] including advisers who provide analytical and expert support to the parliamentary leadership. Additional expert support for the Parliament's draft law work is provided by the Scientific Advisory Council under the Chairman of the Verkhovna Rada of Ukraine, which is an advisory body composed of more than 100 legal experts.[1089]

1081 Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 16.07.2026. Verkhovna Rada of Ukraine. 2026. ↗; Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 11.06.2026. Verkhovna Rada of Ukraine. 2026. ↗

1082 On Amendments to the Criminal Procedure Code of Ukraine Regarding the Peculiarities of Pre-Trial Investigation of Criminal Offences Related to Missing Persons under Special Circumstances during Martial Law: Law of Ukraine No. 4555-IX of 22.07.2025. ↗

1083 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 22.07.2025. Verkhovna Rada of Ukraine, 2025. ↗

1084 On the Distribution of Responsibilities for the Exercise of Certain Powers of the Chairman of the Verkhovna Rada of Ukraine between the First Deputy Chairperson of the Verkhovna Rada of Ukraine and the Deputy Chairperson of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1191-k of 04.11.2019. ↗

1085 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 79–80. ↗

1086 On Approval of the Regulation on the Secretariat of the Chairman of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 911-k of 10.12.2020. ↗

1087 Secretariat of the Chairman of the Verkhovna Rada of Ukraine. Official website of the Verkhovna Rada of Ukraine. ↗

1088 Secretariat of the First Deputy Chairperson of the Verkhovna Rada of Ukraine. Official website of the Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗; Secretariat of the Deputy Chairperson of the Verkhovna Rada of Ukraine. Official website of the Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1089 Regulation on the Scientific Advisory Council under the Chairman of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 502 of 30.12.2021. ↗

Conciliation Council

While presiding over plenary sittings falls within the direct powers of the Chairman of the Verkhovna Rada, coordination of organisational aspects of parliamentary activity is carried out with the participation of the Conciliation Council of parliamentary factions (parliamentary groups), which is an advisory body.

The Conciliation Council is composed of the Chairman of the Verkhovna Rada of Ukraine, the Deputy Chairpersons of the Verkhovna Rada of Ukraine, the heads of parliamentary factions and parliamentary groups with the right to vote, as well as committee chairpersons with an advisory vote. The main tasks of the Conciliation Council include agreeing on the draft plan of draft law work, considering proposals on the calendar plan of the session, the agenda and the schedule of plenary sittings, as well as other organisational matters related to the work of the Verkhovna Rada of Ukraine.[1090]

The European Parliament Mission report noted that, in practice, meetings of the Conciliation Council often took on a politicised character (prior to the full-scale invasion), while issues related to setting the parliamentary agenda were relegated to a secondary role. To focus its work on organisational matters, it was recommended to hold meetings without media presence and to introduce a system of specialised parliamentary correspondents to report on the outcomes of meetings.[1091]

Following the start of the full-scale invasion, the role of the Conciliation Council changed, as its meetings began to be held in a closed format. This limited the use of the platform for political statements and contributed to a stronger focus on coordinating legislative initiatives between factions and committees.[1092] The Conciliation Council thus evolved into a platform not only for agreeing on the agenda, but also for discussing draft laws, potential amendments and building collective support for them, thereby facilitating more timely alignment on legislative decisions.

Whereas prior to the full-scale invasion the Conciliation Council generally met every Monday,[1093] under the current temporary arrangements during martial law such meetings are convened as needed by the Chairman of the Verkhovna Rada of Ukraine, as well as at the request of three parliamentary factions or groups.[1094]

Progress and issues

The temporary nature of the decision to hold Conciliation Council meetings in a closed format creates a risk of reverting to the open format, which was previously characterised by the predominance of political statements over agenda coordination and reduced effectiveness. This may occur following the termination of martial law. In the

1090 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 73. ↗

1091 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, pp. 8, 42. ↗

1092 Adaptation of Parliamentary Practices to the Conditions of Work during the Full-Scale Aggression of the Russian Federation. Agency for Legislative Initiatives, 2023. ↗

1093 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 73. ↗

1094 On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2412-IX of 07.02.2023, para. 4. ↗

absence of procedural revisions, there is a likelihood of a return to practices that limit the effectiveness of the Conciliation Council.

At the same time, some MPs report **abuses associated with the closed format of the Conciliation Council**, noting that it has reduced its influence on shaping the agenda and even propose a return to open meetings.[1095]

The reduced transparency of the Conciliation Council's activities under the closed format is not accompanied by an adequate level of disclosure of summarised information on its work. Information on meeting dates, the list of issues considered and the results of their coordination is not publicly available, which complicates public oversight and external assessment of the regularity and substance of its coordination activities.

Recommendations

1. Revise the approach to organising the work of the Conciliation Council and provide for its meetings to be held in a format closed to the media.
2. Ensure the regular publication of information on the dates of Conciliation Council meetings, the list of issues considered, and the decisions agreed as a result thereof.

Committees of the Verkhovna Rada of Ukraine

State of play

Committees are bodies of the Verkhovna Rada established from among MPs to carry out legislative drafting work, prepare and conduct preliminary consideration of issues falling within the powers of the Verkhovna Rada and perform oversight functions.[1096]

The Verkhovna Rada of the ninth convocation has 23 committees.[1097] Compared with the number of committees in previous convocations (27 committees in the eighth convocation[1098] and 29 committees in the seventh convocation[1099]), there is a trend towards reducing the number of committees, which is one of the recommendations of the Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine.[1100] The previously large number of committees can be explained by the political need to accommodate conflicting demands of political factions.[1101]

1095 Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

1096 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 1 Article 89. ↗

1097 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

1098 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Eighth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 22-VIII of 04.12.2014. ↗

1099 On Committees of the Verkhovna Rada of Ukraine of the Seventh Convocation: Resolution of the Verkhovna Rada of Ukraine No. 11-VII of 25.12.2012. ↗

1100 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 15, Recommendation No. 17. ↗

1101 Ibid, p. 14.

The legal framework for the functioning of the committees of the Verkhovna Rada includes the Constitution of Ukraine and the Laws of Ukraine 'On Committees of the Verkhovna Rada of Ukraine',[1102] 'On the Status of People's Deputy of Ukraine'[1103] (with regard to the rights and duties of MPs) and 'On the Rules of Procedure of the Verkhovna Rada of Ukraine'.[1104] Together, they determine the organisation and procedure of committee work, as well as their functions and procedures. The specific list of committees, their composition, the minimum and maximum number of committee members, as well as the distribution of areas of competence between them, are determined by resolutions of the Verkhovna Rada[1105] at the beginning of a new convocation. These resolutions are regularly amended during the convocation.

The specialised Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' defines three functions of committees: legislative drafting, organisational and oversight. The legislative drafting function consists of developing draft laws, resolutions and other legislative acts, as well as preparing them for consideration in the first and second readings at plenary meetings of the Verkhovna Rada.

As part of their oversight function, committees analyse the practice of applying legislative acts in the activities of state bodies, local self-government bodies and their officials, and provide them, based on such analysis, with recommendations that are mandatory for consideration. Committees also participate in preparing issues for consideration by the Verkhovna Rada. Committees have the right to obtain, review and examine information on matters falling within their areas of competence, including by addressing the Cabinet of Ministers or other state bodies. Committees may invite to their meetings the First Deputy Prime Minister, Deputy Prime Ministers of Ukraine, ministers, heads of other state bodies, local self-government bodies, enterprises, institutions, organisations and associations of citizens, as well as their officials and officers, and obtain from them explanations necessary for considering agenda items. Once the Law of Ukraine 'On Law-Making Activity'[1106] is brought into effect, committees will receive a new range of powers: consideration of the concept of a draft normative legal act, as well as legal monitoring of legislative acts.

Parliament's oversight function should have been strengthened by the establishment of a committee whose remit includes *issues concerning the exercise of the oversight functions of the Verkhovna Rada of Ukraine over the activities of bodies with special law enforcement functions, law enforcement bodies, special-purpose law enforcement bodies and intelligence bodies*. In 2018, the Verkhovna Rada adopted the Law of Ukraine 'On National Security of Ukraine',[1107] which provided for the establishment of a committee with this area of competence. In 2020, the Verkhovna Rada adopted the Law of Ukraine

1102 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995. ↗

1103 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 14, 24. ↗

1104 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 81–84. ↗

1105 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019 ↗; On the Election of Heads, First Deputy Heads, Deputy Heads, Secretaries and Members of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 20-IX of 29.08.2019. ↗

1106 The Law of Ukraine 'On Law-Making Activity' enters into force one year after the termination or cancellation of martial law in Ukraine. On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Part 3 Article 27, Part 5 Article 67. ↗

1107 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018. ↗

'On Intelligence',[1108] which provides for the establishment of a new oversight committee with the relevant area of competence. As of 2026, there is no information on the existence of a separate special committee in Parliament.

The Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' establishes a detailed procedure for organising the work of committees of the Verkhovna Rada, which regulates the procedure for convening and holding committee meetings. Committees plan their work for each regular session of the Verkhovna Rada. The main forms of committee work are meetings and committee hearings. The quorum for holding a meeting is more than half of the committee membership approved by the Verkhovna Rada. Voting at committee meetings is conducted by members personally and openly. Committee acts (decisions, conclusions and recommendations) are adopted by a majority of votes of the committee members present.

After the full-scale invasion, the procedure for committee work changed. Instead of predictable planning of meetings in accordance with the calendar plan, the Verkhovna Rada, by the relevant resolution, allowed meetings to be convened urgently to ensure consideration of agenda items for plenary sittings of the Verkhovna Rada.[1109]

The rules of transparent committee work, enshrined in the sectoral law, stipulate that committees must publicise their activities, in particular by publishing their work plans, meeting schedules and agendas, draft acts and adopted acts, minutes, transcripts of committee meetings and hearings, and video recordings of open committee meetings.[1110] During the COVID-19 pandemic, the Verkhovna Rada adapted the work of committees[1111] and allowed committee meetings to be held by videoconference, with the possibility of simultaneous broadcast on the official website of the Verkhovna Rada, subject to prior consent of a majority of the approved committee membership. At the same time, committees were required to continue publishing committee acts, minutes and transcripts of meetings on the official website of the Verkhovna Rada. After the start of the full-scale invasion, the Verkhovna Rada extended the rules on videoconference meetings to the period of martial law and 30 days after its termination,[1112] while committees partly stopped updating information on their websites, citing security risks. For some committees, such a decision was justified given the specific nature of their areas of competence, for example the Committee on National Security, Defence and Intelligence or the Committee on Law Enforcement. However, other committees (for example, the Committee on National Health, Medical Care and Medical Insurance or the Committee on Environmental Policy[1113]) did not update information on their own websites, creating risks that decisions would be adopted without public discussion.

1108 On Intelligence: Law of Ukraine No. 912-IX of 17.09.2020. ↗

1109 On the Organisation of Work of the Verkhovna Rada of Ukraine under a State of Emergency and/or Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2100-IX of 23.02.2022. ↗

1110 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 9. ↗

1111 On Amendments to the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine': Law of Ukraine No. 543-IX of 30.03.2020. ↗

1112 On Amendments to Certain Laws of Ukraine on the Work of Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 3218-IX of 30.06.2023. ↗

1113 Covered by War. Anti-Rating of Transparency of Verkhovna Rada Committees. CHESNO Movement, 2022. ↗

To remedy the situation, in January 2025 the Verkhovna Rada adopted Law No. 4212-IX[1114] on the openness of committees. The Law requires committees of the Verkhovna Rada to publish meeting agendas no later than 24 hours before the start of committee meetings, as well as to broadcast open committee meetings live and keep video recordings of such meetings freely accessible. Committees are also required to publish minutes and transcripts of committee meetings on the webpage of the relevant committee on the official website of the Verkhovna Rada. Although the Law was adopted back in January 2025, the President signed it only on 17 December 2025, as a result of which it entered into force only on 20 January 2026. Currently, most committees publish information and documents required by the adopted law, although practice remains uneven. For example, some committees do not publish work plans or implementation reports; while the reports that are published, although somewhat similar in structure, differ significantly in the scope of their content.

Secretariats are established to support the work of committees, and their staff are civil servants.[1115] In their work, secretariats are guided by the relevant Regulation[1116] and provide organisational and information, consultative and legal, expert and analytical and methodological support for the activities of committees, organise committee meetings, parliamentary hearings and committee hearings, and support the work of subcommittees and the activities of committee members. Changes in areas of competence, committee heads or committees themselves (for example, their formation during a new convocation) do not constitute grounds for dismissing committee secretariat staff. Committees also have the right to conclude contracts with research institutions, educational institutions and specialists for scientific and informational research, drafting, revision and expert examination of draft laws, but do not exercise this right.[1117]

The legislation defines the **procedure for forming the personal composition of committees and determining committee leadership**. The Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' establishes certain restrictions on MPs' participation in committees. An MP may be a member of only one committee. As of 31 July 2026, 10 MPs[1118] were not members of any committee, three of them by virtue of their office — the Chairman, First Deputy Chairperson and Deputy Chairperson of the Verkhovna Rada, who may not be members of committees.[1119] Committee heads, first deputy heads, deputy heads, secretaries and members are determined taking into account the quotas of proportional representation of parliamentary factions (parliamentary groups). Changing a head, first deputy head, deputy head or secretary, or transferring a member from one committee to another, requires relevant amendments to the Resolution and, accordingly, the support of 226 MPs in the session hall.

1114 On Amendments to Certain Laws of Ukraine on Strengthening Certain Guarantees for the Activities of Media and Journalists and Ensuring Citizens' Right of Access to Information: Law of Ukraine No. 4212-IX of 14.01.2025. ↗

1115 Such staff members are subject to the provisions of the Laws of Ukraine 'On Civil Service' and 'On Prevention of Corruption'.

1116 On Approval of the Regulation on the Secretariat of a Committee of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1241-k of 20.12.2021. ↗

1117 Information provided by the Secretariat of the Verkhovna Rada of Ukraine in letter No. 09/13-2026/48409 of 06.03.2026.

1118 MPs who are not members of any committee. Verkhovna Rada of Ukraine, 2026 (assessed 31.07.2026). ↗

1119 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 2 Article 59. ↗

To support the main areas of their work, committees may establish subcommittees from among their members, each comprising at least three committee members. Committee members may sit on several subcommittees.

As of 31 July 2026, 114 MPs held leadership positions in committees (head, first deputy head, deputy head or committee secretary), of whom 65 MPs were members of the parliamentary faction of the political party 'Servant of the People' in the Verkhovna Rada of Ukraine (parliamentary faction 'Servant of the People', faction 'Servant of the People') (57% of the number of leadership positions).[1120] The formation of a single-party majority in the ninth convocation enabled members of the parliamentary faction 'Servant of the People' to head most committees, as there was no longer any need to reach political agreements with other parliamentary factions and groups. At the same time, some leadership positions remain vacant. Due to the deaths of MPs,[1121] the positions of committee secretaries are vacant in the Committee on Economic Development and the Committee on Legal Policy, while after Dmytro Natalukha was appointed Head of the State Property Fund of Ukraine (SPFU),[1122] the Committee on Economic Development remained without a head. In May 2026, Volodymyr Tsabal,[1123] Secretary of the Committee on Budget, had his parliamentary powers terminated early, while in July, following the change of Government, Denys Maslov, Chairman of the Committee on Legal Policy, was appointed Minister of Justice of Ukraine.[1124]

Representatives of the parliamentary minority head three committees: the Committee on Ukraine's Integration into the European Union (Committee on EU Integration) (the committee head is a member of the parliamentary faction of the political party 'European Solidarity' in the Verkhovna Rada of Ukraine (parliamentary faction 'European Solidarity', faction 'European Solidarity'), the Committee on Youth and Sports (the committee head is a member of the parliamentary faction of the political party All-Ukrainian Union 'Batkivshchyna' in the Verkhovna Rada of Ukraine of the IX convocation (parliamentary faction 'Batkivshchyna', faction All-Ukrainian Union 'Batkivshchyna') and the Committee on Freedom of Speech (the committee head is a member of the parliamentary faction of the political party 'Holos' in the Verkhovna Rada of Ukraine of the IX convocation (parliamentary faction 'Holos', faction 'Holos').

The distribution of roles and leadership positions in committees is determined by arrangements between parliamentarians and does not always take into account the experience, expertise and interests of MPs. For example, MP Andrii Kozhemiakin was an MP in the previous four convocations, where he was a member or head of the Committee

1120 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1121 Holos MP Yaroslav Rushchyshyn Killed in Road Accident. Ukrainska Pravda, 2025 ↗; Holos MP Oleh Makarov Dies. Ukrainska Pravda, 2024. ↗

1122 On the Appointment of D. Natalukha as Head of the State Property Fund of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4760-IX of 14.01.2026. ↗

1123 On the Early Termination of the Powers of V. Tsabal, Member of Parliament of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4885-IX of 27.05.2026. ↗

1124 On the Early Termination of the Powers of D. Maslov, Member of Parliament of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4943-IX of 16.07.2026 ↗; On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026. ↗

on Legislative Support for Law Enforcement, while in the Verkhovna Rada of the ninth convocation he headed the Committee on Youth and Sports.

There is an imbalance in workload among parliamentary committees due to differences in the number of committee members and the distribution of areas of competence between committees, and therefore in the number of draft laws that the relevant committee prepares for consideration by the Verkhovna Rada. During the 14th session,[1125] the Committee on Law Enforcement (22 committee members), the Committee on Finance, Taxation and Customs Policy (29 committee members), the Committee on Social Policy and Protection of Veterans' Rights (10 committee members) and the Committee on Legal Policy (18 committee members) were designated as the lead committees for preparation and preliminary consideration of the largest number of draft laws (more than 40). At the same time, for example, the Committee on Agrarian and Land Policy (31 committee members) was designated as the lead committee for nine draft laws, while the Committee on Energy, Housing and Utilities Services (24 committee members) was designated as the lead committee for eight draft laws.[1126]

Progress and issues

The mismatch between the distribution of committee areas of competence and the powers of specific ministries complicates parliamentary oversight. A situation in which one ministry is accountable to several committees creates risks for its accountability and blurs the responsibility both of ministries before committees and of committees for the relevant areas of ministerial oversight. In such cases, it is more difficult for committees to see the full picture of a ministry's activities and provide well-founded recommendations. Conversely, this creates a need for ministries to report several times on the same issues. An example of a ministry accountable to three committees was the Ministry of Economy, Environment and Agriculture of Ukraine (Ministry of Economy), which was reorganised by the Government in July 2025.[1127] However, following the change of Government in July 2026, this Ministry was again divided into two separate ministries: the Ministry of Agrarian Policy and Food of Ukraine and the Ministry of Economy and Environment of Ukraine.[1128] The repeated reorganisation of the Cabinet of Ministers of Ukraine also complicates parliamentary oversight of their activities, as committees may not immediately be able to determine which ministry is responsible for formulating and implementing state policy in a particular area.

The European Parliament Mission recommended that committees should be clearly aligned with the areas of responsibility of ministries.[1129] To implement this recommendation, in 2018 the Verkhovna Rada of the eighth convocation adopted Draft Law No. 6256[1130]

1125 The 14th session lasted from 02.09.2025 to 02.02.2026.

1126 Legislative Activity in Committees of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

1127 Certain Issues of the Ministry of Economy, Environment and Agriculture: Resolution of the Cabinet of Ministers of Ukraine No. 903 of 21.07.2025. ↗

1128 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 963 of 17.07.2026. ↗

1129 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 15, Recommendation No. 17. ↗

1130 On Amendments to the Laws of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' and 'On Central Executive Bodies' on Optimising the Work of Committees of the Verkhovna Rada of Ukraine and Aligning Their Areas of Competence with the Areas of Activity of Ministries: Draft Law of Ukraine, registration No. 6256 of 28.03.2017. ↗

at first reading, which would have limited the number of ministries and parliamentary committees to 20, and stipulated that a committee could be established or abolished, or its name or area of competence changed, only if a new ministry was established or an existing ministry was reorganised or abolished. In May 2019, Parliament returned this draft law for revision and submission for revision and resubmission for a repeated second reading. In connection with the end of the work of the Verkhovna Rada of the eighth convocation, pursuant to the Rules of Procedure of the Verkhovna Rada,[1131] this draft law was to be considered by the Verkhovna Rada of the new [ninth] convocation. However, the draft law was not recommended for inclusion on the agenda of the second session and was withdrawn from consideration.[1132]

The absence of a single expert position and legal conflicts regarding the establishment of special committees limit the prospects for strengthening parliamentary oversight at committee level. *In 2018 and 2020, laws were adopted regarding a committee whose area of competence would include issues concerning the exercise of the oversight functions of the Verkhovna Rada of Ukraine over the activities of bodies with special law enforcement functions, law enforcement bodies, special-purpose law enforcement bodies and intelligence bodies.* This gave rise to a disputed issue: who should perform the functions of this committee — the Committee on National Security, Defence and Intelligence (which includes a subcommittee with an identical name) or a separately established oversight committee? The law provides that the Verkhovna Rada must determine the requirements to be met by a committee member and committee secretariat staff member, as well as the procedure for organising and undergoing vetting, the frequency of special vetting and the procedure for appealing its results. Parliament has not yet adopted a normative legal act establishing such requirements.[1133]

According to the legal position of the Constitutional Court of Ukraine (CCU), committees are not independent entities exercising parliamentary oversight. They participate only at the stage of preparation and preliminary consideration of issues falling within the sphere of parliamentary oversight[1134] and may only assist the Verkhovna Rada in exercising its powers of parliamentary oversight by carrying out certain auxiliary actions of an informational, expert, analytical or other nature.[1135] In addition, some experts argue that all committees must perform three functions simultaneously (legislative drafting, oversight and the function of preparing and conducting preliminary consideration of issues), and

1131 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 106. ↗

1132 On Amendments to the Laws of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' and 'On Central Executive Bodies' on Optimising the Work of Committees of the Verkhovna Rada of Ukraine and Aligning Their Areas of Competence with the Areas of Activity of Ministries: Draft Law of Ukraine, registration No. 0949 of 29.08.2019. ↗

1133 Green Paper 'Parliamentary Oversight of the Security and Defence Sector in the Context of Correlation Between NATO and Ukrainian Norms and Practices'. Agency for Legislative Initiatives, 2025. ↗

1134 Opinion of the Constitutional Court of Ukraine No. 1-v/2001 of 14.03.2001 in the case on the application of the Verkhovna Rada of Ukraine for an opinion on the compliance of the Draft Law of Ukraine 'On Amendments to the Constitution of Ukraine (Articles 84, 85, 89, 92, 93, 94, 106, 147, 150, 151 and paragraph 6 of Section XV of the Constitution of Ukraine)' with the requirements of Articles 157 and 158 of the Constitution of Ukraine (case concerning amendments to Articles 84, 85 and other articles of the Constitution of Ukraine). ↗

1135 Decision of the Constitutional Court of Ukraine No. 16-rp/2010 of 10.06.2010 in the case on the constitutional petition of 58 MPs of Ukraine concerning the compliance with the Constitution of Ukraine (constitutionality) of the provisions of paragraphs 3, 4, 5 and 6 of Article 9, paragraphs 3, 4 and 5 of Article 10, subparagraph 'g' of paragraph 1 of Article 24, paragraph 3 of Article 26 of the Law of Ukraine 'On the Organisational and Legal Framework for Combating Organised Crime', paragraph 10 of Article 14 and Article 33^1 of the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine'. ↗

that the establishment of oversight committees is inadmissible. On this basis, experts regard the establishment of this special committee as unconstitutional.

Similar arguments are also applied to other committees that could potentially be established. Draft Law No. 8073-d[1136] provides for the establishment of a similar oversight committee whose area of competence would include *issues concerning the exercise of the oversight functions of the Verkhovna Rada of Ukraine over the organisation and activities of law enforcement bodies and prosecution authorities*.

Another Draft Law, No. 8327,[1137] provided for the establishment of a committee whose area of competence would include issues of monitoring compliance with discipline and standards of parliamentary ethics. This was also criticised by the Main Scientific and Expert Department, which interprets this provision as one that envisages only one function for the committee — the oversight function. At the same time, experts consider that no provisions of Draft Law No. 8327 restrict this committee from exercising other functions: carrying out legislative drafting work and preparing and conducting preliminary consideration of issues falling within the powers of the Verkhovna Rada.[1138] In March 2026, MPs registered a revised version of Draft Law No. 8327, which proposes establishing a committee whose remit would include the legal status of MPs and parliamentary ethics, without specifying that it would exercise oversight over compliance with parliamentary ethics.

The distribution of positions in the committees of the Verkhovna Rada does not reflect the actual representation of political forces in Parliament. This is a problem for Parliament's performance of its representative function. Thus, the principle of proportional representation is expressly enshrined in Article 81 of the Rules of Procedure of the Verkhovna Rada, and the current distribution of leadership positions and committee membership therefore also fails to comply with the Rules of Procedure. An important reason for revising the quotas should have been the suspension in April 2022 of the activities of the parliamentary faction of the political party 'Opposition Platform — For Life' in the Verkhovna Rada,[1139] as well as the subsequent dissolution of this parliamentary faction[1140] in May 2022.

A method for distributing quotas was proposed back in 2016 by the European Parliament Mission, which recommended that the Verkhovna Rada introduce a methodology for distributing positions according to the d'Hondt principle.[1141] If this formula had been applied when distributing committee head positions at the beginning of the ninth convocation, the parliamentary faction 'Servant of the People' would have received 15 committee head positions instead of 19.[1142] The Verkhovna Rada of the eighth convocation adopted in the

1136 On Amendments to the Code of Ukraine on Administrative Offences and Other Legislative Acts of Ukraine on Improving Liability for Violations of Parliamentary Oversight: Draft Law of Ukraine, registration No. 8073-d of 06.02.2023. ↗

1137 On Amendments to Certain Legislative Acts of Ukraine on the Rules of Ethical Conduct of MPs of Ukraine (Code of Ethics): Draft Law of Ukraine, registration No. 8327 of 30.12.2022. ↗

1138 Why Is the Adoption of the Code of Ethics a Political Issue? Agency for Legislative Initiatives, 2024. ↗

1139 Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 14.04.2022. Verkhovna Rada of Ukraine, 2022. ↗

1140 Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 12.05.2022. Verkhovna Rada of Ukraine, 2022. ↗

1141 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 15, Recommendation No. 18. ↗

1142 Publication by the Agency for Legislative Initiatives on the social network Facebook, 2019. ↗

first reading Draft Law No. 7550,[1143] which provided for the distribution of positions in committees according to the d'Hondt principle. However, before the second reading, the lead committee raised a number of comments regarding its possible implementation (for example, how to apply the d'Hondt principle if an MP transfers to another parliamentary faction) and recommended returning draft law No. 7550 to the author for revision.

Although, as of 31 July 2026, the Verkhovna Rada of the ninth convocation had voted 39 times[1144] to amend the Resolution determining the personal composition of committees (which indicates frequent transfers of some MPs between committees), these changes did not lead to proportional representation in committee leadership. In addition, the quotas of parliamentary factions in the Committee on Budget, the Committee on Economic Development and the Committee on Legal Policy remain unfilled.

Parliamentary committee secretariats have limited staffing capacity, which adversely affects prospects for improving Parliament's work. The number of staff members of a committee secretariat is set by the Chairman of the Verkhovna Rada upon the submission of committees, within the approved staffing level of the Secretariat of the Verkhovna Rada.[1145] Different committees have different workloads, which may depend on their areas of competence, the scope of their oversight powers, the number and volume of draft laws and other factors. In addition, three committees prepare additional conclusions on all draft laws,[1146] but lack sufficient staffing capacity to do so.[1147] This leads to delays in the preparation of draft laws and creates dependence of committees on external expert assistance.

Recommendations

1. During the formation of committees in the Verkhovna Rada of the tenth convocation, ensure a review of the number of committees and an even distribution of areas of competence that would correspond to the policy areas of ministries.
2. Resolve the legal conflict regarding the existence of a committee whose area of competence includes *issues concerning the exercise of the oversight functions of the Verkhovna Rada of Ukraine over the activities of bodies with special law enforcement functions, special-purpose law enforcement bodies and intelligence bodies*, and adopt the documents necessary for its functioning.
3. Ensure genuine political proportional representation of members of different parliamentary factions and parliamentary groups in the committees of the Verkhovna Rada, especially in leadership positions. Fill the vacant leadership positions in the Committee on Budget, the Committee on Economic Development and the Committee on Legal Policy.

1143 On Amendments to Certain Laws of Ukraine on the Distribution of Positions in Committees of the Verkhovna Rada of Ukraine According to the d'Hondt Principle: Draft Law of Ukraine, registration No. 7550 of 05.02.2018. ↗

1144 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1145 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Part 3 Article 54. ↗

1146 Each draft law is forwarded to the Committee on Anti-Corruption Policy, the Committee on Budget and the Committee on EU Integration to assess its compliance with legislation in the relevant field. On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 93. ↗

1147 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026; Information provided by Respondent No. 57 during an interview conducted on 02.04.2026 and 14.04.2026.

4. Review approaches to determining the number of staff members of secretariats in line with the actual workload of committees of the Verkhovna Rada.

Temporary Commissions of the Verkhovna Rada of Ukraine

State of play

The establishment and activities of temporary commissions in the Verkhovna Rada are regulated by the Constitution,[1148] the Rules of Procedure of the Verkhovna Rada[1149] and the specialised Law of Ukraine 'On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine',[1150] adopted in 2019. The Law distinguishes between two types of temporary commissions: temporary investigative commissions, whose main task is to exercise parliamentary oversight by conducting investigations into matters of public interest, and temporary special commissions, which are established for the preparation and preliminary consideration of issues, as well as for the preparation and finalisation of draft laws and other acts of the Verkhovna Rada acting with the powers of the main committee where the subject matter of such drafts does not fall within the remit of any committee.

Temporary special commissions and temporary investigative commissions perform different functions. The powers of temporary special commissions correspond to those of main committees. The powers of temporary investigative commissions are quite broad: they have the right to obtain all information, documents and other materials necessary for their work from state bodies, local self-government bodies, law enforcement bodies and others. Where necessary, temporary investigative commissions may seize requested documents or obtain copies of them. In addition, temporary investigative commissions may invite witnesses to give testimony or explanations, and involve external experts and law enforcement officers, for example prosecutors.[1151]

As of 31 July 2026, during the IX convocation, the Verkhovna Rada had established 66 temporary commissions,[1152] including 44 temporary investigative commissions and 22 temporary special commissions, the highest number among all previous convocations of the Verkhovna Rada. For example, the Verkhovna Rada of the VIII convocation established five temporary investigative commissions and two temporary special commissions,[1153] while in the VII convocation there were 11 investigative commissions

1148 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 89. ↗

1149 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 85–88. ↗

1150 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019. ↗

1151 Temporary Commissions in Parliament: Control without the Ability to Influence. Parliament Journal No. 1/2023–2024. Agency for Legislative Initiatives, 2024. ↗

1152 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1153 Temporary Special and Investigative Commissions That Have Ceased Their Activities (Eighth Convocation). Verkhovna Rada of Ukraine. ↗

and three special commissions.[1154] Initially, the activities of most commissions concerned investigations into high-profile cases or social issues. After the full-scale invasion, the main focus of parliamentary oversight by commissions shifted to national security, the activities of state bodies during martial law and social protection for service members and other persons. MPs believe that the reasons for establishing such a large number of commissions are: (1) the need for additional tools to influence the Government,[1155] (2) the absence of a body responsible for policy-making in a particular area[1156] or that body's incapacity,[1157] and (3) an MP's desire to change the focus of their work without changing their committee.[1158] In addition, some commissions exist only on paper: they do not hold meetings and are not active.[1159]

Although the establishment of temporary commissions is traditionally an opposition tool, in practice MPs from the single-party majority also use this right. Of the 12 temporary commissions operating as of 31 July 2026, MPs from the parliamentary faction 'Servant of the People' initiated the establishment of six commissions.[1160]

The term of office of an investigative or special commission may not exceed one year from the date of its establishment. In February 2023, the Verkhovna Rada adopted Draft Law No. 7320[1161] at first reading, which would allow the term of office of temporary commissions to be extended during martial law for more than one year. However, this Draft Law made no further progress.

Following legislative amendments in August 2023,[1162] **an MP may participate in one temporary special commission and two temporary investigative commissions. Temporary commissions may include MPs from all parliamentary factions and groups on a proportional basis, while parliamentary factions independently delegate their representatives to temporary commissions.** Although the election of a non-affiliated MP to temporary commissions is not provided for by law, the parliamentary Committee on the Rules of Procedure issued a clarification stating that an MP may not be restricted in their powers and that the principle of proportional representation should also be taken into account for non-affiliated MPs.[1163]

1154 Temporary Special and Investigative Commissions That Have Ceased Their Activities (Seventh Convocation). Verkhovna Rada of Ukraine. ↗

1155 Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

1156 Ibid.

1157 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

1158 Ibid.

1159 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026; Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

1160 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1161 On Amendments to Certain Laws of Ukraine regarding the terms of office of Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine under Martial Law and a State of Emergency: Draft Law of Ukraine, registration No. 7320 of 26.04.2022. ↗

1162 On Amendments to Certain Laws of Ukraine regarding the membership of an MP of Ukraine in Temporary Investigative Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 3307-IX of 09.08.2023. The Law entered into force on 07.09.2023. ↗

1163 Clarification on the application of certain provisions of the Law of Ukraine 'On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine' and the Rules of Procedure of the Verkhovna Rada of Ukraine regarding changes to the numerical and personal composition of established temporary investigative commissions and temporary special commissions of the Verkhovna Rada of Ukraine. Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine, 2024. ↗

Investigative commissions report on their activities by publishing on the official website of the Verkhovna Rada the minutes, transcripts, audio and video recordings of open meetings of the investigative commission, as well as information on the date, time and place of open meetings. Three commissions have their own websites[1164] (one of these commissions had already ceased its activities as of 31 July 2026), but the extent to which they are populated with content varies.

Commissions are obliged to report on their work to the Verkhovna Rada. No later than six months after the date of its establishment, a temporary commission must submit to the Verkhovna Rada a report on the work performed, as well as other materials prepared by the commission. If an **investigative commission** fails to submit a report within the prescribed period, its powers are deemed terminated. The issue of hearing commission reports is considered as a priority at the plenary meeting on the day following the submission of the report, conclusions and proposals. However, there are frequent cases where such reports were submitted or heard outside the timeframe set in the relevant resolution establishing the commission. For example, the Temporary Investigative Commission on the investigation of possible violations of legislation in the implementation of state defence measures registered its six-month report in September 2025,[1165] but it was heard three months later — in December.

Based on the results of its activities, a temporary special commission also prepares a report together with the materials it has prepared: the results of the preparation and preliminary consideration of issues, as well as draft laws and other acts of the Verkhovna Rada.[1166] For example, at the initiative of the temporary commission dealing with the rights of internally displaced persons (IDPs), amendments were adopted to the law on one-off assistance for harm to life and health caused to certain categories of persons as a result of the military aggression of the Russian Federation,[1167] as stated in the explanatory note to the draft law.[1168] Sometimes temporary commissions report in their own reports that they have developed draft acts, but the explanatory notes to such acts, in turn, contain no references to the work of the temporary commission.[1169]

1164 Temporary Commissions of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1165 On the Preliminary Report of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the investigation of possible violations of Ukrainian legislation in the implementation of state defence measures: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14077 of 26.09.2025. ↗

1166 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Article 3. ↗

1167 On Amendments to the Law of Ukraine 'On One-Off Financial Assistance for Harm to Life and Health Caused to Employees of Critical Infrastructure Facilities, Civil Servants and Officials of Local Self-Government as a Result of the Military Aggression of the Russian Federation against Ukraine': Law of Ukraine No. 4793-IX of 25.02.2026. ↗

1168 Explanatory note to the Draft Law of Ukraine 'On One-Off Financial Assistance for Harm to Life and Health Caused to Employees of Critical Infrastructure Facilities, Civil Servants and Officials of Local Self-Government as a Result of the Military Aggression of the Russian Federation against Ukraine', registration No. 14303 of 15.12.2025. ↗

1169 For example, in its report, the Temporary Special Commission on the investigation of possible unlawful actions by officials of state authorities, other state bodies and public sector economic entities that could have harmed Ukraine's economic security states that it developed Draft Law No. 12230, which was subsequently adopted (Law No. 4360-IX). At the same time, the explanatory note to Law No. 4360-IX contains no reference to the work of the temporary investigative commission. On the report of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the investigation of possible unlawful actions by officials of state authorities, other state bodies and public sector economic entities that could have harmed Ukraine's economic security: Resolution of the Verkhovna Rada of Ukraine No. 4298-IX of 12.03.2025 ↗; Explanatory note to the Draft Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding the Specific Features of Privatisation of State and Municipal Property Transferred for Lease', registration No. 12230 of 22.11.2024. ↗

After the results of the work of an investigative or special commission have been discussed at a plenary meeting, the Verkhovna Rada decides to terminate the work of the relevant commission or instructs it to continue its work and sets the deadline for the next report.[1170]

To ensure proper working conditions for investigative and special commissions, a secretariat is established, and specialists may also be involved in their work.[1171] In June 2023, the Head of the Secretariat of the Verkhovna Rada issued an Order[1172] approving the model regulation on the secretariat of a temporary commission. The regulation defines the main functions of the secretariat and sets requirements for its staff (a citizen of Ukraine who has full command of the state language and holds a degree of higher education not lower than bachelor's level). The staffing level and composition of the secretariat are determined by the relevant temporary commission and, upon agreement with the Chairman of the Verkhovna Rada, approved by the Head of the Secretariat. In practice, the secretariat has two staff members (the head of the secretariat and a chief consultant).[1173] Secretariat staff are appointed under fixed-term employment contracts for the term of office of the commission, and their remuneration is determined on the basis of the salary scale in the Secretariat of the Verkhovna Rada.[1174] Of the 12 commissions operating as of 31 July 2026, eight have secretariats.[1175]

The Verkhovna Rada may also establish a special temporary investigative commission if the impeachment of the President of Ukraine is initiated.[1176] The procedure for its establishment and activities is laid down in the Law of Ukraine 'On the Special Procedure for Removing the President of Ukraine from Office (Impeachment)'.[1177]

Progress and issues

Duplication of the remit of temporary investigative and temporary special commissions. The Law provides that investigative commissions may not be established on matters that are already the subject of activity of another established investigative commission.[1178] However, these requirements are not always observed. The Rules of Procedure Committee noted this problem in relation to the establishment of a temporary investigative commission on the investigation of possible violations of Ukrainian legislation during martial law, whose

1170 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Part 6 Article 3. ↗

1171 Ibid, Article 25.

1172 On the Organisation of the Activities of the Secretariats of Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Order of the Head of the Secretariat of the Verkhovna Rada of Ukraine No. 1418-K of 30.06.2023. ↗

1173 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

1174 Certain Issues of Remuneration of Staff of the Secretariats of Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 836 of 14.07.2025. ↗

1175 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026. Temporary Commissions. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1176 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Parts 3 and 4 Article 111. ↗

1177 On the Special Procedure for Removing the President of Ukraine from Office (Impeachment): Law of Ukraine No. 39-IX of 10.09.2019. ↗

1178 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, para. 3 Part 4 Article 4. ↗

main tasks covered the same range of issues as two other investigative commissions.[1179] As a result, the Committee proposed changing the commission's name and clarifying its main tasks.

On 9 August 2023, the Verkhovna Rada established two temporary special commissions with a similar remit — social support for veterans: (1) the Temporary Special Commission for *the preparation and comprehensive settlement of issues related to the provision of social guarantees to war veterans, Defenders of Ukraine and their family members, family members of deceased war veterans and family members of fallen Defenders of Ukraine*[1180] and (2) the Temporary Special Commission *on the legal status, social support and medical care of war veterans, service members, Defenders of Ukraine and their family members*.[1181] In addition to these two commissions, the parliamentary Committee *on Social Policy and Protection of Veterans' Rights* has a similar remit. Thus, at a certain point, three bodies were working on legislation at the same time. This leads to duplication of functions and competition between commissions and committees, since temporary special commissions have the powers of main committees. It also calls into question both the efficient use of resources and the coherence of the results of their work in the context of Parliament forming a coherent vision of public policy and legislative regulation.

Abuse of powers by temporary investigative commissions undermines trust in parliamentary oversight. For example, when considering the case concerning MP Anatolii Hunko, the Appeal Chamber of the High Anti-Corruption Court of Ukraine (HACC) found that his status as an MP and Head of the Temporary Investigative Commission on the investigation of corruption at state enterprises, institutions and organisations of the National Academy of Agrarian Sciences had effectively served as one of the instruments for promising to exert unlawful influence.[1182]

The activities of the Temporary Investigative Commission *on the investigation of possible corruption or corruption-related offences in law enforcement bodies, courts and judicial authorities*, established in June 2025,[1183] also raised concerns. Political pressure by this temporary commission was reported by the High Anti-Corruption Court of Ukraine[1184], the Public Integrity Council,[1185] the High Qualification Commission of Judges of Ukraine,[1186]

1179 Opinion of the Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine on the draft Resolution of the Verkhovna Rada of Ukraine 'On the establishment of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the investigation of possible violations of Ukrainian legislation during martial law', registration No. 14291 of 11.12.2025. ↗

1180 Temporary Special Commission of the Verkhovna Rada of Ukraine for the preparation and comprehensive settlement of issues related to the provision of social guarantees to war veterans, Defenders of Ukraine and their family members, family members of deceased war veterans and family members of fallen Defenders of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 3308-IX of 09.08.2023. ↗

1181 Temporary Special Commission of the Verkhovna Rada of Ukraine on the legal status, social support and medical care of war veterans, service members, Defenders and their family members: Resolution of the Verkhovna Rada of Ukraine No. 3309-IX of 09.08.2023. ↗

1182 Ruling of the Appeal Chamber of the High Anti-Corruption Court of Ukraine of 09.02.2026 in case No. 991/1304/24. ↗

1183 On the establishment of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the investigation of possible corruption or corruption-related offences in law enforcement bodies, courts and judicial authorities: Resolution of the Verkhovna Rada of Ukraine No. 4511-IX of 19.06.2025. ↗

1184 Statement by the High Anti-Corruption Court of Ukraine. High Anti-Corruption Court of Ukraine, 2025. ↗

1185 Publication by the Public Integrity Council on the social network Facebook, 2025. ↗

1186 Statement on the actions of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine and the inadmissibility of interference in the work of the Commission. High Qualification Commission of Judges of Ukraine, 2025. ↗

the High Council of Justice,[1187] and a group of civil society organisations prepared an open appeal to the Verkhovna Rada to stop the unlawful actions and activities of the temporary investigative commission.[1188]

The wording of some tasks of temporary commissions, such as 'investigating possible violations of human rights and freedoms', blurs the limits of the commission's parliamentary oversight, effectively giving it a mandate over all areas of social relations.

A one-year term of activity of a commission is often insufficient to complete all of its tasks. Investigative and special commissions are temporary bodies; however, in the IX convocation, certain commissions carried out their activities on an ongoing basis by establishing a formally new temporary commission which nevertheless had the same composition and tasks as the previous one. For example, the Temporary Special Commission on the protection of investors' rights was established six times,[1189] while the Temporary Special Commission on monitoring the receipt and use of international technical assistance (ITA) during martial law was established four times.[1190]

MPs note that within a one-year period it is possible to identify a problem, but not to resolve it, especially where this concerns the formation of a new public policy in a particular area.[1191] The Temporary Investigative Commission on the investigation of possible unlawful actions by officials of state authorities, other state bodies and public sector economic entities that could have harmed Ukraine's economic security noted in its report that it lacked time to consider the issues planned by the commission.[1192]

State authorities, local self-government bodies and their officials do not respond adequately to parliamentary oversight measures by temporary investigative commissions. MPs have repeatedly stated that officials ignore invitations to attend meetings

1187 On taking measures to ensure the authority of justice upon the appeal of the High Qualification Commission of Judges of Ukraine: Decision of the High Council of Justice No. 2583/0/15-25 of 02.12.2025. ↗

1188 Open appeal to the Verkhovna Rada of Ukraine regarding the cessation of unlawful actions of the temporary investigative commission investigating corruption in law enforcement bodies, courts and judicial authorities. DEJURE Foundation, 2026. ↗

1189 On the establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the protection of investors' rights: Resolution of the Verkhovna Rada of Ukraine No. 683-IX of 05.06.2020. ↗ ; On the establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the protection of investors' rights: Resolution of the Verkhovna Rada of Ukraine No. 1577-IX of 29.06.2021. ↗ ; On the establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the protection of investors' rights: Resolution of the Verkhovna Rada of Ukraine No. 2637-IX of 06.10.2022. ↗ ; On the establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the protection of investors' rights: Resolution of the Verkhovna Rada of Ukraine No. 3581-IX of 22.02.2024. ↗; On the establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the protection of investors' rights: Resolution of the Verkhovna Rada of Ukraine No. 4388-IX of 29.04.2025. ↗; On the Establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Protection of Investors' Rights: Resolution of the Verkhovna Rada of Ukraine No. 4879-IX of 26.05.2026. ↗

1190 On the establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on monitoring the receipt and use of international technical assistance during martial law: Resolution of the Verkhovna Rada of Ukraine No. 2424-IX of 19.07.2022. ↗; On Certain Issues of Exercising Parliamentary Control over the Receipt and Use of International Technical Assistance during Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 3242-IX of 13.07.2023. ↗; On Certain Issues of Exercising Parliamentary Control over the Receipt and Use of International Technical Assistance during Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 3851-IX of 16.07.2024. ↗; On Certain Issues of Exercising Parliamentary Control over the Receipt and Use of International Military Assistance during Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 4506-IX of 18.06.2025. ↗

1191 Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

1192 On the report of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the investigation of possible unlawful actions by officials of state authorities, other state bodies and public sector economic entities that could have harmed Ukraine's economic security: Draft Resolution, registration No. 15074 of 11.03.2026. ↗

of temporary commissions.[1193] The effectiveness of interaction with representatives of the Government or law enforcement bodies sometimes depends on the body or its head, as well as on the focus and methods of the commission's work.

The specialised law provides that an investigative commission may compel an invited person to appear if that person fails to attend a commission meeting without valid reasons.[1194] In September 2025, the Verkhovna Rada adopted Draft Law No. 11387,[1195] which clarified these provisions and established that coercive measures involving physical force could be applied to such a person. The Draft Law was returned with the President's proposals, in which he stated that, when exercising parliamentary oversight, Parliament must comply with the basic principles of the exercise of state power enshrined in the Constitution, and that granting temporary investigative commissions, as structures of the legislative body, the power to adopt a decision whose non-compliance may entail the application of coercive measures involving physical force allowing a person to be escorted to Parliament is hardly consistent with the powers of the legislature.

The de facto failure of some temporary investigative commissions to submit reports jeopardises the effectiveness of their activities. It is in their reports that commissions should set out the facts established during a parliamentary investigation, as well as recommendations or instructions to authorities. In most cases, the report itself should be sent to judicial and law enforcement bodies for information. It is also important that recommendations to authorities, law enforcement bodies and judicial authorities are mandatory. As part of an official investigation, law enforcement bodies should familiarise themselves with the facts established by the commission during its work, search for property and persons mentioned in it and procedurally document the information obtained. However, even after a commission presents its conclusions and recommendations, law enforcement bodies implement them only formally or ignore them altogether, since effective tools for implementing such instructions and recommendations simply do not exist. This undermines the work of MPs and reduces the overall effectiveness of the investigation. Therefore, the only method left to parliamentarians is political and reputational pressure.[1196]

Another negative phenomenon is the delay in voting on reports and the resulting legal uncertainty over the work of commissions. Although the Rules of Procedure provide for priority consideration of such reports, in practice they are almost always considered late (or not considered at all). This creates legal uncertainty in cases where a temporary investigative commission does not report on its activities within the prescribed period. Such a commission is deemed to have ceased its activities, but formally it ceases its work only after the Chairman of the Verkhovna Rada makes the relevant announcement. For example, on 4 December 2025, the presiding officer announced the termination of six

1193 Representatives of the Ministry of Defence failed to attend the meeting of the TIC on possible violations in the mobilisation process — Osadchuk. Radio Liberty, 2024. ↗; Klitschko and Popko failed to attend the TIC meeting on Kyiv. Ukrinform, 2024. ↗; The SBGS explained why it failed to attend the TIC meeting on 'Mindichgate'. Zhelezniak threatens compulsory appearance. Ukrainska Pravda, 2025. ↗

1194 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Part 4 Article 19. ↗

1195 On Amendments to the Code of Ukraine on Administrative Offences, the Criminal Code and the Criminal Procedure Code of Ukraine regarding ensuring respect for the court and prompt consideration of criminal proceedings by the court: Draft Law, registration No. 11387 of 28.06.2024. ↗

1196 Temporary Parliamentary Commissions in Ukraine: Efficiency Problems. Agency for Legislative Initiatives, 2024. ↗

temporary commissions at once;[1197] all of them had been established and had operated for more than a year.

The above-mentioned Temporary Investigative Commission on the investigation of possible corruption or corruption-related offences in law enforcement bodies, courts and judicial authorities registered its six-month report back in December 2025.[1198] Since Parliament would hardly have supported the extension of this commission's work,[1199] in the absence of consideration of the report at a plenary meeting and a corresponding decision by the Chairman of the Verkhovna Rada, this commission continued to operate and, in June 2026, registered a report on its activities,[1200] which had not been considered as of 31 July 2026. In fact, the presence or absence of a report, which should serve as an instrument of oversight by the Verkhovna Rada over the commission's activities, does not affect the possibility of continuing its work.

Draft Law No. 7320[1201] was intended to resolve this problem by providing for the automatic termination of the term of office of a temporary investigative or temporary special commission if it fails to submit a report on the work performed, without involving the Chairman of the Verkhovna Rada.

Recommendations

1. Review the grounds for establishing temporary commissions so that they do not duplicate the tasks of other commissions or parliamentary committees.
2. Temporary commissions should clearly define the remit, competence and main tasks of their activities. Consideration should also be given to introducing an internal oversight mechanism, for example, initiating the early termination of a temporary commission by MPs, committees or the leadership of the Verkhovna Rada.
3. If there is a permanent need for the activities of certain commissions, consideration should be given either to having these powers exercised by committees (especially in the case of temporary special commissions) or to allowing temporary commissions to continue their activities by decision of the Verkhovna Rada for more than one year.
4. State bodies and their officials, as well as local self-government bodies, should ensure an adequate level of interaction with temporary commissions and establish mechanisms for such interaction by responding to requests, invitations and other tools used by commissions.

1197 Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 04.12.2025. The termination of the activities of temporary commissions was announced by the First Deputy Chairperson of the Verkhovna Rada, not the Chairman of the Verkhovna Rada. ↗

1198 On the report of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the investigation of possible corruption or corruption-related offences in law enforcement bodies, courts and judicial authorities on the work performed: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14299 of 15.12.2025. ↗

1199 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

1200 On the Report of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on the Investigation of Possible Facts of Corruption or Corruption-Related Offences in Law Enforcement Agencies, Courts and Judicial Authorities: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15337 of 17.06.2026. ↗

1201 On Amendments to Certain Laws of Ukraine Regarding the Terms of Office of Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine under Martial Law and a State of Emergency: Draft Law of Ukraine, registration No. 7320 of 26.04.2022. ↗

5. Ensure the compliance with the Rules of Procedure of the Verkhovna Rada and hear the reports of temporary commissions within the term of their activities.
6. Resolve the legal uncertainty concerning the powers of a temporary commission if the Verkhovna Rada does not hear its report, for example by adopting Draft Law No. 7320.

Parliamentary Factions and Groups

State of play

In the Verkhovna Rada of the IX convocation, as of July 2026, four parliamentary factions have been formed (the parliamentary faction 'Servant of the People', the faction 'European Solidarity', the parliamentary faction 'Batkivshchyna' and the parliamentary faction 'Holos'), as well as four parliamentary groups (the parliamentary group 'Platform for Life and Peace', the parliamentary group 'Dovira', the parliamentary group 'Restoration of Ukraine' and the parliamentary group of the Party 'For the Future').[1202]

In March 2022, the National Security and Defence Council of Ukraine, *taking into account anti-Ukrainian political and organisational activities, war propaganda and public statements and calls for the violent overthrow of the constitutional order*, suspended for the duration of martial law the activities of a number of political parties,[1203] including the political party 'Opposition Platform — For Life', which at that time had an established faction in the Verkhovna Rada of Ukraine. On this basis, the Verkhovna Rada announced the suspension of the activities of the parliamentary faction of the political party 'Opposition Platform — For Life', together with the suspension of its rights.[1204] In May 2022, the Verkhovna Rada adopted Law No. 2243-IX,[1205] which defined the consequences for a parliamentary faction in cases where the political party that had formed it in Parliament was banned by a court or its activities were suspended following the enactment of a decision of the National Security and Defence Council of Ukraine by the President. In the same month, the 'Opposition Platform — For Life' faction announced its dissolution,[1206] and its MPs formed two parliamentary groups ('Platform for Life and Peace' and 'Restoration of Ukraine'). In September 2022, the Supreme Court ultimately banned the activities of this political party in Ukraine.[1207]

Parliamentary factions are formed from among Members of Parliament elected on the electoral lists of political parties, as well as those nominated by political parties in

1202 Parliamentary factions and groups. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1203 On the Decision of the National Security and Defence Council of Ukraine of 18 March 2022 'On the Suspension of the Activities of Certain Political Parties': Decree of the President of Ukraine No. 153/2022 of 19.03.2022. ↗

1204 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 14.04.2022. Verkhovna Rada of Ukraine, 2022. ↗

1205 On Amendments to Certain Legislative Acts of Ukraine on the Prohibition of Political Parties: Law of Ukraine No. 2243-IX of 03.05.2022. ↗

1206 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 12.05.2022. Verkhovna Rada of Ukraine, 2022. ↗

1207 ACC SC finally banned the political party 'Opposition Platform — For Life'. Judiciary of Ukraine, 2022 ↗ ; Decision of the Eighth Administrative Court of Appeal, adopted by a panel of judges, of 20.06.2022 in case No. P/857/8/22 (entered into force on 15.09.2022). ↗

single-member constituencies.[1208] The Rules of Procedure provide that a political party may form only one parliamentary faction. Each parliamentary faction (or parliamentary group) is registered with the Secretariat of the Verkhovna Rada of Ukraine.[1209]

Parliamentary groups are not formed based on political affiliation but represent associations of non-affiliated MPs. The number of members in a parliamentary group may not be lower than that of the smallest parliamentary faction formed during the first session.[1210] During the first session, the smallest faction — that of the Political Party 'Holos' — comprised 17 MPs; accordingly, a parliamentary group in the IX convocation must consist of at least 17 MPs.[1211] Parliamentary groups enjoy the same rights as parliamentary factions.

A parliamentary faction or group whose membership falls below the established minimum[1212] is declared dissolved by the Chairman 15 days after such a circumstance arises. A Member of Parliament may belong to only one parliamentary faction or group. Admission to a faction or group is subject to the consent of its Head. A Member of Parliament may withdraw from a faction or group, and a faction or group may expel a Member from its composition.[1213]

The organisation of the work of a parliamentary faction or group is also governed by the Regulation on a Parliamentary Faction (Group).[1214] In practice, such regulations are not published by the Verkhovna Rada of Ukraine.

The distribution of leadership positions and the composition of committees are determined based on quotas, in proportion to the numerical strength of parliamentary factions and groups.[1215] Representation in the permanent delegations of the Verkhovna Rada to international parliamentary organisations, as well as in the Ukrainian parts of bilateral and trilateral interparliamentary institutions, is likewise based on the principle of proportional representation of parliamentary factions and groups.[1216] This principle is also applied in the formation of temporary investigative commissions, temporary special commissions[1217] and the counting commission.[1218] Parliamentary factions and groups also enjoy specific rights

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1208 When forming a parliamentary faction, its composition may also include, subject to compliance with the principles governing the activities of such faction, Members of Parliament elected in single-member constituencies who were registered as candidates through self-nomination, or Members of Parliament nominated by political parties that did not participate in the distribution of parliamentary mandates following the election results. For example, Members of Parliament A. Y. Lopushanskyi (electoral district No. 125, Lviv region, self-nominated) and O.O. Honcharenko (electoral district No. 137, Odesa region) are members of the parliamentary faction of the Political Party 'European Solidarity'. Verkhovna Rada of Ukraine. ↗

1209 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 58, 60. ↗

1210 Ibid, Part 4 Article 59.

1211 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 29 August 2019. Verkhovna Rada of Ukraine, 2019. ↗

1212 Number of members in the smallest faction formed during the first session.

1213 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 57–60. ↗

1214 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Part 3 Article 13. ↗

1215 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 4 Article 81. ↗

1216 Ibid, Article 204.

1217 Ibid, Article 85, Part 2 Article 87.

1218 Ibid, Part 2 Article 17.

within the legislative process, including the right of two factions or groups to request a break during plenary sittings and the guaranteed right to speak during the consideration of agenda items.

The functioning of parliamentary factions and groups is supported by the Secretariat of the Verkhovna Rada of Ukraine, within which secretariats of parliamentary factions and groups are established. The number of staff in a faction or group secretariat is determined on the basis of no more than one staff member per five members of the respective faction or group, with an overall cap of 30 staff members per secretariat. A secretariat is established for the duration of the respective parliamentary faction or group, and its staff are employed as patronage service personnel. The structure, staffing schedule and number of staff of a faction secretariat are approved, in accordance with the established procedure, by the Chairman. The Head of the Secretariat is appointed to and dismissed from the position by the Head of the Secretariat of the Verkhovna Rada of Ukraine upon submission by the Head of the respective parliamentary faction or group.[1219] As these secretariats are structural units of the Secretariat of the Verkhovna Rada of Ukraine, no separate rules exist governing their financing or the provision of material resources.

Inter-Factional Associations

Members of Parliament have the right to voluntarily form inter-factional associations (IFAs). The Rules of Procedure of the Verkhovna Rada of Ukraine do not establish any requirements regarding the number of Members of Parliament required to form an IFA. In addition, the Secretariat of the Verkhovna Rada does not provide material or informational support for their activities. The establishment of an IFA is announced by the presiding officer at a plenary sitting.[1220] As of 16 March 2026, 198 IFAs had been established in the Verkhovna Rada.[1221]

IFAs do not enjoy the same procedural rights as parliamentary factions or groups. They are not entitled to participate in the Conciliation Council, do not have the right to separate speaking time or participation in debates, cannot delegate their representatives to temporary investigative commissions and do not have their own secretariats.[1222]

Progress and issues

The activities of IFAs lack sufficient transparency and accountability. The current legal framework does not provide for the establishment of a unified public register of such associations, nor does it set clear requirements for the regular disclosure of information on their composition, purpose or results of activity. As a result, a significant number of IFAs effectively operate outside the system of public monitoring of parliamentary activity: information on their composition, activities or outcomes is often unavailable or fragmented. Due to the non-transparent nature of IFAs' operations, voters lack information on the activities of their representatives in Parliament (MP), in particular with regard to how their

1219 On Approval of the Regulation on the Secretariat of a Parliamentary Faction (Parliamentary Group) in the Verkhovna Rada of Ukraine: Order of the Speaker of the Verkhovna Rada of Ukraine No. 899-k of 07.12.2020. ↗

1220 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 60[1]. ↗

1221 Information provided by the Secretariat of the Verkhovna Rada of Ukraine in a letter of 20.03.2026 No. 09/13-2026/60329.

1222 A 'Club of Interests': Why Members of Parliament in the Verkhovna Rada Create Inter-Factional Associations? Chesno Movement, 2024. ↗

interests are represented within such associations. This closed mode of operation also makes it more difficult to identify potential conflicts of interest. It further has negative implications for public trust and the perception of Parliament, creating the impression that the Verkhovna Rada operates in a non-transparent manner and adopts decisions behind closed doors.

Recommendations

1. Introduce the practice of publishing information on IFAs on the official website of the Verkhovna Rada of Ukraine, including information on their composition, purpose of establishment and activities.

Coalition and Opposition

State of play

A coalition of parliamentary factions in the Verkhovna Rada is formed within one month from the opening of the first sitting of the Verkhovna Rada or within one month from the termination of the coalition. The formation of a coalition is a prerequisite for the Verkhovna Rada to exercise its powers. At present, the Constitution of Ukraine provides only for certain powers of the coalition of parliamentary factions: to submit proposals to the President regarding the candidate for Prime Minister and to the Prime Minister regarding candidates for membership of the Government. The absence of a formed coalition is also one of the grounds for the early termination of the powers of the Verkhovna Rada.[1223]

In 2010, following a decision of the Constitutional Court of Ukraine (CCU)[1224] and the reversion to the 1996 Constitution, Chapters 12–13 of the Rules of Procedure of the Verkhovna Rada — which regulated the procedure for the formation and the principles governing the activities of the coalition of parliamentary factions and the parliamentary opposition — were removed.[1225] However, after the return[1226] to the 2004 version of the Constitution, the relevant provisions were not reinstated in the Rules of Procedure of the Verkhovna Rada, creating a gap in the regulation of procedures relating to the coalition and the opposition. This gap subsequently enabled the Decree of the President on the holding of early elections in 2019 to be recognised as constitutional.[1227]

The rights of the coalition are also vested in a parliamentary faction that comprises a majority of Members of Parliament from the constitutional composition. In the Verkhovna

1223 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 83, 90. ↗

1224 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 252 Members of Parliament of Ukraine regarding the conformity with the Constitution of Ukraine (constitutionality) of the Law of Ukraine 'On Amendments to the Constitution of Ukraine' of 8 December 2004 No. 2222-IV (case on compliance with the procedure for amending the Constitution of Ukraine): Decision of 30.09.2010 No. 20-rp/2010. ↗

1225 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 2600-VI of 08.10.2010. ↗

1226 On the Restoration of Certain Provisions of the Constitution of Ukraine: Law of Ukraine No. 742-VII of 21.02.2014. ↗

1227 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 62 Members of Parliament of Ukraine regarding the conformity with the Constitution of Ukraine (constitutionality) of the Decree of the President of Ukraine 'On the Early Termination of the Powers of the Verkhovna Rada of Ukraine and the Calling of Early Elections': Decision of 20.06.2019 No. 6-r/2019. ↗

Rada of the ninth convocation, the coalition was formed for the first time by a single parliamentary faction: following the early elections, the political party 'Servant of the People' obtained 254 seats in the Parliament. This resulted in a situation where the 'Parliament — Government — President' triangle was effectively controlled by a single political force. As of 31 July 2026, the parliamentary faction 'Servant of the People' comprises 226 Members of Parliament[1228] — the minimum number required to form a coalition.

Despite its numbers, the coalition requires support from other factions when voting on specific legislative initiatives, as not all coalition members are consistently present in the plenary hall, and their votes cannot therefore be guaranteed. The coalition operates in a mode of a situational majority, where support for particular decisions must be sought from other parliamentary factions or groups, including those in opposition. Since May 2022, there has been no law or resolution supported by 226 members of the parliamentary faction 'Servant of the People' (with the exception of the appointment of Vasyl Maliuk as Head of the Security Service of Ukraine (SSU) in February 2023).[1229]

Neither the Constitution nor the Rules of Procedure of the Verkhovna Rada define the rights of the opposition or even determine who constitutes the opposition. The institutionalisation of the parliamentary opposition and the safeguarding of its rights are essential to ensuring democratic principles and procedures, as well as forming a key element of the system of checks and balances in modern democracies.[1230] The regulation of the status of the opposition is a commitment set out both in the Resolution of the Verkhovna Rada on parliamentary reform, adopted on the basis of the recommendations of the European Parliament Mission[1231] and in the Roadmap on the functioning of democratic institutions.[1232]

Members of Parliament from the opposition may still exercise certain rights independently of the coalition, for example by submitting parliamentary appeals or requests,[1233] initiating the establishment of investigative commissions or inviting officials to attend sittings of the Verkhovna Rada, as all such decisions require the support of 150 Members of Parliament. Opposition Members of Parliament also have the right of legislative initiative; however, such draft laws are rarely included in the agenda, as without the support of the parliamentary majority, opposition draft laws are unlikely to be adopted in the session hall.[1234] Data indicate that most adopted laws are initiated by Members of Parliament from parliamentary faction 'Servant of the People', as well as by the Government and

1228 Parliamentary Faction of the Political Party 'Servant of the People'. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1229 Liquidation Syndrome. No Parliament — No Democracy. Dzerkalo Tyzhnia, 2026 ↗ ; 'Servant of the People' Lacks on Average 35 Votes for Voting in the Verkhovna Rada — CHESNO Analysis. CHESNO, 2025. ↗

1230 Daily Analysis: Coalition and Opposition in the Verkhovna Rada of the Ninth Convocation. Agency for Legislative Initiatives, 2019. ↗

1231 On Measures for the Implementation of Recommendations on Internal Reform and Strengthening the Institutional Capacity of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1035-VIII of 17.03.2016. Recommendation 44. ↗

1232 Roadmap on the Functioning of Democratic Institutions. Measure 1 of Strategic Result 2 of Section III.C. ↗

1233 Except for the adoption of a decision to forward a parliamentary request to the President of Ukraine, which is adopted by a majority of the constitutional composition of the Verkhovna Rada. On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 225. ↗

1234 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

the President — in practice, the agenda-setting process is controlled by a single political force.[1235]

Representatives of the opposition chair three parliamentary committees: the Committee on Freedom of Speech, the Committee on Ukraine's Integration into the EU and the Committee on Youth and Sports. In all committees of the Verkhovna Rada (except for two), half or a majority of members belong to the parliamentary faction 'Servant of the People', meaning that final decisions in committees are effectively taken by that faction.

Progress and issues

The Rules of Procedure of the Verkhovna Rada lack coherent legal provisions governing the organisation and functioning of the coalition and the opposition. In the absence of formalised procedures, the rights of the opposition may be undermined. Moreover, in the context of the dominant position of a single political force, this means that the setting of the agenda, as well as decisions on appointments and the exercise of certain other constitutional powers, depend entirely on the coalition.

The Verkhovna Rada has previously attempted to adopt a law on the opposition,[1236] and relevant draft laws are registered during each convocation.[1237] In the Verkhovna Rada of the ninth convocation, a subgroup was established within one of the working groups[1238] to prepare a draft law on the opposition, which developed amendments to the Rules of Procedure of the Verkhovna Rada agreed at the level of the working group.[1239] At the same time, the adoption of a corresponding draft law on the rights and obligations of the opposition is not currently on the agenda.[1240]

Recommendations

1. The Verkhovna Rada should regulate the rights of the coalition and the opposition through the adoption of amendments to legislation (the Rules of Procedure of the Verkhovna Rada of Ukraine, the Laws of Ukraine 'On Committees of the Verkhovna Rada of Ukraine', 'On the Status of People's Deputy of Ukraine', 'On Temporary Investigative Commissions, the Special Temporary Investigative Commission and Temporary Special Commissions of the Verkhovna Rada of Ukraine'). The opposition should be ensured effective opportunities to exercise oversight over the Government, adequate opportunities to participate in agenda-setting, the necessary resources and appropriate representation in parliamentary committees.

1235 Monitoring of the Work of the Verkhovna Rada of the Ninth Convocation during the 14th Session. Agency for Legislative Initiatives, 2026. ↗

1236 On Parliamentary Opposition: Draft Law of Ukraine No. 4494 of 19.03.2014. The draft law was adopted at first reading. ↗

1237 On Parliamentary Opposition: Draft Law of Ukraine No. 1211 of 30.08.2019. ↗

1238 The Chairman of the Verkhovna Rada of Ukraine signed an Order on the establishment of a Working Group to prepare comprehensive legislative proposals on amendments to the laws of Ukraine in the field of parliamentary law. Verkhovna Rada of Ukraine, 2021. ↗

1239 Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

1240 Ibid.

Polarisation and Inter-Party Dialogue

State of play

IFAs serve as an important informal mechanism for interaction between representatives of different political forces.[1241] They are often established around shared thematic or political interests and may include Members of Parliament from different factions, making them potential platforms for inter-party communication and coordination of positions on specific policy or legislative issues.[1242] There are 198 IFAs in the Verkhovna Rada.[1243]

The Jean Monnet Dialogues for Peace and Democracy are a specialised format of inter-parliamentary political dialogue between the Verkhovna Rada and the European Parliament (EP), aimed at supporting inter-party communication and building consensus among all parliamentary factions and groups.[1244] The process was launched in 2015 following the signing of a Memorandum of Understanding between the EP and the Verkhovna Rada of Ukraine,[1245] with the first round held on 27 October 2016. Since then, the Dialogues have become a regular instrument for supporting parliamentary reform and political coordination. The meetings are attended by the Chairman of the Verkhovna Rada, his deputies and representatives of all parliamentary factions and groups, together with European facilitators. The format provides for closed discussions, creating conditions for addressing political issues, including parliamentary reform, European integration and the functioning of the Parliament in wartime. A key feature of the Jean Monnet Dialogues is their institutional role as a permanent channel of communication between political forces in the Parliament, operating independently of electoral cycles and ensuring continuity of inter-party dialogue across convocations of the Verkhovna Rada. As of July 2026, twelve rounds of the Dialogues had been held.[1246] Owing to their mediation-based format and the participation of all parliamentary forces, these meetings enable the maintenance of regular political dialogue and facilitate the development of common positions on key reforms.

Analysis of the participation of factions and groups in the registration of draft laws indicates a gradual increase in inter-factional cooperation over the course of the ninth convocation of the Parliament. Typically, draft laws are initiated by Members of Parliament from two or more factions, while EU integration-related draft laws are registered by members of three or more factions. The trend also shows a steady increase since 2019 in the number of factions involved in registering draft laws[1247] — whereas initially most draft laws were developed and registered by members of a single parliamentary faction or group, as of

1241 For more details, see the subsection 'Parliamentary Factions and Groups'.

1242 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Chapter 11 Article 60[1] ↗ ; Interest Club: Why Do Members of Parliament Need Inter-Factional Associations in the Verkhovna Rada? CHESNO Movement, 2024. ↗

1243 Information provided by the Secretariat of the Verkhovna Rada of Ukraine (letter of 13.03.2026 No. 03/03-16476).

1244 Jean Monnet Dialogues. European Parliament. ↗

1245 Memorandum of Understanding between the Verkhovna Rada of Ukraine and the European Parliament on a Joint Framework for Parliamentary Support and Capacity Building. ↗

1246 European Integration — the Key Theme of the 12th Round of the Jean Monnet Dialogues. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

1247 All draft laws overall, regardless of their subject matter.

July 2026, draft laws are on average initiated by members of three parliamentary factions or groups. This trend indicates growing cooperation and horizontal communication among parliamentary forces. At the same time, analysis of co-sponsorship patterns shows that such interaction is uneven across different parliamentary forces. The main factions and parliamentary groups — 'Servant of the People', 'European Solidarity', 'Holos', 'Batkivshchyna', 'Dovira', 'For the Future', as well as non-affiliated Members of Parliament — form a relatively dense network of cooperation within which joint legislative initiatives regularly emerge. In particular, the 'Dovira' group often acts as a bridge between different political forces, actively cooperating both with the parliamentary faction 'Servant of the People' and the 'For the Future' group. Stable cooperation is also observed between the 'European Solidarity' and 'Holos' factions. At the same time, the parliamentary groups 'Platform for Life and Peace' and 'Restoration of Ukraine', which were formed following the termination of the activities of the 'Opposition Platform — For Life' faction, remain relatively isolated from this network of cooperation and are significantly less likely to participate in the joint registration of draft laws with other factions. However, even in these cases, complete isolation is not observed, as representatives of these groups occasionally act as co-sponsors of draft laws together with others. Overall, despite the presence of dividing lines between certain political forces, the Parliament maintains regular channels of inter-factional interaction in the development of legislative initiatives.[1248]

Voting on draft laws related to European integration demonstrates relatively broad but uneven support among parliamentary forces. Overall, such draft laws are supported by approximately 67% of Members of Parliament, although the level of support varies significantly across factions and groups — ranging from 27% to 81%. An absolute majority of factions and groups support EU integration-related draft laws by more than half of their members.[1249]

Following the start of the full-scale war, an informal 'one voice' policy in the field of international relations was introduced in the Verkhovna Rada.[1250] This is an informal arrangement between parliamentary factions and key state authorities that provides for the coordination of external communication.[1251] During the first year of the full-scale invasion, there was also an internal understanding within the Parliament on consensus-based voting on draft laws; however, this 'unity coalition' ceased to function from the end of 2022.[1252]

An analysis of speeches delivered by Ukrainian parliamentarians in the Parliamentary Assembly of the Council of Europe (PACE) in 2024–2026 indicates that the 'one voice' approach in external communication remains in place. The speeches of Ukrainian parliamentarians are characterised by a high degree of alignment in positions. Regardless of factional affiliation in the Verkhovna Rada or political groups in PACE, Members of

1248 According to calculations based on information available on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1249 According to calculations based on information available on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1250 The First Year of Wartime Diplomacy: An Analysis of the Strengths and Weaknesses of Ukraine's Foreign Policy. European Pravda, 2023. ↗

1251 Stefanchuk on Talking Points from the Ministry of Foreign Affairs for Members of Parliament before Official Visits: Everyone Representing Ukraine Abroad Must Support Its 'One Voice'. Interfax-Ukraine, 2024. ↗

1252 Experience of Members of Parliament during Martial Law in Ukraine. Agency for Legislative Initiatives, 2025. ↗

Parliament generally adhere to a common line on key international issues related to the war, international security, Russia's responsibility and support for Ukraine from European states.[1253] This consolidated position is evident across different sessions and thematic debates. These speeches reflect a coherent foreign policy narrative of the Ukrainian delegation and an absence of noticeable divergences among Members of Parliament on key international issues. At the same time, within the body of analysed speeches, three instances were identified in which issues of Ukraine's domestic policy were raised during debates in PACE. In these interventions, one Member of Parliament expressed criticism of the actions of the Ukrainian authorities, regarding possible pressure on the opposition, issues related to mobilisation and the functioning of anti-corruption institutions.[1254] Such statements remain isolated and do not develop further or receive support from other members of the Ukrainian delegation. Overall, the analysis of speeches indicates that, even where isolated critical assessments of domestic policy are present, Ukrainian parliamentarians in PACE predominantly demonstrate a unified and consistent position on international issues and Ukraine's foreign policy priorities. In the context of bilateral meetings, however, a 'one voice' approach to communication is not always maintained.[1255]

A similar pattern is observed in voting on appeals of the Verkhovna Rada to international partners adopted after the start of the full-scale invasion. The level of support across most parliamentary forces is more uniform. Prior to the invasion, such appeals were supported by the majority of Members of Parliament regardless of factional affiliation, with the exception of members of the 'Opposition Platform — For Life' faction. In subsequent votes following the outbreak of the war, support for such appeals has remained high, ranging between 48% and 82% of Members of Parliament depending on the faction.[1256] A significantly higher level of unity is evident specifically in international activities, as reflected both in parliamentary speeches and in voting patterns emphasising the need to support Ukraine.

Differences in voting, speeches and positions of Members of Parliament are not based on religious, ethnic, racial or social grounds. During the ninth convocation of the Verkhovna Rada, no large-scale clashes involving violence among Members of Parliament have been recorded. This indicates gradual progress, particularly in comparison with the level of violence that characterised parliamentary activity during the first to seventh convocations.[1257]

Progress and issues

The institutionalisation of internal procedures for inter-party dialogue within the Parliament remains limited. The Jean Monnet Dialogues, conducted with the facilitation of the EP, continue to serve as an important mechanism for supporting inter-party

1253 According to calculations based on information available on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1254 Ibid.

1255 Member of Parliament Vitalii Bezghin: The Parliamentary Coalition May Be Reconfigured as Early as Autumn. Civil Network OPORA, 2025. ↗

1256 According to calculations based on information available on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1257 For example: A Fight Broke Out in the Verkhovna Rada between Martyniuk and Liashko. Interfax-Ukraine, 2012 ↗; Arsenii Yatseniuk Went Independent. Ukrainska Pravda, 2008. ↗ ; A Fight Broke Out in the Verkhovna Rada. Ukrainska Pravda, 2012. ↗

communication in the Verkhovna Rada. At the same time, the Jean Monnet Dialogues constitute an external mediation mechanism, whereas the establishment of a platform for inter-factional dialogue with the support of the Secretariat of the Verkhovna Rada is one of the recommendations of the European Parliament Mission.[1258] In the absence of such stable internal mechanisms for coordination among political forces, parliamentary dialogue remains largely dependent on external initiatives and the support of international partners.

Parliamentary factions and groups demonstrate uneven support for EU integration-related legislative initiatives, which may negatively affect the progress of aligning Ukraine's legislation with EU law. Some political forces consistently support such EU integration laws, while others vote for them far less frequently. This uneven level of support indicates that even on issues that formally enjoy broad political consensus, the degree of inter-factional consolidation in the Parliament remains limited. In practice, this may complicate the passage of EU integration draft laws through parliamentary procedures and affect the pace of adopting legislation necessary for fulfilling Ukraine's obligations in the context of European integration. Uneven political support may be one of the factors explaining the record low share of adopted EU integration draft laws during the 14th session of the Verkhovna Rada of the ninth convocation.[1259]

Recommendations

1. Establish a platform for meetings and consultations between representatives of parliamentary factions and groups to resolve disagreements related to the legislative process, in line with the commitment set out in the Resolution of the Verkhovna Rada on parliamentary reform adopted based on the recommendations of the European Parliament Mission.[1260]
2. Introduce regular inter-factional consultations on draft laws necessary for fulfilling Ukraine's obligations in the context of European integration, with a view to ensuring more stable political support for such initiatives during voting in the Verkhovna Rada.

1258 Report and Roadmap on the Internal Reform and Enhancement of the Institutional Capacity of the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 32, Recommendation No. 45. ↗

1259 Monitoring of the Work of the Verkhovna Rada of the Ninth Convocation during the 14th Session. Agency for Legislative Initiatives, 2026. ↗

1260 On Measures for the Implementation of Recommendations on Internal Reform and Strengthening the Institutional Capacity of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1035-VIII of 17.03.2016. Recommendation 44. ↗

Status of Members of Parliament of Ukraine

Status, Resources and Professional Development of Members of Parliament of Ukraine

State of play

An MP of Ukraine is a legally elected representative of the Ukrainian people in the Verkhovna Rada and exercises the parliamentary powers provided for by the Constitution of Ukraine for five years.[1261]

The status of an MP and the guarantees of their activities are determined by the Constitution of Ukraine,[1262] the Laws of Ukraine 'On the Status of People's Deputy of Ukraine'[1263] and 'On the Rules of Procedure of the Verkhovna Rada of Ukraine'.[1264]

The powers of an MP begin from the moment they take the oath of allegiance to Ukraine. The MP confirms the oath by signing its text. Refusal to take the oath results in the loss of the parliamentary mandate.[1265] As a rule, parliamentary powers terminate when the first sitting of the Verkhovna Rada of the new convocation opens.[1266] The title of MP, indicating the ordinal number of the parliamentary convocation, is retained for life, except in cases of early termination of powers,[1267] other than death or dissolution of Parliament.

Ukraine formally recognises the principle of the free (representative) mandate of an MP: MPs exercise their powers in the interests of the entire people of Ukraine.[1268] Amendments to the Constitution of Ukraine introduced an element of the imperative mandate — the

1261 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 1.

1262 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 78–81.

1263 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992.

1264 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010.

1265 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 79.

1266 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 81, 90; On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 2.

1267 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 1.

1268 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 79.

early termination of an MP's powers if they leave the faction of the party on whose list they were elected.[1269]

The law establishes the grounds, procedures and time limits for the early termination of an MP's powers.[1270] Overall, as of 31 July 2026, during the work of the Parliament of the ninth convocation, the powers of 71 MPs had been terminated early,[1271] mainly based on a personal written statement on relinquishing powers. Some of them received ministerial portfolios and other positions in state bodies, for example Vladyslav Kryklii, Denys Maliuska, Hanna Novosad, Oleksii Orzhel, Mykhailo Fedorov and Iryna Venediktova.[1272] The powers of Anatolii Hunko[1273], Andrii Odarchenko[1274] and Fedir Khrystenko[1275] were terminated early on the basis of a guilty verdict that had entered into force, the powers of six MPs were terminated in connection with the termination of Ukrainian citizenship[1276] and those of 12 MPs in connection with their death.[1277]

The state guarantees proper conditions for the exercise of parliamentary powers, while an MP's freedom of speech is limited only by the protection of confidential information and state secrets to which they have gained access in connection with the exercise of their powers, as well as by the requirements of parliamentary ethics and discipline.[1278] An MP must refrain from statements that discredit the MP himself or herself, voters, Parliament or the state, from offensive statements about other MPs or parliamentary factions and from using obscene language. Speeches in the session hall are made with the permission of the presiding officer. An MP may also ask the presiding officer to be given the floor to provide an explanation if their words or actions have been misinterpreted, or to respond

1269 The imperative mandate was introduced by Law of Ukraine No. 2222-IV of 08.12.2004 'On Amendments to the Constitution of Ukraine' ↗; The Law was declared unconstitutional by the Constitutional Court of Ukraine due to a breach of the constitutional procedure for its consideration and adoption. Decision of the Constitutional Court of Ukraine No. 20-rp/2010 of 30.09.2010 in case No. 2-247/2019(5579/19) ↗; The provisions of the Law were restored by Law of Ukraine No. 742-VII of 21.02.2014 'On Restoring the Effect of Certain Provisions of the Constitution of Ukraine'. ↗

1270 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 81 ↗; On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 4. ↗

1271 MPs who left office (assessed 31.07.2026). ↗

1272 On the Formation of the Composition of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 12-IX of 29.08.2019 ↗; On the Formation of the Composition of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 516-IX of 04.03.2020 ↗; On the Appointment of I. Venediktova as Prosecutor General: Decree of the President of Ukraine No. 90 of 17.03.2020. ↗

1273 Hunko Anatolii Hryhorovych. ↗

1274 On Certain Issues Related to the Early Termination of the Powers of an MP of Ukraine Elected in Single-Mandate Election District No. 170 (Kharkiv Region): Resolution of the Central Election Commission No. 61 of 12.11.2025. ↗

1275 On Certain Issues Related to the Early Termination of the Powers of a Member of Parliament of Ukraine Elected in Single-Member Constituency No. 46 (Donetsk Region): Resolution of the Central Election Commission No. 21 of 20.04.2026. ↗

1276 Ihor Vasylkovskyi, Andrii Derkach, Renat Kuzmin, Viktor Medvedchuk, Vadym Rabinovych and Taras Kozak. According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31 July 2026 (assessed 31.07.2026). ↗

1277 Valerii Davydenko, Andrii Ivanchuk, Oleksandr Kabanov, Oleksii Kovaliov, Oleh Makarov, Volodymyr Moroz, Andrii Parubii, Anton Poliakov, Yaroslav Rushchyshyn, Orest Salamakha and Serhii Shvets. According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31 July 2026 (assessed 31.07.2026). ↗

1278 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 8, 19 ↗; On State Secrets: Law of Ukraine No. 3855-XII of 21.01.1994, Articles 29, 31 ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 51–53. ↗

to offensive statements directed at him or her or at the faction.[1279] MPs may participate in debates, put questions to speakers and the presiding officer, speak in support of their proposals and on voting motives and express their views on each item considered at a sitting.[1280]

In September 2019, the newly formed Verkhovna Rada adopted a law amending the Constitution, which abolished parliamentary immunity.[1281] Before this Law entered into force on 1 January 2020, the Verkhovna Rada of the ninth convocation gave its consent to bringing one MP, Yaroslav Dubnevych, to criminal liability, detention and arrest.[1282]

MPs adopted amendments[1283] to the Criminal Procedure Code of Ukraine establishing a special procedure for bringing an MP of Ukraine to criminal liability. Information that may indicate the commission of a criminal offence by an MP may be entered in the Unified Register of Pre-Trial Investigations only by the Prosecutor General. They also approve motions for permission to detain or search the MP, among other measures, including the use of covert investigative/search actions. Without the permission of an investigating judge, detention of an MP is allowed only if the MP is caught during or immediately after the commission of a serious or especially serious crime involving violence, or a crime that caused the death of a person.[1284] A notice of suspicion may be served on an MP only by the Prosecutor General, the Acting Prosecutor General or the Head of Specialised Anti-Corruption Prosecutor's Office (SAPO).[1285]

At the same time, the Constitution retains provisions on parliamentary indemnity: MPs do not bear legal liability for voting results or statements made in Parliament and its bodies, except for liability for insult or defamation.[1286]

MPs may not combine a parliamentary mandate with other types of activity: a representative mandate, civil service, any other paid position or entrepreneurial activity, or membership of governing bodies or supervisory boards of profit-making organisations. Exceptions are made only for teaching, research, creative work and medical practice, provided that they are carried out outside the time allocated for performing the duties of an MP.[1287]

1279 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 51–52. ↗

1280 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 11. ↗

1281 On Amendments to Article 80 of the Constitution of Ukraine (Regarding the Immunity of People's Deputies of Ukraine): Law of Ukraine No. 27-IX of 03.09.2019. ↗

1282 On Granting Consent to Bring MP of Ukraine Y. Dubnevych to Criminal Liability: Resolution of the Verkhovna Rada of Ukraine No. 256-IX of 31.10.2019 ↗; On Granting Consent to Detain MP of Ukraine Y. Dubnevych: Resolution of the Verkhovna Rada of Ukraine No. 257-IX of 31.10.2019 ↗; On Granting Consent to Select a Preventive Measure in the Form of Detention (Arrest) in Respect of MP of Ukraine Y. Dubnevych: Resolution of the Verkhovna Rada of Ukraine No. 258-IX of 31.10.2019. ↗

1283 On Amendments to Certain Legislative Acts of Ukraine to Bring Them into Compliance with the Law of Ukraine 'On Amendments to Article 80 of the Constitution of Ukraine Regarding the Immunity of People's Deputies of Ukraine': Law of Ukraine No. 388-IX of 18.12.2019. ↗

1284 Criminal Procedural Code of Ukraine No. 4651-VI of 13.04.2012, Article 482^2. ↗

1285 Ibid, Article 481.

1286 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 80. ↗

1287 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 78 ↗; On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 3. ↗

An MP appointed or elected to a position that is incompatible with the parliamentary mandate may begin performing the duties of that position no earlier than the day on which they submit to Parliament a statement on relinquishing the powers of an MP. **Within 20 days** from the day such circumstances arise, the MP must terminate such activity or submit a personal statement on relinquishing the powers of an MP of Ukraine.[1288]

If the requirement to relinquish the mandate is not fulfilled, the mechanism for early termination of an MP's powers in court is triggered upon application by the Chairman of the Verkhovna Rada. The court decision on termination of powers is final and does not require additional approval by Parliament.[1289]

During the work of the Verkhovna Rada of the ninth convocation, no cases of early termination of parliamentary powers by a court decision due to incompatibility of positions were recorded. Parliament practises 'package' voting on personnel decisions in the following sequence: appointment to a position followed by termination of powers. Examples include the cases of **Olha Sovhyria**[1290], **Dmytro Natalukha**[1291], **Vitalii Bezghin**[1292] and **Denys Maslov**[1293]: in all cases, during the same sitting, Parliament first appointed them to a new position and then, in the next vote, terminated their parliamentary powers.

MPs are guaranteed equal access to resources regardless of party affiliation. The Law of Ukraine 'On the Status of People's Deputy of Ukraine' defines the material and organisational conditions for the exercise of powers, while Parliament's decisions determine the amounts of material support for MPs and expenditure norms per MP.

The official salary of an MP is set by a decision of Parliament at the level of members of the Cabinet of Ministers, based on the subsistence minimum for able-bodied persons as of 1 January of the relevant year[1294]: from 10 subsistence minimums for a committee member or an MP who is temporarily not a member of a committee to 12 for the Chairman of the Verkhovna Rada.[1295]

1288 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 78 ↗; On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 3. ↗

1289 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 222–223. ↗

1290 On the Appointment of O. Sovhyria as Judge of the Constitutional Court of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 2442-IX of 27.07.2022 ↗; On the Early Termination of the Powers of MP of Ukraine O. Sovhyria: Resolution of the Verkhovna Rada of Ukraine No. 2443-IX of 27.07.2022. ↗

1291 On the Appointment of D. Natalukha as Head of the State Property Fund of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4760-IX of 14.01.2026 ↗; On the Early Termination of the Powers of MP of Ukraine D. Natalukha: Resolution of the Verkhovna Rada of Ukraine No. 4761-IX of 14.01.2026. ↗

1292 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026 ↗; On the Early Termination of the Powers of V. Bezghin, Member of Parliament of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4944-IX of 16.07.2026. ↗

1293 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026 ↗; On the Early Termination of the Powers of D. Maslov, Member of Parliament of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4943-IX of 16.07.2026. ↗

1294 From 1 January 2026, the subsistence minimum for able-bodied persons is UAH 3,328, approximately EUR 64 at the official hryvnia exchange rate against foreign currencies. On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, Article 7. ↗

1295 On Financial Support for the Activities of MPs of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 2240-VIII of 07.12.2017. ↗

Under the Law 'On the Status of People's Deputy of Ukraine', allowances to the official salary established by the Verkhovna Rada are paid in the amount set for members of the Government: MPs are entitled to an allowance for work intensity, up to 100% of the official salary, by decisions of the committees whose remit includes the Rules of Procedure and the budget.[1296]

In matters of material, social and welfare support, an MP is also equated with members of the Government: they are provided with assistance for health improvement and for resolving social and household issues.[1297] In addition, supplements are provided for an academic degree or honorary title, if any. MPs are entitled to free medical care, which is retained for life, except in cases of early termination of powers by a court decision. In addition to salary, throughout the entire term of office MPs receive several types of monthly compensation, including for travel and housing rental for MPs who do not live in Kyiv, as well as reimbursement of expenses related to the exercise of parliamentary powers, which are not taxed.[1298] The Verkhovna Rada website regularly publishes lists of MPs who receive compensation for renting housing or hotel accommodation.[1299]

For work purposes, an MP is provided with a separate, technically equipped office in Parliament and premises in the election district with a workplace for an assistant consultant. The parliamentary leadership is additionally provided with premises for official events, transport, a secretariat, security and funds for representation expenses, up to 40% of the official salary. MPs are entitled to free use of government communication, reimbursement of travel expenses and organisation of meetings with voters.[1300]

Each MP may have up to 31 assistant consultants, under an employment contract, concurrently or on a voluntary basis, independently determining their number and distribution of duties within the fund allocated to him or her for the remuneration of assistant consultants.[1301] The total monthly fund for maintaining an MP's assistant consultants is 43.8 subsistence minimums.[1302]

Each year, the budget estimate of the Verkhovna Rada sets the expenditure norms per MP of Ukraine, specifying the types of expenditure, their amount, calculated monthly and annually, and the legal grounds for making such payments.[1303]

An MP is guaranteed the opportunity to undertake professional development at the expense of budget funds, including study in educational institutions, master's and postgraduate programmes, and foreign language learning.

1296 On Financial Support for the Activities of MPs of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 2240-VIII of 07.12.2017. ↗

1297 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 33 ↗; On the Conditions of Remuneration of Officials, Heads and Senior Employees of Certain State Bodies to Whom the Law of Ukraine 'On Civil Service' Does Not Apply: Resolution of the Cabinet of Ministers of Ukraine No. 304 of 20.04.2016. ↗

1298 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 20, 32–33. ↗

1299 Compensation to MPs of Ukraine for renting housing or a hotel room. ↗

1300 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 28. ↗

1301 Ibid, Article 34.

1302 On Financial Support for the Activities of MPs of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 2240-VIII of 07.12.2017. ↗

1303 On the Estimate of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4696-IX of 03.12.2025. ↗

In 2025, the five-year United States Agency for International Development (USAID) 'RADA: Next Generation' initiative (2021–2026), aimed at supporting the transformation of Parliament into a modern and effective institution, was terminated.[1304] From 2025, educational courses within ITA under this programme were also discontinued.[1305]

The Research Service of the Verkhovna Rada of Ukraine (Research Service) plays an important role in strengthening the institutional capacity of Parliament.[1306] It provides research, information and analytical support for the activities of Parliament, its bodies and MPs, as well as professional training, including advanced training for MPs, their assistant consultants and staff of the Secretariat of the Verkhovna Rada.[1307] Organisational support for the educational process is provided by a training centre operating within the structure of the Research Service.[1308] Training under advanced training programmes is provided by employees of the Research Service and external experts.[1309]

The Research Service annually identifies the educational needs of MPs and their assistants, through annual surveys, requests from MPs and committees, as well as the participation of Service representatives in committee meetings. A calendar of training events is developed based on these needs. For example, following a survey, training was organised to improve English and French language proficiency. At the request of the Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, an advanced training programme entitled 'Law of Ukraine "On Administrative Procedure": Practical Aspects for the Verkhovna Rada of Ukraine' was developed and is held annually.

Overall, MPs and their assistants have the opportunity to undergo training under more than 80 advanced training programmes, as well as to participate in webinars and expert discussions on law-making, parliamentary oversight, adaptation of legislation to EU law and the negotiation process for Ukraine's accession to the EU.[1310] During the first half of 2026, 38 MPs completed professional development programmes.[1311]

For newly elected MPs, the Research Service has prepared a practical guide, 'Member of Parliament of Ukraine', which sets out the theoretical and legal foundations of the status

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1304 USAID 'RADA: Next Generation' Programme ↗; USAID officially terminated implementation of foreign assistance programmes. Detector Media. 2025. ↗

1305 Information on the receipt of ITA by the Administrative Office of the Secretariat of the Verkhovna Rada of Ukraine. ↗

1306 The Verkhovna Rada of Ukraine Research Service was established pursuant to Article 7 of the Rules of Procedure of the Verkhovna Rada of Ukraine to implement measures to strengthen the institutional capacity of Parliament under Order of the Chairman of the Verkhovna Rada of Ukraine No. 438 of 11.08.2022. A new version was approved by Order of the Chairman of the Verkhovna Rada of Ukraine No. 420 of 03.05.2024. Regulation on the Research Service of the Verkhovna Rada of Ukraine ↗; On Amendments to the Regulation on the Research Service of the Verkhovna Rada of Ukraine and Approval of Its New Version: Order of the Chairman of the Verkhovna Rada of Ukraine No. 420 of 03.05.2024. ↗

1307 Catalogue of advanced training programmes for MPs of Ukraine, employees of the Secretariat of the Verkhovna Rada of Ukraine, assistant consultants to MPs of Ukraine, representatives of state authorities, local self-government bodies and other legal and natural persons. ↗

1308 About the Training Centre. ↗

1309 Report on the Activities of the Verkhovna Rada of Ukraine Research Service for 2025. ↗

1310 Catalogue of advanced training programmes for MPs of Ukraine, employees of the Secretariat of the Verkhovna Rada of Ukraine, assistant consultants to MPs of Ukraine, representatives of state authorities, local self-government bodies and other legal and natural persons. ↗

1311 Report on the Activities of the Research Service of the Verkhovna Rada of Ukraine for the First Half of 2026. Research Service of the Verkhovna Rada of Ukraine. 2026. ↗

and activities of an MP of Ukraine, as well as practical aspects of exercising parliamentary powers.[1312]

On the basis of this Guide, an advanced training programme for newly elected MPs has been developed. They also have the opportunity to undertake training under existing programmes that meet their educational needs. The most in-demand programmes among MPs are those devoted to the oversight function of Parliament, the legal status of Verkhovna Rada committees, the legislative process in the Verkhovna Rada, the policy-making process and similar topics.[1313]

The Research Service also cooperates with 89 foreign parliamentary research services, international organisations and expert institutions, organising training events, working meetings, study visits and internships. This facilitates the exchange of experience and the introduction of best European practices into the work of the Verkhovna Rada.[1314]

MPs also exchange experience with their foreign counterparts within the framework of the Verkhovna Rada's international activities, through permanent delegations, interparliamentary assemblies and councils.[1315]

Progress and issues

The imperative mandate creates a conflict between the principle of free expression of will and party discipline.

The provisions on the imperative mandate have been criticised by the Venice Commission,[1316] the Council for Democratic Elections[1317] and PACE,[1318] as it restricts an MP's freedom to act according to their own convictions and oath, weakens the institutional independence of Parliament and effectively gives parties the opportunity to influence election results after the elections have ended. The CCU has also drawn attention to this problem.[1319]

The mechanism for losing a mandate due to leaving a faction is not automatic: the decision may be taken only by the highest governing body of the relevant party.

1312 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

1313 Ibid.

1314 General information ↗; Report on the Activities of the Research Service of the Verkhovna Rada of Ukraine for the First Half of 2026. Research Service of the Verkhovna Rada of Ukraine. 2026. ↗

1315 International activities. Verkhovna Rada of Ukraine. ↗

1316 CDL-AD(2005)015-e Opinion on the amendments to the Constitution of Ukraine adopted on 08.12.2004 adopted by the Commission at its 63rd plenary session (Venice, 10–11 June 2005), p. 3. ↗

1317 Report on the Imperative Mandate and Similar Practices adopted by the Council for Democratic Elections at its 28th meeting (Venice, 14 March 2009) and by the Venice Commission at its 79th Plenary Session, pp. 4, 13. ↗

1318 Resolution 1364 (2004) of the Parliamentary Assembly of the Council of Europe 'Political Crisis in Ukraine' of 29.01.2004 ↗; Resolution 1549 (2007) of the Parliamentary Assembly of the Council of Europe 'The Functioning of Democratic Institutions in Ukraine' of 19.04.2007 ↗; Resolution 1755 (2010) of the Parliamentary Assembly of the Council of Europe 'The Functioning of Democratic Institutions in Ukraine' of 04.10.2010 ↗; Resolution 2145 (2017) of the Parliamentary Assembly of the Council of Europe 'The Functioning of Democratic Institutions in Ukraine' Resolution 2145 (2017). ↗

1319 Opinion of the Constitutional Court of Ukraine No. 9-v/2019 of 24.12.2019 in case No. 2-247/2019(5579/19). ↗

On this ground, the powers of Sviatoslav Vakarchuk, No. 1 on the list of the Holos party, were terminated early[1320] after the Verkhovna Rada did not support the termination of his powers on the basis of a personal statement.[1321] Therefore, an extraordinary congress of the party adopted a decision on early termination of his powers in connection with his departure from the faction. Thus, the imperative mandate mechanism was used to implement the MP's intention to leave Parliament.

The grouping of MPs into factions is a logical instrument of political coordination and implementation of election programmes and entails compliance with faction discipline. At the same time, the imperative mandate contradicts the content of the parliamentary oath, which obliges an MP to act in the interests of the entire people of Ukraine regardless of faction membership.

Under the proportional electoral system with open lists[1322] introduced in 2020, a legal paradox arises: the voter gives personal legitimacy to a specific candidate within a party list, but the party retains the right to annul this choice through the mechanism of deprivation of the mandate for leaving the faction. This construction substitutes representative democracy with party-centered logic, while in the post-war period, when Ukraine begins to apply the open-list system in practice, the imperative mandate may become a serious obstacle to the agency of MPs.

The current situation is a stalemate: during martial law, the Constitution of Ukraine itself prohibits amendments to it, and the imperative mandate contradicts the principles of parliamentary democracy, yet its existence is potentially a restraining factor that ensures the stability of the parliamentary majority and the predictability of the Verkhovna Rada's work during the war.

The abolition of parliamentary immunity has left MPs without political protection from the executive.

In the absence of guarantees of MPs' immunity, law enforcement agencies within the executive's sphere of influence may use criminal proceedings as an instrument of political pressure. Questions have been raised about the independence of the State Bureau of Investigation (SBI) — one of the bodies that conducts pre-trial investigations of criminal offences committed by MPs — from the Office of the President of Ukraine and about its role in possible 'political persecution'. The SBI regularly finds itself at the centre of controversies, while journalists and civil society representatives have repeatedly accused it of exerting pressure, selective law enforcement and politicisation in the context of its excessively broad powers.[1323]

In addition, following amendments to the Criminal Procedure Code of Ukraine, the decision to initiate criminal proceedings depends on one person — the Prosecutor General. The procedure for appointing the Prosecutor General is highly political, as the key role is played by political actors — the President of Ukraine and the Verkhovna Rada of Ukraine.

1320 Vakarchuk Sviatoslav Ivanovych. ↗

1321 On the Early Termination of the Powers of MP of Ukraine S. Vakarchuk: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 3673 of 17.06.2020 ↗; Extraordinary Congress of the Holos Party: Termination of Sviatoslav Vakarchuk's Powers and Updating the Party Charter Ahead of the Local Elections. Holos. 2020. ↗

1322 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Book Three. Elections of People's Deputies of Ukraine. ↗

1323 SBI Reform: Not a Change of Director, but a Change in the Institution's Logic. Agency for Legislative Initiatives. 2026. ↗

In the absence of statutory selection criteria, the risks of political dependence and of the Prosecutor General being perceived as politically affiliated increase. This is particularly important given that it is the Prosecutor General who decides on bringing an MP of Ukraine to criminal liability, detention and arrest and serves an MP with a notice of suspicion.[1324]

Financial support for MPs' activities is insufficient.

The mechanism for setting MPs' salaries has remained unchanged for nine years. Taking into account the official exchange rate of the hryvnia against foreign currencies, the official salary of an MP ranges from EUR 649 to EUR 779.[1325] With the work intensity allowance, 100%, the salary ranges from EUR 1,298 to EUR 1,558.

The salary of an MP who is a committee member, consisting of the official salary, 10 subsistence minimums, and a work intensity allowance of 100% of the salary, is the basis for determining the amount of monthly reimbursement of expenses related to the exercise of parliamentary powers. The amount of this compensation is the same for all MPs of Ukraine.

During 2026, the amount of reimbursement of expenses for the exercise of parliamentary powers was increased **from one to three monthly salaries** of an MP,[1326] approximately EUR 3,000 per month. This decision was an attempt to compensate for outdated standards of support for MPs, which do not cover their actual expenses. For example, the expenditure norm for maintaining a public reception office is UAH 2,000 per year, EUR 39, while the norm for organising and holding meetings with voters is UAH 670 per year, EUR 13.[1327] In practice, funds for the exercise of parliamentary powers are used to pay for the work of external specialists, in particular lawyers to resolve voters' problems or prepare draft laws, to maintain public reception offices and to cover expenses for official travel, except for participation in permanent delegations such as PACE, a significant part of which, unlike government trips, is financed by MPs themselves.[1328]

At the same time, the issue of additional reporting on these funds is perceived by MPs as debatable given the already high oversight burden, including declarations and National Agency on Corruption Prevention (NACP) checks.[1329]

1324 Analytical Brief 'Depoliticising the Appointment and Dismissal of the Prosecutor General: European Models, Constitutional Considerations and Possible Scenarios for Ukraine'. Agency for Legislative Initiatives. 2026. ↗

1325 Here and below, the official exchange rate of the hryvnia against foreign currencies as of 31.07.2026. National Bank of Ukraine. 2026 (assessed 31.07.2026). ↗

1326 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, Article 55, para. 36 clause 6 of the Final Provisions. ↗

1327 On the Estimate of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4696-IX of 03.12.2025. ↗

1328 MPs tripled their own payments. UNIAN. 2025. ↗ Pursuant to subparagraph 170.9.1 of paragraph 170.9 Article 170 of the Tax Code of Ukraine, the Cabinet of Ministers of Ukraine adopted Resolution No. 98 of 02.02.2011 (as amended), approving the amounts of travel expenses for civil servants and other persons sent on business trips by enterprises, institutions and organisations fully or partially maintained (financed) from budget funds. This resolution is the basic document determining the amount of daily subsistence expenses and the maximum amounts of accommodation expenses during business trips within Ukraine and abroad. Tax Code of Ukraine No. 2755-VI of 02.12.2010 ↗; On the Amounts and Composition of Travel Expenses for Civil Servants and Other Persons Sent on Business Trips by Enterprises, Institutions and Organisations Fully or Partially Maintained (Financed) from Budget Funds: Resolution of the Cabinet of Ministers of Ukraine No. 98 of 02.02.2011 ↗; Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

1329 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

Against the background of inflation and the rising average level of pay in the public sector, the current salary of parliamentarians does not correspond to the scope of their responsibility and creates preconditions for seeking alternative sources of income.[1330]

By comparison, heads of state-owned companies receive market-based salaries, in some cases hundreds of thousands of hryvnias, to minimise corruption risks, whereas the issue of parliamentarians' remuneration is often determined by political expediency. At the same time, if the salary does not cover the basic needs and expenses of an MP's work, Parliament may become a place only for those who already have significant capital. This excludes middle-class professionals who do not have passive sources of income.[1331]

Comparing this with the practice of the Bundestag in Germany, where an MP's salary, around EUR 10,000, is two to three times higher than the national average, MPs note that this approach should serve as an example of proportionality rather than direct copying. It would be advisable to link parliamentarians' remuneration in Ukraine to the average salary, for example at the level of three to four average salaries, and to set it at UAH 100,000 to UAH 200,000, while not exceeding payments to service members on the frontline.[1332]

On the issue of their own resource provision, MPs are effectively trapped: they themselves must vote to change their salary, which is perceived as 'political suicide' during the war and amid low public trust in the institution,[1333] against the backdrop of high-profile corruption scandals that shook society in 2025.[1334]

Moreover, cases where MPs who receive compensation for renting housing also declare significant cash assets and luxury items provoke public outrage and shape the perception of payments for the exercise of parliamentary powers as an instrument for increasing their personal income. The fact that MPs are not required to report on the use of monthly payments related to the exercise of their powers gives rise to ideas about the advisability of a variable distribution of compensation depending on an MP's wealth.[1335] However, such an approach would contradict the principle of fairness, which should guarantee any citizen, regardless of material status, the opportunity to perform their duties effectively in the Verkhovna Rada.

This creates a kind of 'vicious circle': corruption scandals, including those involving MPs, fuel public dissatisfaction and distrust of the authorities in general, meaning that increases in MPs' salaries, as one of the anti-corruption safeguards, are not viewed positively by the public.

In November 2025, an expert discussion on reforming the remuneration system in the public sector took place in the Verkhovna Rada, including the introduction of a unified

1330 How Much Do MPs Earn, and How Can They Earn More? Agency for Legislative Initiatives. 2024. ↗

1331 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

1332 Ibid.

1333 Assessment of the Situation in the Country, Trust in Social Institutions and Assessment of Problems Existing in Ukrainian Society (November 2025). Razumkov Centre. 2025. ↗

1334 Case Concerning a Criminal Organisation in the Energy Sector. Operation 'Midas'. HACC Decided. 2026. ↗

1335 Millionaire beneficiaries: which MPs take budget money for housing during the war? CHESNO Movement. 2024 ↗; The state paid UAH 64.4 million in compensation for housing rent to MPs over two years. NV. 2024. ↗

approach to remuneration of civil servants and political figures.[1336] In February 2026, draft law No. 14387 was registered, proposing to establish unified principles for setting salaries in the public and private sectors, including political positions.[1337] On the one hand, the draft law has the potential to modernise the remuneration system; on the other hand, its implementation entails a number of risks. At present, the draft law proposes **establishing an upper limit**, or grades, for payments to prevent manual increases in salaries.

The law does not establish sufficiently detailed rules and procedures that would clearly define for MPs the boundary between proper and improper use of parliamentary resources. Funds related to the exercise of parliamentary powers are not taxable and MPs are not required to report on their use.[1338] They are also not treated as income, meaning MPs are not required to declare receipt of such funds.[1339] This makes external oversight of whether these funds are used for their intended purpose impossible.

In this context, the discussion on creating an independent body, or delegating to an independent body the powers to determine and administer expenses related to the activities of MPs, remains relevant. An example is the Independent Parliamentary Standards Authority (IPSA), an independent regulator of parliamentary standards in the United Kingdom.[1340] This body determines staffing and business costs for MPs, rules on MPs' pay and pensions and provides financial support for the performance of their parliamentary functions through a system of staffing and operational costs for MPs' offices.[1341]

Recommendations

1. After the termination or cancellation of martial law, abandon the imperative mandate. This will require the removal of paragraph 6 of Part 2 Article 81 of the Constitution of Ukraine. Already now, however, taking into account the experience of EU Member States, mechanisms should be developed to ensure political accountability and parliamentary discipline that comply with the principle of proportionality.
2. Initiate a discussion on restoring provisions on parliamentary immunity to the Constitution of Ukraine.
3. Review the procedure for setting MPs' salaries, combining it with ensuring transparency in the use of funds for the exercise of parliamentary powers, through the declaration of compensation and payments received and the publication of reports on their use. Such changes should be accompanied by a communication strategy explaining their purpose to society, as well as the consistent development of parliamentary ethics based on zero tolerance for corruption.

1336 An expert public discussion on reforming the remuneration system in Ukraine was held in the Verkhovna Rada of Ukraine in a roundtable format. Committee on Social Policy and Protection of Veterans' Rights. 2025. ↗

1337 On a Fair Remuneration System in Ukraine: Draft Law of Ukraine, registration No. 14387 of 19.01.2026. ↗

1338 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 32. ↗

1339 Knowledge Base: Clarifications. National Agency on Corruption Prevention. 2026. ↗

1340 Independent Parliamentary Standards Authority — an independent standards body for the UK Parliament, established in 2009 under the Parliamentary Standards Act 2009. ↗

1341 Scheme of MPs' Staffing and Business Costs 2025–26. IPSA. ↗

4. Introduce public reporting by MPs on the use of funds for the exercise of parliamentary powers, including by declaring compensation and payments received and publishing reports on their use.
5. In the longer term, delegate to an independent body the functions of regulating and administering expenses for supporting MPs' activities, regarding the assessment of actual expenses for the exercise of parliamentary powers, automatic recalculation of remuneration based on economic indicators without a separate parliamentary vote and public audit of the use of budget funds.

Integrity of Members of Parliament of Ukraine

State of play

Legal framework

As a State Party to the United Nations (UN) Convention against Corruption, Ukraine implements a comprehensive policy for preventing, detecting and countering corruption, which also applies to Members of Parliament of Ukraine. The basic requirements in this area are set out in the Law of Ukraine 'On Prevention of Corruption', which defines the legal and organisational principles for the functioning of the corruption prevention system in Ukraine, the content and procedure for applying preventive anti-corruption mechanisms, including rules of ethical conduct, prevention and management of conflicts of interest, both real and potential, and rules on eliminating the consequences of corruption offences.[1342]

Special anti-corruption mechanisms and statuses

An important transparency tool is **financial monitoring of politically exposed persons (PEPs)**, which also includes MPs.[1343] Pursuant to Law No. 3419-IX,[1344] adopted to fulfil the requirements of the International Monetary Fund (IMF),[1345] lifelong PEP status was introduced.

Ukraine has established a **regulatory basis for placing interaction between MPs and stakeholders**, including business, within a more transparent and regulated legal framework. On 1 September 2025, the Law of Ukraine 'On Lobbying' entered into force.[1346] This Law provides that lawful influence on decision-making processes, including in interaction with MPs, may be exercised only by lobbying entities included in the Transparency Register maintained by the NACP. The Register is an open information and communication system that ensures the accumulation, processing and free public access to up-to-date

1342 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Section V 'Prevention and Management of Conflicts of Interest', Section VI 'Rules of Ethical Conduct'. ↗

1343 On Prevention and Counteraction to Legalisation (Laundering) of Proceeds of Crime, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction: Law of Ukraine No. 361-IX of 06.12.2019. ↗

1344 On Amendments to the Law of Ukraine 'On Prevention and Counteraction to Legalisation (Laundering) of Proceeds of Crime, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction' Regarding Politically Exposed Persons: Law of Ukraine No. 3419-IX of 17.10.2023. ↗

1345 Country Report IMF No. 23/132 (Ukraine: EFF Prior Actions and Structural Benchmarks). Structural Benchmark No. 14. ↗

1346 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024. ↗

information on lobbying entities and their reporting.[1347] This makes it possible to track the interaction of lobbyists with representatives of public authorities, including MPs, as well as the subject matter of such communications.[1348]

The Law of Ukraine 'On Prevention of Corruption' classifies MPs as persons authorised to perform the functions of the state or local self-government.[1349] Accordingly, most provisions of the Law apply to them and, in this respect, their status is equivalent to that of other persons subject to the Law, such as ministers, judges and members of the Central Election Commission. MPs are therefore subject to provisions on the prevention and management of conflicts of interest, financial control measures and the full range of restrictions established by the Law to prevent corruption offences:

- restrictions on the use of official powers or position;
- restrictions on receiving gifts;
- restrictions on concurrent employment and combining office with other activities;
- post-employment restrictions related to the performance of state or local self-government functions;
- restrictions on the joint employment of close persons.[1350]

Only a small proportion of legislative provisions relate specifically to MPs' activities. For example, the Law of Ukraine 'On Prevention of Corruption' expressly prohibits the employment of a close person as an assistant consultant to an MP of Ukraine.[1351] The Law of Ukraine 'On the Status of People's Deputy of Ukraine' requires MPs to submit asset declarations and comply with other financial control requirements.[1352] The Rules of Procedure of the Verkhovna Rada provide that an MP may participate in the discussion and voting on a matter in which they have a conflict of interest provided that they publicly disclose it during the plenary sitting.[1353] The Law of Ukraine 'On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine' prohibits the election of MPs to a commission where this would give rise to an actual or potential conflict of interest.[1354]

Rules of parliamentary ethics and discipline

The Law of Ukraine 'On Prevention of Corruption' defines general requirements for the conduct of persons authorised to perform state functions, including those holding elected office, which they must follow when exercising their representative powers. These

1347 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024. Article 5 ↗ ; Transparency Register. National Agency on Corruption Prevention. ↗

1348 For more details, see the subsection 'Lobbying'.

1349 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, subpara. 'b' para. 1 Part 1 Article 3. ↗

1350 Ibid. Articles 22-27.

1351 Ibid. Article 27.

1352 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 25. ↗

1353 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 31[1] and Part 6 Article 37. ↗

1354 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, para. 6 Part 7 Article 4 and second paragraph of Part 2 Article 23. ↗

requirements form the legal basis for developing and applying codes and standards of professional ethics. At the same time, the Law refers the specific features of managing conflicts of interest for MPs to special laws that define their status and the procedure for the activities of the relevant bodies.[1355]

The Law of Ukraine 'On the Status of People's Deputy of Ukraine' establishes general requirements for parliamentary ethics, obliging parliamentarians to observe generally recognised moral standards, preserve their own dignity and respect the honour of other persons. MPs must refrain from actions and statements that compromise themselves, voters, Parliament or the state, strictly comply with the prohibition on using the mandate for personal gain, use parliamentary letterheads only for official requests, appeals and letters personally signed by them and comply with labour discipline requirements.[1356]

The Rules of Procedure of the Verkhovna Rada detail the procedural aspects of applying these ethical rules and preventing conflicts of interest. MPs are obliged to publicly announce the existence of a conflict of interest when issues are considered or voted on, and to refuse to participate in the work of temporary special or investigative commissions if a real or potential conflict of interest arises. The Rules of Procedure also regulate conduct in the plenary hall: they prohibit the use of posters, slogans and loudspeakers, obstruction of colleagues' speeches, including through shouting, applause or mobile phone conversations, as well as offensive language and breaches of time limits.[1357]

A number of measures of influence have been established to respond to violations. An MP has the right to refute an incorrect interpretation of their words by making a remark, while the presiding officer is authorised to stop a speech or switch off the microphone if the rules are not followed. Based on the conclusion of the relevant committee, the Verkhovna Rada may deprive an MP of the right to participate in plenary sittings, for up to five plenary sittings, with publication of the relevant decision.[1358]

Parliament has introduced a mechanism of financial liability for improper performance by an MP of their duties. If, without valid reasons,[1359] an MP does not participate in more than 30% of votes or 50% of committee meetings in a month, they are not reimbursed for expenses related to the exercise of parliamentary powers for the relevant month. The decision is formalised by an order of the Chairman of the Verkhovna Rada upon the submission of the relevant committee on the basis of working time records kept by the Secretariat of the Verkhovna Rada.[1360] This creates a basic incentive for proper participation by MPs in the work of Parliament and its bodies and partly limits the risks of misuse of resources. At the same time, this mechanism covers only formal activity

1355 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Articles 35[1], 37.

1356 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992. Articles 8, 24.

1357 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 31[1], 51.

1358 Ibid, Article 51.

1359 Valid reasons for an MP's absence from a plenary sitting or committee meeting are defined in Part 3 Article 26 of the Rules of Procedure of the Verkhovna Rada of Ukraine. On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 26.

1360 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 33.

indicators. However, this provision does not apply during martial law. Working time records for MPs during martial law are kept in accordance with labour legislation.[1361]

Specialised committees

The remit of parliamentary committees covers issues of parliamentary ethics and the general framework of anti-corruption policy, in particular:

The Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada (Rules Committee) considers issues of incompatibility of the parliamentary mandate, discipline and compliance with parliamentary ethics.[1362] For example, in 2025–2026 the Committee considered several complaints from MPs and adopted conclusions on disciplinary liability:

- Mariana Bezuhla, unaffiliated — it was recommended that she be deprived of the right to participate in one plenary sitting;[1363]
- Serhii Vlasenko, faction of the parliamentary faction 'Batkivshchyna' — the Committee emphasised the inadmissibility of the conduct and the need for strict compliance with legislation, the oath of an MP and generally recognised moral standards;[1364]
- Petro Poroshenko, the parliamentary faction 'European Solidarity' — it was recommended that he be deprived of the right to participate in one plenary sitting.[1365]

The Committee on Anti-Corruption Policy is responsible for the general framework of anti-corruption policy, preventing and countering corruption, rules of ethical conduct in public service, financial control over persons authorised to perform state and local self-government functions, liability for corruption and corruption-related offences and anti-corruption review of draft laws.[1366]

The Committee cooperates with anti-corruption bodies and conducts regular analysis of their activities,[1367] including through requests for qualitative and quantitative indicators of their work.

1361 On Amendments to Certain Laws of Ukraine Regarding the Functioning of the Civil Service and Local Self-Government during Martial Law: Law of Ukraine No. 2259-IX of 12.05.2022, para. 2 Section II 'Final and Transitional Provisions'. ↗

1362 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019 ↗ ; Areas of Competence of the Committee of the Verkhovna Rada of Ukraine on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine. ↗

1363 Conclusion on the statement of MP of Ukraine Y.I. Zhelezniak and other MPs of Ukraine (16 signatures in total) (electronic document card (1965521)) regarding the actions of MP of Ukraine M.V. Bezuhla during the ongoing plenary sitting of the Verkhovna Rada of Ukraine on 31.07.2025 ↗; Decision on the statements of MP of Ukraine M.M. Tyshchenko regarding the statements and actions of MP of Ukraine M.V. Bezuhla during the ongoing plenary sitting of the Verkhovna Rada of Ukraine on 16.12.2025. ↗

1364 Decision on the statement of MPs of Ukraine M.L. Bondar and others (10 signatures in total) (electronic document card (1979097)) regarding events that took place during the ongoing plenary sitting of the Verkhovna Rada of Ukraine on 31.07.2025 in the plenary hall of the Verkhovna Rada of Ukraine (5 Hrushevskoho Street) involving MP S.V. Vlasenko. ↗

1365 Conclusion on the statement of MP of Ukraine M.R. Poturaiev and other MPs of Ukraine (electronic document card (1761396)) regarding events that took place on 19.12.2024 in the plenary hall of the Verkhovna Rada of Ukraine involving MP of Ukraine P.O. Poroshenko. 2025.↗

1366 On the List, Quantitative Composition and Areas of Competence of Committees of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019 ↗ ; Areas of Competence of the Committee of the Verkhovna Rada of Ukraine on Anti-Corruption Policy. ↗

1367 Ibid.

The Committee responds to and monitors not only problematic issues in the work of bodies within its areas of competence, but also major corruption scandals. It holds public hearings with officials, considers high-profile cases and analyses the results of internal audits to assess the effectiveness of anti-corruption bodies.[1368]

Anti-corruption infrastructure

Ukraine has created a **comprehensive anti-corruption infrastructure** that meets international standards and covers the entire cycle of preventing and countering corruption. Each element of the system has a clearly defined role within a single anti-corruption mechanism:

The National Agency on Corruption Prevention (NACP) — verification of declarations, lifestyle monitoring, control over conflicts of interest and party financing.[1369]

The National Anti-Corruption Bureau of Ukraine (NABU) — operational and search activites to prevent, detect, prevent, detect, stop and investigate criminal offences and pre-trial investigation of corruption offences.[1370]

The Specialised Anti-Corruption Prosecutor's Office (SAPO) — procedural guidance in criminal proceedings investigated by the NABU, oversight of compliance with the law during operational and search activities and pre-trial investigations and supporting the prosecution in court in relevant proceedings.[1371]

The High Anti-Corruption Court (HACC) — administration of justice at first instance and on appeal in criminal proceedings concerning corruption offences.[1372]

The National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes (ARMA) — identification and tracing of property that may be seized in criminal proceedings or in cases on recognising assets as unjustified and recovering them for the state, as well as facilitating criminal proceedings through a number of measures.[1373]

After being suspended in 2022, the **electronic declaration system** was restored in 2023, together with open access to the declaration register and full checks.[1374] This ensured the restoration of public control over the assets of officials, including MPs.

The NACP conducts full checks of declarations and selective lifestyle monitoring of declarants, including MPs, to establish whether their standard of living corresponds

1368 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

1369 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Article 11. ↗

1370 On the National Anti-Corruption Bureau of Ukraine: Law of Ukraine No. 1698-VII of 14.10.2014, Articles 16, 17. ↗

1371 On the Public Prosecutor's Office: Law of Ukraine No. 1697-VII of 14.10.2014, Article 81. ↗

1372 On the High Anti-Corruption Court: Law of Ukraine No. 2447-VIII of 07.06.2018, Article 4 ↗; Criminal Procedure Code of Ukraine: Law of Ukraine No. 4651-VI of 13.04.2012, Article 331 ↗ ; Criminal Code of Ukraine No. 2341-III of 05.04.2001, Article 45 (note). ↗

1373 On the National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes: Law of Ukraine No. 772-VIII of 10.11.2015, Article 16. ↗

1374 The declaration system and the NACP's functions were restored by Law No. 3384-IX, which entered into force on 12.10.2023. On Amendments to Certain Laws of Ukraine on Determining the Procedure for Submitting Declarations of Persons Authorised to Perform State or Local Self-Government Functions under Martial Law: Law of Ukraine No. 3384-IX of 20.09.2023. ↗

to the property owned by them and their family members and to the income received by them according to the submitted declaration. Such monitoring is carried out on the basis of information received from individuals and legal entities, as well as from media and other open sources of information containing data on the inconsistency between declarants' standard of living and their declared property and income.[1375] The NACP is also entitled to verify assets that a declarant owns indirectly, through relatives or other persons. If lifestyle monitoring reveals signs of a corruption offence, the NACP informs other specially authorised entities in the field of countering corruption.[1376] For example, in April 2026, following lifestyle monitoring conducted by the NACP and on the basis of evidence collected through investigative measures, the NABU and SAPO notified an incumbent MP of suspicion of illicit enrichment in the amount of UAH 12.7 million. The investigation identified illegally acquired assets owned by the MP.[1377]

After the abolition of parliamentary immunity, opportunities to bring MPs of Ukraine to criminal liability were expanded,[1378] including for committing corruption criminal offences.

The resumption by the NACP of full checks of declarations, high-profile investigations by the NABU and SAPO, ARMA's work in identifying and tracing assets in cases concerning unjustified assets and HACC case law on corruption offences send important signals about the inevitability of liability for corruption offences, regardless of the offender's status.

Interaction between Parliament and civil society

Interaction between Parliament and civil society institutions in the field of preventing and countering corruption is implemented through transparency of law-making, involvement of independent expertise and joint countering of corruption risks.

Legislation gives NGOs the right to conduct their own independent anti-corruption review of draft laws and publish its results.[1379] Importantly, its results are mandatory for consideration by the entity adopting the relevant act.[1380]

The expert community contributes to shaping the legislative framework both on its own initiative[1381] and at the invitation of the relevant committees. In particular, the Committee on Anti-Corruption Policy practises targeted engagement of experts to provide professional comments on specific issues.[1382] This makes it possible to integrate the public's position directly into the decision-making process.

1375 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Article 51[4] ↗; On Approval of the Procedure for Lifestyle Monitoring of Declarants: Order of the National Agency on Corruption Prevention No. 236/23 of 26.10.2023. ↗

1376 On Approval of the Procedure for Lifestyle Monitoring of Declarants: Order of the National Agency on Corruption Prevention No. 236/23 of 26.10.2023. ↗

1377 Incumbent MP suspected of illicit enrichment of almost UAH 13 million. National Agency on Corruption Prevention. 2026. ↗

1378 For details, see the subsection 'Status, Resources and Professional Development of Members of Parliament of Ukraine'.

1379 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Article 55. ↗

1380 Ibid.

1381 Anti-Corruption Infrastructure. Transparency International Ukraine. ↗

1382 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

Think tanks provide continuous monitoring and legal support for anti-corruption reforms,[1383] as well as monitoring of MPs' lifestyles,[1384] which is an effective tool of public pressure and a basis for further checks by competent authorities.

Progress and issues

Ukraine received above-OECD-average scores in the 2026 Anti-Corruption and Integrity Review. According to the Organisation for Economic Co-operation and Development (OECD), Ukraine received some of the best scores in almost all areas, which are generally higher than the average among OECD members, among 37 member countries and 25 partner countries. In the field of **lobbying**, Ukraine is among the leaders alongside Canada, France and Estonia in implementing regulatory (80%) and implementation (89%) criteria.[1385]

In assessing the conflict of interest area, the OECD pointed to a developed electronic declaration system that enables verification of officials' assets using a risk-based approach. At the same time, despite the high quality of anti-corruption policy design and the proper level of implementation of integrity governance standards of developed countries, practical application of the established rules and procedures needs to be improved.[1386]

Discrepancies in MPs' declarations demonstrate the need to further develop mechanisms for ensuring integrity. The restoration of declaration, together with open access to the declaration register and full checks, at the same time revealed discrepancies in declarations and signs of unjustified assets.[1387] Although the direct preventive effect, meaning the number of violations not committed, is difficult to measure quantitatively, the continuity and inevitability of checks create conditions in which political corruption becomes too risky and publicly visible.

In 2025–2026, the NACP completed full checks of 34 declarations of MPs for the reporting periods of 2021–2024. No violations were found in only two cases. In 21 declarations, the vast majority of which belong to MPs of the parliamentary faction 'Servant of the People', inaccurate information was established.[1388]

Following full checks completed in 2025, **cases** were established in which four MPs submitted declarations containing unreliable information with signs of criminal offences, Article 366[2] of the Criminal Code of Ukraine (CC of Ukraine). In particular:

1383 Transparency International Ukraine is the accredited representative of the global Transparency International movement, which takes a comprehensive approach to developing and implementing changes aimed at reducing corruption. ↗ ; Legal Analysis. Transparency International Ukraine. ↗ ; CHESNO Movement is a Ukrainian civic movement founded in 2011 to promote transparency, accountability and integrity in politics. It conducts analytical studies of declarations, voting and politicians' connections and publishes the results in open access ; StateWatch is an independent think tank in Ukraine that provides a link between state institutions, civil society and international partners and provides analytics with practical impact that strengthen democratic institutions; Facebook profile. ↗

1384 Billion-level incomes and million-level bails: what MPs with notices of suspicion declared. CHESNO. 2026 ↗ ; Suspicion does not stop them: MPs buy real estate and cars while cases are ongoing. CHESNO. 2026. ↗

1385 Ukraine Scores Above the OECD Average in the 2026 Anti-Corruption and Integrity Review. National Agency on Corruption Prevention. 2026. ↗

1386 Ibid.

1387 Full Checks of Declarations. National Agency on Corruption Prevention. ↗

1388 Full Verification of Declarations. National Agency on Corruption Prevention. ↗

- Roman Ivanisov, 'Restoration of Ukraine' parliamentary group: following the check of his annual declaration for 2023, signs of unjustified assets were identified and the amount of unreliable information totalled UAH 11,662,192.06. The materials were sent to the SAPO;[1389]
- Orest Salamakha, parliamentary faction 'Servant of the People': in his declaration for 2024, he provided inaccurate information in the total amount of UAH 9,018,859.00;[1390]
- Yevhen Petruniak, parliamentary faction 'Servant of the People': for two consecutive years, he provided unreliable information in his annual declarations for 2022 and 2023 in the amounts of UAH 7,313,720.00 and UAH 3,657,000.00 respectively;[1391]
- Nelli Yakovlieva, parliamentary faction 'Servant of the People': in her annual declaration for 2023, the NACP identified signs of unjustified assets in the amount of UAH 4,118,295.00.[1392]

In cases where inaccuracies are detected, the NACP enables declarants to submit corrected declarations, which is recorded in the relevant certificates based on the results of checks. Specifically in the cases cited above, no signs of a conflict of interest were found. However, the recorded facts of million-level discrepancies in declarations and signs that assets may be unjustified confirm the need to strengthen educational and explanatory work.

The most recent explanations on the submission of declarations by MPs were provided by the Rules Committee of the previous Verkhovna Rada of the VIII convocation and concerned specific features of submitting declarations by MPs due to the early termination of powers.[1393]

Overall, analysis of the results of declaration checks indicates that anti-corruption bodies comply with the principle of **political neutrality**. Financial control measures are applied equally to representatives of different factions and groups. The fact that a significant proportion of the identified violations concerns representatives of the ruling majority confirms that belonging to the ruling power structure does not provide immunity from objective monitoring by the NACP. This indicates the strengthening of the independence of the anti-corruption ecosystem as an arbiter that ensures equality of all parliamentarians before the law.

1389 Certificate on the results of the full check of the annual declaration for 2023 submitted by Roman Valeriiovych Ivanisov, MP of Ukraine, No. 61/25 of 24.01.2025. National Agency on Corruption Prevention. ↗

1390 Certificate on the results of the full check of the annual declaration for 2024 submitted by Orest Ihorovych Salamakha, MP of Ukraine, No. 846/25 of 31.10.2025. National Agency on Corruption Prevention. ↗

1391 Certificate on the results of the full check of the annual declaration for 2022 submitted by Yevhen Vasylovych Petruniak, MP of Ukraine, No. 499/25 of 04.07.2025. National Agency on Corruption Prevention ↗; Certificate on the results of the full check of the annual declaration for 2022 submitted by Yevhen Vasylovych Petruniak, MP of Ukraine, No. 202/25 of 21.03.2025. National Agency on Corruption Prevention. ↗

1392 Certificate on the results of the full check of the annual declaration for 2023 submitted by Nelli Illivna Yakovlieva, MP of Ukraine, No. 509/25 of 11.07.2025. National Agency on Corruption Prevention. ↗

1393 Clarification on the application of certain provisions of the Law of Ukraine 'On the Status of People's Deputy of Ukraine' regarding the specific features of submitting a declaration by an MP of Ukraine as a person authorised to perform state or local self-government functions in connection with the early termination of the powers of the Verkhovna Rada of Ukraine. Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine. ↗

The absence of a genuine risk-based approach to banking services for PEPs leads to excessive restrictions for persons acting in good faith and creates preconditions for attempts to weaken anti-corruption safeguards.

The issue of financial monitoring of PEPs remains one of the most destructive factors for personnel policy in public administration. Lifelong PEP status creates excessive reputational and practical burden not only for officials themselves, but also for their family members, which discourages professionals from entering public service. Despite repeated recommendations from the National Bank of Ukraine (NBU),[1394] the key problem is the absence of a genuine risk-based approach to banking services for PEPs. Law No. 3419-IX[1395] requires banks to provide written explanations within five working days if they refuse to provide services to a PEP. However, practice has shown the opposite: fearing multimillion fines, banks choose a risk-avoidance strategy and, instead of analysing transactions, unjustifiably refuse to open or service accounts,[1396] even after 12 months have passed since the person was dismissed from office or their powers ceased.[1397]

In April 2026, a group of MPs proposed changing the approach to PEP status through an amendment to draft law No. 15112-1,[1398] which concerned the taxation of international postal items. Under this initiative, it was proposed to limit PEP status to a three-year period after the end of powers instead of the current lifelong approach.[1399]

The European Commission reacted promptly to this initiative, warning that intentions to reduce PEP status to three years contradicted European integration and recommending that Ukraine hold consultations before introducing the relevant provisions.[1400] The amendment was subsequently removed from the draft law.

After the unsuccessful attempt to change the legislation in April 2026, the National Bank of Ukraine published another clarification for banks on the need to apply a risk-based approach when working with PEPs and clarified the algorithm for reviewing risk levels: in the absence of suspicious transactions 12 months after the end of a PEP's powers, banks should lower the client's risk level.[1401]

The absence of a clear gift policy for MPs creates risks of hidden corruption and opaque lobbying. A gift is money or other property, advantages, benefits, services or intangible assets that are provided or received free of charge or at a price lower than the minimum

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1394 Banks Should Not Take a Formalistic Approach to Servicing PEPs. National Bank of Ukraine. 2026. ↗

1395 On Amendments to the Law of Ukraine 'On Prevention and Counteraction to Legalisation (Laundering) of Proceeds of Crime, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction' Regarding Politically Exposed Persons: Law of Ukraine No. 3419-IX of 17.10.2023. ↗

1396 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.
In 2025, the National Bank applied 158 enforcement measures to banks and other financial institutions for a total amount of UAH 586 million. The main reason for penalties was inadequate customer due diligence. Financial monitoring violations cost banks hundreds of millions of hryvnias. What the NBU fined for. Ministry of Finance of Ukraine. 2026. ↗

1397 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

1398 On Amendments to the Tax Code of Ukraine Regarding Taxation of E-Commerce Transactions with Value Added Tax: Draft Law of Ukraine, registration No. 15112-1 of 03.04.2026. ↗

1399 Operation PEP. How financial monitoring of former officials was attempted to be 'softened' in the tax draft law on parcels. Ain. 2026. ↗

1400 Brussels warned Ukraine about the consequences of reducing the PEP period to three years. European Pravda. 2026. ↗

1401 Banks Should Not Take a Formalistic Approach to Servicing PEPs. National Bank of Ukraine. 2026. ↗

market price.[1402] The law prohibits persons from demanding, asking for or receiving gifts for themselves or close persons in connection with activities related to the performance of state or local self-government functions. The law allows the receipt of gifts not related to the performance of such functions if they correspond to generally recognised notions of hospitality and comply with value limits:

- a gift from one person or group of persons may not exceed two subsistence minimums for able-bodied persons established on the day it is accepted;
- the total value of all gifts received from one person or group of persons during a year may not exceed four subsistence minimums established on 1 January of the relevant year.[1403]

In 2026, the permissible value of a gift from one person or group of persons is UAH 6,656, approximately EUR 130, while the annual value of all gifts from one person or group of persons is UAH 13,312, approximately EUR 260.

In addition, the **limits on the value of gifts do not apply** to gifts received:

- from close persons;
- as publicly available discounts on goods or services, publicly available winnings, prizes, awards or bonuses;
- as reimbursement or coverage of official travel expenses, including at the expense of the organiser or co-organiser of the event in which the person participates during official travel.[1404]

The Group of States against Corruption (GRECO) recommended that Ukraine: (1) improve the rules on the receipt of gifts by MPs, judges and prosecutors, in particular by lowering the permissible value thresholds, providing clearer definitions to cover all possible forms of benefits and clarifying the concept of acceptable hospitality; and (2) introduce internal procedures for assessing, declaring and, where necessary, returning unacceptable gifts.[1405]

The development, adoption and implementation of a gift policy in line with GRECO recommendations is provided for in the FDI Roadmap.[1406] Implementation of this measure is currently at the initial stage: the NACP is taking organisational measures to identify responsible persons and plan their implementation.[1407]

1402 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Article 1. ↗

1403 Ibid, Article 23. From 01.01.2026, the subsistence minimum for able-bodied persons is UAH 3,328. On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, Article 7. ↗

1404 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Article 23. ↗

1405 GrecoRC4(2024)15. Fourth Evaluation Round. Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors. Addendum to the Second Compliance Report. Ukraine. Adopted at the 98th GRECO Plenary Meeting (Strasbourg, 18–22 November 2024). GRECO. 2025. Recommendation IV. ↗

1406 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. Roadmap on the Functioning of Democratic Institutions, para. 44. ↗

1407 Report on the Status of Implementation of the Roadmap on the Functioning of Democratic Institutions: Order of the Cabinet of Ministers of Ukraine No. 475 of 14 May 2025, for the fourth quarter of 2025.

The legislative framework does not provide a comprehensive mechanism for preventing and managing conflicts of interest among MPs. In the activities of MPs, management of conflicts of interest is largely based on self-declaration without proper internal control. Practice shows that MPs may participate in votes or in the work of temporary investigative commissions that affect their private interests. The consequence of the absence of internal safeguards against conflicts of interest in Parliament is high-profile investigations and guilty verdicts.

In December 2025, the NABU and SAPO announced the exposure of a group of incumbent MPs suspected of systematically receiving undue benefits for voting in the Verkhovna Rada. On 29 December, five MPs were notified of suspicion under articles related to bribery.[1408]

In January 2026, the same bodies reported the exposure of the head of a parliamentary faction in an attempt to organise the systematic bribery of MPs. According to the investigation, the published pre-trial investigation materials contained information about informal 'rates' for supporting legislative and personnel decisions and attempts to influence the parliamentary majority.[1409]

Anatolii Hunko, an MP of the IX convocation, 'Restoration of Ukraine' parliamentary group, at the time of committing a criminal offence related to the land resources of a state enterprise within the system of the National Academy of Agrarian Sciences (NAAS), for which on 9 February 2026 he was sentenced to four years' imprisonment,[1410] headed the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on Investigating Facts of Corruption in Institutions and Organisations of that same academy, from 1 December 2022 to 24 January 2023. In addition, during the same period he appeared in schemes related to the seizure of crops of state enterprises within the NAAS system,[1411] which further illustrates the risks of conflict of interest and institutional incompatibility of functions.

In March 2026, the HACC delivered a guilty verdict against MP Liudmyla Marchenko, Deputy Head of the Rules Committee, parliamentary faction 'Servant of the People',[1412] who was sentenced to two years' imprisonment for assisting men liable for military service to illegally travel abroad for a monetary reward.[1413]

Also in March 2026, the NABU and SAPO sent to court an indictment in a case concerning the misappropriation of funds of Joint stock company 'Ukrainian Railways' during

1408 Head of a parliamentary faction notified of suspicion (VIDEO+PHOTO). National Anti-Corruption Bureau of Ukraine. 2026 ↗; Receipt of undue benefits by MPs: criminal group exposed. National Anti-Corruption Bureau of Ukraine. 2025 ↗; NABU announced suspicion to another MP in the case concerning 'cash in envelopes'. Dzerkalo Tyzhnia. 2025. ↗

1409 'We need to knock down this majority': what lies behind the NABU's notice of suspicion to Yuliia Tymoshenko. LB.ua. 2026. ↗

1410 Criminal Code of Ukraine No. 2341-III of 05.04.2001, Part 2 Article 369^2 ↗; Ruling of the Appeal Chamber of the High Anti-Corruption Court of 09.02.2026 in case No. 991/1304/24. ↗

1411 Misappropriation of agricultural products worth almost UAH 30 million: MP and regional council deputy suspected (PHOTO). National Anti-Corruption Bureau of Ukraine. 2026. ↗

1412 Liudmyla Ivanivna Marchenko. ↗

1413 Judgment of the High Anti-Corruption Court of 19.03.2026 in case No. 991/10792/23. ↗

procurement of cable and wire products.[1414] According to media reports, among the defendants in this case is MP Viktor Bondar, member of the Committee on Transport and Infrastructure, unaffiliated.[1415]

In June 2026, a serving MP was notified of suspicion of requesting an undue advantage, money laundering and submitting false information in an asset declaration.[1416] According to media reports, the MP in question is Mykola Tyshchenko (Deputy Chairman of the Committee on Transport and Infrastructure and a member of the parliamentary group 'Restoration of Ukraine').[1417]

According to the SAPO, 41 MPs of the Verkhovna Rada of the IX convocation have been notified of suspicion of committing criminal offences. Over the entire period of operation of the anti-corruption infrastructure, such notices of suspicion have been served on 79 incumbent and former MPs.[1418] Typical corruption offences in which MPs have been exposed include misappropriation or embezzlement of property, receiving an undue benefit, abuse of power or office, false declaration and illicit enrichment.[1419]

The FDI Roadmap[1420] provides for the development, adoption and implementation of amendments to the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' to improve rules for managing conflicts of interest in line with GRECO recommendations. In particular, this concerns the participation of an MP who is a member of the relevant committee in discussing and adopting decisions at a committee meeting on issues in respect of which they have a conflict of interest. Implementation of the measure is scheduled for the fourth quarter of 2027. The NACP is currently taking organisational measures to identify responsible persons and plan implementation of the measure.[1421]

There is a certain 'vacuum of responsibility' in Parliament for preventing corruption, conflicts of interest and discrimination. Internal mechanisms of parliamentary control over compliance with parliamentary ethics standards remain ineffective. In particular, the Rules Committee is limited to episodic responses to complaints, while the Committee on Anti-Corruption Policy focuses on the general policy framework.

The absence of real internal barriers leads to the materialisation of corruption risks. This is confirmed by guilty verdicts against MPs and documented practices of receiving undue benefits for supporting or blocking legislative initiatives and personnel decisions, the 'sale of votes'.

1414 Corruption in cable procurement for Ukrzaliznytsia: MP to stand trial. National Anti-Corruption Bureau of Ukraine. 2026. ↗

1415 Viktor Vasylovych Bondar ↗; Cables for Ukrzaliznytsia: case concerning a UAH 140 million 'scheme' sent to court, with an MP among the defendants. Ukrinform. 2026. ↗

1416 Facebook post by the National Anti-Corruption Bureau of Ukraine. 2026. ↗

1417 Bribe for 'Protection' of a Call Centre: MP Tyshchenko Served with Notice of Suspicion. Ekonomichna Pravda. 2026. ↗

1418 Oleksandr Klymenko, Head of the Specialised Anti-Corruption Prosecutor's Office. 41 MPs of the Verkhovna Rada of the IX convocation have received notices of suspicion from the SAPO. Ukrinform. 2026. ↗

1419 Exposing MPs. Publication by the NABU on the social network Facebook. ↗

1420 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. Roadmap on the Functioning of Democratic Institutions, Section III. Functioning of Parliaments in a Democratic System, subsection III.B. Integrity, Strategic Result 1, measure 3. ↗

1421 Report on the Status of Implementation of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, for the fourth quarter of 2025.

A separate challenge is the absence in Parliament of a procedure for considering complaints of discrimination or sexual harassment. A 2025 study records[1422] the presence of hidden gender stereotypes in the parliamentary environment. Due to the lack of official response protocols, cases of inappropriate behaviour are often addressed through informal mechanisms, such as public exposure or informal remarks by colleagues, which does not ensure systemic protection of rights or the application of sanctions to the offender.

Issues of ethical conduct of MPs are regulated mainly by general and declarative provisions of legislation that are not accompanied by clear mechanisms for responding to violations. Despite the existence of rules, procedures and individual sanctions enshrined in regulations, the system for ensuring parliamentary ethics remains fragmented. In particular, the Rules Committee limits itself to occasional responses to complaints, while the Committee on Anti-Corruption Policy focuses on the overall policy framework rather than MPs' compliance with anti-corruption legislation. The system is characterised by broad discretion in applying measures of influence and the absence of a single mandatory code of conduct that would establish uniform standards of parliamentary ethics and procedures for bringing persons to liability for their violation. The procedure for each MP to formally assume ethical obligations at the beginning of their term remains unregulated. All this limits the effectiveness of existing mechanisms and reduces their preventive effect.

Progress is being made in developing ethical rules for MPs. Draft Law No. 8327,[1423] which provides for comprehensive regulation of parliamentary ethics, has been registered in the Verkhovna Rada. In March 2026, a revised version of the draft law was submitted to Parliament, and in April 2026 the main Rules Committee provided its opinion, indicating that work on implementing the Code of Parliamentary Ethics had intensified.

The draft law was revised taking into account Ukraine's European integration commitments under the EU negotiation framework, recommendations on institutionalising a code of conduct for members of parliament and international practices for regulating ethical conduct. The Rules Committee had previously asked the Research Service to prepare a study on comparative legislation concerning rules of conduct for members of parliament, parliamentary ethics, and the Service prepared the relevant analytical note.[1424] In particular, the revised draft law provides for:

1) enshrining the principles of parliamentary ethics;
2) enshrining the rules of parliamentary ethics;
3) defining the specific features of the work of the parliamentary committee whose areas of competence will include issues concerning the legal status of MPs and parliamentary ethics;[1425]
4) defining the procedure for submitting and considering complaints;

1422 Experience of Female and Male MPs during Martial Law in Ukraine. Agency for Legislative Initiatives. 2025. ↗

1423 On Amendments to Certain Legislative Acts of Ukraine Regarding the Ethics of People's Deputies of Ukraine: Draft Law of Ukraine, registration No. 8327 of 30.12.2022. ↗

1424 Analytical Note on Comparative Legislation Regarding Rules of Conduct for Members of Parliament (Parliamentary Ethics). Research Service of the Verkhovna Rada of Ukraine. ↗

1425 This committee must monitor MPs' compliance with the principles and rules of parliamentary ethics, consider complaints regarding violations of parliamentary ethics rules, organise training for MPs and prepare a report summarising the practice of MPs' compliance with the principles and rules of parliamentary ethics.

5) updating the list of sanctions for violations of parliamentary ethics rules.[1426]

The list of sanctions for violations of parliamentary ethics rules is similar to and partly corresponds to the list of liability measures that may be applied if a Member of the EP fails to comply with standards of conduct under the Rules of Procedure of the EP, including doubling the measures in cases of repeated violations and refusal to comply with the relevant measure.[1427]

One of the innovations proposed by the draft law is to require MPs to comply with parliamentary ethics rules when exercising their parliamentary powers in the Verkhovna Rada and its bodies (the current Rules of Procedure regulate MPs' conduct only during plenary sittings).

The draft law was submitted with the signatures of 18 MPs from different factions and parliamentary groups, which indicates consensus-based inter-factional support and a general demand in Parliament for the regulation of parliamentary ethics standards.

Recommendations

1. Introduce regular, annual, mandatory training for MPs and their assistants on standards of integrity, declaration rules, conflict of interest management and the ethics of interaction with business structures.
2. Develop a guide on standards of integrity and prevention of conflicts of interest in the work of MPs of Ukraine. This guide should be part of the introductory course for MPs of Ukraine.
3. Review the gift policy for MPs, regarding:
   - clarification of the concept of 'acceptable hospitality', including expenses for flights, accommodation, meals and participation in events;
   - lowering the permissible value thresholds and setting a maximum number of gifts during a year, both from one person or group of persons and as an overall limit on benefits received from all entities;
   - clarification of the list of gifts to which value limits do not apply, with the introduction of a mechanism to verify the reality of relationships, events and sources of origin of property to prevent the 'camouflage' of undue benefits as family gifts or publicly available winnings, prizes or discounts on goods or services;
   - declaration of gifts and trips carried out at the expense of third parties;
   - approval of a clear protocol of actions for returning or transferring unacceptable gifts into state ownership.

1426 On Amendments to Certain Legislative Acts of Ukraine Regarding the Ethics of People's Deputies of Ukraine: Draft Law of Ukraine, registration No. 8327 of 30.12.2022. ↗

1427 Opinion of the Committee of the Verkhovna Rada of Ukraine on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine on the Draft Law of Ukraine 'On Amendments to Certain Laws of Ukraine Regarding the Ethics of People's Deputies of Ukraine' (registration No. 8327, revised version of 11.03.2026), submitted by MPs of Ukraine V.V. Podhorna and others (18 signatures in total). ↗

4. Define rules for preventing and managing conflicts of interest for MPs who are members of committees when discussing and adopting decisions at committee meetings on matters in which they have a conflict of interest. Improve the rules for preventing and managing conflicts of interest when MPs vote at plenary sittings and participate in temporary investigative commissions.
5. Develop and implement an internal parliamentary policy on countering discrimination or sexual harassment, which would define standards of conduct for MPs and procedures for responding to violations of these standards.
6. Finalise and adopt the Code of Parliamentary Ethics on the basis of Draft Law No. 8327.

Lobbying

State of play

Legal framework

The Law of Ukraine 'On Lobbying' (Law No. 3606-IX) entered into force on 1 September 2025.[1428] It establishes the legal framework for the development of a transparent and accountable lobbying culture, defines the rules for influencing the legislative process and ensures its accountability to society.

The entry into force of Law No. 3606-IX has introduced changes to the functioning of Parliament. Members of Parliament are defined as objects of lobbying,[1429,1430] and rules governing their interaction with lobbyists have been established:

- during the preparation and preliminary consideration of a draft law, lobbying entities have the right to submit analytical materials to the Verkhovna Rada. Such materials are forwarded to the lead committee and the Secretariat of the Verkhovna Rada;[1431]
- digitalisation and transparency of lobbyists' materials: analytical materials submitted by lobbying entities in relation to draft laws become a mandatory part of the 'draft law file' and must be entered into the unified automated system and published on the official website of the Verkhovna Rada;[1432]
- the explanatory note to a draft law must contain the information necessary for its consideration, including information on analytical materials submitted by lobbying entities, where applicable;[1433]
- lobbying entities may participate in the work of parliamentary committees. The main committees invite to their meetings, when considering a draft law, those lobbying

1428 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024. ↗

1429 Ibid, Article 1.

1430 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 4. ↗

1431 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 93. ↗

1432 Ibid, Articles 7^1, 92, 93, 97.

1433 Ibid, Article 91.

entities that have submitted analytical materials. Such entities have the right to speak, while Members of Parliament may ask them questions in relation to each draft law for which analytical materials have been submitted.[1434]

Lobbying is carried out based on the principles of legality, transparency, accountability, responsibility, professionalism and ethical conduct.[1435] At the same time as the entry into force of Law No. 3606-IX, the Rules of Ethical Conduct of Lobbying Entities[1436] entered into force, establishing standards of integrity in this field. To promote transparency in lobbying and to increase public trust in policymaking processes, lobbying entities are required to:

- respect democratic values and public interests;
- act honestly and with integrity in their activities;
- operate in a transparent and open manner;
- provide accurate information about their activities;
- comply with legislation on information protection and personal data protection;
- avoid undue influence and prevent conflicts of interest.[1437]

Rules on the prevention and management of conflicts of interest in the activities of Members of Parliament are established by the Laws of Ukraine 'On Prevention of Corruption',[1438] 'On the Rules of Procedure of the Verkhovna Rada of Ukraine',[1439] 'On the Status of People's Deputy of Ukraine',[1440] and 'On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine'.[1441]

Transparency Register

On 1 September 2025, the **Transparency Register**[1442] was launched — an open information and communication system that collects, processes and publishes data on lobbying entities and their reporting. The Transparency Register is designed to provide free public access to up-to-date and reliable information on lobbying entities and their reports.[1443] The Law defines the list of information to be submitted to the Transparency Register for

1434 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 48.

1435 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024, Article 4.

1436 On Approval of the Rules of Ethical Conduct of Lobbying Entities: Resolution of the Cabinet of Ministers of Ukraine No. 1128 of 01.10.2024.

1437 Ibid.

1438 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014.

1439 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 31[1], 37, 87.

1440 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 8.

1441 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Article 21.

1442 On the Launch of the Transparency Register: Notification of the Cabinet of Ministers of Ukraine of 01.09.2025.

1443 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024, Article 5.

obtaining lobbying entity status (registration) and for making amendments,[1444] as well as the information to be included in lobbying reports (submitted every six months).[1445]

The Transparency Register was introduced by the National Agency on Corruption Prevention (NACP). During 2025, the NACP conducted around 20 discussions, consultations and system testing sessions, during which well-founded proposals from potential lobbying entities and other stakeholders were considered.[1446]

Liability

Members of Parliament (along with other objects of lobbying):

- **have the right to** inform the NACP about influence (or attempted influence) exerted on them by persons who do not have the status of lobbying entities, where, in their view, such activities display signs of lobbying;
- **are obliged to:**

  – refrain from unlawful interference in lobbying activities;

  – inform the NACP of actions by lobbying entities in the course of lobbying that, in their view, violate the requirements of Law No. 3606-IX;

  – not accept any undue advantage from a lobbying entity, nor any promise or offer of such an advantage for themselves or related persons;

  – take measures to prevent conflicts of interest in relations with lobbying entities;

  – adhere to the principles of lobbying.[1447]

In particular, the principle of legality prohibits the **use of unlawful interference** during lobbying (including deception, bribery, threats or coercion) in the activities of public authorities, local self-government bodies, legal entities under public law vested with public powers and their officials.[1448]

Monitoring compliance with lobbying legislation, including the accuracy of information submitted by lobbying entities to the Transparency Register and disclosed in their reports, is carried out by the NACP. The monitoring process is based on information about potential violations of Law No. 3606-IX obtained from various sources, including reports from objects of lobbying, natural and legal persons, media materials and other open sources.

The legislation provides that any person has the right to inform the NACP of identified violations of lobbying legislation by a lobbying entity.[1449] In addition, the NACP has issued guidance on the course of action in cases where an official is approached by a person who is not a lobbyist, but whose request displays the characteristics of lobbying.[1450]

1444 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024, Article 11. ↗

1445 Ibid, Article 17.

1446 'From today, lobbyists either operate openly and honestly or have no right to influence government decisions': Viktor Pavlushchyk on the launch of the lobbying institution. National Agency on Corruption Prevention, 2025. ↗

1447 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024, Article 15. ↗

1448 Ibid, Article 4.

1449 Ibid, Article 18.

1450 What to do if a public official is approached by a person who is not a lobbyist with a matter that, in substance, constitutes lobbying. National Agency on Corruption Prevention, 2026. ↗

The procedure for monitoring compliance with lobbying legislation is established by a normative legal act of the NACP, which contributes to legal certainty, as well as to the efficiency, accountability and transparency of the monitoring process.[1451]

At the same time as the entry into force of Law No. 3606-IX, provisions establishing **administrative liability for violations in the field of lobbying** also entered into force.[1452] In particular, the following offences are defined: unlawful lobbying[1453] and violations of lobbying legislation.[1454]

Progress and issues

The existence of legislative gaps and the incomplete development of the regulatory framework create risks of legal uncertainty at the stage of establishing the lobbying institution in Ukraine.

Following the adoption of Law No. 3606-IX (in 2024), the Working Group on Legislative Regulation of Lobbying, established under the Verkhovna Rada Committee on Legal Policy,[1455] developed proposals aimed at improving certain provisions of the Law. In June 2025, Draft Law No. 13339[1456] and the alternative draft law No. 13339-1[1457] were registered. These proposed amendments were supported by the business community,[1458, 1459] civil society representatives,[1460] the NACP[1461] and the Verkhovna Rada Committee on Legal Policy.[1462] However, Draft Law No. 13339 did not receive sufficient support among Members of Parliament.[1463]

1451 On Approval of the Procedure for Monitoring Compliance with Lobbying Legislation: Order of the National Agency on Corruption Prevention No. 303 of 03.10.2025, registered with the Ministry of Justice of Ukraine on 17.10.2025 under No. 1505/44911. ↗

1452 On Amendments to the Code of Ukraine on Administrative Offences regarding the establishment of liability for violations of lobbying legislation: Law of Ukraine No. 3620-IX of 21.03.2024. ↗

1453 Code of Ukraine on Administrative Offences: Law of Ukraine No. 8073-X of 07.12.1984, Article $188^{46\text{-}1}$. ↗

1454 Ibid, Article $188^{46\text{-}2}$.

1455 Report of the Verkhovna Rada Committee on Legal Policy for the period of the sixth session of the Verkhovna Rada of Ukraine of the ninth convocation (September 2021 – January 2022). Verkhovna Rada of Ukraine, 2022. ↗

1456 On Amendments to the Law of Ukraine 'On Lobbying' Regarding the Clarification of Certain Provisions: Draft law of Ukraine, registration No. 13339 of 03.06.2025. ↗

1457 On Amendments to the Law of Ukraine 'On Lobbying' Regarding the Clarification of Certain Provisions: Draft law of Ukraine, registration No. 13339-1 of 10.06.2025. ↗

1458 Lobbying under the new rules: new requirements and challenges for business from 1 September. European Business Association, 2025. ↗

1459 Business calls on Parliament to urgently adopt draft laws No. 13339 and No. 13340-1, ensuring proper implementation of the provisions of the Law on Lobbying and postponing for one-year sanctions for violations of this legislation. American Chamber of Commerce in Ukraine, 2025. ↗

1460 On lobbying, once again: key chronological milestones of draft laws No. 13339 and No. 13340. Centre for Democracy and Rule of Law, 2025. ↗

1461 Letter of the National Agency on Corruption Prevention No. 04-26/03-2025/155095 of 04.07.2025. Annex. Draft law file, 2025. Verkhovna Rada of Ukraine. ↗

1462 Opinion of the Verkhovna Rada Committee on Legal Policy on draft laws on amendments to the Law of Ukraine 'On Lobbying' Regarding the Clarification of Certain Provisions (No. 13339 of 03.06.2025), (No. 13339-1 of 10.06.2025). Draft law file. Verkhovna Rada of Ukraine, 2025. ↗

1463 Voting results. Draft law file 'On Amendments to the Law of Ukraine "On Lobbying" regarding the clarification of certain provisions', registration No. 13339 of 03.06.2025. ↗

The lack of alignment between the provisions of Law No. 3606-IX and the principles governing the activities of civil society creates risks of excessive regulatory pressure on civil society institutions.[1464] Since the existence of a commercial interest is one of the key features distinguishing lobbying from other types of activity, and the notion of 'commercial interest'[1465] is broadly interpreted, this grants supervisory authorities (the NACP) discretionary powers to determine whether the activities of a civil society organisation constitute lobbying.[1466, 1467] Representatives of civil society and the expert community have repeatedly drawn attention to the risks posed by Law No. 3606-IX to the activities of civil society organisations and have emphasised the need for further refinement in this regard.[1468, 1469]

The absence in Ukrainian legislation of transparency and accountability mechanisms governing interactions with lobbyists — both for Members of Parliament and for their assistants and staff of the Verkhovna Rada Secretariat — creates legal channels for hidden informal influence on the law-making process and runs counter to European transparency standards. Members of Parliament are not required to disclose their meetings with lobbyists. At the same time, the activities of parliamentary assistants and staff of the Verkhovna Rada Secretariat, including committee secretariats, fall entirely outside the scope of lobbying regulation.

In the practice of the European Union (EU), risks to the principle of transparency are mitigated by extending transparency requirements to contacts with assistants and institutional staff,[1470] as well as through the operation of the EU Transparency Register.[1471]

The relevant legislation and secondary regulatory acts require further refinement through an inclusive dialogue between the state and stakeholders, based on policy evaluation and considering best European practices.[1472]

The launch of the Transparency Register has become a tangible tool for bringing lobbying out of the shadows — for the first time in Ukraine's history, lobbyists have formally registered their activities, and the first reporting campaign recorded hundreds of meetings with public officials as well as specific subjects of influence.

1464 The requirement to register in the Transparency Register and to submit reports creates an additional administrative burden. This may be particularly critical for small civil society organisations that lack the capacity to administer these processes.

1465 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024, Article 1. ↗

1466 What risks lobbying poses to civil society organisations. Reanimation Package of Reforms, 2024. ↗

1467 The Ukrainian model of lobbying contains risks of legal uncertainty for civil society organisations. GOLAW, 2024. ↗

1468 Law on Lobbying: Q&As. OPORA, 2025. ↗

1469 On lobbying, once again: key chronological milestones of draft laws No. 13339 and No. 13340. Centre for Democracy and Rule of Law, 2025. ↗

1470 Commission Decision (EU) 2024/3082 of 4 December 2024 on transparency measures concerning meetings held between Commission staff holding management functions and interest representatives, and repealing Decision 2014/838/EU, Euratom. Document 32024D3082. ↗

1471 Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register. Document 32021Q0611(01). ↗

1472 Recommendation of the Council on Transparency and Integrity in Lobbying and Influence. OECD/LEGAL/0379. ↗

As of 31 July 2026, 200 lobbying entities are registered in the Transparency Register (of which 173 have active status; 93 (47%) are legal entities, 104 (52%) are natural persons and 3 (2%) are foreign representations).[1473]

On 1 February 2026, the first reporting campaign on lobbying activities (covering the second half of 2025) was completed. Eleven out of 132 lobbyists (who obtained their status by 31 December 2025) failed to submit their activity reports to the Transparency Register on time.[1474] Some of those who missed the deadline submitted their reports in early February 2026. Two individual lobbyists remain non-compliant.[1475] As under the Law of Ukraine 'On Lobbying', every lobbyist must submit a lobbying report twice a year, for each six-month period, lobbying entities were required to submit their report for the first half of 2026 by 31 July 2026.[1476]

In their reports, lobbying entities indicated, inter alia: 298 subjects of lobbying; 272 objects of lobbying; and 380 meetings and communications with public officials. The most prominent areas of lobbying were 'financial, banking, tax and customs policy', 'economic development, regulatory policy and property' and 'environmental policy and natural resource management'.[1477]

As of 31 July 2026, the NACP has not initiated any monitoring of compliance with lobbying legislation and, accordingly, has not held any lobbying entity liable.[1478]

Despite the overall successful launch of the reporting campaign, practice has revealed several barriers that reduce the reliability of analytics and limit the effectiveness of public oversight of lobbying activities, namely:

1. **Technical shortcomings:** the system allows only manual data entry and does not enable the import of information from internal databases or Excel files. In addition, inaccuracies have been identified in the display of data in the public interface of the Register (including information on lobbyist managers[1479]).

2. **Methodological gaps:** businesses expect detailed guidance from the NACP on which types of appeals or communications with objects of lobbying qualify as lobbying activities.[1480] The absence of such guidance has resulted in divergent interpretations by lobbyists regarding objects of influence and data formats, which undermines the overall reliability of the Register's analytics, as the same person or event may appear under different names and statuses. A selective analysis of

1473 Detailed statistics. Distribution by type/status. Transparency Register. National Agency on Corruption Prevention, 2026 (assessed 31.07.2026). ↗

1474 First reporting campaign on lobbying completed: key results. National Agency on Corruption Prevention, 2026. ↗

1475 98% of lobbyists registered in the Transparency Register submitted their first reports: results of the initial assessment of lobbying activity in Ukraine. Opendatabot, 2026. ↗

1476 Three Days Remain until the End of the Lobbying Reporting Campaign. National Agency on Corruption Prevention. 2026. ↗

1477 First reporting campaign on lobbying completed: key results. National Agency on Corruption Prevention, 2026. ↗

1478 Transparency Register. National Agency on Corruption Prevention, 2026. ↗

1479 98% of lobbyists registered in the Transparency Register submitted their first reports: results of the initial assessment of lobbying activity in Ukraine. Opendatabot, 2026. ↗

1480 Transparency Register. National Agency on Corruption Prevention, 2026. ↗

reports submitted by lobbying entities for the second half of 2025 confirms the existence of such inconsistencies:

- **non-uniform classification of statuses:** objects of lobbying are reported variously as Verkhovna Rada committees, members of committees present at specific meetings, or individual Members of Parliament;
- **duplication of statuses:** the same individual is reported in different capacities (e.g. separately as a Member of Parliament and as a committee chair), which distorts statistics on the number of public officials engaged;
- **inconsistent formats for personal data:** the use of different formats for recording surnames, first names, patronymics and positions complicates automated search and identification of participants in the process (including objects of lobbying).[1481]

3. **The absence of data integration between the Transparency Register and the Verkhovna Rada web portal.** Lobbyists declare their interactions with objects of lobbying in the Transparency Register and publish their positions on draft laws on their own websites (for example, in relation to Draft Law No. 14245[1482]), while parliamentary committees, during their meetings, disclose the receipt of correspondence from lobbyists (for example, in relation to Draft Law No. 14245[1483]). However, these materials are not consistently reflected in the draft law files on the Verkhovna Rada website.[1484] This breaks the logical link between lobbying efforts and the final committee decision for external observers. At the same time, although the introduction of new transparency requirements for lobbying entails additional work related to recording, processing and publishing relevant information, as of March 2026 the entry into force of Law No. 3606-IX has not led to a significant increase in the workload of the Verkhovna Rada Secretariat.[1485]

1481 Information based on the analysis of the case of the Draft Law 'On Amendments to the Tax Code of Ukraine and Certain Other Legislative Acts of Ukraine regarding increasing the effectiveness of control over the production and circulation of tobacco raw materials' No. 14245 of 25.11.2025.

1482 Report for the second half of 2025. Association 'Ukrtyutyun'. Transparency Register. National Agency on Corruption Prevention. ↗ ; Report for the second half of 2025. Enterprise with Foreign Investment 'Imperial Tobacco Ukraine'. Transparency Register. National Agency on Corruption Prevention. ↗ ; Information notes on Draft Law No. 14245. European Business Association, 2025. ↗ ; The American Chamber of Commerce calls on Parliament not to support Draft Law No. 14245. American Chamber of Commerce, 2025. ↗

1483 Transcript of the meeting of the Committee on Finance, Taxation and Customs Policy of 15.12.2025. Verkhovna Rada of Ukraine, 2025. ↗ ; Transcript of the meeting of the Committee on Finance, Taxation and Customs Policy of 02.02.2026. Verkhovna Rada of Ukraine, 2026. ↗

1484 For example, On Amendments to the Tax Code of Ukraine and Certain Other Legislative Acts of Ukraine regarding increasing the effectiveness of control over the production and circulation of tobacco raw materials: Draft Law of Ukraine, registration No. 14245 of 25.11.2025. ↗

1485 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

The NACP's information campaign has ensured stakeholders' readiness to work with the Transparency Register and has laid a conceptual foundation for distinguishing between lawful lobbying and corruption. The NACP is implementing an awareness-raising campaign on lobbying. Since October 2025, the following issues have been covered:

- the scope of application of the Law of Ukraine 'On Lobbying' to lobbying entities;[1486]
- changes in the status of a lobbying entity;[1487]
- methods of lobbying;[1488]
- the rights and obligations of lobbyists, clients and objects of lobbying;[1489]
- the subject of lobbying;[1490]
- administrative liability in the field of lobbying;[1491]
- the algorithm of actions for public officials when approached by a person who is not a lobbyist with a matter that, in substance, constitutes lobbying;[1492]
- procedures for updating data in the Transparency Register;[1493]
- how to enter data on clients and beneficiaries.[1494]

At the same time, despite the substantial volume of materials prepared, lobbying entities continue to need more in-depth expert support, particularly guidance on the application of Law of Ukraine No. 3606-IX.[1495]

As part of a communication campaign aimed at reducing the negative perception of lobbying and explaining the rationale for its regulation, a webinar[1496] and user guidelines for the Transparency Register have been delivered.[1497] In June 2026, the NACP approved

1486 Who is prohibited from acting as a lobbyist in Ukraine: restrictions under the Law of Ukraine 'On Lobbying'. National Agency on Corruption Prevention, 2025. ↗

1487 Change of status of a lobbying entity: procedure and grounds. National Agency on Corruption Prevention, 2025. ↗

1488 Lawful instruments of influence: methods of lobbying. National Agency on Corruption Prevention, 2025. ↗

1489 Lobbyist, client and object of lobbying: rights and obligations. National Agency on Corruption Prevention, 2025. ↗

1490 Subject of lobbying: what a lobbyist may influence and applicable exceptions. National Agency on Corruption Prevention, 2025. ↗

1491 Lobbying: administrative liability for unlawful lobbying and violations of legislation in this field. National Agency on Corruption Prevention, 2025. ↗

1492 What to do if a public official is approached by a person who is not a lobbyist with a matter that, in substance, constitutes lobbying. National Agency on Corruption Prevention, 2026. ↗

1493 How to update data submitted during the registration of a lobbying entity in the Transparency Register. National Agency on Corruption Prevention, 2026. ↗

1494 Lobbying Report: How to Enter Data on Clients and Beneficiaries. National Agency on Corruption Prevention. 2026. ↗

1495 Business Needs Additional Clarification on the Lobbying Law — EBA Survey. European Business Association. 2026. ↗

1496 Webinar 'Submission of lobbying reports'. YouTube channel of the National Agency on Corruption Prevention. ↗

1497 User guide for the public interface of the Information and Communication System 'Transparency Register'. National Agency on Corruption Prevention, 2025. ↗

the Clarification on the Application of Lobbying Legislation[1498] and launched a new series of videos on lobbying in Ukraine.[1499]

Recommendations

1. Conduct a comprehensive evaluation of the effectiveness of lobbying legislation and refine it in a phased manner, with the active involvement of stakeholders, building on prior developments and best international practice.
2. Address technical shortcomings of the Transparency Register and provide clear, detailed guidance to lobbyists on reporting procedures to ensure the timeliness, consistency and completeness of submitted information.
3. Implement a targeted awareness-raising campaign for different audiences, aimed at reducing negative perceptions of lobbying and clarifying key aspects of the legislation for both subjects and objects of lobbying. As part of this effort, organise dedicated training for Members of Parliament, their assistants and staff of the Verkhovna Rada Secretariat to strengthen their capacity and ensure consistent compliance with transparency requirements in the field of lobbying.

1498 NACP Approves Clarification on the Application of Lobbying Legislation. National Agency on Corruption Prevention. 2026. ↗

1499 How Lobbying Works in Ukraine: NACP Launches New Video Series. National Agency on Corruption Prevention. 2026. ↗

Organisation of the Parliamentary Process

Rules of Procedure of the Verkhovna Rada of Ukraine

State of play

The Rules of Procedure of the Verkhovna Rada have a clearly defined constitutional and legal nature and origin. First of all, under the Constitution of Ukraine,[1500] they are adopted in the form of a law and determine the organisation and procedure of the Verkhovna Rada's activities. The CCU has also been consistent in its position that the Rules of Procedure of the Verkhovna Rada must be adopted exclusively as a law of Ukraine and in accordance with the procedure for its consideration, adoption and entry into force established by the Constitution.[1501]

The relevant Law of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine'[1502] was adopted by the Verkhovna Rada on 10 February 2010 and defines the procedure for organising the work of the Verkhovna Rada, forming parliamentary factions, groups and committees, electing the leadership of the Verkhovna Rada, the legislative procedure, the exercise of its oversight function and so on.

1500 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, para. 15 of Part 1 of Article 85, para. 21 of Part 1 of Article 92. ↗

1501 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of the President of Ukraine regarding the conformity with the Constitution of Ukraine (constitutionality) of the Law of Ukraine 'On the Organisation and Procedure of Activities of the Verkhovna Rada of Ukraine' and the Rules of Procedure of the Verkhovna Rada of Ukraine No. 30-rp/2009 of 26.11.2009. ↗ ; Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 105 MPs of Ukraine regarding the official interpretation of the provisions of Parts 6, 7 and 9 of Article 83 of the Constitution of Ukraine (the case on the coalition of parliamentary factions in the Verkhovna Rada of Ukraine) No. 16-rp/2008 of 17.09.2008. ↗; Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 50 MPs of Ukraine regarding the conformity with the Constitution of Ukraine (constitutionality) of the provisions of Parts 2, 3 and 4 of Article 219 of the Rules of Procedure of the Verkhovna Rada of Ukraine (the case on the Rules of Procedure of the Verkhovna Rada of Ukraine) No. 4-rp/2008 of 01.04.2008. ↗

1502 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

According to the legal position of the CCU, the Rules of Procedure of the Verkhovna Rada must also be adopted exclusively as a law of Ukraine.[1503] Because of that, amendments to them may also be introduced only in the form of a law and must therefore go through the relevant legislative procedure and be signed by the President. In the Verkhovna Rada of the IX convocation, only MPs have initiated amendments to the Rules of Procedure.

Laws amending the Rules of Procedure have generally been adopted by a simple majority of MPs, although in some cases such laws have also been supported by a constitutional majority of parliamentarians.[1504]

In the Verkhovna Rada of the IX convocation, clarification of the provisions of the Rules of Procedure is provided by the Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine. Such clarifications are published on the Committee's website and do not have the status of official interpretation.[1505] Training for MPs on the procedures enshrined in the Rules of Procedure is provided through cooperation with civil society organisations or international projects,[1506] or by the Research Service on selected topics of the parliamentary process.[1507]

Progress and issues

The main problem with the Rules of Procedure is that their provisions do not correspond to the Constitution, the needs of the Verkhovna Rada and MPs or the current state of parliamentary procedures. After the return[1508] in 2014 to the 2004 version of the Constitution, the Rules of Procedure were not brought into line with the Constitution of Ukraine, while the targeted amendments made to the Rules of Procedure do not fully take into account the experience gained from parliamentary processes during the COVID-19 pandemic or the full-scale invasion. The need for a comprehensive review of the Rules

1503 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of the President of Ukraine concerning the compliance with the Constitution of Ukraine (constitutionality) of the Law of Ukraine 'On the Organisation and Procedure of Activity of the Verkhovna Rada of Ukraine' and the Rules of Procedure of the Verkhovna Rada of Ukraine of 26.11.2009 No. 30-rp/2009 ↗ ; Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 105 Members of Parliament concerning the official interpretation of the provisions of Parts 6, 7 and 9 Article 83 of the Constitution of Ukraine (case on the coalition of parliamentary factions in the Verkhovna Rada of Ukraine) of 17.09.2008 No. 16-rp/2008 ↗ ; Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 50 Members of Parliament concerning the compliance with the Constitution of Ukraine (constitutionality) of the provisions of Parts 2, 3 and 4 Article 219 of the Rules of Procedure of the Verkhovna Rada of Ukraine (case on the Rules of Procedure of the Verkhovna Rada of Ukraine) of 01.04.2008 No. 4-rp/2008. ↗

1504 For example: Draft Law of Ukraine 'On Amendments to Certain Laws of Ukraine Regarding Ensuring the Effective Exercise of Parliamentary Oversight' (registration No. 4131 of 18.09.2020) was supported in the second reading and as a whole by a constitutional majority of votes, with 303 MPs voting in favour.
Roll-call vote on the draft Law on Amendments to Certain Laws of Ukraine Regarding Ensuring the Effective Exercise of Parliamentary Oversight (No. 4131) — in the second reading and as a whole. Verkhovna Rada of Ukraine ↗ ; On Amendments to Certain Laws of Ukraine Regarding Ensuring the Effective Exercise of Parliamentary Oversight: Law of Ukraine No. 1052-IX of 03.12.2020. ↗

1505 Clarifications of the Committee. Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine. ↗

1506 The RADA Programme Held Training for Newly Elected MPs on the Rules of Procedure of the Verkhovna Rada of Ukraine. Information Department of the Office of the Verkhovna Rada of Ukraine, 2019. ↗

1507 Information provided by the Research Service of the Verkhovna Rada of Ukraine in its letter No. 22/50-1-20 of 18.02.2026.

1508 On Restoring the Effect of Certain Provisions of the Constitution of Ukraine: Law of Ukraine No. 742-VII of 21.02.2014. ↗

of Procedure has been repeatedly noted by the leadership of the Verkhovna Rada,[1509] and in November 2021, the Verkhovna Rada established a Working Group to prepare comprehensive legislative proposals for amendments to Ukrainian laws in the field of parliamentary law,[1510] which was supposed, among other things, to consider updating the Rules of Procedure. The Working Group never presented any outputs, but the discussion on updating the Rules of Procedure in Parliament is still ongoing.[1511]

To bring the provisions of the Rules of Procedure into line with the Constitution, draft law No. 1045-1[1512] was registered in the Verkhovna Rada. It is aimed at harmonising provisions concerning the formation of the personal composition of the Government and the termination of powers of Government members, the exercise of the powers of the Chairman of the Verkhovna Rada to promulgate adopted laws and other matters. Although the main committee[1513] issued an opinion recommending that the Verkhovna Rada adopt the draft law in the first reading and in its entirety,[1514] it has not been considered at a plenary meeting of the Verkhovna Rada.

The Rules of Procedure of the Verkhovna Rada are adopted in a form of law of Ukraine, meaning that changes of the internal rules of the Parliament must be approved by the President. Thus, the revision of internal document on parliamentary procedures can be blocked by the President (due to failure to sign the law amending the Rules of Procedure).

Some experts advocate changing the form of the Rules of Procedure and adopting them in the form of a resolution based on the principle of self-regulation, so that the President could not interfere in the adoption procedure and to prevent a possible veto of the Rules of Procedure of the Verkhovna Rada.[1515] However, this approach is impossible without prior amendments to the Constitution. There is also an opposing position on the form of the Rules of Procedure, based on concerns that a 'simplified' approach to implementing the Rules of Procedure of the Verkhovna Rada would not guarantee an improvement in their quality and would provoke chaotic changes in the legal regulation of parliamentary procedures.[1516]

1509 'Servant of the People' Intends to Change the Rules of Procedure of the Verkhovna Rada. Ukrainska Pravda, 2019 ↗; Rewriting the Rules of Procedure. Servant of the People's Plans and the Opposition's Reaction. LB.ua, 2021. ↗

1510 The Chairman of the Verkhovna Rada of Ukraine Signed an Order Establishing a Working Group to Prepare Comprehensive Legislative Proposals for Amendments to Ukrainian Laws in the Field of Parliamentary Law. Information Department of the Office of the Verkhovna Rada of Ukraine, 2021. ↗

1511 Korniienko Explained What the Rada May Approve for the Next Convocation of Parliament after the Elections. CHESNO Movement, 2026. ↗

1512 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Bring Them into Line with the Constitution of Ukraine: draft Law of Ukraine, registration No. 1045-1 of 06.09.2019. ↗

1513 The main committee for the preparation and preliminary consideration of Draft Law No. 1045-1 is the Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine.

1514 Opinion of the Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine of 09.09.2019. ↗

1515 Yuliia Kyrychenko: 'The First Post-War Elections Will Be Unique, Complex and Imperfect'. CHESNO Movement, 2024. ↗

1516 Concept of Comprehensive Amendments to the Rules of Procedure of the Verkhovna Rada. Agency for Legislative Initiatives, 2015. ↗

The Rules of Procedure need to be aligned with the Laws of Ukraine 'On Law-Making Activity'[1517] and 'On Public Consultations'.[1518] The Final Provisions of the Law of Ukraine 'On Law-Making Activity'[1519] even instruct two committees of the Verkhovna Rada, within six months from the date of entry into force of this Law,[1520] to prepare proposals for amendments to the Rules of Procedure arising from this Law. As of 31 July 2026, such proposals had not yet been prepared. Although the Law of Ukraine 'On Law-Making Activity' will be put into effect one year after the cancellation or termination of martial law, this period may be insufficient to bring the Rules of Procedure of the Verkhovna Rada into line with it. The inconsistency between the Rules of Procedure of the Verkhovna Rada and the law that defines the principles of law-making activity may create a conflict between the provisions of these two acts.

The Law of Ukraine 'On Public Consultations', which will enter into force one year after the termination or cancellation of martial law, does not impose an obligation on MPs or committees to hold public consultations. However, even if MPs or parliamentary committees exercise this right, the Rules of Procedure of the Verkhovna Rada do not define the status of the results of public consultations or their further role in the law-making process.[1521]

The Verkhovna Rada also has no established practice of systematically reviewing the provisions of the Rules of Procedure. Amendments to the Rules of Procedure of the Verkhovna Rada are introduced irregularly and in a targeted manner to address a specific issue. As of 31 July 2026, the most recent amendments to the Rules of Procedure had been made back in 2024.[1522] The most recent amendments specifically aimed at updating parliamentary procedures were made in 2022.[1523] Subsequent amendments to the Rules of Procedure have generally either been secondary to the principal subject matter of the law being adopted (for example, amendments to the Rules of Procedure and numerous other laws were introduced by the Law of Ukraine 'On Lobbying'[1524]) or concerned only a few provisions, without any systematic review of the Rules of Procedure as a whole. Irregular targeted amendments without systematic audit and updating lead to the accumulation of outdated or 'dead' provisions, which MPs collectively ignore instead of adapting them to the realities and needs of Parliament.

The Verkhovna Rada also lacks experience in systematising the practice of applying the Rules of Procedure in separate documents, such as principles, guidelines, guides or recommendations. The powers of the Chairman of the Verkhovna Rada do not include the authority to interpret the provisions of the Rules of Procedure, while the clarifications of the relevant committee are not official. This leaves MPs without guidance on how to act

1517 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.03.2023. ↗

1518 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024. ↗

1519 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.03.2023, para. 3, Section XIV 'Final Provisions'. ↗

1520 The Law entered into force on 20.09.2023.

1521 For more details, see the subsection 'Public Consultations'.

1522 On Amendments to Certain Legislative Acts of Ukraine to Improve the Competitive Selection of Candidates for the Position of Judge of the Constitutional Court of Ukraine: Law of Ukraine No. 2846-IX of 13.12.2022. ↗

1523 For example, On Amendments to Certain Legislative Acts of Ukraine Regarding the Improvement of the Procedure for the Competitive Selection of Candidates for the Position of Judge of the Constitutional Court of Ukraine: Law of Ukraine No. 2846-IX of 13.12.2022. ↗

1524 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024. ↗

in situations where the Rules of Procedure allow for ambiguous interpretation or where parliamentarians hold differing views, meaning that MPs sometimes allow for inconsistent interpretations of the Rules of Procedure of the Verkhovna Rada.[1525] Summarising the experience gained could also help new MPs or future convocations of the Verkhovna Rada avoid violations of the Rules of Procedure.

Recommendations

1. Review the provisions of the Rules of Procedure of the Verkhovna Rada for compliance with the Constitution of Ukraine.
2. Initiate the drafting, and after the abolition or termination of the martial law, introduce amendments to the Constitution that would clearly specify that the Rules of Procedure of the Verkhovna Rada are approved in the form of a resolution of the Verkhovna Rada.
3. The Verkhovna Rada Committees on Legal Policy and on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine should prepare proposals for amendments to the Rules of Procedure of the Verkhovna Rada to align their provisions with the Laws of Ukraine 'On Law-Making Activity' and 'On Public Consultations'.
4. Introduce a review of the provisions of the Rules of Procedure of the Verkhovna Rada, either annually or once per convocation, based on an analysis of the practice of applying the Rules of Procedure, identified gaps and conflicts, compliance with international standards and other relevant factors. Such a review may be carried out by the relevant committee with the involvement of representatives of all parliamentary factions and groups, the Secretariat of the Verkhovna Rada and experts.
5. Summarise the practice of applying the provisions of the Rules of Procedure of the Verkhovna Rada by developing guidelines, recommendations or manuals and ensure that MPs and staff of the Secretariat of the Verkhovna Rada of Ukraine are familiarised with them on an ongoing basis.

Parliamentary Procedures

State of play

The powers of the Verkhovna Rada provided for by the Constitution of Ukraine may not be restricted under martial law.[1526] If martial law or a state of emergency is introduced in Ukraine, the Verkhovna Rada convenes for an extraordinary session without a separate convocation within no more than two days and continues to operate until martial law or the state of emergency is lifted.[1527] In this context, the Rules of Procedure of the Verkhovna

1525 For example, after the law on ratification was rejected, the question arose whether it could be referred for a first repeated reading or returned to the subject of legislative initiative. Transcript of the Plenary Meeting of the Verkhovna Rada of Ukraine of 15.01.2026. Verkhovna Rada of Ukraine. ↗

1526 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 3 Article 12. ↗

1527 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 4 Article 11. ↗

Rada are not in line with the Constitution of Ukraine, which provides that the Verkhovna Rada shall convene within two days for a sitting[1528] rather than for an extraordinary session. The Verkhovna Rada plays a key role during emergency situations, since it is responsible for approving Presidential Decrees introducing martial law or a state of emergency.[1529]

Following the start of the full-scale invasion and the declaration of martial law, in addition to security risks, the Verkhovna Rada faced problems related to the organisational support of its work, namely the holding of sittings of the Verkhovna Rada. Wartime processes required a rapid legislative response, while the security situation almost completely limited the discussion of draft laws in the plenary hall.[1530]

Between 24 February and 2 April 2022, when the battle for Kyiv was ongoing, only five plenary sittings were held, with a total duration of 2 hours and 23 minutes. This was slightly more than half the duration of a single pre-war sitting. During this time, MPs devoted approximately 57 minutes directly to the consideration of draft laws, in addition to addresses by senior representatives of foreign states. In those 57 minutes, Parliament adopted 70 laws and three resolutions in full. In addition, 10 draft laws were adopted as a basis.[1531] Due to the need for rapid decision-making, draft laws were not debated, while MPs voted for them in the first reading and as a whole, taking into account the committee's proposals and the necessary technical and legal amendments,[1532] which made it possible to finalise the draft laws. A return to a more standard format for plenary sittings took place following a decision of the Conciliation Council from 21 April 2022.[1533]

The Rules of Procedure of the Verkhovna Rada do not establish a separate procedure for holding plenary sittings during martial law or a state of emergency. To organise its work, the Verkhovna Rada adopted several resolutions,[1534] but they have lower legal force than the Rules of Procedure, which were not amended. The resolutions established the format of a single plenary sitting, special conditions for convening committees and the Conciliation Council, as well as specific rules for setting the agenda of a plenary sitting.

MPs cast all votes in person in the session hall of the Verkhovna Rada building. In March 2022, MPs registered Draft Law No. 7129,[1535] which would have allowed sittings to be held remotely. The draft law was not included in the agenda and was not subsequently considered by the Verkhovna Rada.

1528 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 3 Article 83. ↗

1529 Ibid, para. 31 Part 1 Article 85.

1530 Wartime Parliamentarism: Features of the Work of the Verkhovna Rada of Ukraine under Martial Law. Parliament Journal No. 1/2022–2023. Agency for Legislative Initiatives, 2024. ↗

1531 Ibid.

1532 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 03.03.2022. Verkhovna Rada of Ukraine ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 15.03.2022. Verkhovna Rada of Ukraine. ↗

1533 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 21.04.2022. Verkhovna Rada of Ukraine. ↗

1534 On the Organisation of the Work of the Verkhovna Rada of Ukraine in Connection with the Act of Armed Aggression of the Russian Federation against Ukraine on 24 February 2022: Resolution of the Verkhovna Rada of Ukraine No. 2103-IX of 24.02.2022. ↗; On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation during the Eighth Session under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2558-IX of 06.09.2022. ↗; On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2912-IX of 07.02.2023. ↗

1535 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine Regarding the Holding of Remote Sittings of the Verkhovna Rada of Ukraine: Draft Law of Ukraine, registration No. 7129 of 08.02.2022. ↗

Parliamentary calendar

The formation of the calendar plan for a session of the Verkhovna Rada is governed by the Rules of Procedure of the Verkhovna Rada.[1536] Under normal circumstances, the first and third weeks of each calendar month during a session are allocated for plenary sittings of the Verkhovna Rada, the second week for work in committees, temporary special commissions, temporary investigative commissions, parliamentary factions and groups and the fourth week for MPs' work with voters. This was the schedule followed by the Verkhovna Rada before the full-scale invasion, with certain exceptions during the quarantine period.[1537]

Before the full-scale invasion, the Verkhovna Rada also approved the calendar plan for each session.[1538] The draft calendar plan is prepared and submitted for consideration by the committee responsible for matters concerning the Rules of Procedure, with the involvement of the Secretariat of the Verkhovna Rada and taking into account proposals from parliamentary factions and groups.[1539]

On the Verkhovna Rada website, the calendar plan[1540] can be viewed by session, convocation and year, and the monthly schedule can also be opened. The Verkhovna Rada website contains links to the timeline of a plenary sitting, the agenda, real-time information on the results of consideration of items and the transcript of the sitting.

As of 31 July 2026, the Verkhovna Rada calendar plan website contains only information on plenary sittings and the 'Government's Question Hour' sessions that have been held. Information on the work of parliamentary committees is not displayed there; instead, weekly schedules of committee meetings are published separately.[1541]

Convening sessions and setting the agenda

The Verkhovna Rada convenes for its first session no later than the thirtieth day after the official announcement of the election results.[1542] On 7 August 2019, the Central Election Commission (CEC) officially published the list of MPs elected in the early parliamentary elections.[1543] The first sitting of the first session of the Verkhovna Rada of the ninth

1536 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 19. ↗

1537 On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine for the Period of Quarantine in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 534-IX of 17.03.2020. ↗

1538 On the Calendar Plan for the Second Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 25-IX of 30.08.2019. ↗ ; On the Calendar Plan for the Third Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 462-IX of 16.01.2020 ↗ ; On the Calendar Plan for the Fourth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 792-IX of 15.07.2020. ↗ ; On the Calendar Plan for the Fifth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 1130-IX of 26.01.2021 ↗ ; On the Calendar Plan for the Sixth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 1628-IX of 13.07.2021. ↗ ; On the Calendar Plan for the Seventh Session of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 2023-IX of 27.01.2022. ↗

1539 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 7 Article 19. ↗

1540 Calendar Plan for Sessions of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

1541 Schedules of Meetings of Committees of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

1542 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 3 Article 82. ↗

1543 Elections of MPs of Ukraine on 21 July 2019. Analytical Report. Central Election Commission, 2019. ↗

convocation took place on 29 August 2019, within the timeframe established by the Constitution.[1544]

The Constitution provides that regular sessions of the Verkhovna Rada begin on the first Tuesday of February and the first Tuesday of September each year. For the session period, the Verkhovna Rada determines the range of issues to be considered and resolved, prepares the agenda of the regular session, determines the days and weeks for plenary sittings, the work of committees and commissions and MPs' work in electoral districts, sets the number and duration of daily plenary sittings of Parliament and so on.[1545] Extraordinary sessions of the Verkhovna Rada, with the agenda specified, are convened by the Chairman of the Verkhovna Rada at the request of the President or at the request of at least one third of MPs of the constitutional composition of the Verkhovna Rada.[1546] In the Verkhovna Rada of the ninth convocation, extraordinary sessions were convened four times:[1547] twice at the request of the President and twice at the request of MPs. The Government does not have the right to convene an extraordinary session of the Verkhovna Rada.

Proposals for the draft session agenda are consolidated by the Secretariat of the Verkhovna Rada, including based on submissions from committees and temporary commissions. After discussion and approval by the Conciliation Council, the session agenda is submitted by the Chairman of the Verkhovna Rada for approval. At the beginning of each session, the Verkhovna Rada approves the agenda by a majority vote of MPs of its constitutional composition.[1548]

To plan its legislative work, the Verkhovna Rada adopts the Legislative Work Plan each year at the beginning of the regular session that opens on the first Tuesday of February. This instrument was introduced in 2019[1549] to coordinate legislative work between the Government and the Verkhovna Rada and improve the efficiency of Parliament's work. At the same time, these Plans usually contain far more tasks than the Verkhovna Rada is able to adopt. For example, the Legislative Work Plan for 2025[1550] contains 417 tasks, while during 13th and 14th sessions the Verkhovna Rada adopted 179 laws.[1551] The number of tasks is therefore more than twice the number of laws adopted, even without taking into

1544 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 29.08.2019. Verkhovna Rada of Ukraine. ↗

1545 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 50 MPs of Ukraine regarding the official interpretation of provisions of Articles 75, 82, 84, 91 and 104 of the Constitution of Ukraine concerning the competence of the Verkhovna Rada of Ukraine No. 17-rp/2002 of 17.10.2002. ↗

1546 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 2 Article 83. ↗

1547 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1548 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 21, 22. ↗

1549 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine Regarding the Planning and Systematic Nature of Legislative Activity of the Verkhovna Rada of Ukraine: Law of Ukraine No. 162-IX of 03.10.2019. ↗

1550 On the Legislative Work Plan of the Verkhovna Rada of Ukraine for 2025: Resolution of the Verkhovna Rada of Ukraine No. 4228-IX of 11.02.2025. ↗

1551 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

account the significant number of unplanned laws adopted. The Legislative Work Plan for 2026[1552] contains 389 tasks.

Plenary sittings

During sessions, plenary sittings are the main form of activity of the Verkhovna Rada.[1553] Plenary sittings are opened, chaired and closed by the Chairman of the Verkhovna Rada or, in the Chairman's absence, by the First Deputy Chairperson or Deputy Chairperson of the Verkhovna Rada.[1554] It is the presiding officer who is responsible for ensuring compliance with the rules for conducting a plenary sitting.[1555]

The Verkhovna Rada holds its sittings in the Verkhovna Rada building. By decision of a majority of MPs, sittings of the Verkhovna Rada may be held at another location.[1556]

Sittings of the Verkhovna Rada are open and public.[1557] In 2014, the Chairman of the Verkhovna Rada approved the procedure for access to open plenary sittings,[1558] which established the mechanism for exercising the right of free access to plenary sittings. At the same time, no amendments were made to this Procedure after the quarantine was introduced or after the start of the full-scale invasion, which calls its effectiveness into question. The public nature of sittings is ensured through their broadcast in the media, publication of verbatim records and decisions of the Verkhovna Rada and the posting of information on the official website of the Verkhovna Rada.

To consider specific issues, a majority of MPs of the constitutional composition may decide to hold a closed plenary sitting, during which the use of photo and video equipment, means of communication and other devices is prohibited.[1559] No closed sittings were held in the Verkhovna Rada of the ninth convocation.

Extraordinary plenary sittings were convened quite frequently by MPs and the President: before the full-scale invasion, MPs held 52[1560] extraordinary plenary sittings. The Government does not have the right to convene extraordinary sittings of Parliament. Since, during martial law, the Verkhovna Rada operates in the format of a single continuous sitting, convening an extraordinary sitting is currently impossible.

The Verkhovna Rada also has an agenda for each day of plenary sittings. This agenda is prepared by the Secretariat of the Verkhovna Rada and provided to MPs by 18:00 on

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1552 On the Legislative Work Plan of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4774-IX of 10.02.2026. ↗

1553 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 50 MPs of Ukraine regarding the official interpretation of provisions of Articles 75, 82, 84, 91 and 104 of the Constitution of Ukraine concerning the competence of the Verkhovna Rada of Ukraine No. 17-rp/2002 of 17.10.2002. ↗

1554 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 5 Article 26, para. 3 Part 1 Article 27. ↗

1555 Ibid., para. 1 Part 1 Article 27.

1556 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 2. ↗

1557 Ibid, Article 3.

1558 On the Procedure for Access of Persons to Open Plenary Sittings of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 694 of 27.10.2014. ↗

1559 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 4. ↗

1560 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

the day preceding the next day of plenary sittings.[1561] The Verkhovna Rada does not have the practice of so-called 'opposition days', when only draft laws initiated by MPs from the parliamentary minority or non-affiliated MPs are considered.

Under martial law, the draft agenda for each day following a break in the ongoing plenary sitting is prepared by the Secretariat of the Verkhovna Rada and submitted for consideration and approval by the Conciliation Council, usually no later than five days before the Conciliation Council meeting. Proposals to amend the draft agenda for the day following a break in the ongoing plenary sitting may be submitted by at least two parliamentary factions or groups whose members together account for a majority of MPs.[1562] In practice, this means that the agenda includes only draft laws supported by the parliamentary faction 'Servant of the People', as it holds the majority in Parliament.

MPs from any parliamentary faction or group, as well as non-affiliated MPs, may initiate changes to the agenda, including the inclusion of draft laws or a change in the order of their consideration, during a plenary sitting. However, this requires the support of a majority of MPs of the constitutional composition of the Verkhovna Rada.[1563]

An electronic petition to the Verkhovna Rada may also be examined at a plenary sitting. Parliament examines an electronic petition if it receives at least 25,000 citizens' signatures in support within no more than three months from the date of its publication.[1564] The Chairman of the Verkhovna Rada refers the electronic petition to the relevant committee, which examines it at its meeting. The committee approves an opinion on the outcome of the petition's examination and, where necessary, prepares a draft act of the Verkhovna Rada. The draft act, together with the opinion, is then discussed at a plenary sitting under the full debate procedure.[1565]

As of 31 July 2026, 41 petitions had been published on the Verkhovna Rada website for the collection of signatures.[1566] Between September 2025 and July 2026, only one petition received more than 25,000 votes — the petition concerning guarantees of the rights of teaching staff.[1567] The committee issued its opinion on it, but the petition was not discussed at a plenary sitting. The committee secretariat responds to petitions that do not receive the required number of signatures.

1561 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 6 Article 25. ↗

1562 On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2912-IX of 07.02.2023. ↗

1563 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 2 Article 23. ↗

1564 On Citizens' Appeals: Law of Ukraine No. 393/96-VR of 02.10.1996, Article 23^1. ↗

1565 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 02.10.2010, Articles 223^1–223^2. ↗

1566 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026. List of Petitions. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1567 Information on the Petition. Verkhovna Rada of Ukraine. ↗

Quorum

The Constitution of Ukraine establishes the condition for the Verkhovna Rada to be competent — the election of at least two thirds of its constitutional composition.[1568] At the same time, neither the Constitution nor the Rules of Procedure defines the mandatory number of MPs who must be present for a decision to be adopted. Nor is there a rule under which a vote is determined by a certain number of MPs out of those present: the number of votes 'in favour' required to adopt a decision does not depend on the number of persons present in the hall or registered for the sitting.

The CCU has held that the Verkhovna Rada is competent to adopt laws and exercise its other constitutionally defined powers provided that, at the time of voting at its plenary sittings, at least the number of MPs required by the Constitution to adopt the relevant decision is present.[1569]

The Rules of Procedure of the Verkhovna Rada do not establish rules for announcing or verifying a quorum. In practice, the presiding officer may conduct an indicative vote to forecast the result.[1570] Between September 2025 and 31 July 2026, the Verkhovna Rada held 96[1571] such votes.

Indicative voting has effectively replaced the registration of MPs. Before the opening of each plenary sitting in the session hall of the Verkhovna Rada, MPs register through the electronic system by pressing the 'in favour' button. If an MP has not registered through the electronic system in the manner prescribed by this Article but votes on agenda items during the plenary sitting using the electronic system, the MP is deemed to have registered through the electronic system.[1572]

At the same time, since under martial law the Verkhovna Rada operates in the format[1573] of a single continuous plenary sitting,[1574] MPs register only once after the session is opened.[1575] Instead, before considering agenda items, the presiding officer announces an indicative vote on each plenary day when a sitting takes place, except on days when

1568 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 2 Article 82. ↗

1569 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of 50 MPs of Ukraine regarding the official interpretation of provisions of Articles 75, 82, 84, 91 and 104 of the Constitution of Ukraine concerning the competence of the Verkhovna Rada of Ukraine No. 17-rp/2002 of 17.10.2002. ↗

1570 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, para. 5 Part 1 Article 28. ↗

1571 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1572 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 1 Article 26. ↗

1573 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 1 Article 12. ↗

1574 On the Organisation of the Work of the Verkhovna Rada of Ukraine in Connection with the Act of Armed Aggression of the Russian Federation against Ukraine on 24 February 2022: Resolution of the Verkhovna Rada of Ukraine No. 2103-IX of 24.02.2022. ↗; On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation during the Eighth Session under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2558-IX of 06.09.2022. ↗; On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2912-IX of 07.02.2023. ↗

1575 Electronic Registration. Verkhovna Rada of Ukraine. ↗

the 'Government's Question Hour' is held and no votes are taken.[1576] Such indicative votes have become a form of quorum check.

In 2016, the European Parliament Mission found that the high threshold for adopting ordinary legislation created an obstacle to effective legislative work, as ordinary laws require the support of a majority of MPs of the constitutional composition — 226 votes. The European Parliament Mission recommended revising the legislative procedure by introducing a system under which ordinary laws would be adopted by a simple majority, provided that a quorum is present, while special laws would require an absolute majority.[1577] The adopted Law of Ukraine 'On Law-Making Activity' does not include ordinary or special laws in the hierarchy of normative legal acts, meaning that this recommendation remains unimplemented.

Debates

The Rules of Procedure of the Verkhovna Rada provide for two types of debate on matters considered at its sittings: full and shortened. The main difference between them is the time allocated and the number of reports and speeches by MPs.[1578] The Rules of Procedure also set specific time limits, for example at least 10 minutes for a report and one minute to substantiate proposals or amendments.[1579] Both types of debate take place during plenary sittings of the Verkhovna Rada, which must be broadcast on the parliamentary television channel and are also recorded in publicly available transcripts of sittings.

After the full-scale invasion, the Verkhovna Rada temporarily departed from the Rules of Procedure, which require mandatory debate on draft laws under either the full or shortened debate procedure. Debate on draft laws moved to the level of the Conciliation Council, which determines which drafts will be debated in the session hall of the Verkhovna Rada and which may be adopted without debate. In practice, there have been cases where laws were adopted without any debate, if this had been agreed in advance by the Conciliation Council, as evidenced by the transcripts of plenary sittings.[1580]

Compliance with the Rules of Procedure during the debate on matters is monitored by the presiding officer. The presiding officer gives the floor to speakers and is also responsible for ensuring equal opportunities for MPs, parliamentary factions and groups to participate in the debate.[1581]

The order of speeches is determined through the electronic system using a random number generator, either with or without taking into account MPs' affiliation with parliamentary factions and groups. Each parliamentary faction and group has a guaranteed right for one

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1576 This practice developed almost immediately after the full-scale invasion, from March 2022, as evidenced by the transcripts of plenary sittings of the Verkhovna Rada.

1577 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 10, Recommendation No. 13. ↗

1578 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 30, 31. ↗

1579 Ibid, Part 2 Article 32.

1580 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 25.03.2026. ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 10.03.2025. ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 26.02.2026. ↗

1581 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 1 Article 27. ↗

representative to speak on each item on the agenda of a plenary sitting.[1582] In practice, there have been no recorded cases of the Chairman restricting MPs' opportunities to participate in debates based on their factional affiliation.

Voting

The Constitution of Ukraine establishes that voting at sittings of the Verkhovna Rada is carried out by MPs personally.[1583] The Rules of Procedure of the Verkhovna Rada do not contain provisions that would give an MP the right to vote on behalf of another MP at sittings of the Verkhovna Rada.[1584] For a long time, Parliament had a problem with non-personal voting, the so-called 'button pushing', and the Verkhovna Rada of the ninth convocation was no exception.[1585] To put an end to this practice, in December 2019 the Verkhovna Rada adopted Law No. 404-IX,[1586] which introduced criminal liability for an MP voting on behalf of another MP. In March 2021, the sensor button became operational in the Verkhovna Rada, making non-personal voting by MPs impossible.[1587]

Decisions of the Verkhovna Rada are adopted by open vote, either through the electronic system or by a show of hands if voting through the electronic system is technically impossible, or by secret ballot through the submission of ballot papers.[1588] Most votes in the Verkhovna Rada are open. Secret ballots are held on charges against the President of Ukraine as part of the impeachment procedure.[1589] In practice, no secret ballots have been held during the ninth convocation.

Voting results are available in the cards of draft laws. The only exceptions are several drafts adopted at the first plenary sittings after the full-scale invasion. The Verkhovna Rada website also allows users to view statistics on MPs' voting over a selected period.[1590]

There are cases where an MP's card or voting button fails during a vote. In such cases, MPs may submit a statement requesting that their vote be counted. However, this is more of a political statement by the MP, since no recount is carried out and such a statement does not affect the voting result. For example, MP Rostyslav Pavlenko submitted a statement requesting that his 'in favour' vote be counted during the consideration of Draft Law

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1582 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 1 Article 27. ↗

1583 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 84. ↗

1584 Decision of the Constitutional Court of Ukraine in the case upon the constitutional petition of the President of Ukraine regarding the official interpretation of Parts 2 and 3 Article 84 and Parts 2 and 4 Article 94 of the Constitution of Ukraine concerning the procedure for voting and repeated consideration of laws by the Verkhovna Rada of Ukraine No. 11-rp/98 of 07.07.1998. ↗

1585 Life Before the Sensor Button: Who Engaged in 'Button Pushing' in the Verkhovna Rada of the Ninth Convocation and How? Radio Liberty, 2021. ↗

1586 On Amendments to Certain Legislative Acts of Ukraine to Ensure Personal Voting by MPs of Ukraine at Plenary Sittings of the Verkhovna Rada of Ukraine: Law of Ukraine No. 404-IX of 19.12.2019. ↗

1587 Cameras Installed and Sensor Button Activated in the Verkhovna Rada to Prevent Button Pushing. Ukrainska Pravda, 2021. ↗

1588 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 37, 47. ↗

1589 On the Special Procedure for Removing the President of Ukraine from Office (Impeachment): Law of Ukraine No. 39-IX of 10.09.2019. ↗

1590 Voting Statistics for the Selected Period. Verkhovna Rada of Ukraine. ↗

No. 14166 because his card had failed,[1591] but this did not affect the voting result.[1592] Between September 2025 and 31 July 2026, at least six cases of malfunctioning voting consoles were recorded.[1593]

The current 'Rada-3' voting system was installed in the Verkhovna Rada as far back as 2002 and has already reached the end of its service life. The Verkhovna Rada considered upgrading the system for some time,[1594] but this would require a considerable amount of time: the 'Rada-3' system took two months to install. In the absence of remote voting, this would mean that MPs would be unable to adopt laws or would have to hold sittings at another location. In addition, the Verkhovna Rada building is an architectural monument, meaning that such works may require the relevant permit.

Document flow

In January 2020, the Verkhovna Rada adopted Law No. 469-IX,[1595] which provided for the use of the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine (UAS) in the Verkhovna Rada as a single tool for processing all documents created in Parliament. Law No. 469-IX also established that document flow is carried out in electronic and paper form, with electronic document flow being the main form. The Verkhovna Rada's transition to electronic document flow made it possible to reduce financial and material costs, increase the speed of document circulation within the Verkhovna Rada and enable electronic interaction between the subjects of the right of legislative initiative.

Initially, Law No. 469-IX provided that the documents specified in the Rules of Procedure could be created in either paper or electronic form until the first day of the fourth session of the Verkhovna Rada of the ninth convocation. However, due to the need to create the conditions for the full commissioning of the UAS, the complete transition to electronic document flow was postponed several times.[1596] Under the latest amendments,[1597] paper

1591 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 24.02.2026. Verkhovna Rada of Ukraine, 2026. ↗

1592 The voting table indicates 'Did not vote' next to the MP's surname. Roll-call vote on the Draft Law on Amendments to Certain Laws of Ukraine Regarding the Specifics of Designing and Constructing the National Memorial Complex of the Heroes of the Heavenly Hundred — Museum of the Revolution of Dignity (No. 14166). ↗

1593 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 05.11.2025. Verkhovna Rada of Ukraine, 2025 ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 14.01.2026. Verkhovna Rada of Ukraine, 2026 ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 15.01.2026. Verkhovna Rada of Ukraine, 2026 ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 24.02.2026. Verkhovna Rada of Ukraine, 2026 ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 26.02.2026. Verkhovna Rada of Ukraine, 2026 ↗; Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 11.06.2026. Verkhovna Rada of Ukraine, 2026. ↗

1594 How Will MPs Vote? Korniienko Discussed Plans to Upgrade the System. CHESNO Movement, 2022. ↗

1595 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Improve the Electronic Form of Document Flow in the Verkhovna Rada of Ukraine: Law of Ukraine No. 469-IX of 16.01.2020. ↗

1596 On Amendments to Paragraph 3 Section II 'Final and Transitional Provisions' of the Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Improve the Electronic Form of Document Flow in the Verkhovna Rada of Ukraine': Law of Ukraine No. 758-IX of 13.07.2020. ↗; On Amendments to Paragraph 3 Section II 'Final and Transitional Provisions' of the Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Improve the Electronic Form of Document Flow in the Verkhovna Rada of Ukraine': Law of Ukraine No. 1132-IX of 26.01.2021. ↗; On Amendments to Paragraph 3 Section II 'Final and Transitional Provisions' of the Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Improve the Electronic Form of Document Flow in the Verkhovna Rada of Ukraine': Law of Ukraine No. 1997-IX of 25.01.2022. ↗

1597 On Amendments to Paragraph 3 Section II 'Final and Transitional Provisions' of the Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Improve the Electronic Form of Document Flow in the Verkhovna Rada of Ukraine' Regarding Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine under Martial Law: Law of Ukraine No. 2848-IX of 13.12.2022. ↗

and electronic forms of documents will continue to exist in parallel until the first day of the next regular session of the Verkhovna Rada of the ninth convocation that begins after martial law is terminated or lifted. This was linked to the introduction of martial law and the need to have alternative ways for documents created in Parliament to move through the system — either electronically or in paper form.[1598]

The procedure for handling documents in the Verkhovna Rada is governed by the relevant regulation.[1599]

Records of all votes, decisions adopted at plenary sittings, transcripts and other materials are published on the Verkhovna Rada website, along with draft laws, draft resolutions and their supporting documents. Parliamentary committees publish agendas, as well as minutes and transcripts of open meetings.

Dissolution of Parliament

The Constitution of Ukraine provides that the powers of the Verkhovna Rada terminate on the day of the opening of the first sitting of the Verkhovna Rada of a new convocation. It also establishes the grounds on which the President may terminate the powers of the Verkhovna Rada early, namely where: 1) a coalition of parliamentary factions is not formed within one month; 2) the personal composition of the Government is not formed within 60 days after the resignation of the Government; or 3) plenary sittings cannot begin within 30 days of a regular session.[1600]

The powers of the Verkhovna Rada may not be terminated while martial law is in force.[1601] If Parliament's term expires while martial law or a state of emergency is in force, its powers are extended until the day of the first sitting of the first session of the Verkhovna Rada elected after martial law or the state of emergency has been lifted.[1602]

The Rules of Procedure of the Verkhovna Rada do not establish separate procedures in the event of the dissolution of Parliament or the expiry of its term of office. They only regulate the procedure for considering draft laws adopted by the Verkhovna Rada of the previous convocation in the first and subsequent readings. Such draft laws are prepared for consideration by the Verkhovna Rada under the procedure for preparation for the second reading. The Law of Ukraine 'On the Status of People's Deputy of Ukraine' also does not contain separate ethical requirements for MPs after the expiry of their term of office. MPs are subject to the same regulation as other persons authorised to perform state functions.[1603]

1598 On Amendments to Paragraph 3 Section 'Final and Transitional Provisions' of the Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine to Improve the Electronic Form of Document Flow in the Verkhovna Rada of Ukraine' Regarding Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine under Martial Law: Explanatory Note to Draft Law of Ukraine, registration No. 8241 of 28.11.2022. ↗

1599 On Certain Issues of Ensuring Document Flow in the Verkhovna Rada of Ukraine in Electronic and Paper Form: Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

1600 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 90. ↗

1601 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 1 Article 10. ↗

1602 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 4 Article 83. ↗

1603 On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Article 26. ↗

The procedure for transferring files for archival storage is determined by the Regulation on Document Flow.[1604] Archives of documents subject to permanent and long-term storage are created in paper and electronic form, while documents subject to temporary storage are archived electronically.

Progress and issues

A business continuity plan has been developed in the Verkhovna Rada. The COVID-19 pandemic and the full-scale invasion undoubtedly affected the work of the Verkhovna Rada. This raised the need to ensure the safety of parliamentarians and staff of the Secretariat of the Verkhovna Rada, as well as to prevent the destruction of buildings, documents and means of communication. Based on the experience gained, Parliament developed a business continuity plan that enables it to respond to crisis situations and restore the work of the Verkhovna Rada within the shortest possible time. The plan contains algorithms for action by MPs and staff of the Secretariat of the Verkhovna Rada to ensure the uninterrupted performance of their functions in specific crisis situations and to establish cooperation with other units. As of 31 July 2026, this plan had been submitted for consideration to the leadership of the Secretariat of the Verkhovna Rada.[1605]

The Rules of Procedure of the Verkhovna Rada do not contain provisions regulating the organisation of the Verkhovna Rada's work during martial law or a state of emergency. They set out the procedure for considering Presidential Decrees introducing martial law or a state of emergency, but these are effectively the only provisions concerning such regimes. The resolutions adopted are only partial measures and should be integrated into the Rules of Procedure of the Verkhovna Rada as the main document governing Parliament's work. As a law, the Rules of Procedure have higher legal force than resolutions of the Verkhovna Rada. Any inconsistency between them therefore creates legal uncertainty as to which rules should apply. Moreover, these resolutions do not regulate the full range of the Verkhovna Rada's work. For example, the rules on the timeframes for the passage of draft laws in the first and second readings were not amended by resolution and are therefore often breached because of attempts to balance the urgency of adopting a law with compliance with formal procedures. The development, adoption and implementation of legislation to ensure Parliament's work under martial law or a state of emergency is an obligation of the Verkhovna Rada under the Roadmap on the Functioning of Democratic Institutions.[1606]

Information on the dates when the ongoing plenary sitting will resume and on the agendas of plenary sittings is not published in advance. Immediately after the full-scale invasion, restricting information on the dates of sittings was justified by security risks. However, since April 2024, the Verkhovna Rada has returned to a more standard work schedule: with certain exceptions, the plenary sitting resumes on Tuesday, Wednesday, Thursday and Friday every second week. In addition, individual MPs announce the dates of sittings on their social media.[1607] Accordingly, as of 2026, withholding such information on security grounds is unjustified. The lack of prior publication of agendas has a negative

1604 On Certain Issues of Ensuring Document Flow in the Verkhovna Rada of Ukraine in Electronic and Paper Form: Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

1605 Information provided by Respondent No. 64 during an interview conducted on 23.04.2026.

1606 Roadmap on the Functioning of Democratic Institutions, Measure 6 of Strategic Result 1 of Section III.C. ↗

1607 Publication by MP of Ukraine Yaroslav Zhelezniak on the social network Facebook, 2026. ↗

impact on the transparency of Parliament's work, as the public cannot obtain timely information on the consideration and preparation of draft laws.

Information on meetings of parliamentary committees is not displayed on the Verkhovna Rada website together with the calendar plan; instead, weekly schedules of committee meetings are published separately.[1608] This fragmentation of data not only makes the website less user-friendly but also complicates public oversight, as stakeholders cannot track committee meetings within Parliament's overall calendar plan. Although planned committee meetings are listed on committee websites and announced on the Verkhovna Rada website, including it in the calendar plan would make public oversight of committees' work easier, given their key role in the legislative process.

MPs do not use the session agenda as a real tool for ensuring the predictability of the legislative process. For the last three sessions, the Verkhovna Rada has approved the session agenda late, reducing its role as a planning document. In addition, committees include almost all registered draft laws in the agenda, regardless of their prospects for adoption. Pre-prepared agendas are not always followed: during a sitting, new draft laws that were not previously scheduled for consideration may be put forward for consideration.[1609] The agenda should be a planning document and should identify the issues that are priorities for Parliament's consideration. Including a large number of legislative initiatives reduces the predictability of the legislative process, as it remains unclear whether a draft law included in the agenda will actually be considered at a plenary sitting.

Unrealistic planning of legislative activity makes the legislative process less predictable. An analysis of the implementation of the Legislative Work Plan shows that only one third of the tasks[1610] have been completed, suggesting that the Government, committees and MPs perceive the Plan more as a formality than as a real tool for planning legislative activity. In addition, the Rules of Procedure of the Verkhovna Rada do not require committees to publish reports on the implementation of the Plan, still less to analyse the status of its implementation, while the promised tool for tracking draft laws included in the Plan[1611] has never been developed.

Agenda items are often discussed without the required number of MPs present. It is common for MPs to be absent during the consideration of particular issues. For example, low attendance by MPs is a problem during the 'Government's Question Hour',[1612] which can be linked to MPs' negative perception of this instrument as a formality. The same problem arises during the consideration of a large number of amendments and proposals to draft laws. For example, MPs considered proposals to the State Budget almost until midnight with only a small number of MPs present.[1613]

1608 Schedules of Meetings of Committees of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

1609 Agendas and Their Implementation: Why Does the Rada Not Follow Its Own Plans? Agency for Legislative Initiatives, 2023. ↗

1610 Delivering the Unplanned or Failing to Deliver the Planned: The Dilemma of Parliament's Legislative Planning. Agency for Legislative Initiatives, 2025. ↗

1611 The Verkhovna Rada of Ukraine Is Improving the Planning of Legislative Work. Information Department of the Secretariat of the Verkhovna Rada of Ukraine, 2020. ↗

1612 Information provided by Respondent No. 57 during an interview conducted on 02.04.2026 and 14.04.2026. Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

1613 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 21.10.2025. Verkhovna Rada of Ukraine. ↗

Recommendations

1. Consider amending the Rules of Procedure of the Verkhovna Rada to reflect the existing practice of organising the work of the Verkhovna Rada and its bodies while martial law is in force, in particular regarding agenda-setting, debate and adoption of draft laws, the exercise of oversight powers and other matters.
2. Ensure the advance publication on the Verkhovna Rada website of information on the dates when the plenary sitting will resume and the planned agenda.
3. Integrate committee meeting schedules into the calendar plan for sessions and display them on the relevant page of the Verkhovna Rada website.
4. Ensure that the session agenda and the agendas of plenary sittings contain a proportionate number of draft laws and draft resolutions to be considered.
5. Substantially revise the process for preparing the Legislative Work Plan, its content and the approach taken by committees to formulating proposals for the Plan. The number of tasks in the Plan should be reduced to match Parliament's actual capacity to adopt laws. Parliament's actual work should be based to a greater extent on the Plan.
6. Consider introducing tools to verify the presence of the required number of MPs in the session hall during the consideration of any agenda item.

Legislative Process

Legislative Procedure

State of play

Legislative initiative

The right of legislative initiative in the Verkhovna Rada is vested in to the President, Members of Parliament and the Government. The Constitution provides for exceptions for the submission of certain draft laws. For example, a draft law on the State Budget may be submitted only by the Government, while a draft law on amendments to the Constitution may be submitted by the President or by at least one-third or two-thirds of MPs of the constitutional composition.[1614]

Draft laws on the ratification of an international treaty are submitted by the President or the Government. MPs may submit draft laws on the denunciation of international treaties,[1615] but they are not active initiators of such laws: during the ninth convocation, they registered only three draft laws on the denunciation of international treaties, two of which were adopted as laws.

Neither the Constitution nor the Rules of Procedure of the Verkhovna Rada impose restrictions on submitting draft laws on amendments, including to the Law on the State Budget of Ukraine.[1616] MPs initiated two laws amending the State Budget of Ukraine for

1614 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 93, Part 2 Article 96, Article 154, Article 156. ↗

1615 In 2012, the CCU interpreted that the Constitution of Ukraine does not contain provisions excluding the possibility for MPs to submit draft laws on the ratification or denunciation of international treaties of Ukraine to the Verkhovna Rada, and declared unconstitutional the provision of the Rules of Procedure of the Verkhovna Rada that restricted MPs from submitting draft laws on the denunciation of international treaties. Decision of the Constitutional Court of Ukraine in the case on the constitutional petition of 47 MPs of Ukraine regarding the compliance with the Constitution of Ukraine (constitutionality) of Part 1 Article 202 of the Rules of Procedure of the Verkhovna Rada of Ukraine, approved by the Law of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine', as amended by the Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine' (case on legislative initiative) No. 12-rp/2012 of 30.05.2012. ↗

1616 This was confirmed by the CCU in its 2009 decision, in which it held that all subjects of the right of legislative initiative have the right to submit draft laws on amendments to the Law on the State Budget of Ukraine to the Verkhovna Rada. Decision of the Constitutional Court of Ukraine in the case on the constitutional petition of 54 MPs of Ukraine regarding the official interpretation of the provisions of paragraph 13 of para. 1 of Part 1 Article 20 of the Law of Ukraine 'On the Cabinet of Ministers of Ukraine', Part 2 Article 52, Part 3 Article 53 and Part 2 Article 54 of the Budget Code of Ukraine in the context of Part 1 Article 93, Part 2 Article 96 and para. 6 Article 116 of the Constitution of Ukraine (case on the right of legislative initiative regarding amendments to the Law on the State Budget of Ukraine) No. 1-rp/2009 of 13.01.2009. ↗

2025, while the Government initiated one.[1617] One law amending the State Budget for 2026 was initiated by the Cabinet of Ministers of Ukraine.[1618]

In August 2019, the President registered a draft law that would have introduced the people's right of legislative initiative.[1619] The CCU found the draft law to be consistent with the Constitution, but noted that the people's right of legislative initiative could not be exercised unless the Constitution established the required number of citizens entitled to exercise it,[1620] as the draft law did not determine the relevant number of votes. Despite the positive opinion of the CCU, no further work was carried out on this law.

Subjects of the right of legislative initiative may also submit alternative draft laws within 14 days from the date on which the first draft law is provided to MPs or within 10 days from the date on which a draft law is referred for a repeated first reading. Draft laws are considered alternative if they cover the same range of issues and essentially reproduce provisions regulating the same relations. Once a draft law has been adopted in the first reading, no alternative draft laws may be submitted in relation to it.[1621] MPs actively use this right — during the ninth convocation of the Verkhovna Rada, they registered almost 1,562 alternative draft laws, while the Government registered only 13.[1622]

The Rules of Procedure of the Verkhovna Rada do not limit the number of proposals or amendments that an MP may submit or the number of MPs who must support the submission of a proposal or amendment to a draft law (except for draft laws on amendments to the Constitution). They only set the deadline within which such proposals and amendments must be submitted.[1623]

The adoption of laws is an exclusive power of the Verkhovna Rada.[1624] The Constitution of Ukraine also sets out a list of matters that must be regulated exclusively by laws.[1625] The Verkhovna Rada adopts laws, resolutions and other acts by a majority of its constitutional composition, except in cases provided for by the Constitution[1626] (for example, in relation to the adoption of laws amending the Constitution of Ukraine).

1617 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1618 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1619 On Amendments to Article 93 of the Constitution of Ukraine (Regarding Legislative Initiative): Draft Law of Ukraine, registration No. 1015 of 29.08.2019. ↗

1620 Opinion of the Constitutional Court of Ukraine in the case on the constitutional application of the Verkhovna Rada of Ukraine requesting an opinion on the compliance of the draft law on amendments to Article 93 of the Constitution of Ukraine (regarding the people's legislative initiative) (registration No. 1015) with the requirements of Articles 157 and 158 of the Constitution of Ukraine No. 5-v/2019 of 13.11.2019. ↗

1621 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 100. ↗

1622 The President did not register any alternative draft law. According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1623 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 109, 116, 124, 125, 128, 142. ↗

1624 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 75, para. 3 Part 1 Article 85. ↗

1625 Ibid, Article 92.

1626 Ibid, Article 91.

Amendments to the Constitution

Amendments to the Constitution may be initiated by the President of Ukraine or by at least one-third of MPs (two-thirds of MPs are required for amendments to the so-called 'protected' chapters[1627] of the Constitution). The Constitution does not empower the Verkhovna Rada to adopt a new Constitution of Ukraine or a new version of the Constitution, does not contain clear provisions on the procedure for adopting a new Basic Law by a constituent authority and does not provide for any provisions on a constituent body within the mechanism of state power.[1628]

The Verkhovna Rada may consider a draft law amending the Constitution only if there is a CCU opinion confirming compliance with the requirements of the Constitution. For example, the Constitution may not be amended under martial law or a state of emergency, or if the amendments provide for the abolition or restriction of human and citizens' rights and freedoms, or if they are aimed at abolishing independence or violating the territorial integrity of Ukraine. Another safeguard is that the Verkhovna Rada may not amend the same provisions twice during its term of office.[1629]

The development of draft laws amending the Constitution is generally characterised by the non-public and closed nature of the entire process. Constitutional amendments are prepared by the relevant subject without a constitutional reform concept or public consultations, while the official text of the relevant draft law often becomes known to MPs and the public only after it has been officially submitted to the Verkhovna Rada.[1630]

There are two ways of adopting constitutional amendments, depending on whether they concern the 'protected' chapters of the Constitution. To adopt amendments to the Constitution (except for the 'protected' chapters), a draft law on amendments to the Constitution that has been preliminarily approved by a majority is deemed adopted if, at the next regular session of the Verkhovna Rada, at least two-thirds of its constitutional composition votes in favour of it.

The issue of amending the Constitution under this procedure remains ambiguous in terms of interpreting the phrase 'at the next regular session of the Verkhovna Rada'. In 2002, the CCU held that the issue of amending the Constitution had to be considered and decided at two consecutive regular sessions of the Verkhovna Rada.[1631] However, in 2016, the CCU issued a new interpretation[1632] that effectively allowed constitutional amendments to be adopted at non-consecutive sessions. This decision was criticised by experts[1633] and

1627 Chapter I 'General Principles', Chapter III 'Elections. Referendum' and Chapter XIII 'Amendments to the Constitution of Ukraine' of the Constitution of Ukraine.

1628 Green Paper on Constitutional Reform in Ukraine. Centre of Policy and Legal Reform, 2021. ↗

1629 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 154–159. ↗

1630 Green Paper on Constitutional Reform in Ukraine. Centre of Policy and Legal Reform, 2021. ↗

1631 Decision of the Constitutional Court of Ukraine in the case on the constitutional petition of 50 MPs of Ukraine regarding the official interpretation of the provisions of Articles 75, 82, 84, 91 and 104 of the Constitution of Ukraine (regarding the competence of the Verkhovna Rada of Ukraine) No. 17-rp/2002 of 17.10.2002. ↗

1632 Decision of the Constitutional Court of Ukraine in the case on the constitutional petition of 51 MPs of Ukraine regarding the official interpretation of the phrase 'at the next regular session of the Verkhovna Rada of Ukraine' contained in Article 155 of the Constitution of Ukraine No. 1-rp/2016 of 15.03.2016. ↗

1633 The Only Result of the CCU Decision on the 'Next Regular Session' Is the Discrediting of the Court Itself. Ukrainska Pravda, 2016 ↗; Creativity Beyond Logic: How the CCU Interpreted the Concept of the 'Next Regular Session'. LB.ua, 2016. ↗

by judges of the CCU (more than one-third of the judges submitted separate opinions disagreeing with the CCU decision).

Amendments to Chapters I 'General Principles', III 'Elections. Referendum' and XIII 'Amendments to the Constitution of Ukraine' are adopted by two-thirds of the constitutional composition of the Verkhovna Rada and approved by an all-Ukrainian referendum called by the President.

For a long time, the legislation did not contain provisions that would allow amendments to be made under this procedure, as in 2018 the CCU declared the Law of Ukraine 'On All-Ukrainian Referendum' unconstitutional.[1634] In January 2021, the Verkhovna Rada adopted the new Law No. 1135-IX,[1635] which established a procedure for holding an all-Ukrainian referendum to approve a law amending the 'protected' chapters of the Constitution.

Legislative drafting

The main requirements for the structure and content of draft laws are contained in the Rules of Procedure of the Verkhovna Rada and the Law of Ukraine 'On Law-Making Activity'[1636] (not yet put into effect[1637]). Certain rules on the development of Government draft laws are also contained in the Rules of Procedure of the Government.[1638]

In 2014, the Secretariat of the Verkhovna Rada prepared the Rules for Drafting Draft Laws and the Main Requirements of Legislative Drafting Technique (methodological recommendations).[1639] The Government has similar recommendations.[1640] The adopted Law of Ukraine 'On Law-Making Activity' also provides that the Ministry of Justice of Ukraine (MoJ) develops recommendations on applying the general rules of legislative drafting technique, while the Verkhovna Rada may issue recommendations on the specific features of drafting normative legal acts that it adopts or issues.[1641] The new Rules for Drafting Legislative Acts and the Main Requirements of Legislative Drafting Technique are being approved by the leadership of the Verkhovna Rada.[1642]

By Order of the MoJ No. 934/7 of 19 May 2025, a working group was established to develop recommendations on the application of the general rules of legislative drafting technique and to prepare other acts related to the implementation of the Law of Ukraine 'On Law-Making Activity'. To implement the Law of Ukraine 'On Law-Making Activity', the Working Group developed the Recommendations on the Application of the General

1634 Decision of the Constitutional Court of Ukraine in the case on the constitutional petition of 57 MPs of Ukraine regarding the compliance with the Constitution of Ukraine (constitutionality) of the Law of Ukraine 'On All-Ukrainian Referendum' No. 4-r/2018 of 26.04.2018. ↗

1635 On All-Ukrainian Referendum: Law of Ukraine No. 1135-IX of 26.01.2021, Part 1 Article 15, Articles 17, 26, 120. ↗

1636 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023. ↗

1637 The Law of Ukraine 'On Law-Making Activity' enters into force one year after the termination or cancellation of martial law in Ukraine.

1638 On the Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007. ↗

1639 Rules for Drafting Draft Laws and the Main Requirements of Legislative Drafting Technique (Methodological Recommendations). Secretariat of the Verkhovna Rada of Ukraine, 2014. ↗

1640 Methodological Recommendations on Developing Draft Laws and Complying with the Requirements of Legislative Drafting Technique: Resolution of the Board of the Ministry of Justice of Ukraine No. 41 of 21.11.2000. ↗

1641 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Part 3 Article 31. ↗

1642 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

Rules of Legislative Drafting Technique, approved by Order of the Ministry of Justice of Ukraine No. 57/5 of 8 January 2026. The Recommendations are intended to unify the rules for preparing draft regulatory legal acts by defining requirements for legislative drafting technique. The Working Group is subsequently expected to develop a draft law amending the Law of Ukraine 'On Law-Making Activity' in order to improve the quality of monitoring the application of regulatory legal acts and policy documents, improve other provisions of the Law, eliminate duplication between two types of monitoring of regulatory legal acts and regulate the conduct of legal experiments.[1643]

An explanatory note is attached to all draft laws. It must contain: 1) justification for the need to adopt the draft law, its objectives, tasks, main provisions and place in the legislative system; 2) justification of the expected socio-economic, legal and other consequences of applying the law after its adoption; 3) other information necessary for consideration of the draft law, including information on analytical materials provided by lobbying entities, if any.[1644] The draft law and all accompanying documents are published on the official website of the Verkhovna Rada.[1645]

The Law of Ukraine 'On Law-Making Activity'[1646] established the hierarchy of normative legal acts and the principles of legislative drafting technique at the legislative level for the first time. This Law also establishes requirements for the preparation of draft normative legal acts, including laws and their accompanying documents. For example, for a draft code or a primary law, it is mandatory to develop a concept that must include an analysis of social relations, the purpose of legal regulation, an assessment of compliance with EU law, etc.[1647]

The Law of Ukraine 'On Law-Making Activity' provides that legal norms in a normative legal act must meet the requirements for consistent terminology used in them, unambiguous wording (clarity, precision, accessibility for understanding and implementation), etc.

When draft laws are considered in the Verkhovna Rada and prepared for subsequent readings (except for the first reading), they are sent for editorial review to the relevant structural units of the Secretariat. Final editorial review is carried out after the act of the Verkhovna Rada has been adopted as a whole.[1648] Expert and editorial review should ensure that the text of the draft law is written in clear language and does not contain contradictory provisions.

Most adopted laws are amending laws: from September 2025 to 31 July 2026, the Verkhovna Rada adopted 80 amending laws and 23 primary laws (including ten laws approving or endorsing presidential decrees).[1649]

1643 Report on the Status of Implementation of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475-r of 14 May 2025, for the first quarter of 2026.

1644 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 91. ↗

1645 Official website of the Verkhovna Rada of Ukraine. ↗

1646 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023. ↗ The Law enters into force one year after the termination or cancellation of martial law in Ukraine.

1647 Ibid, Article 27.

1648 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 2 Article 103. ↗

1649 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

The general requirements for amending normative legal acts are contained in the Law of Ukraine 'On Law-Making Activity'. For example, it prohibits amendments to an amending law (except for changes to its entry-into-force provision) or provides that normative legal acts being amended must be arranged in chronological order, etc.[1650]

The Rules of Procedure of the Verkhovna Rada provide a mechanism for cases where inconsistencies are identified in the adopted text of a draft law, for example following consideration of the draft law at second reading. A proposal to eliminate such inaccuracies or inconsistencies is submitted to the Verkhovna Rada by its Chairman. Since September 2025, the Verkhovna Rada has voted twice on eliminating inconsistencies.[1651]

MPs have significantly fewer resources than the Government to prepare legislative initiatives. This negatively affects the quality of MPs' draft laws. The idea of establishing a parliamentary legislative drafting office has not yet been reflected in the structure of the Secretariat of the Verkhovna Rada.[1652]

Draft laws are usually developed either solely by MPs and their assistant-consultants or with the involvement of third parties (civil society organisations, business associations, etc.). The practice of registering Government-developed draft laws through MPs is not uncommon, allowing the Government to avoid the lengthy procedure of approval and public consultations on draft laws.[1653]

Impact assessments

The Rules of Procedure of the Verkhovna Rada provide that the explanatory note to a draft law must include, among other things, justification of the expected socio-economic, legal and other consequences of applying the law.[1654] At the same time, these requirements are often fulfilled only formally, without an in-depth analysis of economic or other consequences. It is this document that should help MPs, structural units of the Secretariat of the Verkhovna Rada and the public familiarise themselves with the purpose of the draft law and its main provisions. The Rules of Procedure of the Government contain somewhat different requirements for the content of an explanatory note, including for a draft law.[1655] It must contain a forecast of the expected results of implementing the act, the criteria for assessing the effectiveness of its implementation, as well as possible risks and ways to minimise them. Where implementation of the act will affect the market environment, employment, public health, ecology and the natural environment, etc., this must be stated

1650 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 42. ↗

1651 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026. Although there were two votes, they concerned the same issue, as the proposal to eliminate inconsistencies did not receive the required number of votes the first time. At the same time, the Rules of Procedure of the Verkhovna Rada do not provide for a repeated vote on such proposals, and the Chairman of the Verkhovna Rada should have signed the previously submitted text of the law.

1652 For more details, see the subsection 'Legal Status of the Secretariat of the Verkhovna Rada and Its Structural Units'.

1653 On the Status of Veterans and Family Members of Fallen (Deceased) Defenders of Ukraine and Veterans: Draft Law of Ukraine, registration No. 3407 of 29.04.2020 ↗; Draft Code on Administrative Offences, registration No. 11386 of 28.06.2024. ↗

1654 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 91. ↗

1655 Annex 4 to the Rules of Procedure of the Cabinet of Ministers of Ukraine. On the Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007. ↗

separately and data and calculations confirming or substantiating such a forecast must be provided, together with possible ways to minimise the negative impact.[1656]

After the Law of Ukraine 'On Law-Making Activity' enters into force, MPs who initiate draft laws will also have to prepare an impact assessment, which is one of the stages of law development. The impact assessment must be set out in the explanatory note and must contain information on:

1) the relevance and importance of the problem that needs to be regulated through the adoption (issuance) of a normative legal act;
2) alternative ways to address the problem requiring legal regulation, identifying the economic, social, financial, budgetary, environmental, demographic, regulatory, investment, gender, discrimination-related, corruption-related and other consequences, as well as the status of Ukraine's compliance with its international obligations for each alternative option;
3) quantitative and qualitative indicators used to assess the projected impact on social relations of each alternative option;
4) the optimal way to address the problem, with an explanation of the causal link between the selected option and the expected impact of the draft normative legal act on social relations;
5) methods for carrying out legal monitoring and the criteria (indicators) for such monitoring if the draft normative legal act is adopted;
6) criteria (indicators) according to which legal monitoring will be carried out if the draft normative legal act is adopted.[1657]

The Rules of Procedure of the Verkhovna Rada have not yet been amended to indicate that inclusion of an impact assessment in the accompanying documents to a draft law is mandatory. Developing and implementing amendments to the Rules of Procedure and the Laws of Ukraine 'On Committees of the Verkhovna Rada of Ukraine', 'On the Cabinet of Ministers of Ukraine' and 'On Central Executive Bodies' regarding the procedure for conducting impact assessments of draft laws and legal monitoring of adopted laws (ex post), as well as to implement other provisions of the Law of Ukraine 'On Law-Making Activity', is one of the Parliament's commitments under the Roadmap on the Functioning of Democratic Institutions.[1658]

As of 31 July 2026, the Verkhovna Rada had not developed recommendations, instructions or other guidelines on conducting impact assessments, which significantly reduces the Parliament's analytical capacity.

The Research Service is involved, to a certain extent, in preparing analytical materials on draft laws. For example, it prepares analytical notes on the subject matter of a legislative act being developed or may prepare a parliamentary study related to the processing of

1656 Ibid.

1657 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 30. ↗

1658 Roadmap on the Functioning of Democratic Institutions. Measure 3 of Strategic Result 1 of Section III.C. ↗

draft laws under consideration by the Parliament.[1659] In the future, the functions of the Research Service may be expanded to include analysis (assessment) of the impact of a draft law on social relations.[1660]

To use the Twinning institution-building instrument to implement the Strategy for the Development of the Research Service of the Verkhovna Rada of Ukraine until 2027, a Twinning Fiche entitled 'Introducing Impact Assessment of Draft Laws and Legal Monitoring of Laws in Line with European Union Best Practices' was submitted to the Delegation of the European Union to Ukraine.[1661]

Legislative procedure

The legislative framework for regulating the development of laws consists of the Rules of Procedure of the Verkhovna Rada, the Law of Ukraine 'On Law-Making Activity'[1662] and the Law of Ukraine 'On Public Consultations'.[1663]

The Rules of Procedure of the Verkhovna Rada provide that, as a rule, the Parliament considers draft laws under the three-reading procedure, which includes:

1) first reading — discussion of the main principles, provisions, criteria and structure of the draft law and its adoption at first reading;
2) second reading — article-by-article discussion and adoption of the draft law in the second reading;
3) third reading — adoption as a whole of a draft law that requires further revision and reconciliation.[1664]

In practice, no draft law adopted by the Verkhovna Rada of the ninth convocation has gone through the third-reading procedure. The last time a draft law[1665] went through the three-reading procedure was in 2015, but it did not become law.

As a rule, the legislative procedure includes discussion of draft laws in the plenary hall. In practice, there are cases where laws are adopted without any discussion if this has been agreed in advance at the Conciliation Council, as evidenced by transcripts of plenary meetings.[1666]

1659 On the Research Service of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 438/22-RH of 11.08.2022. ↗

1660 Information provided by Respondents No. 60 and No. 61 during an interview conducted on 17.04.2026.

1661 Report on the Activities of the Research Service of the Verkhovna Rada of Ukraine for the First Half of 2026. Research Service of the Verkhovna Rada of Ukraine. 2026. ↗

1662 The Law of Ukraine 'On Law-Making Activity' enters into force one year after the termination or cancellation of martial law in Ukraine. On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023. ↗

1663 The Law of Ukraine 'On Public Consultations' will enter into force 12 months after the termination or cancellation of martial law. On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024. ↗

1664 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 102. ↗

1665 On Restructuring Obligations under Foreign-Currency Loans: Proposals of the President of Ukraine to the Law, registration No. 1558-1 of 23.12.2014. ↗

1666 Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 25.03.2026; Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 10.03.2026; Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 26.02.2026. ↗

Each draft law is referred by the leadership of the Verkhovna Rada to a committee designated as the main committee for its preliminary consideration and preparation for consideration. This allocation is made in accordance with the committees' defined remits (for example, a draft law amending the CC of Ukraine will be considered by the Committee on Law Enforcement, whose remit includes criminal legislation). The Rules of Procedure provide that the main committee must consider a draft law and adopt an opinion on it within 30 days.[1667] During the 14th session, committees provided opinions for the first reading (including on inclusion in the agenda) in an average of 101 days.[1668] The speed with which opinions are provided varies significantly depending on the committee and depends on the number of drafts considered by the committee, their subject matter, the initiators of the draft laws, etc. The main committee's opinion is mandatory for the further passage of a draft law. In their opinions, committees may provide recommendations for revising draft laws. The Rules of Procedure also set deadlines by which such opinions must be provided to MPs and the time allocated for discussion of draft laws.[1669]

Each draft law is also referred to three committees to obtain expert opinions: the Committee on Anti-Corruption Policy, the Committee on Budget and the Committee on Integration of Ukraine into the European Union. These committees must provide their opinions to the main committee within 21 days of receiving the draft law.[1670] Each registered draft law included in the agenda of a session is mandatorily referred for scientific expert review when being prepared for the first reading and, when being prepared for all subsequent readings, for legal expert review to the relevant structural units of the Secretariat of the Verkhovna Rada[1671] (the Main Scientific and Expert Department and the Main Legal Department, respectively).

The Rules of Procedure of the Verkhovna Rada do not define a single urgent or emergency consideration procedure. Instead, they contain a number of procedures that may accelerate consideration of draft laws:

- shortened procedure for discussing an issue.[1672] The Verkhovna Rada may adopt a procedural decision to consider any issue, including a draft law, under a shortened procedure, which only reduces the time limits for discussion and does not affect the subsequent time limits for consideration. Currently, almost all draft laws or other matters (for example, appointments) are considered by the Verkhovna Rada under the shortened discussion procedure;
- special procedure for considering draft laws in the second reading in the plenary hall.[1673] It applies to draft laws to which at least 500 amendments have been submitted

1667 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 93. ↗

1668 Monitoring Report of the Activity of the Verkhovna Rada 14th Session 9th Convocation. Agency for Legislative Initiatives, 2026. ↗

1669 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 108–124. ↗

1670 Ibid, Article 93.

1671 Ibid, Article 103.

1672 Ibid, Article 31.

1673 Ibid, Article 119[1].

and is intended to limit parliamentary obstruction.[1674] A proposal to apply the special procedure must be signed by at least one-third of MPs and voted for by a majority of the constitutional composition. If the special consideration procedure is applied, each parliamentary faction or group submits five rejected proposals or amendments on which it insists, while a non-affiliated MP submits one. On this basis, the main committee summarises the proposals and provides an updated comparative table, which is considered in the plenary hall;

- recognition of draft laws as urgent.[1675] The President or the Verkhovna Rada may recognise a draft law as urgent. For such draft laws, the Verkhovna Rada may, on an ad hoc basis, shorten the deadlines for submitting alternative draft laws, proposals and amendments, as well as the deadlines for providing the draft law to MPs before its consideration in a particular reading. A draft law recognised as urgent is included in the nearest plenary meeting and considered out of sequence. Since September 2025, the President has recognised three draft laws as urgent;[1676]
- one-off derogation (ad hoc) from procedures. The Verkhovna Rada may adopt an ad hoc decision to extend or shorten the deadlines for submitting alternative draft laws (Article 101) and to shorten the deadlines for submitting proposals or amendments to draft laws (Article 116), but by no more than half. During the 14th session, the Verkhovna Rada shortened the deadlines for preparing draft laws for the second reading for nine of the 63 adopted laws.[1677]

Ukraine has limited experience of delegated legislation. In November 1992, the Verkhovna Rada temporarily delegated to the Cabinet of Ministers the power to issue decrees on economic matters.[1678] Over the following six months, the Government issued 83 decrees,[1679] most of which have now lost force and relevance because the relevant legal relations are regulated by laws. At present, mechanisms for delegating powers to adopt legislation do not exist and are not applied.

Entry into force

The Constitution establishes the general rule that a law enters into force ten days after its official promulgation, unless otherwise provided by the law itself, but not earlier than the day of its publication.[1680] Laws or their individual provisions may be put into effect after the

1674 The special procedure for considering draft laws in the second reading was introduced into the Rules of Procedure in 2020 as a tool to counter 'amendment spam' — a phenomenon where MPs submit several hundred proposals and amendments to a draft law in order to block its consideration in the second reading, since the Rules of Procedure of the Verkhovna Rada provided for the possibility of discussing and voting on each such proposal. This procedure was first applied during the consideration of Law No. 590-IX: MPs submitted 16,579 proposals and amendments for the second reading. Since then, the relevant provision has been applied only twice.

1675 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 101. ↗

1676 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1677 According to data collected during the Monitoring of the Work of the Verkhovna Rada during the 14th Session. ↗

1678 On the Temporary Delegation to the Cabinet of Ministers of Ukraine of the Powers to Issue Decrees in the Field of Legislative Regulation: Law of Ukraine No. 2796-XII of 18.11.1992. ↗

1679 Decrees of the Cabinet of Ministers of Ukraine. ↗

1680 Constitution of Ukraine No. 254k/96-VR, Part 5 Article 94.

date on which they enter into force, but the Parliament may set another date for putting the law into effect.[1681]

Each adopted law is signed by the Chairman of the Verkhovna Rada and immediately sent to the President. Within 15 days of receiving the law, the President must sign and officially promulgate it or veto it. In that case, the President returns the law with reasoned and formulated proposals to the Verkhovna Rada[1682] for reconsideration by the Parliament.[1683] A proposal may be to revise the law in line with the President's vision or to reject it in full. If, upon reconsideration, the law is again adopted by the Verkhovna Rada by at least two-thirds of its constitutional composition, the President is obliged to sign and officially promulgate it within ten days. If the President does not sign such a law, it is immediately officially promulgated by the Chairman of the Verkhovna Rada and published under Chairman's signature.[1684]

The Rules of Procedure of the Verkhovna Rada provide for four ways to respond to the President's proposals:

1) if the President has proposed rejecting the law, MPs may reject the law in its entirety by a majority of votes of MPs of the constitutional composition;

2) overcome the veto by voting again for the law by at least two-thirds of the votes of MPs of the constitutional composition;

3) if all the President's proposals are taken into account, the law is deemed adopted if a majority of MPs of the constitutional composition votes for it;

4) if the President's proposals are taken into account only partially or the Parliament does not take any of the President's proposals into account, the law is deemed adopted if at least two-thirds of MPs of the constitutional composition vote for it.[1685]

During the ninth convocation, the President returned 53 draft laws to the Verkhovna Rada with proposals, of which the President's proposals were supported in relation to 37 draft laws.[1686]

Official publication

The electronic original of a law adopted by the Verkhovna Rada is endorsed by the head of the secretariat of the main committee and signed by the head of that committee no

1681 Decision of the Constitutional Court of Ukraine in the case on the constitutional petition of the Supreme Court of Ukraine regarding the compliance with the Constitution of Ukraine (constitutionality) of the provisions of the Laws of Ukraine 'On the Principles of Prevention and Counteraction to Corruption', 'On Liability of Legal Entities for Corruption Offences' and 'On Amendments to Certain Legislative Acts of Ukraine Regarding Liability for Corruption Offences' (case on corruption offences and the entry into effect of anti-corruption laws) No. 21-rp/2010 of 06.10.2010. ↗

1682 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 94. ↗

1683 Ibid, para. 30 Part 1 Article 106.

1684 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 94. ↗

1685 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 135. ↗

1686 Of these, one draft law was adopted with the President's proposals partially taken into account (with the veto overridden), one draft law has not been signed by the President, while proposals to eliminate inconsistencies were submitted in relation to another draft law. The veto was not overridden for another four draft laws, while 11 President's proposals are awaiting a committee opinion or consideration at a plenary meeting. Proposals concerning one draft law were withdrawn from consideration. According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

later than ten days from the date of its adoption. The text of the adopted law is processed by the legal unit, which prepares the opinion of the final legal expert review. The head of the relevant unit produces the paper original of the law and, together with the opinion, submits it to the Chairman of the Verkhovna Rada for signature. The Chairman of the Verkhovna Rada signs the law no earlier than two and no later than five days from the date of its submission. The signed law is immediately sent by the Chairman of the Verkhovna Rada to the President.[1687] This period is justified by the fact that MPs may, within two days, challenge the voting results if the vote was held with violations.[1688]

After the full-scale invasion, a practice emerged of instructing the Chairman of the Verkhovna Rada to immediately sign laws adopted by the Parliament and send them to the President for signature without delay.[1689] Although implementing the Parliament's instructions is one of the powers of the Chairman of the Verkhovna Rada, the procedure for immediate signature is not provided for in the Rules of Procedure of the Verkhovna Rada. However, this has become a fairly widespread practice under martial law, often justified by the need to accelerate certain stages of the legislative procedure.[1690]

The Constitution provides that laws and other normative legal acts defining citizens' rights and obligations must be brought to the attention of the population in the manner established by law, otherwise they are invalid.[1691] The Constitution also links the entry into force of a law to its promulgation.

Laws signed by the President are published in the newspaper Holos Ukrainy and in the Bulletin (Vidomosti) of the Verkhovna Rada of Ukraine and are also posted on the official website of the Verkhovna Rada. Publication of laws and other acts of the Verkhovna Rada in these official printed publications constitutes official promulgation.[1692]

All laws and other normative legal acts, as well as amendments to them, are published on the website of the Verkhovna Rada (the subsection 'Database of Normative Legal Information "Legislation of Ukraine"').[1693] The database is populated in accordance with the Technological Scheme[1694] and the Document Entry Scheme.[1695] Access to the website is free of charge and normative legal acts are displayed in consolidated text, which allows users to familiarise themselves with the current version of a normative legal act and track amendments made to it.

1687 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 130. ↗

1688 Laws Outside the Rules of Procedure: How Acceleration Displaced Procedure. Agency for Legislative Initiatives, 2025. ↗

1689 Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 03.03.2022. ↗

1690 Laws Outside the Rules of Procedure: How Acceleration Displaced Procedure. Agency for Legislative Initiatives, 2025. ↗

1691 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 57. ↗

1692 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 139. ↗

1693 Legislation of Ukraine. ↗

1694 On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

1695 On Certain Issues of Ensuring Document Flow in the Verkhovna Rada of Ukraine in Electronic and Paper Forms: Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

Post-legislative scrutiny

As of 31 July 2026, Ukraine did not have a full-fledged procedure for post-legislative scrutiny. The closest analogue is the exercise by committees of the Verkhovna Rada of their oversight function through analysis of the practice of applying legislative acts in the activities of state authorities. Given the extremely large body of legislation,[1696] it is an overwhelming task for committee members and their secretariats to track all nuances of the practice of applying legislative acts. Obviously, the focus should be only on analysing the practice of applying the most high-profile, socially sensitive and relevant legislative acts.[1697] However, in practice, committees almost never use this tool and almost never conduct full-fledged assessments of what happens to laws after their adoption. Instead, committees provide targeted responses to problems or political requests. 13 of the 23 committees of the Verkhovna Rada reported carrying out at least some form of oversight over the implementation of laws during the 14th session.[1698]

After being put into force, the Law of Ukraine 'On Law-Making Activity' will introduce legal monitoring — an oversight measure that will make it possible to track, analyse and assess the implementation of a law in terms of its full entry into effect, the achievement of the law's planned objectives, its impact on society or individual social groups, and the identification of various planned and unplanned consequences.

Legal monitoring will include:

1) legal assessment of a law (analysis of the timeliness of adoption of subordinate normative legal acts, their compliance with the law and CCU decisions concerning the adopted law), which is carried out no earlier than one year after the law enters into force;

2) assessment of the effectiveness of implementation of a law (analysis of the stages of implementation of the law, the effectiveness and efficiency of the law and normative legal acts adopted to implement it, and planned and unplanned impacts on participants in social relations), which is usually carried out three years after the law enters into force.[1699]

Sources for assessing laws may include reports of state and local self-government authorities, the results of parliamentary and committee hearings, statistical data, case law, academic research, etc. Following legal monitoring of a law, a report is prepared, approved by the Verkhovna Rada and sent to the Government for implementation of the recommendations contained in it.[1700]

1696 The Verkhovna Rada of the ninth convocation had adopted more than 1,700 laws of Ukraine as of 31.07.2026.

1697 Booklet: 'Oversight Powers of Committees of the Verkhovna Rada of Ukraine'. Agency for Legislative Initiatives, 2015. ↗

1698 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026. The calculation was based on information provided in committee reports on the work performed during the 14th session. The calculation was complicated by the fact that the websites of some committees do not contain such reports and by the fact that committees use different names for measures carried out within the oversight function (for example, 'analysis of the practice of applying the law...', 'status of implementation of the law...', 'status of execution of the law...').

1699 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 67. ↗

1700 Ibid, Articles 68–69.

Although the provisions on legal monitoring have not yet entered into force, some committees of the Verkhovna Rada already have experience of conducting post-legislative scrutiny with the assistance of donor organisations. Seven committees successfully carried out 12 post-legislative scrutiny reviews between 2020 and March 2025.[1701]

The Research Service has developed a Guide to Post-Legislative Scrutiny, the main purpose of which is to provide explanations and establish a unified approach to the organisation and conduct of post-legislative scrutiny by committees of the Verkhovna Rada.[1702]

Human Rights

The Verkhovna Rada has the legislative framework and organisational resources to protect human rights. Human rights are defined in Chapter II of the Constitution, 'Human and Citizens' Rights, Freedoms and Obligations'. Ukraine is a party to the main international human rights treaties: the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and its Optional Protocols, the Convention on the Elimination of All Forms of Discrimination against Women and its Optional Protocol, the Convention on the Rights of the Child and others.[1703] The Verkhovna Rada may consider and ratify other international treaties on the protection of human rights, such as the Council of Europe Convention on preventing and combating violence against women and domestic violence, ratified in 2022.[1704]

Among parliamentary committees, issues concerning observance of human and citizens' rights and freedoms fall within the remit of the Committee on Human Rights, De-occupation and Reintegration of the Temporarily Occupied Territories of Ukraine, National Minorities and Interethnic Relations (Human Rights Committee). The Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' does not assign any separate powers to this committee specifically relating to human rights compliance. Like other committees, it prepares draft laws for consideration by the Verkhovna Rada, hears information on the status of implementation of laws of Ukraine within its oversight function and, as the lead committee, considers the annual and special reports of the Ukrainian Parliament Commissioner for Human Rights.[1705]

Progress and issues

The absence of limits on the number of initiators of a draft law contributes to the emergence of 'legislative spam'. At present, every MP may register a draft law irrespective of its relevance or quality. Over time, the number of registered draft laws has become a purported indicator of MPs' performance.[1706] A large number of registered draft laws

1701 Strengthening Ukraine's democracy in 2024–2025. Westminster Foundation for Democracy, 2025. ↗

1702 Post-Legislative Scrutiny as a Tool for Assessing the Quality of Legislation: Experience of Committees of the Verkhovna Rada of Ukraine. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗

1703 Key international treaties in the field of human rights. Ukrainian Parliament Commissioner for Human Rights. ↗

1704 Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention), ratified on 20.06.2022. ↗

1705 For more details on the activities of the Ukrainian Parliament Commissioner for Human Rights, see the section 'Parliamentary Oversight Through the Human Rights Commissioner'.

1706 Right to Spam: Should the Possibility of Registering Draft Laws Be Limited? Agency for Legislative Initiatives, 2024. ↗

overloads the Verkhovna Rada because every draft law must be considered by committees and by the expert units of the Secretariat of the Verkhovna Rada. A large number of substantively weak, political and alternative draft laws on the same issue significantly obstructs committees' legislative work and deprives MPs themselves of the opportunity to consider and adopt high-quality and necessary draft laws.[1707] The European Parliament Mission proposed that, after the start of each new session of the Verkhovna Rada,[1708] 20 MPs' draft laws be selected for further consideration by the Verkhovna Rada, but this recommendation has never been implemented. MPs regard any regulation of their legislative initiative as a restriction of their rights,[1709] which is why no previous initiatives to introduce collective legislative initiative for MPs have been supported,[1710] despite the position of the Main Scientific and Expert Department, which supports the clear formalisation of the requirements of the Basic Law, where 'MPs', as subjects of the right of legislative initiative, are used in the plural.[1711] **Low requirements for the quality of draft laws and accompanying documents are another problem contributing to 'legislative spam'.** Because of the low quality of legislative initiatives, adopted laws require further revision through amendments. The share of new laws initiated by MPs and revised within the first year after adoption was 54% in 2022 and 50% in 2021.[1712] This leads to inconsistency and instability in legislation, which negatively affects regulation of the relevant area of public relations.

There is no pre-registration review of draft laws. Often, draft laws initiated by MPs do not meet the requirements of constitutionality, budget neutrality and consistency with obligations under the EU–Ukraine Association Agreement, which should prevent their registration by the Secretariat.[1713] However, the review covers only formal requirements, namely the presence of all accompanying documents rather than their substance, which allows low-quality draft laws and explanatory notes to be registered. The Rules of Procedure of the Verkhovna Rada do not clearly define the entity authorised to decide on refusal to register a draft law, whether the structural unit responsible for organisational support, the Secretariat of the Verkhovna Rada of Ukraine or the Chairman of the Verkhovna Rada. Nor do they define an exhaustive list of grounds for refusal to register a draft law, namely which inconsistencies of a draft law with the form and requirements established by the Rules of Procedure entail refusal of registration and which may be remedied by the subject

1707 The right of legislative initiative in Ukraine and worldwide. Analytical materials. Centre of Policy and Legal Reform, 2020.

1708 Report and Roadmap on internal reform and capacity-building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016, p. 15, Recommendation No. 6.

1709 Information provided by Respondent No. 50 during an interview conducted on 24.03.2026.

1710 For example, On Amendments to Certain Laws of Ukraine Regarding the Right of Legislative Initiative of MPs: Draft Law of Ukraine No. 1040 of 29.08.2019 and alternatives thereto ; On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine (Regarding a Letter of Support for Draft Laws): Draft Law of Ukraine No. 6640 of 22.06.2017 ; On Amendments to Certain Legislative Acts of Ukraine Regarding the Exercise of the Right of Legislative Initiative: Draft Law of Ukraine No. 1311 of 09.12.2014.

1711 Opinion of the Main Scientific and Expert Department on the Draft Law of Ukraine 'On Amendments to Certain Laws of Ukraine Regarding the Right of Legislative Initiative of MPs of Ukraine': card of Draft Law of Ukraine No. 1040 of 29.08.2019 and alternatives thereto.

1712 Public Administration in Ukraine. Assessment against the Principles of Public Administration. SIGMA Monitoring Report, 2023.

1713 Report and Roadmap on internal reform and capacity-building for the Verkhovna Rada of Ukraine.

of the right of legislative initiative.[1714] The European Parliament Mission recommended establishing, within the structure of the Secretariat of the Verkhovna Rada, a special unit whose functional duty would be to check all draft laws for compliance with procedural requirements before their official registration. The newly established unit should become an independent expert centre on the application of the Rules of Procedure, whose staff would act without fear or favour, be independent in exercising their powers, advise the Chairman of the Verkhovna Rada within their competence and have the right to address the Committee on the Rules of Procedure.[1715] As of 31 July 2026, the recommendation had not been implemented.

There is no conceptual vision for constitutional initiatives submitted to Parliament. In August 2019, the President initiated seven draft laws amending the Constitution without any prior discussions with civil society, while the authorities never prepared or presented a concept or vision for constitutional reform. All constitutional initiatives, except the draft law abolishing the advocates' monopoly, were largely populist and contained a number of legal problems and pitfalls.[1716] This led to situations where the President twice submitted and twice withdrew a draft law amending the Constitution on decentralisation.[1717]

The quality of draft laws amending the Constitution is low. The Law of Ukraine 'On Law-Making Activity' does not apply to the preparation of a draft law amending the Constitution.[1718] This means that no impact assessment is carried out for such a draft law and the rules on legislative drafting technique also do not apply to it. Amendments to the Constitution are also not subject to public consultations. Among the entities conducting public consultations, the Law of Ukraine 'On Public Consultations' does not include the President at all, while MPs and parliamentary committees have the right, but not the obligation, to conduct public consultations.[1719] This creates a situation where amendments to the Constitution are introduced unsystematically and without assessing the consequences of such changes. For example, three presidential draft laws amending

1714 Analytical note on comparative legislation concerning pre-registration review during the procedure for registering draft laws in foreign parliaments. Research Service of the Verkhovna Rada of Ukraine, 2023. ↗

1715 Report and Roadmap on internal reform and capacity-building for the Verkhovna Rada of Ukraine. Recommendation 4. ↗

1716 Constitutional reform. Draft analytical brief. Yuliia Kyrychenko, 2020. ↗

1717 On Amendments to the Constitution of Ukraine (Regarding Decentralisation of Power): Draft Law of Ukraine No. 2598 of 13.12.2019. ↗

1718 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 1. ↗

1719 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024, Part 2 Article 5, Article 8. ↗ For more details, see the subsection 'Public Consultations'.

the Constitution received a negative opinion from the Constitutional Court,[1720] while two more received a positive opinion with reservations.[1721]

The methodological recommendations of the Secretariat of the Verkhovna Rada on drafting laws are outdated, given the adoption of the Law of Ukraine 'On Law-Making Activity'. The Government's methodological recommendations[1722] were developed back in 2000, while the relevant regulation on presidential draft laws[1723] dates back to 1995. By contrast, the Law of Ukraine 'On Law-Making Activity' established unified rules on the structure and formatting of draft laws that must be followed by all subjects of legislative initiative.

Explanatory notes to both Government and MPs' initiatives do not contain sufficiently justify the need for the legislative initiative. The established requirements for explanatory notes are often fulfilled only de jure, justifications may consist of only a few sentences and the unit of the Secretariat responsible for registering draft laws carries out only a formal review of the explanatory note or other accompanying documents.[1724] The initiators of draft laws mostly treat this development stage formally: even where a draft law was preceded by intensive analytical work, this is rarely reflected in explanatory notes. The low quality of explanatory notes limits the possibility of understanding the purpose and content of the proposed draft law.

The absence of financial and economic justification in a significant share of explanatory notes to draft laws, especially those initiated by MPs, undermines the balance of the State Budget of Ukraine. Unlike the Government, which has both the capacity and

1720 Opinion of the Constitutional Court of Ukraine in the case upon the constitutional petition of the Verkhovna Rada of Ukraine requesting an opinion on the compliance of the draft law amending Article 81 of the Constitution of Ukraine (regarding additional grounds for early termination of powers of an MP of Ukraine) (Reg. No. 1027) with the requirements of Articles 157 and 158 of the Constitution of Ukraine No. 9-v/2019 of 24.12.2019. ↗ ; Opinion of the Constitutional Court of Ukraine in the case upon the constitutional petition of the Verkhovna Rada of Ukraine requesting an opinion on the compliance of the draft law amending Article 106 of the Constitution of Ukraine (regarding consolidation of the powers of the President of Ukraine to establish independent regulatory authorities, the National Anti-Corruption Bureau of Ukraine and to appoint and dismiss the Director of the National Anti-Corruption Bureau of Ukraine and the Director of the State Bureau of Investigation) (Reg. No. 1014) with the requirements of Articles 157 and 158 of the Constitution of Ukraine No. 7-v/2019 of 16.12.2019. ↗ ; Opinion of the Constitutional Court of Ukraine in the case upon the constitutional petition of the Verkhovna Rada of Ukraine requesting an opinion on the compliance of the draft law amending Articles 85 and 101 of the Constitution of Ukraine (regarding the Ukrainian Parliament Commissioner for Human Rights) (Reg. No. 1016) with the requirements of Articles 157 and 158 of the Constitution of Ukraine No. 6-v/2019 of 20.11.2019. ↗

1721 Opinion of the Constitutional Court of Ukraine in the case upon the constitutional petition of the Verkhovna Rada of Ukraine requesting an opinion on the compliance of the draft law amending Articles 76 and 77 of the Constitution of Ukraine (regarding reduction of the constitutional composition of the Verkhovna Rada of Ukraine and consolidation of the proportional electoral system) (Reg. No. 1017) with the requirements of Articles 157 and 158 of the Constitution of Ukraine No. 8-v/2019 of 16.12.2019. ↗ ; Opinion of the Constitutional Court of Ukraine in the case upon the constitutional petition of the Verkhovna Rada of Ukraine requesting an opinion on the compliance of the draft law amending Article 93 of the Constitution of Ukraine (regarding the people's legislative initiative) (Reg. No. 1015) with the requirements of Articles 157 and 158 of the Constitution of Ukraine No. 5-v/2019 of 13.11.2019. ↗

1722 Methodological Recommendations on the Development of Draft Laws and Compliance with Requirements of Legislative Drafting Technique: Resolution of the Board of the Ministry of Justice of Ukraine No. 41 of 21.11.2000. ↗

1723 On Approval of the Regulation on the Procedure for Working with Draft Laws and Other Documents Submitted by the President of Ukraine for Consideration by the Verkhovna Rada of Ukraine: Decree of the President of Ukraine No. 270/95 of 30.03.1995. ↗

1724 Explanatory Note as a Potential Tool in the Fight Against 'Legislative Spam' and the Practice of Foreign Parliaments. Agency for Legislative Initiatives, 2025. ↗

methodology to conduct such calculations,[1725] MPs are forced to prepare such financial and economic justifications themselves but usually lack the specialised knowledge to do so. The absence of financial and economic justification makes it impossible to determine the future costs of introducing and implementing certain laws, measures or policies. Preparing and including financial and economic justification in the explanatory note, where implementation of the law entails expenditure from the State Budget, would help the subject of legislative initiative comply with the principle of a balanced budget.[1726]

Opinions of the expert units of the Secretariat of the Verkhovna Rada are often not taken into account when laws are prepared for consideration at plenary meetings, which leads to the adoption of low-quality legislation. The Rules of Procedure of the Verkhovna Rada allow draft laws to be adopted in the first or second reading provided there are no comments from MPs and the expert units of the Secretariat of the Verkhovna Rada of Ukraine.[1727] In addition, while the Main Scientific and Expert Department prepares its opinion for the first reading before the committee meeting at which the draft law is considered, the Main Legal Department prepares its opinion for the second reading after the committee meeting, meaning that the opinion is prepared on the text of the draft law already being prepared for consideration in the session hall. These opinions are often not taken into account because the committee cannot 'correct' the table for the second reading without holding another committee meeting and revising the table.[1728] Since September 2025, the Main Scientific and Expert Department and the Main Legal Department have raised comments on more than 50 laws[1729] that were subsequently adopted. Failure to take these opinions into account causes problems in legislative regulation and eventually leads to the development of new legislative initiatives intended to correct problems caused by disregarding the comments of expert and analytical units.

MPs often submit proposals for the second reading that go beyond the subject matter of the draft law adopted in the first reading, which negatively affects the predictability of legislative changes. As an exception, the lead committee may decide to take into account proposals and amendments submitted for the second reading to provisions of the draft law that were not considered in the first reading.[1730] At the same time, even such proposals and amendments must correspond to the subject matter of legal regulation of the draft law.[1731] One example of MPs adding new provisions to a draft law for the second

1725 On Approval of the Methodology for Conducting Financial and Economic Calculations when Preparing a Draft Act of the Cabinet of Ministers of Ukraine and a Draft Law Submitted to the Verkhovna Rada of Ukraine in the Exercise of the Legislative Initiative of the Cabinet of Ministers of Ukraine: Order of the Ministry of Finance of Ukraine No. 428 of 21.03.2008. ↗

1726 Explanatory note as a potential instrument for combating 'legislative spam' and the practice of foreign parliaments. Agency for Legislative Initiatives, 2025. ↗

1727 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 4 Article 102, Part 4 Article 123. ↗

1728 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

1729 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1730 This is possible if the lead committee and/or an expert unit of the VRU Secretariat indicated the need for their submission in their opinions and the presiding officer announced this at the plenary meeting during consideration of the draft law in the first reading.

1731 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 116. ↗

reading is the adoption of Law No. 4555-IX.[1732] In violation of the Rules of Procedure of the Verkhovna Rada,[1733] provisions restricting the independence of the NABU and SAPO appeared before the second reading in a draft law whose main subject of regulation was simplifying access by the family of a missing person to the pre-trial investigation.

Introducing amendments for the second reading outside the scope of legal regulation makes it possible not to register a new draft law that would have to comply with the requirements of the Rules of Procedure, contain a justification and undergo mandatory reviews by the structural units of the Secretariat of the Verkhovna Rada and committees.[1734] Since September 2025, at least 15 laws[1735] have been adopted with provisions that were not part of the subject matter of regulation in the first reading. For example, in a law concerning payment of the single contribution, MPs decided to regulate their own leave.[1736] Such cases prevent the proposed changes from being promptly assessed because MPs simply do not have enough time to familiarise themselves with them. Although the comparative table must be provided to MPs 10 days before a draft law is considered at a plenary meeting,[1737] in practice this rule is often violated. For example, during the 14th session, the deadlines for providing the comparative table were violated for almost 30% of draft laws adopted in the second reading.[1738]

The Verkhovna Rada does not use the potential of the third reading. The main advantage of the third reading is the possibility of developing a full implementation plan for a draft law. The third reading enables MPs to introduce complete and detailed amendments to legislation without possible distortion at the level of the executive branch. Poor coordination between the legislative and executive branches is also one reason for the adoption of low-quality acts.[1739] Otherwise, the Verkhovna Rada should reconsider the third-reading stage in view of the absence of practice of its application and update the Rules of Procedure of the Verkhovna Rada by removing 'dead provisions'.[1740]

The Verkhovna Rada systematically violates the Rules of Procedure when considering draft laws, which adversely affects the quality of the legislative process. For example, the Rules of Procedure set deadlines by which MPs must receive the opinion of the lead committee and the Main Scientific and Expert Department for the first reading, namely seven days before the draft law is considered in the session hall in the first reading, as well as the opinion of the lead committee and the Main Legal Department for the second reading,

1732 On Amendments to the Criminal Procedure Code of Ukraine Regarding the Specifics of Pre-Trial Investigation of Criminal Offences Related to the Disappearance of Persons Missing in Special Circumstances during Martial Law: Law of Ukraine No. 4555-IX of 22.07.2025. ↗

1733 Laws outside the Rules of Procedure: how acceleration displaced procedure. Agency for Legislative Initiatives, 2025. ↗

1734 Ibid.

1735 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1736 On Amendments to Certain Laws of Ukraine Regarding Inclusion of the Period of Unlawful Dismissal of an Employee in the Insurance Record: Law of Ukraine No. 4697-IX of 03.12.2025. ↗

1737 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 117. ↗

1738 Monitoring Report of the Activity of the Verkhovna Rada 14th Session 9th Convocation. Agency for Legislative Initiatives, 2026. ↗

1739 Analytics of the day: Is the third reading redundant? Agency for Legislative Initiatives, 2021. ↗

1740 For more details on the need to update the Rules of Procedure of the Verkhovna Rada, see the section 'Rules of Procedure of the Verkhovna Rada of Ukraine'.

namely ten days, or five days if the deadlines are shortened, before the draft law is considered in the session hall for the second reading. In terms of consideration procedures, approximately 38% of laws had violations during the 14th session,[1741] although for most other sessions the level of violations was much higher, for example 61% during the 13th session and 66% during the 12th. A draft law provided in breach of the rules, especially for the second reading, does not allow MPs to familiarise themselves with the provisions of the draft law and the comments of expert departments and leads to situations where MPs do not know or do not understand what they are voting for.

The Government does not develop subordinate legislation to implement some laws on time. Laws usually contain a deadline by which the Government must ensure the adoption of normative legal acts necessary for implementation of the law and bring its normative legal acts into line with the adopted law. This makes implementation of the law dependent on the adoption of subordinate normative legal acts. For a significant share of laws, the Government adopts its normative legal acts late: in 2021, the Government adopted only 33% of such normative legal acts on time and 11% in 2022.[1742] MPs also highlighted the problem of delayed adoption of subordinate legislation.[1743]

The President does not sign some laws adopted by the Verkhovna Rada and sometimes violates the signing deadlines. During the 14th session, the President violated the deadline for signing or submitting proposals on 20 laws out of 63 adopted, that is, in 32% of cases.[1744] Overall, as of 31 July 2026, 41 draft laws remained unsigned.[1745] Neither the Constitution nor the Rules of Procedure of the Verkhovna Rada establish a course of action for cases where the President does not sign draft laws, the so-called 'silent veto'. The constitutional provision requiring a law to be signed and officially promulgated where the President has not returned the signed law is imperfect because it does not identify the entity that must officially promulgate the unsigned law. The Constitution also does not regulate the signing procedure where the President's proposals have been supported, for example Draft Law No. 7087,[1746] but the President does not sign the adopted law for some reason. The same applies to violations of signing deadlines. In both cases, the Verkhovna Rada is limited in its legislative function because it is unclear whether it should start developing new draft laws analogous to the unsigned ones, wait for a veto or wait for the draft law to be signed. The resolution of societal problems is therefore blocked and has no legal remedy.

1741 Monitoring Report of the Activity of the Verkhovna Rada 14th Session 9th Convocation. Agency for Legislative Initiatives, 2026. ↗

1742 Public Administration in Ukraine. Assessment against the Principles of Public Administration. SIGMA Monitoring Report, 2024. ↗

1743 Transcript of the plenary meeting of the Verkhovna Rada of Ukraine of 28.02.2025. ↗ ; Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 14.05.2025. ↗ ; Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 26.05.2025. ↗

1744 Monitoring Report of the Activity of the Verkhovna Rada 14th Session 9th Convocation. Agency for Legislative Initiatives, 2026. ↗

1745 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1746 Proposals of the President of Ukraine to the Law 'On Amendments to Certain Legislative Acts of Ukraine Regarding the Delimitation of Functions of State Authorities and Local Self-Government Bodies on the Protection of Children's Rights in Connection with the Establishment of the State Service for Children's Affairs', registration No. 7087 of 22.02.2022. ↗

In May 2026, MPs registered Draft Law No. 15256,[1747] which seeks to address this problem through amendments to the Rules of Procedure of the Verkhovna Rada. The draft law is under consideration by the Rules Committee.

The committees of the Verkhovna Rada need stronger staffing in order to carry out post-legislative scrutiny. Given that this activity is new for all parliamentary committees, they need sufficient material resources and expert staff to carry out post-legislative scrutiny properly. Committee secretariats may perform administrative work, such as data collection, but they are not ready to carry out analysis or prepare conclusions and recommendations.[1748] Introducing a legal monitoring mechanism (ex post) as a systematic comprehensive oversight activity is one of the obligations of the Verkhovna Rada set out in the Roadmap on the Functioning of Democratic Institutions.[1749]

Recommendations

1. The Verkhovna Rada should strengthen the fight against legislative spam, which may include introducing collective legislative initiative for MPs, strengthening requirements for the quality of draft laws and their accompanying documents and introducing pre-registration review of all draft laws.
2. Amendments to the Constitution should be introduced on the basis of a holistic concept, and the process of developing them should include dialogue with experts, academics and the wider public.
3. The Verkhovna Rada, as the sole legislative body, or the Secretariat of the Verkhovna Rada, as the body supporting the activities of the Verkhovna Rada, should develop new detailed recommendations, guidelines or instructions on developing and drafting laws and other draft acts adopted by Parliament, taking into account the Law of Ukraine 'On Law-Making Activity'. In addition, it would be advisable to provide a unified format for such recommendations for all subjects of legislative initiative, which would simplify consideration of draft laws by parliamentary committees and the expert and legal units of the Secretariat of the Verkhovna Rada.
4. The Verkhovna Rada should take measures to conduct impact assessments: strengthen the analytical capacity of MPs and staff of structural units of the Verkhovna Rada through education and training; prepare a methodology for conducting impact assessments[1750] supplemented with supporting materials, such as guides and recommendations. Other subjects of legislative initiative should also take similar measures to strengthen their own capacity to conduct impact assessments. Impact assessments and accompanying documents should be published, for example in draft law files.

1747 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine Regarding the Specific Features of Promulgating Laws: Draft Law of Ukraine, registration No. 15256 of 18.05.2026. ↗

1748 Information provided by Respondent No. 53 during an interview conducted on 27.03.2026.

1749 Roadmap on the Functioning of Democratic Institutions. Measure 4 of strategic result 1 of Section III.C. ↗

1750 For example, based on the European Commission's 'Toolbox'. Better regulation: guidelines and toolbox. European Commission. ↗

5. All subjects of legislative initiative should prepare explanatory notes with sufficient justification for the need to adopt the draft law and should determine the economic and financial consequences of implementing legislative changes.

6. Committees should take into account the comments set out in the opinions of expert structural units of the Secretariat of the Verkhovna Rada for the first and subsequent readings. Committees should develop the practice of revising comparative tables for the second reading where the opinion of the Main Legal Department contains substantial comments on the text of the draft law.

7. MPs should avoid submitting proposals for the second reading that do not concern the subject matter of regulation of the draft law adopted in the first reading, and committees should reject such proposals on the basis of the provisions of the Rules of Procedure of the Verkhovna Rada. This would contribute to the predictability of the legislative process and improve the quality of legislation.

8. The Verkhovna Rada should reconsider the appropriateness of the third-reading procedure. The question of whether to retain it or remove the relevant provisions from the Rules of Procedure should be discussed between the legislative and executive branches.

9. Parliament should reduce the number of violations of the Rules of Procedure of the Verkhovna Rada to a minimum.

10. Improve coordination between the Verkhovna Rada and the Government on developing subordinate legislation to implement adopted laws. The entry-into-force deadlines for laws should leave enough time for the Government to approve subordinate normative legal acts.

11. The Verkhovna Rada should develop a mechanism for the President's 'silent veto'. Although such amendments will likely require amendments to the Constitution of Ukraine, which is impossible while martial law is in force, their development can begin now.

12. Strengthen the committees of the Verkhovna Rada for post-legislative scrutiny by increasing the number of committee secretariat staff whose main area of work would be ex post monitoring of adopted laws or by engaging additional resources, such as research institutions, civil society organisations, experts and specialists in specific fields, that could provide high-quality analysis and support in carrying out post-legislative scrutiny.

Budget Process

State of play

Development and adoption of the State Budget of Ukraine

The procedure for adopting the State Budget differs from the procedure for adopting other laws of Ukraine. The specific features of its adoption are established by the Rules of Procedure of the Verkhovna Rada[1751] and the Budget Code.[1752]

The budget process begins with the adoption of the Budget Declaration — a medium-term budget planning document that defines the principles of budget policy and state budget indicators for the medium term. The Government approves the Budget Declaration no later than 1 June of the year preceding the planned year and submits it to the Verkhovna Rada within three days, together with the financial and economic justification. If the Budget Declaration has not been considered by 15 July, the matter does not require further consideration. If the Government breaches the deadlines for submitting the Budget Declaration, the deadlines for its consideration by the Verkhovna Rada are calculated from the date of its actual submission.[1753]

Within ten days, MPs may submit their proposals on budget policy to the Budget Committee, which considers them and prepares a draft resolution on the Budget Declaration. Following consideration, the Verkhovna Rada may adopt a draft resolution taking note of the Budget Declaration and/or approving recommendations on budget policy.[1754] After the introduction of medium-term budget planning[1755] in 2018, the Verkhovna Rada considered the Budget Declaration for 2022–2024 only once, in 2021.[1756] In 2022 and 2023, the provisions of the Budget Code article concerning the Budget Declaration were not applied.[1757]

The Government submits the draft law on the State Budget for the following year to the Verkhovna Rada no later than 15 September of the current year. It is also accompanied by a list of other materials: an explanatory note, which must contain information on the economic situation of the state, explanations of the main provisions of the draft State Budget, information on the consideration of the Budget Declaration and so forth, a list of tax and fee benefits, information on public investment, information on public debt and other materials. Over the past three years, the Government has submitted the draft law on the State Budget to the Verkhovna Rada on time.

The draft law is presented at a plenary sitting by the Minister of Finance, while the Head of the Budget Committee delivers a report on the draft law's compliance with the

1751 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 152–162. ↗

1752 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Articles 33–42, 52–55. ↗

1753 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 152. ↗

1754 Ibid., Parts 3 and 6 Article 152.

1755 On Amendments to the Budget Code of Ukraine Regarding the Introduction of Medium-Term Budget Planning: Law of Ukraine No. 2646-VIII of 06.12.2018. ↗

1756 On the Budget Declaration for 2022–2024: Resolution of the Verkhovna Rada of Ukraine No. 1652-IX of 15.07.2021. ↗

1757 On Amendments to Section VI 'Final and Transitional Provisions' of the Budget Code of Ukraine and Other Legislative Acts of Ukraine: Law of Ukraine No. 2134-IX of 15.03.2022. ↗

requirements of the Budget Code. The Verkhovna Rada may decide to reject the draft law on the State Budget if it does not comply with the requirements of the Budget Code. In such a case, the Government must submit a new draft law on the State Budget within seven days, with a justification of the amendments made.[1758]

MPs formulate their proposals on the draft law on the State Budget and submit them to the Budget Committee no later than 1 October.[1759] In 2025, MPs submitted 3,339 proposals, setting a record for the past 19 years.[1760]

The Verkhovna Rada considers the draft law on the State Budget in the first reading no later than 20 October. Based on the budget proposals submitted by MPs, the Budget Committee prepares its conclusions and proposals (Budget Conclusions). It is the approval of the Budget Conclusions that constitutes the adoption of the draft law on the State Budget in the first reading.[1761]

Following adoption as a basis, the Government, together with representatives of the Committee, submits within 14 days, but no later than 3 November, the draft law on the State Budget prepared in accordance with the Budget Conclusions, together with a comparative table on their incorporation and explanations of the differences between the provisions and indicators of that draft law and those considered in the first reading. Such a draft law is provided to MPs no later than ten days before the matter is considered at a plenary sitting, while the Committee prepares a conclusion on the incorporation of the Budget Conclusions. At the same time, proposals from MPs and committees to the draft law on the State Budget for the second reading are not considered. Following discussion of the draft law, the Verkhovna Rada votes on its adoption in the second reading. If the draft law on the State Budget of Ukraine for the following year is adopted in the second reading, a vote is then held on adopting the draft law as a whole.[1762]

The Rules of Procedure of the Verkhovna Rada provide that the law on the State Budget is adopted by the Verkhovna Rada by 1 December.[1763] The Law of Ukraine 'On the State Budget of Ukraine for 2026' was adopted after the deadline — on 3 December 2025. The laws on the State Budget for the previous three years were adopted within the statutory deadline. Prior to this, the Verkhovna Rada of the ninth convocation adopted the State Budget for the following year late on two further occasions: in 2021[1764] and 2020.[1765] MPs spent almost 12 hours of plenary sitting time considering the State Budget for 2026.[1766]

1758 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1862-IV of 10.02.2010, Article 154. ↗

1759 Ibid, Part 1 Article 156.

1760 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 21.10.2025. ↗; Conclusion of the Committee of the Verkhovna Rada of Ukraine on Budget on the Draft Law on the State Budget of Ukraine for 2026, registration No. 14000, No. 04-13/3-2025/240616 of 17.10.2025. ↗

1761 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1862-IV of 10.02.2010, Article 157. ↗

1762 Ibid, Article 158.

1763 Ibid, Part 6 Article 159.

1764 On the State Budget of Ukraine for 2022: Law of Ukraine No. 1928-IX of 02.12.2021. ↗

1765 On the State Budget of Ukraine for 2021: Law of Ukraine No. 1082-IX of 15.12.2020. ↗

1766 Monitoring of the Activity of the Verkhovna Rada of the Ninth Convocation During the 14th Session. Agency for Legislative Initiatives, 2026. ↗

Oversight of implementation

Oversight of the receipt of funds into the State Budget and their use is exercised by the Accounting Chamber.[1767]

Managers of budget funds prepare reports on the implementation of the State Budget (estimates of financial institutions), which include financial and budget reporting. The consolidation, preparation and submission of reports on the implementation of the State Budget are carried out by the State Treasury Service of Ukraine (Treasury).

The Treasury submits monthly and quarterly reports on the implementation of the State Budget to the Verkhovna Rada, while the Government submits the annual report no later than 1 April.[1768] At the same time, certain provisions of the Budget Code do not apply under martial law, including those concerning deadlines for submitting monthly and quarterly reports and the annual report on State Budget execution.[1769] The Accounting Chamber submits to the Verkhovna Rada conclusions on the implementation of the law on the State Budget, including an assessment of the efficiency of state budget fund management, as well as proposals to eliminate violations identified during the reporting budget period and to improve the budget process.[1770]

Information on the implementation status of the State Budget is published on the website of the MoF.[1771] Chief administrators of budget funds publicly present information on the implementation of budget programmes for the reporting budget period by 15 March. Chief managers publish, by posting on their official websites, information on state policy objectives, budget programme passports, reports on their implementation and other relevant information.[1772]

Consideration of the report on the implementation of the law on the State Budget takes place under the full debate procedure. The annual report is presented in the Verkhovna Rada by the Minister of Finance of Ukraine, with co-reports delivered by the Head of the Budget Committee and the Head of the Accounting Chamber.[1773]

Budget Committee

In the Verkhovna Rada of the ninth convocation, the Budget Committee plays the most significant role in the consideration of the draft law on the State Budget of Ukraine, reporting on budget implementation and exercising oversight of compliance with budget legislation.

It is this Committee that is responsible for preparing and conducting the preliminary consideration of the draft law on the State Budget of Ukraine. The Committee also

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1767 For more details on the activities of the Accounting Chamber, see the section 'Control Exercised by the Verkhovna Rada through the Accounting Chamber'.

1768 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Articles 59–61. ↗

1769 Budget Code of Ukraine No. 2456-VI of 08.07.2010, subparas. 18 and 19 para. 22 Section VI 'Final and Transitional Provisions' ↗; At the same time, the analogous provision of the Rules of Procedure of the Verkhovna Rada concerning submission of reports on implementation of the Law on the State Budget of Ukraine contains no such exceptions.

1770 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Articles 59–61. ↗

1771 2026 Budget. Ministry of Finance of Ukraine. ↗

1772 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Article 28. ↗

1773 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 162. ↗

exercises certain special oversight powers concerning the implementation of the State Budget. For example, the Committee approves decisions of the Government on changes to the amounts of state budget financing sources,[1774] the raising of above-plan state borrowings[1775] or the allocation of funds from the State Fund for Radioactive Waste Management[1776] and other matters. At the same time, under martial law, some provisions on such approvals do not apply.[1777]

The Rules of Procedure of the Verkhovna Rada do not establish separate requirements for the formation of its membership: like all other committees, it is formed on the basis of quotas for the proportional representation of parliamentary factions and groups. As of 31 July 2026, the Budget Committee was the largest of all committees, with 35 MPs among its members.[1778] The Committee is headed by a representative of the mono-majority, while the positions of First Deputy Head, two Deputy Heads are held by representatives of the minority. Almost half of all Committee members belong to parliamentary minority factions (16 Committee members or 45.7%).[1779] The Committee Secretariat is funded on a general basis by the Secretariat of the Verkhovna Rada, in the same way as the secretariats of other committees.

Upon request of the Budget Committee, executive authorities and local self-government bodies provide information on the state budget and local budgets that the Committee needs to prepare and conduct preliminary consideration of budget matters.[1780] In addition, the Committee has the same oversight tools as other Verkhovna Rada committees, including consideration of reports, statements and information from state bodies and officials. The Committee also considers the Accounting Chamber's conclusions on the results of state budget implementation.

Expert support

There is no separate budget office[1781] within the structure of the Secretariat of the Verkhovna Rada. Most budget-related matters are handled by the Budget Committee and its Secretariat. Some analytical materials are prepared by the Research Service, such as information notes on draft laws or budget policy issues, or the Budget Process Guide[1782] for newly elected MPs and their assistant-consultants.

Experts or external civil society organisations are involved unsystematically and mostly at the initiative of individual MPs or partner organisations.[1783]

1774 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Part 4 Article 15. ↗

1775 Ibid., Part 7 Article 16.

1776 On Radioactive Waste Management: Law of Ukraine No. 255/95-VR of 30.06.1995. ↗

1777 Budget Code of Ukraine No. 2456-VI of 08.07.2010, subpara. 1 para. 22 Section VI 'Final and Transitional Provisions'. ↗

1778 Budget Committee. Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

1779 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

1780 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Part 2 Article 109. ↗

1781 For more details on the prospects for establishing a Parliamentary Budget Office, see the section 'Secretariat of the Verkhovna Rada of Ukraine'.

1782 Budget Process Guide. Research Service of the Verkhovna Rada of Ukraine, 2024. ↗

1783 Information provided by Respondent No. 62 during an interview conducted on 20.04.2026.

Progress and issues

The Verkhovna Rada does not approve recommendations to the Budget Declaration. Following the restoration[1784] of the provisions on the preparation of the Budget Declaration, the Government submitted the Budget Declaration for 2025–2027 almost one month after the statutory deadline. As a result, the latest possible deadline for its consideration by Parliament was set as 11 August 2024. However, since plenary sittings of the Verkhovna Rada were not held during that period, it was not considered. The Government also submitted the Budget Declaration for 2026–2028 to the Verkhovna Rada after the statutory deadline. It was not considered at a parliamentary sitting. Instead, the Budget Committee prepared recommendations and proposals, which were sent to the Government with a request to provide information on their incorporation during the preparation of the draft law on the State Budget.[1785] As of 31 July 2026, the Budget Declaration for 2027–2029 had been considered by the relevant subcommittee of the Committee on Budget.[1786]

In the absence of consideration of the Budget Declaration, the Verkhovna Rada cannot formulate recommendations to it that the Government should take into account when preparing the draft law on the State Budget. Thus, the Verkhovna Rada has effectively deprived itself of an additional tool for influencing the formation of budget policy.

The Verkhovna Rada does not consider reports on budget implementation. The Verkhovna Rada of the ninth convocation has considered only two reports on the implementation of the State Budget: those for 2019[1787] and 2020.[1788] Following consideration of the report, the Verkhovna Rada issues instructions to the Government, on the implementation of which the latter must report. Reports for other years,[1789] although submitted to the Verkhovna Rada, were not considered at its plenary sitting, but only by the Budget Committee, which reduces the scope of parliamentary oversight of the implementation of the State Budget.

Recommendations

1. Consider Budget Declarations as a tool for influencing budget policy.
2. Return to the practice of considering Government reports on the implementation of the State Budget at plenary sittings of Parliament.

1784 On Amendments to the Budget Code of Ukraine Regarding Ensuring the Predictability of Budget Policy and Strengthening Debt Sustainability: Law of Ukraine No. 3278-IX of 27.07.2023. ↗

1785 On Preparation for the First Reading of the Draft Law on the State Budget of Ukraine for 2026, registration No. 14000 of 15.09.2025. Budget Committee, 2025. ↗

1786 Relevant Verkhovna Rada Subcommittee Considers Budget Declaration for 2027–2029. Accounting Chamber. 2026. ↗

1787 On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2019': Resolution of the Verkhovna Rada of Ukraine No. 722-IX of 18.06.2020. ↗

1788 On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2020': Resolution of the Verkhovna Rada of Ukraine No. 1567-IX of 18.06.2021. ↗

1789 On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2021': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 9369 of 08.06.2023 ↗; On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2022': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 9370 of 08.06.2023 ↗; On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2023': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 11353 of 19.06.2024 ↗; On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2024': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 13281 of 13.05.2025 ↗; On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2025': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15408 of 14.07.2026. ↗

Representative Democracy

Interaction with Voters

State of play

The current legislation defines the main duties of an MP in interacting with voters:

- on an ongoing basis, an MP must maintain contact with voters, study public opinion and the needs of the population, consider citizens' appeals and monitor their consideration by public authorities;
- periodically, an MP is required to inform voters about their activities through the media and at meetings with citizens (at least twice a year), as well as to hold personal meetings with citizens on the days determined by the Verkhovna Rada.[1790]

Statistics on the number of appeals are published on the Verkhovna Rada website.[1791] During the first half of 2026, the Verkhovna Rada received 250,977 proposals, applications and complaints from citizens.[1792] Personal meetings with citizens have not been held since the beginning of the full-scale invasion.

The 'Electronic Petitions' system operates on the official website of the Verkhovna Rada. During January–June 2026, 18,900 citizens registered in this system, and 121 electronic notifications were initiated, of which 70 were published as petitions.[1793] Of these, as of 31 July 2026, one electronic petition received the required number of votes and were answered by the relevant committees of the Verkhovna Rada.[1794] As of 31 July 2026, signatures were being collected for 41 petitions.[1795]

Electronic petitions that do not receive the required number of supporting votes within the established period are considered as citizens' appeals after the signature collection period

1790 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 7, 24. ↗

1791 Reports on Citizens' Appeals. Citizens' Appeals Office of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

1792 On Citizens' Appeals to the Verkhovna Rada of Ukraine in January–June 2026. Verkhovna Rada of Ukraine. 2026. ↗

1793 Ibid.

1794 On Preventing the Restriction of the Rights and Guarantees of Education Workers. Information on the Petition. Verkhovna Rada of Ukraine, 2026. ↗

1795 List of Published Petitions. Verkhovna Rada of Ukraine, 2026 (assessed 31.07.2026). ↗

expires.[1796] Responses to such petitions are also published in the 'Electronic Petitions' system.

MPs may raise issues of importance to their voters by exercising their right to submit parliamentary requests[1797] and parliamentary appeals,[1798] as well as through procedural tools, including announcements, statements and proposals and speeches 'on various issues'.[1799]

The texts of parliamentary requests and responses to them are published on the official website of the Verkhovna Rada[1800] after personal data have been anonymised in accordance with the requirements of personal data protection legislation.[1801] As a result, publication of such documents may be delayed.[1802]

Parliament may involve public associations in the process of shaping public policy, including by holding consultations with public associations on important matters of state and public life, developing draft normative legal acts and establishing consultative and other auxiliary bodies.[1803]

The Verkhovna Rada is a key actor in the budget process which, in accordance with budget legislation, approves the State Budget of Ukraine and oversees its implementation.[1804] At the legislative level, the principle of openness and transparency of the budget system has been declared.[1805] This entails informing the public about budget policy, the preparation, consideration, approval and implementation of the state budget and oversight of its implementation.

Committees of the Verkhovna Rada **interact with the public when organising and holding parliamentary hearings,**[1806] **committee hearings,**[1807] **'round tables', conferences and other events,**[1808] **as well as meetings of working groups** (for the preparation of draft acts, issues discussed at committee meetings, draft decisions, recommendations, committee opinions and so on).[1809] Public associations (non-governmental organisations) play a significant role in providing the Verkhovna Rada with analytical support, developing

1796 On Citizens' Appeals: Law of Ukraine No. 393/96-VR of 02.10.1996, Article 23[1]. ↗

1797 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 15. ↗

1798 Ibid, Article 16.

1799 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 25. ↗

1800 Parliamentary Inquiries. Verkhovna Rada of Ukraine. 2026. ↗

1801 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 224. ↗

1802 As of 31 July 2026, the texts of parliamentary requests announced at plenary meetings of the Verkhovna Rada of the IX convocation were published: 218 during the 14th session and 285 during the 15th session.

1803 On Public Associations: Law of Ukraine No. 4572-VI of 22.03.2012, Articles 21, 22. ↗

1804 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 152–162. ↗

1805 Budget Code of Ukraine: Code of Ukraine No. 2456-VI of 08.07.2010, Article 7. ↗

1806 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 235–236. ↗

1807 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Articles 29, 42. ↗

1808 Ibid, Article 42.

1809 Ibid, Article 15.

legislation, providing expert assessments and organising activities and events for committees.

Cooperation between the Verkhovna Rada and its committees and non-governmental organisations has been transformed under the influence of security restrictions caused by the introduction of martial law. Some committee events are held by videoconference or in a hybrid format.[1810] Civil society representatives positively assess the use of information technologies, including cloud services, online documents and similar tools, which makes it possible to ensure more transparent storage and prompt exchange of information with the involvement of a wide range of stakeholders.[1811]

The Rules of Procedure of the Verkhovna Rada also provide for **parliamentary hearings** to examine matters of public interest requiring legislative regulation. A committee may propose holding parliamentary hearings by submitting a draft resolution of the Verkhovna Rada specifying the topic and date. The Verkhovna Rada decides on the topic, date and time of parliamentary hearings no later than 30 days before they are held. Representatives of state authorities, local self-government bodies, political parties, other civic associations, research institutions, members of the public and the author (initiator) of an electronic petition may be invited to participate, provided they wish to do so and submit an application to the committee preparing the hearings no later than five days beforehand. Following parliamentary hearings, the committee prepares recommendations. A resolution approving the recommendations must specify deadlines for reporting on their implementation and, where necessary, a plan for discussions ('round tables', public discussions, committee hearings, etc.) on the status of implementation, a list of draft laws required to implement the recommendations, indicative deadlines for their preparation and submission and the committees tasked by the Verkhovna Rada with drafting them, as well as other measures aimed at implementing the recommendations and monitoring their implementation. Following parliamentary hearings, the Verkhovna Rada adopts a resolution at a plenary sitting approving the relevant recommendations.[1812] Before March 2020, the Verkhovna Rada of the ninth convocation held six parliamentary hearings.[1813] After quarantine was introduced due to the COVID-19 pandemic, other planned parliamentary hearings were not held and the Verkhovna Rada postponed[1814] them in view of the epidemiological situation. Since the Russian Federation's full-scale invasion, parliamentary hearings have not been held for security reasons, although the Committee on Social Policy proposed holding parliamentary hearings to mark the 40th anniversary of the Chornobyl disaster.[1815]

1810 Information from the minutes of committee meetings published on the websites of Verkhovna Rada committees, 2026.

1811 Cooperation between Parliamentary Committees and Non-Governmental Organisations in Ukraine. Parliamentary Centre and Agency for Legislative Initiatives, 2025. ↗

1812 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Chapter 39. ↗

1813 According to calculations based on information published on the Verkhovna Rada of Ukraine website as of 31.07.2026.

1814 On Certain Specific Features of Holding Parliamentary Hearings during Quarantine in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 975-IX of 05.11.2020. ↗

1815 On Holding Parliamentary Hearings on '40 Years since the Chornobyl Disaster: Present-Day Realities and Future Challenges': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15008 of 06.02.2026. ↗

Committee hearings are held in different formats, including offline, online, hybrid and off-site formats: six times during the 13th session, twice during the 14th session and eight times during the 15th session, as of 31 July 2026.[1816]

Off-site meetings of Verkhovna Rada committees, round-table meetings and forums are held to study current issues directly on the ground, strengthen oversight of the executive, involve the public in the law-making process and promptly address matters of cooperation with local self-government bodies. During the 14th session, five off-site meetings of Verkhovna Rada committees were held in territorial communities, along with two round-table meetings and one forum.[1817]

MPs elected in single-member constituencies are required to maintain contact with voters in their constituencies. MPs elected in the nationwide multi-member constituency maintain contact with voters residing in Ukraine in accordance with arrangements for personal representation determined by parliamentary factions (groups) of the Verkhovna Rada in accordance with law.[1818]

The main **guarantees for the activities of MPs** that are directly linked to interaction with voters are the provision of conditions for the exercise of parliamentary powers, including the provision of office premises in the election district[1819] and the financing of expenses related to parliamentary activities.[1820]

Expenses related to the exercise of parliamentary powers are reimbursed throughout the entire term of office in the amount of an MP's monthly salary, paid monthly, and are not subject to taxation.[1821] An MP receives funds to reimburse expenses related to the exercise of parliamentary powers from the day of their election. MPs are reimbursed travel expenses for work with voters outside the city of Kyiv.[1822]

Local executive authorities and local self-government bodies provide separate technically equipped office premises with a permanent workplace for an assistant consultant to the MP located there. They are also obliged to facilitate the organisation of MPs' reports and meetings with voters. Incurred expenses are reimbursed within the established limits from budget allocations for supporting the activities of the Verkhovna Rada.[1823]

MPs and parliamentary parties may use constituency offices or territorial branches of political parties to communicate with citizens. At the same time, the effectiveness of interaction with MPs elected in single-member constituencies through their constituency offices varies.[1824] Due to the introduction of martial law, information on MPs' constituency

1816 According to calculations based on information published on the websites of Verkhovna Rada committees, in the sections 'Committee Hearings', 'Agendas' and 'Transcripts', as of 31.03.2026.

1817 Schedules of Meetings of Verkhovna Rada Committees. Verkhovna Rada of Ukraine, 2026. ↗

1818 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, para. 2 Part 1 Article 7. ↗

1819 Ibid. Article 28.

1820 Ibid, Article 32.

1821 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 32. ↗

1822 Ibid, Article 33.

1823 Ibid, Article 28.

1824 13 'Servants' of Kyiv: How the Capital's Majoritarian MPs Work in the Rada. CHESNO. 2025 ↗; 'What the Hell Are They Needed For?': How Constituency Offices of MPs from Cherkasy Region Work and Where They Are Located. Suspilne Cherkasy. 2026. ↗

offices has not been published on the official website of the Verkhovna Rada. At the same time, information on the location of territorial organisations/branches of some political parties is publicly available, including for the following parliamentary parties of the Verkhovna Rada of the IX convocation: the parliamentary faction 'European Solidarity',[1825] the parliamentary faction 'Batkivshchyna'[1826] and the parliamentary faction 'Servant of the People'.[1827]

The fourth week of each calendar month during a session is allocated for MPs' work with voters (under normal circumstances).[1828] The calendar plans of the sessions of the Verkhovna Rada of the IX convocation, starting from the 8th session in September 2022, do not provide for MPs' work with voters,[1829] namely due to martial law. At the same time, during the first half of 2026, more than 82,000 voters contacted MPs and their assistant consultants in election districts, around 45,000 written appeals were considered and around 7,000 personal meetings and meetings with voters were held.[1830]

The holding of the 'Government's Question Hour', which had not taken place in Parliament on a regular basis since the beginning of the full-scale invasion, resumed in 2024. Usually, the 'Government's Question Hour' was held every Friday at the end of the plenary week, but after 24 February 2022 such question sessions were rare and unsystematic. Thus, during the 14th session of the Verkhovna Rada of the IX convocation, the 'Government's Question Hour' was held seven times[1831] and, as of 31 July 2026, ten

1825 Information on the addresses of territorial organisations of the political party 'European Solidarity' in the 'Contacts' section via the link to the official website of the territorial organisation in the relevant region or city. ↗

1826 Information on the addresses of regional branches and constituency offices of the political party All-Ukrainian Union 'Batkivshchyna'. ↗

1827 Information on the addresses of territorial organisations of the political party 'Servant of the People' in the 'Contacts' section via the link to the relevant region or city. ↗

1828 On Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 19. ↗

1829 Calendar Plan of Sessions of the Verkhovna Rada of Ukraine. ↗

1830 On Citizens' Appeals to the Verkhovna Rada of Ukraine in January–June 2026. Citizens' Appeals Office of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

1831 Topics of 'Government's Question Hour': on the organisation of the new academic year and the state of the security infrastructure of educational institutions under martial law (05.09.2025); on the state of Ukraine's financial system and priority areas for ensuring its functioning in 2026 (19.09.2025); on the effectiveness of the use of budget support for enterprises in 2025, prospects for such support in 2026 and the status of implementation of the Agreement between Ukraine and the USA on the establishment of the Investment Fund for Reconstruction and Critical Minerals Partnership (10.10.2025); on the formation and implementation of state social policy under martial law (24.10.2025); on the fulfilment of Ukraine's obligations in the field of European integration under martial law (07.11.2025); on the state of formation and implementation of state policy in the field of social protection and ensuring the rights and freedoms of veterans and members of their families (05.12.2025); on the state of the energy sector and measures to restore and protect energy infrastructure facilities (16.01.2026). Information from transcripts of plenary meetings of the fourteenth session of the Verkhovna Rada of the IX convocation. Verkhovna Rada of Ukraine, 2026. ↗

times[1832] during the 15th session, with plenary meetings held in open session. During the 'Government's Question Hour', MPs also raised issues of relevance to voters that went beyond the subject matter of the meetings.

Parliament has mechanisms to respond to issues that arise in the course of its work and have not been included in its work plans in advance. Legislation allows amendments to be made to the draft agenda for the day after a break in an ongoing plenary meeting.[1833] On Tuesdays, Wednesdays and Fridays, MPs have 30 minutes for announcements, statements and speeches on various issues, during which they may discuss urgent and unplanned matters. Such matters may also be raised during 'Government's Question Hour', after which MPs may use parliamentary requests and inquiries to follow up on the executive's actions on issues of public importance. Parliament may also establish temporary investigation commissions and temporary special commissions to investigate matters of public interest or consider issues that fall outside the areas of competence of committees. To ensure access to information on the activities of such commissions, reports on certain aspects of their work may be provided to the media, while investigation materials, conclusions and proposals may be published in the newspaper 'Holos Ukrainy'.[1834] Some temporary investigative commissions have their own social media accounts, while some of their members cover their work through personal communication channels.

The Verkhovna Rada's external communication responds to wartime challenges and seeks to meet Ukrainians' demand for access to information, including on matters of public interest. The Verkhovna Rada communicates with stakeholders through 19 pages across seven social media platforms, as well as through the official web portal of the Verkhovna Rada. Its communication work is coordinated by the Press Service and the Information Department of the Office of the Verkhovna Rada, the RADA TV channel,[1835] the Holos Ukrainy media outlet,[1836] the Educational Centre of the Verkhovna Rada (Educational

1832 Topics of Government's Question Hour: on the state of social policy under martial law, pension provision and the functioning of the Pension Fund of Ukraine, the provision of social assistance to children with disabilities and orphans, support for internally displaced persons and persons affected by the Chornobyl disaster (13.02.2026); on the state and implementation of state policy in the field of physical culture and sport under martial law, the results of the participation of Ukraine's national team in the 2026 Winter Olympic Games and priorities for the development of Olympic sport (27.02.2026); on the state of provision of the fuel and energy sector and priority measures to stabilise the situation on the energy market under martial law (13.03.2026); on the current economic situation in Ukraine and ways to address challenges under martial law (27.03.2026); implementation of state humanitarian policy and support for the development of national culture amid the Russian Federation's armed aggression (10.04.2026); the current state of negotiations on Ukraine's accession to the European Union, opening of negotiation clusters, fulfilment of Ukraine's international commitments in the field of European integration and implementation of the list of priority draft laws aimed at adapting Ukrainian legislation to EU law (01.05.2026); implementation of state policy in healthcare and ensuring the population's sanitary and epidemiological well-being amid current challenges (15.05.2026); implementation of state policy in Ukraine's foreign-policy activities under martial law (29.05.2026); implementation of state policy on European integration and key tasks in Ukraine's EU accession process (12.06.2026); and the formulation and implementation of state policy in the areas of economic development, agriculture and environmental security under martial law (03.07.2026). Information from transcripts of plenary meetings of the fifteenth session of the Verkhovna Rada of the IX convocation. Verkhovna Rada of Ukraine, 2026. ↗

1833 On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2912-IX of 07.02.2023. ↗

1834 On Temporary Investigation Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.02.2019, Articles 1, 8. ↗

1835 Rada Parliamentary TV Channel, 2026. ↗

1836 Holos Ukrainy, the newspaper of the Verkhovna Rada of Ukraine, 2026. ↗

Centre),[1837] committee secretariat members responsible for communications and the press secretaries of the Verkhovna Rada leadership.[1838]

In 2025, the official web portal of the Verkhovna Rada was comprehensively updated: new analytical tools were introduced, the design of MP profile cards, committee and faction pages and the voting section was updated, as was information on previous convocations of Parliament.[1839]

In 2019, the Educational Centre was established to raise public awareness of the principles and functions of Parliament and democracy, help ensure the transparency and openness of the Verkhovna Rada, improve interaction with citizens and implement educational programmes for Ukrainian schoolchildren and students.[1840]

The Educational Centre[1841] is guided in its activities by the Regulation on the Secretariat of the Verkhovna Rada of Ukraine[1842] and the Regulation on the Procedure for Organising and Conducting Open Visiting Events in the Verkhovna Rada of Ukraine.[1843] Open visiting events in the Verkhovna Rada are held free of charge and, depending on their purpose, may be of two types:

- general overview events: familiarisation with the premises of the Verkhovna Rada and the organisation of Parliament's work, covering the history of the formation and development of Ukrainian parliamentarism, the legislative process and the present-day Ukrainian Parliament;
- thematic information and educational events: on the basics of parliamentarism, law-making and democratic development, conducted in the form of workshops, debates, simulation games and other events.[1844]

Due to martial law, a special regime has been established for facilities of state importance in Ukraine, including the administrative building of the Verkhovna Rada, which provides for enhanced security and restricted access. Therefore, open visiting events, or excursions, are not held in the administrative building of the Verkhovna Rada at 5 Hrushevskoho Street. At the same time, offline educational events are held in the building of the Verkhovna Rada committees.[1845]

The main areas and formats of the Educational Centre's work include educational events for a broad audience, in particular primary, lower secondary and upper secondary pupils,

1837 Educational Centre of the Verkhovna Rada of Ukraine, 2026. ↗

1838 Parliament under Conditions of War: Ukraine's Experience. Research Report on the Work of the Tenth Session of the Verkhovna Rada of Ukraine of the IX Convocation (from 5 September 2023 to 5 February 2024). Internews, 2024. ↗

1839 Rada in a Smartphone: Major Update of the Ukrainian Parliament's Website. CHESNO Movement, 2025. ↗

1840 About the Educational Centre of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

1841 For details on the establishment of the Educational Centre and its events, see the section 'Interaction with Voters'.

1842 On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769 of 25.08.2011. ↗

1843 On Approval of the Regulation on the Procedure for Organising and Conducting Open Visiting Events in the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 582 of 24.05.2004. ↗

1844 Ibid.

1845 How to attend a lesson at the Educational Centre of the Verkhovna Rada of Ukraine? Educational Centre of the Verkhovna Rada of Ukraine. 2025. ↗

winners of school Olympiads and representatives of school parliaments, junior-year university students, representatives of student parliaments and educators, including academic and teaching staff. A separate area of work is parliamentary educational events for cadet students of specialised educational institutions. Several events have also been developed and held, with the participation of Parliament's leadership, in specialised institutions for children with psychophysiological developmental needs and hearing impairments.

When holding events, the Educational Centre actively involves:

- the leadership of the Verkhovna Rada (communication with young people during nationwide lessons, international events and state-level events; participation in offline educational events organised for pupils and students; delivery of original educational lectures in online and offline formats, including at educational institutions; development of children's drawing diplomacy);
- MPs (guided tours, simulations of Parliament's work, civic education courses and educational projects, nationwide online lessons);
- former MPs from the Association of People's Deputies of Ukraine (online parliamentarism week);
- veterans and service members, including MPs (nationwide online lessons and educational projects);
- members of international institutions (an online event marking Europe Day).[1846]

The Educational Centre holds its events in partnership with museums, universities, civil society organisations and youth councils.[1847] Educational events are non-partisan, promote the basic principles of democracy and cover current topics: civic parliamentary education, the history of Ukraine and Ukrainian parliamentarism, countering disinformation and information and psychological operations, the Ukrainian language, gender policy and so on. Given the European integration vector of the country's development and the relevant requirements for an EU candidate state, special attention is paid to informing young people about the negative impact of corruption and methods of combating it.[1848]

Overall, in 2025 the Educational Centre organised 167 events. The shift to an online format, caused by security risks first from the COVID-19 pandemic and later from martial law, made it possible to involve a wider audience in the Educational Centre's events: women, school-age children, young people and residents of remote communities. In 2025, thanks to the online format, the Educational Centre reached 208,446 people: 97% of the audience, 202,475 participants, joined 39 remote events, representing 23% of the total number, while 128 events, or 77%, were held offline and reached only 3% of the audience, namely 5,971 people.[1849]

1846 How to attend a lesson at the Educational Centre of the Verkhovna Rada of Ukraine? Educational Centre of the Verkhovna Rada of Ukraine. 2025. ↗

1847 Information provided by Respondent No. 51 during an interview conducted on 26.03.2026. ↗

1848 Areas and formats of work. Educational Centre of the Verkhovna Rada of Ukraine. 2025. ↗

1849 Information provided by Respondent No. 51 during an interview conducted on 26.03.2026.

To facilitate citizens' access to information and materials of the Educational Centre, its website has been updated. It contains: (1) information on registration for offline events;[1850] (2) methodological and information materials on parliamentary education and the activities of the Educational Centre;[1851] (3) news in the fields of education, parliamentarism and civic education[1852] and so on.

To carry out information and educational work and involve a wider audience in its events, the Educational Centre also uses social media: Facebook, with over 18,000 followers, YouTube, with over 19,000 subscribers, Instagram, with around 5,000 followers, Telegram, with over 7,000 subscribers and TikTok, with around 600 subscribers.[1853] When holding educational events online, the Educational Centre uses digital mechanisms that make it possible to conduct online surveys and identify the geography of the audience involved in the event.[1854]

A separate format of the Educational Centre is outreach lessons in the regions of Ukraine for young people from remote communities. More than 70 outreach parliamentary education events have been held for schoolchildren and students, covering 17 regions of Ukraine, 11 of them since the full-scale invasion.[1855]

Subject to proper staffing and financial support, the Educational Centre also plans to implement the following promising projects:

- 'Democracy Workshop' — a format of the Austrian educational programme Demokratiewerkstatt adapted in Ukraine, which has been operating successfully at the Austrian Parliament since 2007. It is a series of workshops for pupils on the basics of democracy, the work of Parliament, the European Union, the role of media and civic participation. The project develops civic competences among young people, expands their knowledge of the work of the legislative body and involves them in democratic processes from an early age;[1856]
- 'Parliamentary Ambassadors' — an initiative aimed at creating civic education hubs in secondary education institutions throughout Ukraine. The project concept provides that teacher-ambassadors will moderate thematic clubs called 'Young Parliamentarians', where pupils will study the principles of Parliament's work, their

1850 How to attend a lesson at the Educational Centre of the Verkhovna Rada of Ukraine? Educational Centre of the Verkhovna Rada of Ukraine. 2025. ↗

1851 Information and methodological materials. Educational Centre of the Verkhovna Rada of Ukraine ↗; Video materials. Media library. Educational Centre of the Verkhovna Rada of Ukraine. ↗

1852 News. Educational Centre of the Verkhovna Rada of Ukraine. ↗

1853 Links to the Educational Centre's social media pages are available on its official website. Educational Centre of the Verkhovna Rada of Ukraine ↗; Educational Centre of VRU. TikTok. ↗

1854 In particular, Mentimeter, an online service for creating and conducting instant polls during live events and webinars.

1855 In 2024, the Educational Centre visited Zakarpattia, Ternopil and Volyn regions and held 52 events for 9,000 participants. In Volyn region, 21 events were held over five days for 4,000 participants, while in Ternopil region the number of participants in educational events reached a record 680 during one offline event. Areas and formats of work. Educational Centre of the Verkhovna Rada of Ukraine. ↗

1856 Introducing the Verkhovna Rada to new formats of parliamentary interaction with young people. USAID RADA: Next Generation Programme. ↗ ; In 2024, a Letter of Intent was signed between the Verkhovna Rada of Ukraine and the Parliament of Austria on the implementation in the Ukrainian Parliament of the educational project for young people 'Democracy Workshop'. Areas and formats of work. Educational Centre of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

electoral rights and mechanisms for participation in state-building processes, as well as organise 'Parliamentary Lessons'.

The Secretariat of the Verkhovna Rada has developed a vision for creating a Centre of Statehood — a modern educational and cultural visitor centre designed to deepen understanding of Ukrainian statehood, national identity and the role of Parliament in the development of democracy. It is planned that the future Centre of Statehood will include the following functional areas: a museum of parliamentarism, presenting an interactive history of Ukrainian democracy; an educational centre, including simulations of meetings of the Verkhovna Rada, its committees and the Conciliation Council, debates and training for young people; a reception hall and meeting rooms for events and meetings with international partners; a parliamentary library as a platform for knowledge and dialogue; a parliamentary café and a souvenir shop.[1857]

Progress and issues

The inability of MPs to hold personal meetings with citizens with their physical presence due to security challenges restricts citizens' rights and reduces the effectiveness of interaction with voters. For this reason, the Verkhovna Rada has undertaken[1858] to introduce digital formats that will enable communication between Parliament officials and citizens. In December 2025, technical requirements were approved for the creation and implementation of a solution to automate the process 'Personal Reception of Citizens in Digital Format' (a digital format for receiving citizens during martial law). The Secretariat of the Verkhovna Rada is currently developing the relevant software, which will make it possible to introduce a new digital format of communication between officials of the Verkhovna Rada and citizens.[1859]

Public participation in the budget cycle[1860] is legally limited and often formal, creating a gap between societal needs and the allocation of public funds. Mechanisms for genuine citizen involvement in the budget process remain unregulated. As early as 2018, plans envisaged defining in legislation mechanisms for citizen participation at different stages of the budget process while preserving its integrity and timeframes, as well as developing and approving a system of public hearings (consultations).[1861] As of 2026, these plans have not been implemented: Parliament has not introduced a system of public hearings (consultations) as part of the budget process and no reports on citizen

1857 Introducing the Verkhovna Rada to new formats of parliamentary interaction with young people. USAID RADA: Next Generation Programme. ↗ ; In 2024, a Letter of Intent was signed between the Verkhovna Rada of Ukraine and the Parliament of Austria on the implementation in the Ukrainian Parliament of the educational project for young people 'Democracy Workshop'. Areas and formats of work. Educational Centre of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

1858 Roadmap on the Functioning of Democratic Institutions. Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

1859 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

1860 Within the competence of the Verkhovna Rada of Ukraine.

1861 On Approval of the Action Plan for the Implementation of the Public Finance Management System Reform Strategy for 2017–2020: Order of the Cabinet of Ministers of Ukraine No. 415-r of 24.05.2017. ↗

participation in the budget process are publicly available.[1862] Overall, public participation in the budget process remains low in practice. At the same time, the provisions of the Law of Ukraine 'On Public Consultations' do not apply to social relations arising under the Budget Code of Ukraine,[1863] creating a legal vacuum in which the budget process may be isolated from public influence.

Electronic petitions to the Verkhovna Rada of Ukraine are not an effective instrument for interaction with citizens. A significant number of electronic submissions do not meet the requirements for electronic petitions that create an additional burden on the Secretariat of the Verkhovna Rada. Since 2016, the number of petitions that receive the required number of votes has remained low: 2016 — one, 2017 — two, 2018 — four, 2019 — five, 2020 — three, 2021 — one, 2022 — one, 2023 — none, 2024 — two, 2025 — one and 2026, as of 31 July — one, with 21 petitions in total.[1864] This trend may indicate:

- misuse of the tool due to a lack of understanding of the difference between a petition and a citizens' appeal;
- the dependence of the success of electronic petitions on the political cycle, in particular their greater effectiveness during periods of electoral competition and political turbulence;
- reduced activity during periods of crisis, when the agenda is shaped by security challenges;
- the formal nature of responses to supported petitions, which weakens the sense of their real impact on the law-making process and trust in Parliament.

Since the beginning of Russia's full-scale invasion of Ukraine, access to the government quarter in Kyiv has remained restricted for security reasons. This complicates, although does not make impossible, public and other external stakeholder access to the work of committees and the Verkhovna Rada, including **offline committee hearings, parliamentary hearings and other events involving the public**.[1865] At the same time, the practice of holding parliamentary hearings in the Verkhovna Rada has not yet resumed.

The expenditure norms per MP related to interaction with voters have not been reviewed for a long time and do not take inflation into account. In **2026**, they amount to:[1866]

- reimbursement of expenses for the maintenance of premises in election districts[1867] — UAH 167 per month and UAH 2,000 per year;

1862 Each country is scored on a scale from 0 to 100 reflecting the strength of its formal public participation practices across institutions and throughout the budget process. Ukraine scores 41 points for public participation, including 20 for formulation (Government), 56 for approval (Parliament), 25 for implementation (Government) and 78 for audit (supreme audit institution). Open Budget Survey 2025: Ukraine. International Budget Partnership. ↗

1863 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024, Article 2. ↗

1864 List of Petitions for Which a Response Has Been Prepared. Verkhovna Rada of Ukraine, 2026. ↗

1865 Parliament under Conditions of War: Ukraine's Experience. Research Report on the Work of the Tenth Session of the Verkhovna Rada of Ukraine of the IX Convocation (from 5 September 2023 to 5 February 2024). Internews, 2024. ↗

1866 On the Budget Estimate of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4696-IX of 03.12.2025. ↗

1867 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 28. ↗

- reimbursement of expenses related to the organisation and holding of meetings of an MP with voters[1868] — UAH 670 per year;
- business trips of assistant consultants to MPs to election districts[1869] — UAH 8,000, calculated for 10 months.

MPs' work with voters has not been adapted to the challenges of martial law, as there are problems with: (1) representing the interests of voters in occupied election districts, (2) IDPs, (3) Ukrainian refugees and (4) voters in majoritarian districts who have lost the representatives elected in those districts. After the start of the full-scale invasion, 23 election districts in Donetsk, Zaporizhzhia, Luhansk, Kharkiv and Kherson regions became fully or partially occupied.[1870]

As of December 2025, 4.62 million IDPs were officially registered in Ukraine, including 3.78 million adults over the age of 18. Almost half of IDPs currently live in Kharkiv, Donetsk and Dnipropetrovsk regions and in the city of Kyiv, with around 500,000 people in each.[1871]

As of January 2026, 5.6 million Ukrainian refugees[1872] remained abroad, including approximately 4.4 million under temporary protection in European Union Member States[1873] and 3.8 million adults over the age of 18.[1874,1875] At the same time, as of 31 December 2025, according to the State Register of Voters, including consular registration data, which forms the basis for compiling voter lists for election precincts abroad, around 390,000 voters had an electoral address abroad.[1876] However, without information on the whereabouts of Ukrainian citizens abroad, it is impossible to ensure their effective interaction with MPs and the representation of their interests in Parliament. Effective interaction with Ukrainian voters abroad is important for restoring public trust in the state and for their return to Ukraine.

1868 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 28. ↗

1869 On the Amounts and Composition of Travel Expenses of Civil Servants and Other Persons Sent on Business Trips by Enterprises, Institutions and Organisations Fully or Partially Maintained (Financed) from Budget Funds: Resolution of the Cabinet of Ministers of Ukraine No. 98 of 02.02.2011. ↗

1870 Wartime Parliament: MPs from the Temporary Occupied Territories of Ukraine — Who They Are and What They Do. Agency for Legislative Initiatives, 2024. ↗

1871 Which Regions of Ukraine Have the Largest Number of Internally Displaced Persons and How Their Number Has Changed — Infographic. Apostrophe, 2026. ↗

1872 Ukrainian Refugees after Four Years Abroad. Fifth Wave of the Study. Centre for Economic Strategy, 2026. ↗

1873 Ilona Havronska: More than 4.3 Million Ukrainians Are under Temporary Protection in EU Countries. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

1874 According to calculations based on information provided in the digest *Ukrainian Refugees after Four Years Abroad. Fifth Wave of the Study*. Centre for Economic Strategy, 2026. ↗

1875 Before the beginning of the full-scale invasion, around 3 million Ukrainians, so-called labour migrants, were abroad. Since the beginning of the full-scale war, slightly more than 4 million Ukrainians have left the country — Libanova. Ukrinform, 2024. ↗

1876 On Proposals for Legislative Regulation of Specific Aspects of the Organisation and Conduct of National Elections after the Termination or Cancellation of Martial Law in Ukraine: Resolution of the Central Election Commission No. 1 of 07.01.2026. ↗

The interests of voters in 21 single-mandate election districts,[1877] as of 31 July 2026, are not fully represented in Parliament due to the ban on holding by-elections during martial law to fill vacant seats.[1878]

The circumstances listed above have complicated the process of interaction between MPs and voters, including IDPs and Ukrainian refugees abroad. The existing system of constituency offices does not take into account the dynamics of population displacement, which hinders the exercise of citizens' right to submit appeals and the protection of their interests in Parliament.[1879]

Insufficient communication by MPs with their voters remains a problem.[1880] MPs are required to inform voters about their activities through the media and at meetings of voters at least twice a year.[1881] At the same time, legislation does not provide for a standard reporting format, so such reporting takes place in a free form and is difficult to track.

The current institutional capacity of the Educational Centre does not correspond to its needs and limits opportunities for developing the Verkhovna Rada's educational activities. As of early 2026, the Educational Centre had four staff members. However, approximately 7–10 staff members are needed to properly support the current workload. A significant institutional challenge was the termination of administration of foreign assistance programmes by the USAID project,[1882] which had supported the Educational Centre's initiatives. Work on the system for monitoring changes in audience awareness after classes was suspended, which complicates further verification of the effectiveness of the lessons. Limited public expenditure under martial law reduces the capacity of the Educational Centre to scale up educational projects and update its material and technical base.

As part of the reform of the Secretariat of the Verkhovna Rada, it is envisaged that the Educational Centre will be integrated as a structural and functional component of the future Centre of Statehood,[1883] the creation of which will require staff strengthening and the attraction of funding, including extra-budgetary funding.[1884]

The official web portal of the Verkhovna Rada demonstrates a low level of basic accessibility. According to the results of the 2025 web accessibility monitoring of public authority websites, it received two points, with eight out of ten components of basic website accessibility not achieved. The Verkhovna Rada web portal has certain barriers

1877 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026. ↗

1878 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 19. ↗

1879 Expert View on Key Risks to the Exercise of Active and Passive Electoral Rights by Internally Displaced Persons as a Vulnerable Group of Voters. Civil Network OPORA, 2025. ↗; Citizens and Parliament: Trust, Interaction and Openness under Martial Law. Info Sapiens Survey on Behalf of the Centre for Insights in Survey Research of the International Republican Institute under the USAID RADA: Next Generation Programme, 2024. ↗

1880 Ibid.

1881 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 7, 24. ↗

1882 Notification of Administrative Leave. U.S. Agency for International Development. 2025. ↗

1883 For details, see the section 'Interaction with Voters'.

1884 Information provided by Respondent No. 51 during an interview conducted on 26.03.2026.

that complicate or prevent access to electronic services for some groups of users, in particular persons with disabilities.[1885]

Recommendations

1. Restore personal reception of citizens by the heads of committees and parliamentary factions (parliamentary groups), MPs and staff of the structural unit for citizens' appeals of the Secretariat of the Verkhovna Rada who are required to hold such receptions by virtue of their position:
   - either at the reception office of the Verkhovna Rada, taking into account security conditions. If necessary, introduce the relevant amendments to the Procedure for Organising and Holding Personal Reception of Citizens in the Verkhovna Rada of Ukraine[1886] and other normative legal acts;
   - or complete the introduction of digital formats for the reception of citizens, ensure that citizens are informed about this possibility and facilitate the use of the relevant service.
2. Introduce mechanisms for citizen participation in the budget process that: (1) establish clearly defined procedures for citizen participation, (2) allow citizens to participate at all stages of the budget process, including preparation of the Budget Declaration, consideration at committee level, consideration at a plenary sitting and oversight of budget execution, (3) provide citizens with sufficient time to participate and (4) explain in plain and accessible language the substance of the matters on which consultations are being conducted.
3. Develop and publish/disseminate recommendations or a guide on creating an electronic petition to the Verkhovna Rada.
4. Include work with voters in the calendar plan of the Verkhovna Rada or regulate this issue in another way for the period of martial law, which would ensure transparency of MPs' schedules and make them predictable for interaction with voters.
5. Ensure systematic mechanisms in Parliament for representing interests and communicating with voters from temporarily occupied territories, internally displaced persons and refugees through digital communication tools.
6. Develop a mechanism for a 'Digital MP Constituency Office'.
7. Publish information on MPs' constituency offices on the Verkhovna Rada website, adapting it to security requirements, without disclosing the addresses of constituency offices but indicating other contact information, including email addresses, constituency office telephone numbers, links to verified social media pages and so on.
8. Establish a reporting form for MPs on their activities, to be published twice a year on the Verkhovna Rada website, for example in MP profile cards.

1885 Web Accessibility of Public Authority Websites. Report on the Results of the 2025 Monitoring, 2026. ↗

1886 On the Procedure for Organising and Holding Personal Reception of Citizens in the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 43 of 01.03.2021. ↗

9. Strengthen the institutional capacity of the Educational Centre by:
   - increasing staffing levels to a level that corresponds to the real scope of tasks and workload assigned to the Educational Centre;
   - attracting targeted extra-budgetary funding for specific projects and educational initiatives;
   - creating sustainable networks with the civil society sector and educational institutions for the joint organisation and conduct, including financing, of outreach regional events;
   - involving citizens on a voluntary basis, including interns of the Verkhovna Rada, students, activists, experts and educators, in conducting educational events;
   - introducing effectiveness evaluation to verify the results of educational events, the level of engagement and monitor changes in audience awareness.
10. Take into account web accessibility recommendations[1887] during the next update of the Verkhovna Rada website, which would make it possible to improve its basic accessibility.

Public Consultations

State of play

Legal framework

When conducting public consultations, the Verkhovna Rada is guided by the Constitution of Ukraine,[1888] the Laws of Ukraine 'On Citizens' Appeals',[1889] 'On Access to Public Information',[1890] 'On Civic Associations',[1891] 'On Information'[1892] and 'On Committees of the Verkhovna Rada of Ukraine',[1893] as well as the Rules of Procedure of the Verkhovna Rada.[1894] The Constitution and laws of Ukraine create conditions for the functioning of civil society, in particular:

- guarantee everyone the right to freedom of thought and speech, the free expression of their views and beliefs and the right to peaceful assembly;[1895]

1887 Web Accessibility of Public Authority Websites. Report on the Results of the 2025 Monitoring, 2026. ↗

1888 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 6 and Part 4 Article 76. ↗

1889 On Citizens' Appeals: Law of Ukraine No. 393/96-VR of 02.10.1996. ↗

1890 On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011. ↗

1891 On Civic Associations: Law of Ukraine No. 4572-VI of 22.03.2012. ↗

1892 On Information: Law of Ukraine No. 2657-XII of 02.10.1992. ↗

1893 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995. ↗

1894 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

1895 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 34, 39. ↗

- define the specific features of the establishment, registration, termination and financing of public associations, namely the Laws of Ukraine 'On Public Associations'[1896] and 'On State Registration of Legal Entities, Individual Entrepreneurs and Public Formations';[1897]
- grant citizens the right to take part in the administration of state affairs,[1898] including in parliamentary work.

Legislation also establishes requirements for the use of personal data. Public discussion of draft laws is conducted in compliance with the requirements of the Laws 'On Personal Data Protection',[1899] 'On Ratification of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data and the Additional Protocol to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, regarding supervisory authorities and transborder data flows',[1900] 'On Information',[1901] 'On Protection of Information in Information and Communication Systems'[1902] and the Regulation on the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine.[1903] Where the entity responsible for entering information cannot clearly determine whether certain personal data constitute legally protected confidential information about a person, such data may be published only after obtaining additional written consent from the personal data subject to the dissemination of the relevant information.[1904]

Public participation in parliamentary processes

To ensure **meaningful participation in the law-making process**, the public should have the opportunity and the necessary resources to cooperate with Parliament at all stages of the policy development cycle, including information, data and digital tools.[1905]

The official web portal of the Verkhovna Rada is a key instrument for ensuring information parity between the authorities and society, as it gives citizens access, on the same basis as MPs, to all documents accompanying the consideration and adoption of a draft law. Through the section 'Draft Laws. Search by Details',[1906] the public can prepare well-

1896 On Public Associations: Law of Ukraine No. 4572-VI of 22.03.2012. ↗

1897 On State Registration of Legal Entities, Individual Entrepreneurs and Public Formations: Law of Ukraine No. 755-IV of 15.05.2003. ↗ ; For details, see the section 'Civil Society'.

1898 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 1 Article 38. ↗

1899 On Personal Data Protection: Law of Ukraine No. 2297-VI of 01.06.2010. ↗

1900 On Ratification of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data and the Additional Protocol to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, regarding supervisory authorities and transborder data flows: Law of Ukraine No. 2438-VI of 06.07.2010. ↗

1901 On Information: Law of Ukraine No. 2657-XII of 02.10.1992. ↗

1902 On Protection of Information in Information and Communication Systems: Law of Ukraine No. 80/94-VR of 05.07.1994. ↗

1903 On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

1904 On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

1905 Cooperation of Parliamentary Committees with Non-Governmental Organisations in Ukraine. Parliamentary Centre and Agency for Legislative Initiatives. 2025, p. 12. ↗

1906 Draft Laws. Search by Details. Verkhovna Rada of Ukraine. ↗

founded advocacy proposals, track every stage of an initiative's progress in real time and identify proposals submitted by lobbying entities. The website's advanced search and grouping of alternative draft laws make it an effective monitoring platform.

In addition to digital monitoring, public participation is exercised through electronic petitions, submission of proposals, participation in parliamentary and committee hearings, round-table meetings, conferences, working groups and other events.[1907]

Consultative and advisory bodies, including public and expert councils, may also be established under Verkhovna Rada committees to involve the public in the legislative process.[1908] Consultative and advisory bodies also operate under inter-factional associations[1909] and the Chairman of the Verkhovna Rada.[1910] This multi-level interaction supports inclusive law-making and increases the transparency of Parliament's activities by involving external expertise in the development of public decisions.

Verkhovna Rada committees involve the public in performing the **oversight** function in the following ways:

- processing information — using information received from civil society organisations (CSO) and citizens when analysing the application of legislation and considering Government reports on the implementation of the Government Programme;[1911]
- hearings open to the public — holding public committee hearings on reports, presentations and other information from state bodies and officials, except information subject to restricted access;[1912]
- effectiveness analysis — holding committee hearings to assess the effectiveness of law implementation, involve broad sections of the public in policy-making and support the development of a democratic society;[1913]
- conveying voters' concerns — acting as an institutional intermediary in preparing and conducting the 'Government's Question Hour' by consolidating citizens' appeals within the committee's remit, shaping the topics for the 'Government's Question Hour' and presenting them as questions to members of the Government (a passive form of public participation).[1914]

1907 For further details, see the subsection 'Interaction with Voters'.

1908 For example, the Public Council on Humanitarian and Information Policy, the Public Council under the Verkhovna Rada Committee on Social Policy and Protection of Veterans' Rights and the Expert Council under the Verkhovna Rada Committee on National Health, Medical Care and Health Insurance. Information from the official websites of the committees of the Verkhovna Rada of Ukraine. ↗

1909 Expert Council on Increasing Parliamentary Transparency Begins Work in Ukraine. CHESNO. 2025. ↗

1910 On the Scientific Advisory Council under the Chairman of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 502 of 30.12.2021. ↗

1911 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Part 3 Article 25^1. ↗

1912 Ibid, para. 3 Part 1 Article 25^2.

1913 Ibid, para. 2 Part 1 Article 29.

1914 Ibid, Article 26.

Following engagement with the public, the Verkhovna Rada processes proposals and **provides feedback** concerning:

- proposals (comments) submitted to the Verkhovna Rada — it considers them and, as a general rule, informs the citizen of the outcome within one month.[1915] The Citizens' Appeals Office of the Secretariat of the Verkhovna Rada publishes quarterly and annual reports on its official webpage indicating, among other things, the number and subject matter of appeals, including proposals, and a list of draft laws on which the public submitted proposals (comments) or expressed support during the reporting period;[1916]
- electronic petitions — the Chairman of the Verkhovna Rada publicly announces on the official website the decision on whether an electronic petition is supported. The response is published on the official website of the Verkhovna Rada no later than the next working day after consideration is completed[1917] and is sent in writing to the author (initiator) of the electronic petition and the civic association that collected signatures in support of it. The author (initiator) of an electronic petition has the right to present it at parliamentary hearings where the petition contains such a request, in which case consideration of the petition continues for the period of the hearings. Following consideration of an electronic petition, MPs may initiate draft laws aimed at addressing the issues raised in it;[1918]
- nationwide public discussion — Verkhovna Rada committees consolidate comments and proposals received during nationwide public discussion of draft laws.[1919] Information on the results of discussion of the draft law as a whole and of its individual sections is published on the Public Discussion of Draft Laws Portal (the Portal);[1920]
- proposals submitted through working groups and advisory bodies — feedback in this format is less public and is generally provided through comparative tables containing comments on whether proposals have been accepted or rejected. Since the beginning of the full-scale invasion, communication between Verkhovna Rada committees and the public has changed significantly, with wider use of messaging and cloud services for the rapid exchange of information and documents;[1921]

1915 On Citizens' Appeals: Law of Ukraine No. 393/96-VR of 02.10.1996, Articles 14, 20. ↗

1916 Reports on Citizens' Appeals. Citizens' Appeals Office of the Secretariat of the Verkhovna Rada of Ukraine. ↗

1917 List of Petitions for Which a Response Has Been Prepared. Responses to Petitions. Electronic Petitions. Verkhovna Rada of Ukraine. ↗

1918 On Citizens' Appeals: Law of Ukraine No. 393/96-VR of 02.10.1996, Article 23^1. ↗

1919 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, para. 10 Article 16. ↗

1920 Results of Consideration of the Draft Law 'On Credit History' (registration No. 12260 of 28.11.2024) Published. Public Discussion. List of Completed Discussions. Discussion Results. Verkhovna Rada of Ukraine. ↗

1921 For example, work on the draft law text was conducted in an online document in which all parties involved could comment on the text and on one another's proposals. This use of information technologies enabled more transparent storage and exchange of information. Cooperation of Parliamentary Committees with Non-Governmental Organisations in Ukraine. Parliamentary Centre and Agency for Legislative Initiatives. 2025, p. 34. ↗

- results of committee and parliamentary hearings — minutes and transcripts of the relevant hearings are published on Parliament's website and recommendations are adopted on the basis of their results.[1922]

Digital service 'Public Discussion of Draft Laws'

To establish effective feedback from the public and ensure citizens' participation in decision-making, in 2017 the Verkhovna Rada introduced the 'Citizen's E-Cabinet' web portal as a single entry point for working with Parliament's digital services, in particular the digital service Public Discussion of Draft Laws Portal (the Portal),[1923] which provides citizens with convenient access through their own electronic cabinet and a secure user environment.[1924]

In 2025, the Portal's functionality was updated: it now allows users to rate a draft law from one to five points, based on which its rating is formed. Citizens may leave comments under a draft law, both on the draft law as a whole and on individual blocks, with their comments or proposals. It is also possible to vote for a particular draft law to be submitted for nationwide discussion or to propose that it be submitted for discussion. Draft laws can be filtered by thematic headings or lead committees, as well as by date and popularity.[1925]

The Portal was used to conduct a discussion on only one draft law, No. 12260.[1926] Parliament thus attempted to use the nationwide public discussion procedure[1927] after Draft Law No. 12260 failed to receive the number of votes required for adoption at first reading.[1928]

The Portal's functionality accumulates statistics on the discussion of draft laws, including general statistics, such as the number of draft laws under discussion and those for which discussion has ended, and statistics by committee and by heading.

Accessibility of the Portal for persons with visual and cognitive impairments is ensured through the 'Accessibility Panel', located in the upper right-hand corner of the window. This panel makes it possible to change the appearance of the website and increase the font size without changing the size of other website elements. Although modern browsers have built-in zoom and high-contrast functions, a dedicated panel on the website is considered better practice and helps adapt content more quickly for persons with such impairments.[1929]

1922 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 52. ↗ On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Parts 6–10 Article 236. ↗

1923 Digital service 'Public Discussion of Draft Laws'. 'Citizen's E-Cabinet' web portal of the Verkhovna Rada of Ukraine. ↗

1924 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

1925 Public discussion of draft laws launched on the Verkhovna Rada website. CHESNO. 2025. ↗

1926 List of Completed Discussions. Verkhovna Rada of Ukraine. ↗

1927 On Nationwide Public Discussion of the Draft Law of Ukraine on Credit History: Resolution of the Verkhovna Rada of Ukraine No. 4233-IX of 11.02.2025. ↗

1928 'National Discussion' of the Draft Law: What Is This New (Old) Mechanism? Agency for Legislative Initiatives. 2025. ↗

1929 Short Guide to Digital Accessibility. 2023, p. 73. ↗

Public consultations

In June 2024, the Verkhovna Rada adopted Law of Ukraine No. 3841-IX 'On Public Consultations'.[1930] The Law will enter into force 12 months after martial law is terminated or cancelled. It defines the entities, forms and procedure for conducting public consultations. The Law provides for three forms of public consultation: (1) electronic consultations on an online platform, (2) targeted consultations by sending materials to stakeholders and (3) public discussion through events such as round tables and focus groups. Public consultations may be conducted in several forms simultaneously, but Law No. 3841-IX makes electronic consultations mandatory.[1931] For certain bodies, public discussion is mandatory in specified cases, for example where a draft act concerns citizens' constitutional rights, freedoms and duties or affects the environment, environmental, biological or genetic safety, etc.[1932] Following public consultations, the body must publish the proposals received, analyse them and prepare and publish a report on the consultation results. Public consultations must last at least 15 working days and the report must be published within 30 working days after they end.[1933]

The original Government draft law[1934] did not provide for public consultations on MP-sponsored draft laws to be recommendatory. However, following revision for the second reading, a special, essentially recommendatory, procedure was established for public consultations conducted by MPs and Verkhovna Rada committees. For MPs and Verkhovna Rada committees, public consultations are optional: under the Law, conducting them is a right rather than an obligation, unlike for other entities conducting public consultations. MPs may conduct public consultations on a draft law before submitting it to the Verkhovna Rada, while a parliamentary committee may conduct public consultations after the draft law has been adopted as a basis at first reading.[1935]

Consideration of public interests and the Sustainable Development Goals in parliamentary activities

The implementation of the UN Global Goals in Ukraine is based on the principle of 'leaving no one behind' and covers a national system of 86 tasks and 172 monitoring indicators.[1936] Responsibility for implementing the Sustainable Development Goals (SDGs) lies primarily with governments, but achieving these goals by 2030 requires the participation of a wide range of stakeholders, including parliaments. Effective achievement of the SDGs requires the systematic involvement of the Verkhovna Rada, particularly through its legislative, budgetary and oversight functions.[1937]

1930 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024. ↗

1931 Ibid, Articles 9, 10.

1932 Ibid, Article 12.

1933 Ibid, Articles 13, 19.

1934 On Public Consultations: Draft Law of Ukraine, registration No. 4254 of 23.10.2020. ↗

1935 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024, Article 8. ↗

1936 National Report 'Sustainable Development Goals: Ukraine'. Ministry of Economic Development and Trade of Ukraine. 2017 ↗ ; On the Sustainable Development Goals of Ukraine for the Period until 2030: Decree of the President of Ukraine No. 722/2019 of 30.09.2019 ↗ ; Certain Issues of Ensuring the Achievement of the Sustainable Development Goals in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1190 of 29.11.2024. ↗

1937 Implementation of the Sustainable Development Goals by National Parliaments of European Member States: Lessons for the Verkhovna Rada. EU-UNDP Parliamentary Reform Project, p. 6. ↗

During 2019–2021, a number of events took place in the Verkhovna Rada aimed at integrating the SDGs into the Ukrainian parliamentary process and building the institutional architecture for their implementation, in particular:

- a thematic roundtable[1938] presenting the parliamentary handbook 'The Role of Parliaments in Achieving the Sustainable Development Goals', developed as a tool to support the participation of parliaments in implementing the 2030 Agenda, including the achievement of the SDGs[1939] (2019);
- hearings on implementing the concept of Ukraine's sustainable development until 2030 in the Verkhovna Rada Committee on Economic Development[1940] (2019);
- the establishment, under the Committee on Economic Development, of the 'Ukraine 2030' Working Group to prepare and submit for discussion a draft law on the principles of state policy for the sustainable development of Ukraine, which was intended to define the model for the country's further development to achieve the UN Global Goals[1941] (February 2020). As of 31 July 2026, the relevant draft law had not been registered in the Verkhovna Rada;[1942]
- a high-level discussion involving representatives of the United Nations Development Programme, the EU and the Inter-Parliamentary Union on ways to intensify cooperation with the Government on achieving the SDGs (September 2020). During this event, the results of a study on the implementation of the SDGs by national parliaments of EU Member States were presented,[1943] while Parliament's leadership proposed: (1) that the Government should submit to the Verkhovna Rada the Voluntary National Review on Ukraine's progress in achieving the SDGs;[1944] (2) that the Committee on Economic Development be designated in the Verkhovna Rada as

1938 On 25.02.2019, the Committee of the Verkhovna Rada of Ukraine on Foreign Affairs (Verkhovna Rada of the VIII convocation) initiated and organised a roundtable on 'The Role of Parliaments in Achieving the Sustainable Development Goals (SDGs). What mechanisms can be used', with the support of the United Nations Development Programme in Ukraine (UNDP) and the Government of Sweden. It became the first platform for parliamentary discussion of the SDGs.
A parliamentary roundtable on 'The Role of Parliaments in Achieving the Sustainable Development Goals (SDGs). What mechanisms can be used' was held. United Nations Development Programme in Ukraine. 2019. ↗

1939 The Role of Parliaments in Achieving the Sustainable Development Goals. Handbook. Global Organization of Parliamentarians Against Corruption, United Nations Development Programme and Islamic Development Bank. 2017, p. 60. ↗

1940 Hearings were held in the Committee on Economic Development on 'Implementing the concept of sustainable development of Ukraine until 2030'. Committee on Economic Development. Verkhovna Rada of Ukraine. 2019. ↗

1941 A Working Group was established in the Committee on Economic Development to develop the draft Law 'On the Principles of State Policy for the Sustainable Development of Ukraine'. Verkhovna Rada of Ukraine. 2020. ↗

1942 According to information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026. Search by details. Draft Laws. Verkhovna Rada of Ukraine. ↗ ; In the Verkhovna Rada of the VIII convocation, Draft Laws No. 9015 and No. 9015-1 were registered, with the aim of adopting by the Verkhovna Rada the 'Strategy for Sustainable Development of Ukraine until 2030'. In the opinions of the Main Scientific and Expert Department on these draft laws, it was noted that Parliament should adopt normative acts, whereas strategic planning and approval of specific sectoral or national strategies is a function of the Government. In 2025, the Cabinet of Ministers of Ukraine approved the Concept of the National Strategic Planning System, which defines the general framework for strategic planning and provides that the SDGs should be taken into account, among other things, when developing strategic planning documents in the field of socio-economic development of Ukraine. On the Strategy for Sustainable Development of Ukraine until 2030: Draft Law of Ukraine, registration No. 9015 of 07.08.2018. ↗

1943 Implementation of the Sustainable Development Goals by National Parliaments of European Member States: Lessons for the Verkhovna Rada, p. 48. ↗

1944 Voluntary National Review on Ukraine's progress in achieving the Sustainable Development Goals. Ministry of Economy. 2020. ↗

responsible for coordinating SDG implementation,[1945] with a recommendation that it begin preparations for organising parliamentary hearings on the SDGs; (3) that the Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine, together with the Secretariat of the Verkhovna Rada, coordinate activities to conduct Parliament's self-assessment on achieving the SDGs.[1946]

In 2021, the monitoring report 'Sustainable Development Goals. Ukraine 2020' was published.[1947]

Since February 2022, Ukraine has focused its main resources on responding to the consequences of Russia's full-scale invasion and ensuring the functioning of the state in wartime. At the same time, preparations for Ukraine's accession to the EU have intensified, which also contributes to Ukraine's progress in achieving the SDGs. In this context, European integration reforms are seen as an instrument capable of complementing and improving national sustainable development policy and integrating it into post-war recovery processes. At the same time, Ukraine still needs to preserve the progress already achieved in sustainable development and ensure that efforts aimed at achieving the SDGs form the basis of Ukraine's recovery and European integration processes.[1948]

In October 2022, the Committee on Economic Development held hearings on 'Recovery and Post-War Sustainable Development of Ukraine'. Following them, it was recommended to: (1) create a platform based on the Committee on Economic Development for developing, discussing and coordinating an algorithm of practical steps for Ukraine's sustainable recovery in the post-war period; (2) ensure regular committee hearings on this topic, with a defined frequency, involving the expert community; (3) hold parliamentary hearings to coordinate the actions of state and local authorities, business, civil society and international organisations.[1949]

Progress and issues

A coherent strategy should become the foundation for building inclusive dialogue between the Verkhovna Rada and the public, defining a clear vector for the development of public participation in Parliament's work. The Secretariat of the Verkhovna

1945 To take the SDGs into account in their activities, parliaments should define an appropriate institutional architecture that will guarantee a systematic approach to the SDGs in all parliamentary processes, coherence and continuity. EU parliaments have three models of such institutional architecture: 1) new committees have been created or the powers of existing ones responsible for the SDGs have been expanded; 2) the SDGs have been incorporated into the work of existing committees or relevant subcommittees have been established within them; 3) informal mechanisms such as SDG networks or inter-factional SDG associations have been created. Since, under the Rules of Procedure, the Verkhovna Rada may establish committees only at the beginning of a convocation, the Verkhovna Rada effectively authorised the Committee on Economic Development to coordinate SDG implementation. On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 2 Article 81 ; Implementation of the Sustainable Development Goals by National Parliaments of European Member States: Lessons for the Verkhovna Rada, pp. 11–14.

1946 'For Ukraine, the Sustainable Development Goals are ambitious tasks that fully coincide with our internal national interests', Ruslan Stefanchuk. Verkhovna Rada of Ukraine. 2020.

1947 One of the indicators assessed in the report was 5.4.1. Share of women among MPs of the Verkhovna Rada of Ukraine. According to the monitoring report, this share was 20%. Monitoring Report 'Sustainable Development Goals. Ukraine 2020'.

1948 Implementation of SDGs in Ukraine in the context of recovery from the war and towards the European integration. UNDP.

1949 On 26 October 2022, hearings were held in the Committee on 'Recovery and Post-War Sustainable Development of Ukraine'. Committee on Economic Development. 2022.

Rada is developing a corporate development strategy aimed at improving the efficiency and quality of Parliament's work, strengthening internal interaction and effective external communication, including with the Government and other state authorities. As of 31 July 2026, a Strategic Executive Framework (SEF) for the activities of the Secretariat of the Verkhovna Rada of Ukraine for 2026–2030 had been developed. It contains five goals to be achieved through the implementation of mutually integrated projects. Under Goal 1, 'Ensuring a higher level of Parliament's institutional capacity', projects are envisaged on planning legislative work 'in a new way' and strengthening the institutional capacity of the Verkhovna Rada to conduct public consultations.[1950]

The current legislation on public involvement in the activities of the Verkhovna Rada is imperfect and fragmented, which has a negative impact on the ability to take citizens' views into account through mechanisms provided by law. This is manifested in:

- the selective submission of draft laws for discussion. During 2025, only one draft law was under discussion;[1951]
- the absence of a transparent link between the popularity of a draft law in the 'Propose for Discussion' section and its actual submission for discussion. Since there is no clearly defined number of votes, unlike in the case of e-petitions, that would guarantee the start of a discussion, the tool remains declarative;
- the lack of standardised reports on the results of public discussions and the absence of a dedicated section on the websites of the Verkhovna Rada and its committees where such reports would be published;[1952]
- the absence of publicly available Verkhovna Rada reports assessing the use of its mechanisms and tools for public participation.[1953]

The absence in the Law of Ukraine 'On Public Consultations' of an obligation for MPs and Verkhovna Rada committees effectively turned public consultations into an optional instrument of parliamentarians' goodwill. The fact that the Law of Ukraine No. 3841-IX adopted by Parliament did not make public consultations mandatory for MPs of Ukraine when drafting laws was criticised by the civil society sector.[1954]

1950 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

1951 Following consideration of the Draft Law 'On Credit History' (registration No. 12260 of 28.11.2024) in the first reading on 11.02.2025, the Verkhovna Rada decided to publish the draft law for nationwide discussion and submit it for a repeated first reading. This step was used as a last resort because Parliament did not have enough votes to send it for a repeated first reading or return it to the author for revision. The nationwide discussion lasted from 17.02.2025 to 15.03.2025. Results of discussion on the web portal: 17 people rated the draft law, nine 'for' and eight 'against'; one comment and one proposal were submitted on the text as a whole; 81 proposals, 32 comments and six remarks were submitted on individual blocks. All proposals, comments and remarks were not taken into account.
The Draft Resolution on setting the deadline for submitting the Draft Law of Ukraine on Credit History (registration No. 12260/P1 of 11.04.2025) for a repeated first reading was not adopted. On 3 September 2025, the draft law was removed from consideration. Results of discussion of the draft law 'On Credit History' (registration No. 12260 of 28.11.2024). Verkhovna Rada of Ukraine. ↗

1952 Information based on an analysis of the official websites of the committees of the Verkhovna Rada of Ukraine and the website of the Verkhovna Rada of Ukraine.

1953 Information based on an analysis of the website of the Verkhovna Rada of Ukraine.

1954 Pros and cons of the adopted Law 'On Public Consultations'. UPLAN Public Law and Administration Network. 2024. ↗ Public Consultations as an Instrument of Public Participation in Public Administration. Agency for Legislative Initiatives. 2025. ↗ ; Publication by the Centre of Policy and Legal Reform on the social network Facebook. 2025. ↗ ; Public consultations: how the Rada fulfilled the European Commission's requirement for show and what should citizens do now? Holka. 2024. ↗

The Roadmap on the Functioning of Democratic Institutions provides for the adoption and implementation, by the fourth quarter of 2027, of amendments to the Law of Ukraine 'On Public Consultations' extending its requirements to draft laws submitted by MPs of Ukraine.[1955]

By Order of the Ministry of Justice of Ukraine No. 1894/7 of 11 September 2025, a working group was established to implement measures provided for by the Action Plan for 2025–2026 on implementation of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026[1956] and by the Roadmaps on the Rule of Law, Functioning of Democratic Institutions and Public Administration Reform,[1957] including measures to implement the Law of Ukraine 'On Public Consultations' and incorporate European standards on public participation into national legislation. The working group is holding meetings and developing draft Methodological Recommendations on Conducting Public Consultations. Following preparation of the Methodological Recommendations and taking into account proposals submitted by working group members, a draft law amending the Law of Ukraine 'On Public Consultations' is expected to be prepared, including with a view to extending its requirements to draft laws sponsored by MPs of Ukraine.[1958]

Due to the dominance of complex legal language and the absence of 'easy-read' formats in the communications of the Verkhovna Rada, most citizens are effectively excluded from parliamentary participation. Despite the Government Recommendations approved in 2023 on presenting information by public authorities in formats that ensure accessibility of perception,[1959] the Verkhovna Rada has still not introduced effective inclusive ways of presenting draft laws to citizens. Although the full texts of draft laws are contained in the cards of registered draft laws and are published in the 'Public Discussion of Draft Laws' section, both tools remain ineffective for the public. Due to excessively complex legal wording and the lack of explanations in plain language and easy-read format, citizens face a cognitive barrier.[1960] This is resulting in limited public participation and limiting the real influence of broader society on the law-making process.

There are no reports on monitoring and evaluating the use of parliamentary mechanisms and tools for public participation in Parliament's activities on the official website of the Verkhovna Rada. The official website of the Verkhovna Rada does not have a separate functional module or section to aggregate cross-cutting analytics on interaction with civil society. Even where individual committees publish ad hoc reports on particular

1955 Roadmap on the Functioning of Democratic Institutions, measure 3 of strategic result 2 and measure 10 of strategic result 1 of subsection III.C 'Effectiveness' of section III 'Functioning of Parliament in a Democratic System'. ↗

1956 On Approval of the Action Plan for 2025–2026 for the Implementation of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026: Order of the Cabinet of Ministers of Ukraine No. 246-r of 21.03.2025. ↗

1957 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475-r of 14.05.2025. ↗

1958 Report on the Status of Implementation of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475-r of 14 May 2025, for the first quarter of 2026.

1959 On Approval of Recommendations on Presenting Information by Public Authorities in Formats Ensuring Accessibility of Perception: Order of the Cabinet of Ministers of Ukraine No. 1046 of 07.11.2023. ↗

1960 'Plain language about complex matters': a new online course promoting accessible communication principles in the public sector has started. United Nations Development Programme. 2025. ↗

draft laws,[1961] these data are dispersed, making it impossible to assess the overall effectiveness of citizen engagement at the level of Parliament as a whole.

Public involvement in parliamentary oversight is also largely nominal. The official website of the Verkhovna Rada does not contain reference materials explaining how the public can contribute to parliamentary oversight.

Although the public has the right to participate in such parliamentary oversight mechanisms as committee and parliamentary hearings and meetings of Verkhovna Rada committees, its participation often remains passive, since the public is usually not given the right to speak during committee meetings. This closed nature has been systematically deepened since 2020 due to the COVID-19 pandemic and, with the beginning of the full-scale invasion, has intensified because of security challenges and restrictions on access to the 'Government Quarter'. Parliamentary hearings were not held and meetings of most Verkhovna Rada committees were closed to the public for a period of time. In January 2026, Law No. 4212-IX entered into force. It obliged parliamentary committees, in particular, to ensure public access to meetings, namely, to provide links for connecting to open committee meetings held by videoconference.[1962]

The Verkhovna Rada has low institutional capacity to conduct public discussion and, subsequently, public consultations. The function of ensuring public discussion, or public consultations, on MP-sponsored draft laws is assigned to committees and structural units of the Secretariat of the Verkhovna Rada.[1963] The implementation of the requirements of the Law of Ukraine 'On Public Consultations' obliges initiators not only to collect proposals, but also to process them professionally, prepare reports and revise draft laws. Meeting these requirements will significantly increase the workload of MPs, their assistant-consultants and Secretariat staff even under the current version of the Law, which does not make public consultations mandatory for MP-sponsored draft laws. Therefore, successful implementation of the Law requires additional human resources and their systematic training in unified standards for conducting public consultations.

Alongside staffing needs, the issue of technical readiness also arises, in particular the creation of an online platform for public consultations. Until such a platform is created, electronic consultations are conducted on the websites and/or social media pages of bodies responsible for the formation of state policy or for resolving local issues and/or bodies that develop draft acts.[1964] At present, the Public Discussion of Draft Laws Portal operates for electronic consultations on draft laws initiated by MPs.[1965] If the procedure changes and the number of draft laws under discussion increases, the Portal's functionality

1961 Report following the public consultation on the draft Law of Ukraine 'On the Unified Information System of the Social Sphere' (registration No. 11377 of 24.06.2024). Committee of the Verkhovna Rada of Ukraine on Digital Transformation. 2024. ↗

1962 On Amendments to Certain Laws of Ukraine on Strengthening Certain Guarantees for the Activities of Media and Journalists and Ensuring Citizens' Right of Access to Information: Law of Ukraine No. 4212-IX of 14.01.2025. ↗

1963 White Paper on the Legislative Process. Centre of Policy and Legal Reform, NGO 'Internews-Ukraine' within the USAID RADA: Next Generation Programme. 2023, pp. 12–15. ↗

1964 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024, para. 2 Section IV 'Final and Transitional Provisions'. ↗

1965 Digital service 'Public Discussion of Draft Laws'. 'Citizen's E-Cabinet' web portal of the Verkhovna Rada of Ukraine. ↗

will need to be improved and modernised, with additional resources involved to ensure its effective operation.

The absence of a strategic approach to involving different population groups in parliamentary processes limits the inclusiveness of parliamentary activities and deepens the gap between Parliament and society. Despite Parliament's declared openness to interaction with citizens, the level of public trust in it remains among the lowest among state institutions: 76% of respondents express distrust in the Verkhovna Rada.[1966] This indicates the need to rethink approaches to communication and public engagement. The Inter-Parliamentary Union recommends moving away from situational public engagement towards strategic planning: building a clear system of goals, objectives, resources and measurable results, identifying audiences and ways to involve them in parliamentary processes.[1967]

At present, stakeholder engagement in the Verkhovna Rada is selective and uneven. Institutionally capable groups, such as large business associations, civil society organisations and analytical centres, are regularly involved in consultations and discussions, while representatives of remote territorial communities, small businesses or socially vulnerable groups often remain less represented in parliamentary processes due to communication and infrastructure barriers. All activities in this area are unsystematised and lack a unified strategic approach; monitoring and evaluation of quantitative and qualitative indicators are not carried out. The absence of internal audit, performance indicators and verified evaluation criteria makes it impossible to determine the real level of inclusiveness of parliamentary processes and their correspondence to the needs of different population groups.

Certain initiatives envisaged by the draft Strategic Executive Framework (SEF) for the activities of the Secretariat of the Verkhovna Rada of Ukraine for 2026–2030, could potentially strengthen public involvement in law-making. However, the scale of engagement will depend on whether they include real mechanisms for overcoming barriers to the participation of different social groups, particularly the most socially excluded groups.[1968]

The Verkhovna Rada has an insufficient level of institutional capacity and consistency in implementing the SDGs. Although the Committee on Economic Development has been designated as responsible for coordinating SDG implementation, no corresponding amendments have been made to the subject matters of the committees of the Verkhovna Rada of the ninth convocation.[1969] In 2025, the Research Service analysed the need to establish a separate Committee on the Future, or on long-term planning. Following this

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1966 Assessment of the situation in the country, trust in social institutions and assessment of problems existing in Ukrainian society (November 2025). Razumkov Centre. 2025. ↗

1967 Global Parliamentary Report 2022 — Public Engagement in the Work of Parliament. Inter-Parliamentary Union. 2022, p. 11. ↗

1968 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.
In particular, the following projects may potentially affect the involvement of different population groups in parliamentary processes: projects 8 'Strengthening the institutional capacity of the Verkhovna Rada of Ukraine to conduct public consultations' and 9 'Digitalisation of the legislative function of parliamentary committees' under Goal 1 'Ensuring a higher level of Parliament's institutional capacity'; projects 1 'Communication Strategy 2.0' and 4 'Representation of Parliament on social media' under Goal 2 'Openness of the Verkhovna Rada of Ukraine'; projects 1 'Digital ecosystem of plenary sittings and meetings of parliamentary committees', 3 'Electronic Platform "Legislation of Ukraine"', 4 'Electronic Archive of Parliament' and project 6 'Integration of AI tools into Parliament's work' under Goal 3 'Digital Parliament'.

1969 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

analysis, it recommended discussing the concept of establishing such a committee with representatives of all parliamentary committees, which would make it possible to objectively assess the advantages and potential challenges of creating it both in the current and in the next convocation of the Verkhovna Rada.[1970]

In fact, the last committee hearings dedicated to the SDGs took place back in October 2022.[1971] In 2023 and 2025, the Committee on Economic Development held committee hearings on the Plan for the Recovery of Ukraine from the Consequences of the War and on the Ukraine Plan for the Ukraine Facility, but SDG issues were not discussed during these hearings.[1972]

Parliamentary hearings on the principles of state policy for the sustainable development of Ukraine, despite plans, never took place. Initially, this was due to quarantine restrictions introduced to counter the spread of COVID-19, and after the beginning of Russia's full-scale invasion, due to security restrictions.[1973] The results of Parliament's self-assessment on achieving the SDGs are not publicly available.[1974]

Recommendations

1. Amend the Law of Ukraine 'On Public Consultations' and the Rules of Procedure of the Verkhovna Rada of Ukraine to provide for mandatory public consultations by MPs and committees of the Verkhovna Rada.
2. Modernise the functionality of the Public Discussion of Draft Laws Portal in line with legislative requirements, adopted amendments and best practices for conducting public consultations.
3. Introduce inclusive communication of draft laws by: (1) accompanying documents with short summaries in an 'easy-read' format on the Verkhovna Rada portal; (2) adapting the public discussion interface to inclusiveness standards; and (3) systematically training staff of the Secretariat of the Verkhovna Rada and assistants to MPs in accessible presentation of information.[1975]

1970 Information note on the establishment of a Committee on the Future in the Verkhovna Rada of Ukraine. Research Service of the Verkhovna Rada of Ukraine. 2025. ↗

1971 On 26 October 2022, hearings were held in the Committee on 'Recovery and Post-War Sustainable Development of Ukraine'. Committee on Economic Development. Verkhovna Rada of Ukraine. ↗

1972 On 24 March 2023, hearings were held in the Committee on 'Plan for the Recovery of Ukraine from the Consequences of the War'. Committee on Economic Development. Verkhovna Rada of Ukraine ↗ ; On 27 February 2025 at 16:00, hearings were held in the Committee on 'Results of implementation of the Ukraine Plan for the Ukraine Facility in 2024 and plans for 2025'. Committee on Economic Development. Verkhovna Rada of Ukraine. ↗

1973 The planned date of parliamentary hearings was postponed several times (28.04.2021, 14.07.2021, 17.11.2021, 15.12.2021). After the beginning of the full-scale invasion, no parliamentary hearings were held due to security measures and restricted access to the 'Government Quarter'.
On Holding Parliamentary Hearings on 'The Principles of State Policy for Sustainable Development of Ukraine' (14 July 2021): Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 5130 of 22.02.2021 ↗ ; On Holding Parliamentary Hearings on 'The Principles of State Policy for Sustainable Development of Ukraine' (15 December 2021): Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 6066 of 16.09.2021. ↗

1974 Information based on an analysis of the website of the Verkhovna Rada.

1975 Plain Language about Complex Matters. How to write and speak simply, clearly and accessibly — so that you are read, understood and trusted. Diia.Education ↗ ; Written communication of public servants: plain language and easy reading. Training. Knowledge Management Portal. ↗

4. Introduce procedures for monitoring and evaluating the use of parliamentary mechanisms and tools for public participation in public consultations. Oblige the Secretariat of the Verkhovna Rada to ensure publication of the relevant reports on the official website of the Verkhovna Rada, in a separate section.

5. Strengthen mechanisms for citizen participation in Parliament's oversight functions by: (1) creating a separate and intuitive 'Public Oversight' section on the official website of the Verkhovna Rada, containing algorithms for citizen participation in oversight processes of the Verkhovna Rada and its committees; (2) ensuring that all information and reference materials on parliamentary oversight are duplicated in plain language and in an easy-read format; and (3) creating a single integrated calendar of oversight events and publishing links to online broadcasts of such events, open meetings and document packages.

6. Introduce specialised units or positions of specialist analysts on public consultations within the structure of the Secretariat of the Verkhovna Rada and committee secretariats, providing them with clear operational regulations and digital tools for processing public proposals.

7. Develop a comprehensive strategic stakeholder engagement plan with clear representativeness criteria for vulnerable and regional groups and introduce an internal mechanism for monitoring and annual evaluation of the inclusiveness of consultations held.

8. Strengthen Parliament's institutional capacity in coordinating SDG implementation by:

   - increasing the awareness of MPs of Ukraine, their assistant-consultants and staff of the Secretariat of the Verkhovna Rada about the SDGs;
   - defining an appropriate institutional architecture that will guarantee a systematic approach, coherence and continuity in integrating the SDGs into all parliamentary processes, either by establishing a new Verkhovna Rada committee or by strengthening the staffing, material and technical capacity of the Committee on Economic Development;
   - strengthening parliamentary control over reporting on the SDGs, by restoring the practice of committee and parliamentary hearings and introducing mandatory analysis of the impact of draft laws on achieving the SDGs;
   - identifying key legislative priorities related to the SDGs and ensuring their priority consideration;
   - ensuring mandatory consideration of the SDGs when preparing and developing the Budget Declaration and the draft State Budget of Ukraine;
   - involving civil society organisations, citizens and other stakeholders in the law-making process based on the core principle of 'leaving no one behind'.[1976]

1976 The recommendations have been developed taking into account the results of the study of the role and practice of national parliaments of the European Union in implementing the 2030 Agenda and achieving the SDGs. Implementation of the Sustainable Development Goals by National Parliaments of European Member States: Lessons for the Verkhovna Rada. EU-UNDP Parliamentary Reform Project, p. 48. ↗

Open Parliament and Access to Data

State of play

Access to information

The Verkhovna Rada provides information upon request in accordance with the Law of Ukraine 'On Access to Public Information'.[1977] The consideration of information requests and the provision of responses are ensured by the Secretariat of the Verkhovna Rada.[1978] The Secretariat of the Verkhovna Rada is also guided by the Laws of Ukraine 'On Information',[1979] 'On Personal Data Protection',[1980] the Rules of Procedure of the Verkhovna Rada of Ukraine,[1981] the Regulation on datasets subject to publication in the form of open data[1982] and its own normative legal acts.[1983]

Information requesters[1984] have the right to apply to the Verkhovna Rada, as the information holder, with an information request regardless of whether the information concerns them personally, without having to explain the reason for submitting the request.[1985] An information request to the Secretariat of the Verkhovna Rada may be submitted orally or in writing, by post or email, by telephone or by completing an electronic request form.[1986] The Verkhovna Rada publishes monthly reports on the processing of information requests.[1987]

The information holder must respond to an information request no later than five working days from the date of receipt of the request. If the request concerns a large volume of information or requires a search through a significant amount of data, the information holder may extend the period for considering the request to 20 working days.[1988] Information is provided free of charge upon request, except in cases defined by law.[1989]

1977 On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011. ↗

1978 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, para. 2 Part 5 Article 3. ↗

1979 On Information: Law of Ukraine No. 2657-XII of 02.10.1992. ↗

1980 On Personal Data Protection: Law of Ukraine No. 2297-VI of 01.06.2010. ↗

1981 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

1982 On Approval of the Regulation on Datasets Subject to Publication in the Form of Open Data: Resolution of the Cabinet of Ministers of Ukraine No. 835 of 21.10.2015. ↗

1983 On Ensuring the Implementation of the Law of Ukraine 'On Access to Public Information' in the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 393 of 11.05.2011. ↗; On Approval of the Amount of Actual Costs for Copying or Printing Documents Provided upon Information Requests and the Procedure for Reimbursement of Such Costs: Order of the Head of the Secretariat of the Verkhovna Rada of Ukraine No. 2941 of 31.05.2011. ↗; On Certain Issues of Ensuring Document Flow in the Verkhovna Rada of Ukraine in Electronic and Paper Forms: Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗; On Approval of the List of Information Constituting Official Information in the Verkhovna Rada of Ukraine, Bodies of the Verkhovna Rada of Ukraine and the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 398 of 11.07.2022. ↗

1984 Information requesters are natural persons, legal entities and associations of citizens without legal entity status, except for public authorities. On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011, Article 12. ↗

1985 Ibid, Article 19.

1986 Information for requesters on submitting requests. Verkhovna Rada of Ukraine, 2023. ↗

1987 Reports. Verkhovna Rada of Ukraine. ↗

1988 Ibid, Article 20.

1989 Except where more than 10 pages of copies of documents must be produced to respond.

Public information with restricted access includes: (1) confidential information, (2) secret information and (3) official information. The Law of Ukraine 'On Access to Public Information' establishes that access to information may be restricted only if the following cumulative requirements are met (the 'three-part test'):

- exclusively in the interests of national security, territorial integrity or public order, to prevent disturbances or criminal offences, to protect public health, to protect the reputation or rights of others, to prevent the disclosure of information received in confidence or to maintain the authority and impartiality of justice;
- disclosure of the information may cause substantial harm to these interests;
- the harm caused by disclosure of such information outweighs the public interest in receiving it.[1990]

The list of information constituting official information in the Verkhovna Rada, its bodies and the Secretariat is approved by the Chairman of the Verkhovna Rada. In July 2023, this list was significantly expanded, in particular by adding information concerning: (1) documentation of the activities of committees, temporary special commissions and temporary investigative commissions of the Verkhovna Rada; (2) the description and protection system for service identity cards, identity cards and temporary passes recorded and issued by the Secretariat of the Verkhovna Rada; (3) the planning and organisation of events involving officials of the Verkhovna Rada and visits by parliamentary delegations, delegations of foreign states and international organisations to the Verkhovna Rada; (4) official travel of MPs, except members of permanent delegations, during the special period.[1991]

Decisions, actions or inaction of information holders may be appealed to the head of the information holder, a higher body or a court.[1992] In addition, violation of the right to information, including failure to respond to an information request, constitutes an administrative offence.[1993]

To implement the requirements of the Law of Ukraine 'On Access to Public Information', the Open Data Portal operates,[1994] providing access to public information of the Verkhovna Rada in the form of open data and enabling access to information with the possibility of its further free use and dissemination.[1995]

The priority list of open datasets for which the Verkhovna Rada is the holder includes information on: (1) plenary sittings, (2) consideration of agenda items, (3) MPs and their activity, (4) the attendance of MPs of Ukraine at meetings of relevant committees, (5)

1990 On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011, Article 6. ↗

1991 On Approval of the List of Information Constituting Official Information in the Verkhovna Rada of Ukraine, Bodies of the Verkhovna Rada of Ukraine and the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 398 of 11.07.2022 (as amended by Order of the Chairman of the Verkhovna Rada No. 871 of 13.07.2023). ↗

1992 On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011, Articles 23, 24. ↗

1993 Code of Ukraine on Administrative Offences No. 8073-X of 07.12.1984, Article 212^3. ↗

1994 The portal was developed pursuant to the Memorandum of Cooperation between the Secretariat of the Verkhovna Rada, Civil Network OPORA and the State Agency for E-Governance, with support from the United Nations Development Programme.

1995 Homepage of the Open Data Portal. ↗

assistants-consultants to MPs, (6) draft laws registered in the Verkhovna Rada, (7) the normative legal database of Ukraine (the 'Legislation of Ukraine' database), (8) the economic and financial activities of the Verkhovna Rada, (9) transcripts and agendas of plenary sittings of the Verkhovna Rada and (10) the administrative-territorial structure of Ukraine.[1996] As of 31 July 2026, 610 datasets had been published on the Open Data Portal,[1997] which are updated periodically.

Transparency of parliamentary processes

Sittings of the Verkhovna Rada are open and public, except in cases established by the Constitution of Ukraine[1998] and the Rules of Procedure of the Verkhovna Rada.[1999] The openness of sittings of the Verkhovna Rada is ensured through access to them by any persons, except in cases provided for by law.[2000] Before the full-scale invasion, the legal framework also provided for separate procedures for public access to open plenary sittings of the Verkhovna Rada[2001] and participation in open visitor events in Parliament.[2002] At the same time, in view of martial law, open visitor events in the administrative building of Parliament on Hrushevskoho Street are not held.[2003]

The public nature of sittings of the Verkhovna Rada is ensured through their broadcasting in linear audiovisual media, publication of stenographic bulletins of sittings of the Verkhovna Rada,[2004] its decisions in the Bulletin (Vidomosti) of the Verkhovna Rada of Ukraine,[2005] the newspaper Holos Ukrainy[2006] and other publications of the Verkhovna Rada, as well as by publishing information on the official website of the Verkhovna Rada.[2007] The time, scope and form of broadcasting and the volume of printed materials are determined in accordance with the Rules of Procedure of the Verkhovna Rada and separate resolutions of the Verkhovna Rada.[2008]

Committees of the Verkhovna Rada inform the public about their activities, in particular by publishing work plans, schedules of committee meetings, agendas of committee meetings, draft laws under committee consideration and the status of their consideration, decisions, minutes, transcripts of committee meetings and committee hearings and video

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1996 On Approval of the Regulation on Datasets Subject to Publication in the Form of Open Data: Resolution of the Cabinet of Ministers of Ukraine No. 835 of 21.10.2015. ↗

1997 Open datasets. Open Data Portal (assessed 31.07.2026). ↗

1998 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 84. ↗

1999 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 4. ↗

2000 Ibid, Article 3.

2001 On the Procedure for Access of Persons to Open Plenary Sittings of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 694/14-RH of 27.10.2014. ↗

2002 On Approval of the Regulation on the Procedure for Organising and Holding Open Visitor Events in the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 582/04-RH of 24.05.2004. ↗

2003 How to Visit the Educational Centre? Official website of the Educational Centre of the Verkhovna Rada of Ukraine, 2025. ↗

2004 Stenographic bulletins of plenary sittings of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

2005 Vidomosti Verkhovnoi Rady Ukrainy. ↗

2006 Newspaper Holos Ukrainy. ↗

2007 Official website of the Verkhovna Rada of Ukraine. ↗

2008 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 5 Article 3. ↗

recordings of open committee meetings on their webpages on the official website of the Verkhovna Rada.[2009]

In January 2025, the Verkhovna Rada adopted Law No. 4212-IX[2010] on the openness of committees. The Law requires committees of the Verkhovna Rada to publish agendas of meetings no later than 24 hours before the beginning of committee meetings, as well as to provide live broadcasts of open committee meetings and keep video recordings of such meetings freely accessible. Committees are also required to publish minutes and transcripts of committee meetings on the webpage of the relevant committee. Although the Law was adopted in January 2025, the President signed it only on 17 December 2025, which means that it was put into effect only on 20 January 2026.

Transparency of the legislative process[2011]

Draft laws and drafts of other acts submitted to the Verkhovna Rada are registered by the Secretariat of the Verkhovna Rada on the day of their submission or, if submitted outside working hours, no later than the next working day. All registered draft laws, drafts of other acts and supporting documents are published on the website of the Verkhovna Rada.[2012] The content of the draft law card is determined by the Technological Scheme.[2013] Thus, the draft law card contains the full title of the draft law, its registration number and date, the main committee and other committees as assigned by the leadership of the Verkhovna Rada, the text of the draft law and supporting documents (submission, explanatory note etc.), documents related to work on the draft (opinions of scientific expertise, the main committee and other committees, comparative tables containing all proposals and amendments to draft laws, the text of the adopted law signed by the Chairman of the Verkhovna Rada etc.). Draft law cards also contain information on stages of passage of the draft, related draft laws, alternative draft laws, the chronology of consideration and voting results. The website of the Verkhovna Rada contains a visualisation of the passage of draft laws[2014] as well as a scheme for the passage of draft laws.[2015]

2009 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, para. 1 Part 1 Article 9. ↗

2010 On Amendments to Certain Laws of Ukraine on Strengthening Certain Guarantees for the Activities of Media and Journalists and Ensuring Citizens' Right of Access to Information: Law of Ukraine No. 4212-IX of 14.01.2025. ↗

2011 For more detail on the legislative process, see the section 'Legislative Process'.

2012 Draft laws. Verkhovna Rada of Ukraine. ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 92. ↗

2013 Technological Scheme for Populating the Web Resources of the Verkhovna Rada of Ukraine with Information. On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

2014 Visualisation of the passage of draft laws. Verkhovna Rada of Ukraine. ↗

2015 Schemes for the passage of draft laws. Verkhovna Rada of Ukraine. ↗

The website of the Verkhovna Rada publishes the calendar plan for sessions,[2016] agendas of plenary sittings,[2017] minutes of plenary sittings,[2018] the chronology of consideration of the agenda[2019] and voting results.[2020]

Laws signed by the President are published in the newspaper Holos Ukrainy and in the Bulletin (Vidomosti) of the Verkhovna Rada of Ukraine, as well as on the official website of the Verkhovna Rada.[2021]

The Secretariat of the Verkhovna Rada maintains the normative legal information database 'Legislation of Ukraine',[2022] which contains, in particular, reference electronic texts[2023] of the originals of acts adopted by the Verkhovna Rada. Access to this database on the official website of the Verkhovna Rada is free of charge and unrestricted.[2024]

Transparency of the budget cycle and the parliamentary budget[2025]

One of the principles on which Ukraine's budget system is based is the principle of publicity and transparency.[2026] The procedures for considering the Budget Declaration,[2027] preparing and considering the draft law on the State Budget of Ukraine for the following year,[2028] amending the Law on the State Budget of Ukraine[2029] and considering the annual report on the implementation of the Law on the State Budget of Ukraine[2030] are carried out in compliance with the general rules on ensuring the transparency of the law-making process. The draft resolution on the Budget Declaration and the draft law on the State Budget of Ukraine, together with supporting documents, are published on the website of the Verkhovna Rada. In the relevant draft law cards, it is possible to trace the chronology of consideration and voting results. These draft acts are heard at a plenary sitting of the Verkhovna Rada.

2016 Calendar plan for sessions of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine. ↗

2017 Agendas of plenary sittings. Verkhovna Rada of Ukraine. ↗

2018 Minutes of plenary sittings. Verkhovna Rada of Ukraine. ↗

2019 Chronology of agenda consideration. Verkhovna Rada of Ukraine. ↗

2020 Voting results. Verkhovna Rada of Ukraine. ↗

2021 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 1 Article 139. ↗; The procedure for bringing normative legal acts to public attention is regulated by Article 48 of the Law of Ukraine 'On Law-Making Activity'. On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 48. ↗

2022 For more detail on the publication and entry into force of laws, see the subsection 'Legislative Procedure'. Legislation of Ukraine. Verkhovna Rada of Ukraine. ↗

2023 A reference electronic text means the text of an act adopted by the Verkhovna Rada, stored as a computer file, the integrity of which is ensured by special information protection tools. The Law of Ukraine 'On Law-Making Activity' uses another term, 'consolidated text of a normative legal act'. The consolidated text of a normative legal act is a technical tool for familiarisation with the current version of each legal norm currently in force and/or the version of each legal norm whose entry into force has been deferred in the relevant normative legal act. On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Article 52. ↗

2024 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 5 Article 7. ↗

2025 For more detail on the budget process in Parliament, see the subsection 'Budget Process'.

2026 Budget Code of Ukraine No. 2456-VI of 08.07.2010, para. 10 Part 1 Article 7. ↗

2027 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 152. ↗

2028 Ibid, Articles 153–159.

2029 Ibid, Article 160.

2030 Ibid, Article 162.

For example, the draft law on the State Budget for 2026[2031] was registered by the Government together with supporting documents and was available for review, as was the draft resolution on Budget Conclusions.[2032] The transcripts of consideration of the drafts in the sectoral Budget Committee[2033] and at the plenary sitting of the Verkhovna Rada[2034] are available for review.

The Government submits the annual report on the implementation of the State Budget no later than 1 April. Consideration of the report on the implementation of the Law on the State Budget of Ukraine takes place in the Verkhovna Rada under the full discussion procedure. Based on the results of consideration, the Verkhovna Rada adopts a decision.[2035] Under martial law, the provision on the deadline for submitting the annual report on the implementation of the Law on the State Budget of Ukraine does not apply,[2036] and reports on the implementation of the State Budget during the full-scale invasion have not been considered. The report on execution of the State Budget for 2025[2037] was registered in July 2026 but was not considered at a plenary sitting of the Verkhovna Rada. At the same time, the public may review the committee's conclusions in the card of the relevant draft resolution or the process of considering the report in the Budget Committee.[2038] Information on the status of implementation of the State Budget is also published on the website of the MoF.[2039] According to the 2025 Open Budget Survey, Ukraine scored 65 points.[2040]

The budget estimate of the Verkhovna Rada is approved by Parliament when adopting the draft law on the State Budget of Ukraine for the following year in the second reading, based on the conclusions of the committees responsible for rules of procedure and budget matters.[2041] Information on estimates, reports on their implementation, budget requests and internal audit activity plans is available on the website of the Verkhovna

2031 On the State Budget of Ukraine for 2026: Draft Law of Ukraine, registration No. 14000 of 15.09.2025. ↗

2032 On Conclusions and Proposals to the Draft Law of Ukraine on the State Budget of Ukraine for 2026: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14000/П of 17.10.2025. ↗

2033 Transcript of Budget Committee meeting No. 227 of 17.09.2025. ↗; Transcript of Budget Committee meeting No. 228 of 17.10.2025. ↗; Transcript of Budget Committee meeting No. 231 of 03.12.2025. ↗

2034 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 19.09.2025. ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 21.10.2025. ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 22.10.2025. ↗; Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 03.12.2025. ↗

2035 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 162. ↗

2036 Budget Code of Ukraine No. 2456-VI of 08.07.2010, subpara. 1 para. 22 Section VI 'Final and Transitional Provisions' ↗; However, the corresponding provision in the Rules of Procedure of the Verkhovna Rada does not contain such an exception. On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 5 Article 161. ↗

2037 On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2025': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15408 of 14.07.2026. ↗

2038 For example: Transcript of Budget Committee meeting No. 239 of 14.07.2026. ↗

2039 Budget 2026. Ministry of Finance of Ukraine. ↗

2040 This component assesses the online availability, timeliness and comprehensiveness of eight key budget documents using 109 equally weighted indicators and scores each country on a scale from 0 to 100. A transparency score of 61 or higher indicates that a country publishes sufficient budget information and that this information provides meaningful coverage of key fiscal data, enabling the public to understand government budget decisions and supporting informed public debate on fiscal policy. Open Budget Survey 2025. Ukraine. International Budget Partnership. ↗

2041 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 4 Article 7. ↗

Rada.[2042] The Chairman of the Verkhovna Rada is obliged to ensure the submission to the Verkhovna Rada of the report on the implementation of the Verkhovna Rada's estimate for the previous year.[2043] However, such a report has never been considered by the Verkhovna Rada of the ninth convocation; instead, the report on the implementation of the estimate is considered by the Rules of Procedure Committee.[2044]

Parliamentary communication

In 2016, the Verkhovna Rada officially joined the Declaration on Parliamentary Openness.[2045] The Chairman of the Verkhovna Rada approved an Action Plan developed in cooperation with civil society, which contained 20 commitments of Parliament in the areas of (1) access to information, (2) citizen engagement in parliamentary processes, (3) reporting and (4) technologies and innovation.[2046] In 2017, additionally in implementation of the recommendations of the Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine,[2047] the Chairman of the Verkhovna Rada approved the Communication Strategy of the Verkhovna Rada of Ukraine for 2017–2021.[2048] A new Communication Strategy was being developed in the Verkhovna Rada.[2049] In addition, in August 2023 the Chairman of the Verkhovna Rada approved an order on the use of official emblem of the Verkhovna Rada[2050] on all official documents of Parliament.

The organisation of coverage of the activities of the Verkhovna Rada and its bodies in the media, as well as the preparation and distribution of materials on the activities of the Verkhovna Rada, is carried out by the Secretariat of the Verkhovna Rada.[2051]

In April 2025, an IFA, 'Open Parliament of Ukraine', was established in the Verkhovna Rada of the ninth convocation.[2052] Its purpose is to make Parliament more open and accountable

2042 Financial and economic activities. Verkhovna Rada of Ukraine. ↗

2043 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, para. 24 Part 1 Article 78. ↗

2044 Decision of the Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine on the report of the Administrative Department of the Secretariat of the Verkhovna Rada of Ukraine on the implementation of the estimate of the Verkhovna Rada of Ukraine for 2025. ↗

2045 The Verkhovna Rada of Ukraine joined the Declaration on Parliamentary Openness and became a participant in the Open Government Partnership initiative. Verkhovna Rada of Ukraine, 2016. ↗

2046 On Certain Measures to Ensure the Openness of the Work of the Verkhovna Rada of Ukraine, Its Bodies, MPs of Ukraine and the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 47 of 05.02.2016. ↗

2047 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016. Recommendation No. 28. ↗

2048 On Additional Measures for the Implementation of the Declaration on Parliamentary Openness: Order of the Chairman of the Verkhovna Rada of Ukraine No. 486 of 21.11.2017. ↗

2049 Information provided by Respondent No. 52 during an interview conducted on 26.03.2026.

2050 On the Use of the Official Emblem in the Activities of the Verkhovna Rada of Ukraine, Bodies of the Verkhovna Rada of Ukraine, MPs, Parliamentary Factions and Groups in the Verkhovna Rada of Ukraine and the Secretariat of the Verkhovna Rada of Ukraine and Approval of the Temporary Procedure for Its Use: Order of the Chairman of the Verkhovna Rada of Ukraine No. 935 of 24.08.2023.

2051 On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769 of 25.08.2011. ↗

2052 Information provided by the Secretariat of the Verkhovna Rada of Ukraine in letter No. 09/13-2026/60329 of 20.03.2026.

to society and to strengthen interaction between the Verkhovna Rada and the public.[2053] An Expert Council operates under the IFA with the participation of 16 representatives of the public, selected through an open competition.[2054] The task of the Expert Council is to prepare a new Action Plan within the Open Government Partnership initiative.[2055]

At the beginning of its convocation, the Verkhovna Rada of the ninth convocation adopted a resolution on coverage of its work[2056] in accordance with the requirements of the Law of Ukraine 'On the Procedure for Coverage of the Activities of State Authorities and Local Self-Government Bodies in Ukraine by the Media' No. 539/97-VR.[2057] At the same time, Law No. 539/97-VR ceased to be in force following the adoption of the Law of Ukraine 'On Media'.[2058] The Law of Ukraine 'On Media' established that the entity in the field of parliamentary broadcasting is the state enterprise 'Parliamentary TV Channel Rada' (the Rada TV channel[2059]) or its legal successor.[2060] The Rada TV channel was established to provide society with reliable, complete, balanced, objective, impartial and timely information about the work of the Verkhovna Rada, its bodies and officials, MPs, parliamentary factions and groups, as well as other important events in Ukraine and the world.[2061]

The Rada TV channel ensures full live broadcasting of (1) open plenary sittings of the Verkhovna Rada, (2) daily programmes on the days of plenary sittings and the 'Government's Question Hour' and (3) weekly programmes with equal participation of representatives of parliamentary factions and groups and non-affiliated MPs.[2062]

If, during martial law in Ukraine, restrictions are imposed on live broadcasting of open plenary sittings of the Verkhovna Rada to ensure the security measures of the Verkhovna Rada, such broadcasting is provided by the Rada TV channel: (1) as a recording on the day of the relevant plenary sitting or (2) as a produced programme or, if this is not possible, (3) during the first week of broadcasting programmes according to the schedule after the day of the plenary sitting or the production of the relevant programme.[2063]

2053 The IFA 'Open Parliament of Ukraine' was established in the Verkhovna Rada. CHESNO Movement, 2025. ↗

2054 Publication by the Centre of Policy and Legal Reform on the social network Facebook, 2025. ↗

2055 Public consultations on the Open Parliament Action Plan have started. CHESNO Movement, 2025 ↗;The Expert Council has completed work on proposals for the Action Plan to increase the openness of the Verkhovna Rada. CHESNO Movement, 2025. ↗; The Expert Council of the IFA 'Open Parliament of Ukraine' is updating the Action Plan on transparency of the Verkhovna Rada. CHESNO Movement, 2026. ↗

2056 On the Procedure for Coverage of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 26-IX of 30.08.2019. ↗

2057 On the Procedure for Coverage of the Activities of State Authorities and Local Self-Government Bodies in Ukraine by the Media: Law of Ukraine No. 539/97-VR of 23.09.1997. ↗

2058 On Media: Law of Ukraine No. 2849-IX of 13.12.2022. ↗

2059 Parliamentary TV Channel Rada. ↗

2060 On Media: Law of Ukraine No. 2849-IX of 13.12.2022, para. 4 Part 5 Article 14. ↗

2061 On Approval of the Charter of the State Enterprise 'Parliamentary TV Channel Rada': Order of the Deputy Head of the Secretariat of the Verkhovna Rada of Ukraine — Head of the Administrative Department No. 84 of 05.06.2024. ↗

2062 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 6 Article 3. ↗

2063 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 6 Article 3. ↗

The Law of Ukraine 'On Media' obliged the Government to submit to Parliament proposals on regulating the status and principles of activity of the entity in the field of parliamentary broadcasting, namely the Rada TV channel.[2064]

In October 2023, MPs registered Draft Law No. 10107,[2065] which provided that during martial law, open plenary sittings of the Verkhovna Rada and daily and weekly programmes would be broadcast by the Rada TV channel exclusively by means of online broadcasting. The Ministry of Culture and Strategic Communications of Ukraine[2066] also developed a draft law[2067] providing that the public nature of sittings of the Verkhovna Rada would be ensured through their broadcasting by the parliamentary broadcasting entity rather than by linear audiovisual media. This draft law also established provisions defining the status and principles of operation of the Rada TV channel.

Both draft laws were submitted to the Council of Europe for assessment of their compliance with European standards on parliamentary broadcasting. In its opinion, the Council of Europe noted that the problem lay in the lack of independence of the Rada TV channel, which is managed directly by the Verkhovna Rada. This makes it a state media outlet contrary to the principles of public service broadcasting set out in Council of Europe recommendations and endorsed by the European Commission. Based on the legal assessment, the opinion proposed choosing one of two solutions: (1) strictly limit the content of the parliamentary channel to broadcasting the work of Parliament and its committees during sessions, as well as official parliamentary activity or (2) transfer responsibility for the parliamentary channel to the National Public Broadcasting Company of Ukraine ('Suspilne') in order to comply with the principle of independence.[2068]

Despite this, in November 2025, upon the Government's submission, a draft Resolution of the Verkhovna Rada was registered,[2069] proposing to determine the principles of operation and main tasks of the Rada TV channel. The explanatory note to the draft resolution stated that, in order to take into account the findings of the Council of Europe's legal assessment, a meeting was held with representatives of the Secretariat of the Verkhovna Rada, the National Council of Television and Radio Broadcasting of Ukraine, the State Committee for Television and Radio Broadcasting of Ukraine, Joint Stock Company 'National Public Broadcasting Company of Ukraine' and the state enterprise 'Parliamentary TV Channel Rada'. The participants in the meeting agreed that in Ukrainian realities, taking into account the provisions of the Law of Ukraine 'On Media', full implementation of the recommendations set out in the Council of Europe opinion of 11 December 2023 was

2064 On Media: Law of Ukraine No. 2849-IX of 13.12.2022, subpara. 4 para. 34 Section X 'Final and Transitional Provisions'. ↗

2065 On Amendments to Certain Laws of Ukraine Regarding the Specific Features of Coverage of the Activities of the Verkhovna Rada of Ukraine by the State Enterprise 'Parliamentary TV Channel Rada' under Martial Law: Draft Law of Ukraine, registration No. 10107 of 03.10.2023. ↗

2066 In November 2025, the Ministry of Culture and Strategic Communications of Ukraine was renamed the Ministry of Culture of Ukraine. Certain Issues of the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1509 of 19.11.2025. ↗

2067 Public discussion of the draft Law of Ukraine 'On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine (regarding regulation of the status and principles of activity of the entity in the field of parliamentary broadcasting)'. Ministry of Culture of Ukraine. ↗

2068 Legal Assessment of the Draft Legislative Amendments on the Status and Principles of Parliamentary Broadcasting. Council of Europe project 'Safeguarding Freedom of Expression and Freedom of Media in Ukraine' (SFEM-UA). ↗

2069 On Certain Issues of the Status and Principles of Activity of the State Enterprise 'Parliamentary TV Channel Rada', Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14268 of 28.11.2025. ↗

impossible because the Rada TV channel has a special status that does not allow it to be merged with public service media. The possibility of developing clear provisions on editorial policy that would meet Council of Europe standards while taking into account the specific features of the Ukrainian context and the need for information accessibility for Ukrainian citizens was considered.[2070] At the same time, the main committee[2071] noted that the Law of Ukraine 'On Media' defines the entity in the field of parliamentary broadcasting as a special type of audiovisual media entity. Therefore, given the importance of systemic regulation of the status and principles of parliamentary broadcasting, the Committee noted the expediency of regulating the legal status of parliamentary broadcasting at the level of law and recommended that the Verkhovna Rada not include this draft resolution on the agenda.[2072]

In September 2022, the Verkhovna Rada adopted a Resolution restricting live broadcasts of plenary sittings,[2073] although live broadcasts had in fact stopped on 24 February 2022.[2074] Instead, recordings of plenary sittings were published on the Rada TV channel's YouTube channel several hours after they ended. At the same time, civil society organisations and media called for the restoration of live broadcasts of parliamentary sittings.[2075] For the first time since the full-scale invasion, a live broadcast of part of a plenary sitting was held by decision of the Verkhovna Rada on 31 July 2025.[2076] In September 2025, Parliament fully restored live broadcasts of plenary sittings by adopting the relevant resolution,[2077] which lifted the previous restrictions. Recordings of broadcasts are also available on the YouTube page of the Rada TV channel.[2078]

Since 24 February 2022, the Rada TV channel had participated in the United News telethon. However, from 1 January 2026, the Rada TV channel effectively ceased its participation in it.[2079] The likely reason for the cessation of the Rada TV channel's participation in the telethon is reported to be bureaucratic procedures related to the budget programmes under which funds are allocated for the production of the telethon specifically for the parliamentary TV channel.[2080] In addition, the content producer for the Rada TV channel, Kinokit LLC, dismissed almost all its employees in December 2025 and stopped renting the

2070 Explanatory note to the draft Resolution of the Verkhovna Rada of Ukraine 'On Certain Issues of the Status and Principles of Activity of the State Enterprise "Parliamentary TV Channel Rada"'. Draft resolution card, registration No. 14268 of 28.11.2025. ↗

2071 Committee of the Verkhovna Rada of Ukraine on Humanitarian and Information Policy.

2072 Opinion of the Committee of the Verkhovna Rada on Humanitarian and Information Policy on the draft Resolution of the Verkhovna Rada of Ukraine on Certain Issues of the Status and Principles of Activity of the State Enterprise 'Parliamentary TV Channel Rada' of 15.01.2026. Draft resolution card, registration No. 14268. ↗

2073 On Certain Issues of Coverage of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2568-IX of 06.09.2022. ↗

2074 Military Parliamentarism: Features of the Work of the Verkhovna Rada of Ukraine under Martial Law. Journal 'Parliament' No. 1/2022–2023. Agency for Legislative Initiatives, 2024. ↗

2075 Statement: We call on the leadership of the Verkhovna Rada to restore live broadcasts of parliamentary sittings. CHESNO Movement, 2025. ↗

2076 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 31.07.2025. Verkhovna Rada of Ukraine, 2025. ↗

2077 On Certain Issues of Coverage of the Activities of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 4597-IX of 04.09.2025. ↗

2078 Plenary sittings. Page of the Rada TV channel on YouTube. ↗

2079 Rada channel stopped broadcasting in the telethon from 1 January. Detector Media, 2026. ↗

2080 Ibid.

studio.[2081] At the same time, in April 2026 the Rada TV channel selected another company, Faino-Company LLC, through an open competition, to develop the creative concept and produce programmes for the United News telethon in 2026,[2082] which suggests that the Rada TV channel may return to the telethon. As of 31 July 2026, the Rada TV channel was not participating in the telethon.

Parliament has pages on social media: Facebook (312,000 followers),[2083] Instagram (56,400 followers),[2084] Telegram (98,400 subscribers)[2085] and X (Twitter) (247,600 followers).[2086] The leadership of the Verkhovna Rada, parliamentary factions, parliamentary committees and some MPs also have social media pages.

Website of the Verkhovna Rada

In 2020,[2087] the updated official web portal of the Verkhovna Rada[2088] began operating. The functioning of the website and other web resources of Parliament is determined by the relevant regulation.[2089] Web resources of the Verkhovna Rada are provided and technologically supported by the Secretariat of the Verkhovna Rada of Ukraine and have an electronic address in the rada.gov.ua domain zone. Public information published on the official website and other web resources of the Verkhovna Rada is an official source of information. The official website and other web resources of the Verkhovna Rada are maintained in Ukrainian and English.[2090]

In March 2025, the Parliament's website was updated. A range of new online tools were introduced on the website of the Verkhovna Rada: a timeline of plenary sittings, detailed voting statistics, visualisation of the passage of draft laws, updated MP profiles and more.[2091] In addition, the website of the Verkhovna Rada entered the top three among all parliamentary websites in the world by number of monthly views. Users from Ukraine account for 94% of the website's audience.[2092] At the same time, it is on the portal of the Verkhovna Rada that legislation and other normative legal acts[2093] are published, regardless of whether they were issued by Parliament or another state body, which may partly explain the popularity of the parliamentary website.

2081 'Kinokit' dismissed almost all employees and stopped renting the studio, according to DM sources. Detector Media, 2026. ↗

2082 Rada TV channel selected the winner of the competition for production of content for the telethon in 2026. Institute of Mass Information, 2026. ↗

2083 Official page of the Verkhovna Rada of Ukraine on Facebook (assessed 31.07.2026). ↗

2084 Official page of the Ukrainian Parliament on Instagram (assessed 31.07.2026). ↗

2085 Official page of the Verkhovna Rada of Ukraine on Telegram (assessed 31.07.2026). ↗

2086 Official page of the Verkhovna Rada of Ukraine on X (assessed 31.07.2026). ↗

2087 The Verkhovna Rada of Ukraine is moving to a new official web portal. Verkhovna Rada of Ukraine, 2020. ↗

2088 Official web portal of the Parliament of Ukraine. ↗

2089 On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

2090 On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

2091 Rada in a smartphone: large-scale update of the Ukrainian Parliament's website. CHESNO Movement, 2025. ↗

2092 Supreme traffic: website of the Verkhovna Rada among the world's top three. CHESNO Movement, 2025. ↗

2093 Homepage of the 'Legislation of Ukraine' section. Verkhovna Rada of Ukraine. ↗

In 2024, as part of ITA, an audit was conducted of the digital accessibility of the Verkhovna Rada's web resources for users with visual, hearing, mobility, speech and intellectual impairments.[2094] As of March 2025, the web resources of the Verkhovna Rada demonstrated a limited level of accessibility for persons with visual impairments.[2095] According to the results of monitoring the accessibility of state websites, the official portal of Parliament meets only certain basic requirements: in particular, alternative text for images and text labels for buttons are provided, while other components, such as text contrast, navigation accessibility, correct markup and keyboard navigation support, remain unfulfilled. This indicates the absence of a systemic approach to ensuring the digital accessibility of information for users with visual impairments.

The parliamentary website makes it possible to participate in the parliamentary process through several tools. A citizen may register in the Citizen's E-Cabinet,[2096] which makes it possible to submit citizens' appeals, public information requests, register an electronic petition or participate in public discussion of draft laws.[2097] In addition, MPs' pages include their contact details, including telephone numbers and email addresses; upon an MP's request, the addresses of an MP's reception offices, links to personal websites, social media pages and so on may also be published.[2098]

Media access to Parliament

The Rules of Procedure of the Verkhovna Rada provide that representatives of media entities and journalists are accredited with the Verkhovna Rada for a certain period or for the entire term of the current convocation, in accordance with the Law of Ukraine 'On Information' and under the procedure defined by the relevant regulation approved by the Chairman of the Verkhovna Rada. Accreditation is carried out by the relevant structural unit of the Secretariat of the Verkhovna Rada,[2099] which is independent of parliamentary factions and groups or political parties.

In 2014, the Verkhovna Rada adopted Resolution No. 1549-VII,[2100] which approved the regulation on accreditation of journalists and media technical staff. In 2020, due to the introduction of quarantine in Ukraine, amendments were made to the Resolution,[2101] providing that if martial law or a state of emergency is introduced or quarantine is established in Ukraine, accredited journalists and media technical staff are admitted to buildings and separate premises of Parliament with an additional accreditation card,

2094 Breakdown of international technical assistance (equipment, services) received in 2025. Secretariat of the Verkhovna Rada of Ukraine, 2025. ↗

2095 Web accessibility of government websites: 2025 monitoring report. UNDP, 2025. ↗

2096 New electronic service for citizens — Citizen's E-Cabinet. Verkhovna Rada of Ukraine, 2017. ↗

2097 Citizen's E-Cabinet. Verkhovna Rada of Ukraine. ↗

2098 Technological Scheme for Populating the Web Resources of the Verkhovna Rada of Ukraine with Information. On Certain Issues of the Functioning of the Official Website and Other Web Resources of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 21 of 31.01.2022. ↗

2099 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 3 Article 3. ↗

2100 On Approval of the Regulation on Accreditation of Journalists and Technical Workers of Mass Media with the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1549-VII of 01.07.2014. ↗

2101 On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine during Quarantine in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 534-IX of 17.03.2020. ↗

the conditions and procedure for issuing which are determined by the Chairman of the Verkhovna Rada.

After the beginning of the full-scale invasion, access for media representatives to buildings and premises of the Verkhovna Rada, as well as to the territory of the Government Quarter, was closed. Instead, in September 2022 the Verkhovna Rada obliged its Secretariat to ensure the organisation and holding of official speeches and statements by the leadership of the Verkhovna Rada and briefings by MPs in one of Parliament's administrative buildings outside security posts.[2102]

Access for journalists and media to the premises of the Verkhovna Rada was restored in May 2024 on the basis of the relevant Order of the Chairman of Parliament, which approved the Regulation on Media Accreditation.[2103] In July 2026, the relevant Regulation was substantially updated.[2104] In particular, it regulated the procedure for admitting media representatives to meetings of parliamentary bodies, such as meetings and events of committees and temporary commissions, and established the procedure for coverage of the Verkhovna Rada's activities by other persons. Thus, accreditation during martial law is carried out for each regular session with respect to registered national and foreign media (1) to which the restrictions (sanctions) provided for by law have not been applied, (2) which systematically cover the activities of the Verkhovna Rada and (3) which are accredited with the Verkhovna Rada of the ninth convocation. Media accreditation is carried out upon submission of a request (application for accreditation) by the media entity.[2105] A template request by a media entity for accreditation is published on the website of the Verkhovna Rada.[2106]

At the same time, for each scheduled part of an ongoing plenary sitting or other media event, no more than two persons from each accredited media outlet are admitted to the Press Centre. Journalists have access only to the Press Centre of the Verkhovna Rada, i.e. the third-floor corridors,[2107] on the days of a regular part of an ongoing plenary sitting or other media events, on a rotational basis of up to 30 persons.[2108]

Representatives of the media, including regional, local, specialised and other media, irrespective of whether they have additional accreditation for the period of martial law, are admitted to other administrative buildings of Parliament to attend meetings and other public events of Verkhovna Rada committees or temporary commissions (on a one-time

2102 On Certain Issues of Coverage of the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2568-IX of 06.09.2022. ↗

2103 On Certain Issues of Organising the Work of Journalists in the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law in Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 431 of 08.05.2024. ↗

2104 On Amendments to the Order of the Chairman of the Verkhovna Rada of Ukraine No. 431 of 8 May 2024 'On Certain Issues of Organising the Work of Journalists in the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law in Ukraine': Order of the Chairman of the Verkhovna Rada of Ukraine No. 1013 of 30.07.2026. ↗

2105 On Certain Issues of Organising the Work of Journalists in the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law in Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 431 of 08.05.2024. ↗

2106 Announcement on media accreditation with the Verkhovna Rada of Ukraine of the ninth convocation during martial law in Ukraine. Verkhovna Rada of Ukraine, 2024. ↗

2107 Before the full-scale invasion, journalists also had access to the press gallery in the chamber. The discussion on restoring journalists' access to the corridors and press gallery is currently ongoing in Parliament. Korniienko explained whether journalists will return to the corridors of the Verkhovna Rada. CHESNO Movement, 2026. ↗

2108 On Certain Issues of Organising the Work of Journalists in the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law in Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 431 of 08.05.2024. ↗

pass), and to conduct filming or interviews with MPs for the purpose of covering their activities (based on a list included in the MP's written request).

Thanks to the accreditation requirement concerning coverage of the activities of the Verkhovna Rada and additional accreditation, a pool of parliamentary journalists has in practice been formed: while before the beginning of the ninth convocation around 4,000 journalists and publications were accredited, the current number is approximately 70 persons.[2109] As early as 2016, the European Parliament Mission recommended that the Verkhovna Rada consider establishing or organising a system for the work of a group of specialised parliamentary correspondents.[2110]

Progress and issues

The gap between the formal rules on public access to plenary sittings and current practice creates risks of non-transparent restrictions on public access to parliamentary activity. The procedure for access to open plenary sittings[2111] has not been adapted to the conditions of martial law and formally still provides for the right of citizens to freely visit the building of the Verkhovna Rada. A person wishing to attend an open plenary sitting of the Verkhovna Rada submits an electronic application through the official website of Parliament indicating the desired day for attending an open plenary sitting.[2112] However, after the introduction of martial law, actual public access to the building of the Verkhovna Rada and open plenary sittings was suspended for security reasons. At the same time, no amendments have been made to this Procedure and it formally remains in force.

Parliament does not have an approved communication strategy, which limits the systemic nature, continuity, planning and development of parliamentary communications. This means that there are no defined target audiences or communication channels that would take into account the different needs of such audiences. There is also no unified approach to informing the public about legislative processes. As the sole legislative body, the Verkhovna Rada adopts decisions that have a significant impact on society, but information about the content of laws and their purpose is often difficult for society to understand. In the absence of a communication strategy, it is impossible to ensure continuity of Parliament's information policy that would not depend on the leadership of the Verkhovna Rada, personnel decisions or the political situation in Parliament. Approval and implementation of the Communication Strategy of the Verkhovna Rada of Ukraine for 2025–2028 is one of the commitments of the Secretariat of the Verkhovna Rada under the Roadmap on the Functioning of Democratic Institutions.[2113]

The absence of a Strategy for Developing an Innovative Digital Parliament complicates long-term planning for the development of e-parliamentarism. In 2016, the European Parliament Mission noted that the representative and communication functions of Parliament could be strengthened through new technologies and a strategic approach

2109 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2110 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016. Recommendation No. 12. ↗

2111 On the Procedure for Access of Persons to Open Plenary Sittings of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 694 of 27.10.2014. ↗

2112 Ibid.

2113 Roadmap on the Functioning of Democratic Institutions. Measure 4 of Strategic Result 1 of Section III.A. ↗

to more active citizen engagement. It was noted that the concept of an e-parliament involves the use of digital technologies to ensure greater openness, transparency and accountability of Parliament to citizens.[2114]

Despite progress in transforming Parliament into an institution that is more open to citizens, citizen input and interaction, the absence of a comprehensive strategy restrains the systemic development of digital solutions and does not allow a unified approach to the digital modernisation of parliamentary activity to be formed.

To achieve full transparency and accountability of Parliament to voters, the Roadmap on the Functioning of Democratic Institutions provides for the development, adoption and implementation by Q4 2027 of the Strategy for Developing an Innovative Digital Parliament for 2025–2028.[2115] At the same time, the timeframe for implementing this measure needs to be revised because, as of 2026, the Strategy had not yet been adopted and the specified implementation deadline almost coincides with the end of its period of validity.

The status of the Rada TV channel remains unregulated. In practice, the channel performs the functions of a parliamentary broadcaster, but guarantees of editorial independence, accountability mechanisms and principles for content formation have not been defined at the legislative level. This creates a risk that the Rada TV channel may be used not as a tool for informing citizens about the activities of Parliament, but as a resource for political PR,[2116] or, conversely, makes it possible to exclude opposition representatives.[2117] The lack of transparency in the procedures for selecting the contractor for content production, Kinokit LLC,[2118] also drew public criticism, while the Accounting Chamber also reported violations.[2119]

The regulatory framework governing media access to Parliament does not comply with legislation. The Regulation on Accreditation of Journalists and Technical Workers of Mass Media, approved by Resolution No. 1549-VII, does not comply with the Law of Ukraine 'On Media' and refers to laws of Ukraine that are no longer in force.[2120]

The Regulation on Media Accreditation approved by the Chairman of the Verkhovna Rada somewhat narrows the categories of persons who may be accredited with Parliament. In particular, the Law of Ukraine 'On Information' provides for accreditation of journalists (natural persons), not media, and not all media are required to register, for example online

2114 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine. European Parliament, September 2015 – February 2016. Recommendation No. 17. ↗

2115 Roadmap on the Functioning of Democratic Institutions, measure 1.4 of Section III.A. ↗

2116 The amount of PR in Rada blocks on the United News broadcast has doubled, according to monitoring. Detector Media, 2023. ↗

2117 Mono-marathon. Guest censorship of United News. Detector Media, 2024. ↗

2118 Bihus.info Investigation: Kinokit, the Company Producing Content for Rada, Is Linked to Kyrylo Tymoshenko. Detector Media. 2022. ↗

2119 Accounting Chamber report on the results of the audit of the efficiency of management of state-owned assets that have financial implications for the state budget and public procurement by bodies supporting the activities of the Verkhovna Rada of Ukraine of 17.12.2024. Accounting Chamber, 2024. ↗

2120 In particular, due to the adoption of the Law of Ukraine 'On Media', the Laws of Ukraine 'On Print Media (Press) in Ukraine', 'On Television and Radio Broadcasting', 'On News Agencies' and 'On the Procedure for Coverage of the Activities of State Authorities and Local Self-Government Bodies in Ukraine by the Media' ceased to be in force. On Media: Law of Ukraine No. 2849-IX of 13.12.2022, para. 32 Section X 'Final and Transitional Provisions'. ↗

media.[2121] At the same time, the Regulation on Media Accreditation itself is temporary in nature, for the period of martial law, which means that progress in forming a separate pool of parliamentary journalists may be undone after the termination or cancellation of martial law, since the Regulation on Accreditation of Journalists and Technical Workers of Mass Media does not establish restrictions regarding the area of media activity.

Recommendations

1. Update the Procedure for Access of Persons to Open Sittings, clearly defining the procedure for admitting persons and the grounds for restricting attendance at plenary sittings, for example, the introduction of martial law.
2. Approve and implement the Communication Strategy of the Verkhovna Rada of Ukraine, which would ensure Parliament's communication with internal and external audiences.
3. Develop and approve the Strategy for the Formation of an Innovative Digital Parliament, updating its period of validity and implementation stages in accordance with the actual timeframe for its preparation and implementation.
4. Regulate the status of the Rada parliamentary TV channel at the legislative level and provide guarantees for its operation, editorial independence and the principle of political pluralism.
5. Align the normative legal acts of the Verkhovna Rada and the Chairman of the Verkhovna Rada on public and journalist access to Parliament with Ukrainian legislation.

2121 Whom the Verkhovna Rada accredits. Institute of Mass Information, 2024. ↗

Parliamentary Oversight

Interaction of the Verkhovna Rada with the Executive Branch

State of play

System of executive authorities

The Constitution defines the Cabinet of Ministers as the highest body in the system of executive power, responsible to the Verkhovna Rada and subject to its control and accountability within the limits established by the Constitution.[2122]

The system of central executive bodies (CEB) includes ministries and other CEB whose activities are directed and coordinated by the Cabinet of Ministers directly or through the relevant ministers. The powers of the bodies within the CEB system extend throughout the territory of Ukraine.[2123]

Executive power in regions and districts, as well as in the cities of Kyiv and Sevastopol, is exercised by local state administrations, which are accountable to and controlled by higher-level executive authorities and to councils in respect of the powers delegated to them by the relevant district or regional councils.[2124]

Relations between Parliament and the Cabinet of Ministers

Relations between Parliament and the executive branch are most closely connected with the Government and are regulated, in particular, by the Laws of Ukraine 'On the Cabinet of Ministers of Ukraine',[2125] 'On the Status of People's Deputy of Ukraine',[2126] 'On Committees

2122 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 85 and 113–116. ↗

2123 On Central Executive Bodies: Law of Ukraine No. 3166-VI of 17.03.2011, Article 1. ↗

2124 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 118 and 119. ↗

2125 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Articles 11, 28–30, 33–35. ↗

2126 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 15–16. ↗

of the Verkhovna Rada of Ukraine'[2127] and 'On the Rules of Procedure of the Verkhovna Rada of Ukraine'.[2128]

The Constitution and laws of Ukraine regulate the procedures for appointment, termination of powers, dismissal, resignation and consideration of the Cabinet of Ministers' responsibility. Legislation provides for members of the Government to be appointed both as a single list and separately. In particular, the Prime Minister, the Minister of Defence and the Minister of Foreign Affairs are appointed separately upon submission by the President.[2129] Decisions on the dismissal or appointment of ministers, as well as on the resignation of the Prime Minister, are also adopted separately.[2130]

The Government Programme — the main programme document for the Government's term of office (the PACM)[2131] — is of particular importance in relations between the Verkhovna Rada and the Government. It is based on the agreed political positions of the coalition of deputy factions and defines programme objectives, tasks for achieving them and deadlines for completing those tasks.[2132]

Approval of the PACM by the Verkhovna Rada grants the Cabinet of Ministers one-year immunity from consideration of the issue of its responsibility.[2133]

The Cabinet of Ministers has the right of legislative initiative in the Verkhovna Rada.[2134] Since 2019, Parliament has introduced planning of legislative work, with the PACM also serving as one of the key reference points.[2135] The Prime Minister designates a member of the Cabinet of Ministers to present Government draft laws in the Verkhovna Rada.[2136] If that person is unable to present a draft law, this may be done by a deputy minister or the head of a CEB that is not part of the Cabinet of Ministers, with the consent of the Prime Minister and following written notification of the Verkhovna Rada.[2137]

Coordination between the Cabinet of Ministers and the Verkhovna Rada is also carried out through officials designated by the Government who are responsible for interaction

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2127 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Articles 1, 4, 11, 14, 17, 18 and 25–26.

2128 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 228–232.

2129 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 85, 106.

2130 Ibid, Articles 85, 114 and 115 ; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Articles 13–15. ; For more details on the practice of changes in the composition of the Government, see the section 'Governance'.

2131 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 85. ; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 11.

2132 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 11.

2133 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 87. ; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Part 5 Article 14.

2134 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 27.

2135 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Parts 1–3 Article 19^1. ; On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine regarding the planning and systematic nature of legislative activity of the Verkhovna Rada of Ukraine: Law of Ukraine No. 162-IX of 03.10.2019, para. 1.

2136 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Part 3 Article 27.

2137 Ibid.

with parliamentary factions, groups, committees and other bodies of Parliament.[2138] These persons are involved in setting the agenda, preparing the 'Government's Question Hour', ensuring the participation of Government representatives in the work of Parliament and other related matters.

The ninth convocation of the Verkhovna Rada has seen four Governments. In July 2025, the Verkhovna Rada accepted the resignation of Prime Minister Denys Shmyhal,[2139] which entailed the resignation of the entire Government and the formation of a new one.[2140] Yuliia Svyrydenko,[2141] who had previously served as First Deputy Prime Minister of Ukraine — Minister of Economy of Ukraine, became the new Prime Minister.

Two Governments — those of Shmyhal and Svyrydenko — operated without a Government Programme approved by the Verkhovna Rada. The constitutional framework presupposes that the Government's activities are based on a Government Programme approved by Parliament and that the Programme serves as the basis for the Verkhovna Rada to assess the Government's achievement of the goals and tasks set out in it when considering annual reports. In the absence of an approved Government Programme, Parliament is effectively deprived of criteria for systematically assessing the Government's performance against agreed goals, tasks and deadlines.[2142]

Draft Resolution No. 14069[2143] on the Svyrydenko Government Programme was registered on 23 September 2025, but the Verkhovna Rada never voted on it. The Rules of Procedure provide that consideration of approval of the Government Programme at a plenary sitting must take place within 15 days after its submission to the Verkhovna Rada and that the matter is included in the agenda of the relevant session without a vote.[2144] At the same time, if Parliament adopts neither of the possible decisions — approval of the Government Programme or its return for revision — the Programme is deemed not approved and the Government may not submit a new Government Programme to the Verkhovna Rada for one year.[2145]

2138 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, Rules of Procedure of the Cabinet of Ministers of Ukraine, § 110. ↗; On Ensuring Interaction between the Cabinet of Ministers of Ukraine and the Verkhovna Rada of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 449 of 24.06.2016, paras. 1, 2; Annex. ↗

2139 On the Resignation of Prime Minister of Ukraine D. Shmyhal: Resolution of the Verkhovna Rada of Ukraine No. 4548-IX of 16.07.2025. ↗

2140 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4550-IX of 17.07.2025. ↗

2141 On the Appointment of Y. Svyrydenko as Prime Minister of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4549-IX of 17.07.2025. ↗

2142 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Part 1 Article 11 ↗; Programme Promises and Immunity: Will the Verkhovna Rada Restore Control over the Government? Agency for Legislative Initiatives. 2025. ↗

2143 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14069 of 23.09.2025. ↗

2144 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 3 Article 227. ↗

2145 Ibid, Parts 6, 8 and 9 Article 227.

In July 2026, Parliament accepted the resignation of Prime Minister Yuliia Svyrydenko[2146] and once again changed the Government.[2147] The new Government was headed by Serhii Koretskyi,[2148] who had neither political experience nor prior experience working in ministries or other CEBs. At the same time, as of 31 July, the positions of Minister of Defence of Ukraine and Minister of Foreign Affairs of Ukraine, for which nominations are submitted by the President, remained vacant (their duties were being performed by acting ministers[2149]).

In both cases, the initiative to change the Government came from the President rather than Parliament, to which the Government is accountable and subject to oversight. This points to an imbalance between the branches of government in which Government accountability is concentrated outside Parliament. For example, Yuliia Svyrydenko and the Government reported to the President of Ukraine on the results of their first 100 days in office, including implementation of tasks under priorities defined by the Government itself, and received specific instructions from the President.[2150] The role of the coalition, which under the Constitution submits proposals to the President on candidates for Prime Minister and other members of the Government, was largely formal.

The change of Government, including the dismissal of Minister of Defence Mykhailo Fedorov, led to protests demanding his reinstatement as Minister of Defence and the dismissal of Commander-in-Chief of the Armed Forces of Ukraine Oleksandr Syrskyi.[2151]

Instruments of parliamentary oversight

The Constitution and laws of Ukraine enable Parliament, its bodies and individual MPs to obtain information from the Government and individual executive authorities. For this purpose, Parliament has a set of instruments and procedures for direct and indirect parliamentary oversight.

Direct parliamentary oversight is exercised directly by MPs, the Verkhovna Rada and its bodies, through:

- MPs' requests and appeals;[2152]

2146 On the Resignation of Prime Minister of Ukraine Y. Svyrydenko: Resolution of the Verkhovna Rada of Ukraine No. 4935-IX of 14.07.2026. ↗

2147 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026. ↗

2148 On the Appointment of S. Koretskyi as Prime Minister of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4941-IX of 16.07.2026. ↗

2149 On Temporarily Assigning the Duties of Minister of Defence of Ukraine to Y. Khmara: Order of the Cabinet of Ministers of Ukraine No. 723-r of 17.07.2026 ↗; On Temporarily Assigning the Duties of Minister of Foreign Affairs of Ukraine to A. Sybiha: Order of the Cabinet of Ministers of Ukraine No. 721-r of 17.07.2026. ↗

2150 Yuliia Svyrydenko: Government Reports to the President on Its First 100 Days — Focus on Defence, the Economy and Support for People. Government Portal. 2025 ↗; Svyrydenko and Cabinet Report to Zelenskyy on 100 Days in Office. Ukrinform. 2025. ↗

2151 On 22 July 2026, the President dismissed Oleksandr Syrskyi as Commander-in-Chief of the Armed Forces of Ukraine and appointed Mykhailo Drapatyi in his place, but protests were continuing as of 31 July. On the Dismissal of O. Syrskyi from the Position of Commander-in-Chief of the Armed Forces of Ukraine: Decree of the President of Ukraine No. 627/2026 of 22.07.2026 ↗; On the Appointment of M. Drapatyi as Commander-in-Chief of the Armed Forces of Ukraine: Decree of the President of Ukraine No. 630/2026 of 22.07.2026 ↗; Two Weeks without Fedorov: Why the Protests Continue and Whether Society Is Ready for Compromise. Ukrainska Pravda. 2026. ↗

2152 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 86. ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 224–226. ↗; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 33. ↗

- the 'Government's Question Hour';[2153]
- consideration of reports, statements and information from the Government and other executive authorities, as well as parliamentary hearings;[2154]
- the oversight function of Verkhovna Rada committees, including committee hearings;[2155]
- the work of temporary investigative commissions and temporary special commissions;[2156]
- consideration and approval of the Law on the State Budget and amendments to it, as well as consideration of the report on its implementation.[2157]

MPs' requests and appeals are basic instruments of parliamentary oversight. MPs' requests are public: their brief content is announced at a sitting of Parliament, while the texts of requests and replies to them (after data are anonymised in accordance with personal data protection legislation) are posted on the Parliament's website, except for requests and replies containing restricted information.[2158] Upon the proposal of the MP who initiated the request, supported by the signatures of MPs representing at least one fifth of the constitutional composition of Parliament, the Verkhovna Rada may decide to discuss the reply to the MP's request.[2159] The Chairman of the Verkhovna Rada oversees the timely submission and consideration of MPs' requests.[2160]

The law establishes an obligation to respond to an MP's request within 15 days and to an MP's inquiry within 10 days from the date of receipt. Where objective circumstances exist, these time limits may be extended, but the total period for providing a response may not exceed one month.[2161] From September 2025 to 31 July 2026, MPs submitted 265 parliamentary inquiries to the Cabinet of Ministers of Ukraine.[2162]

2153 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 229–230 ↗; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 35. ↗

2154 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 228, 232, 232[1], 232[4] ↗; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 11, 29, 30, 33–35. ↗

2155 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Articles 9, 14, 24 and 25–25[2]. ↗

2156 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Article 1, 3, 4, 7. ↗

2157 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 96–98. ↗

2158 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 224 ↗; Exercise of oversight functions by the Verkhovna Rada of Ukraine. MPs' requests. ↗

2159 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 226. ↗

2160 Ibid, para. 14 Article 78.

2161 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 15 ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 78, 224–226 ↗; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 33. ↗

2162 According to calculations based on information published on the Verkhovna Rada of Ukraine website as of 31.07.2026.

Verkhovna Rada committees have the right to obtain from state bodies and their officials the materials and documents necessary for the exercise of their powers in accordance with their areas of responsibility.[2163]

During the 'Government's Question Hour' at a plenary sitting of the Verkhovna Rada, the Cabinet of Ministers participates in its full composition, except for members of the Government who are absent for valid reasons. During the 'Government's Question Hour', only issues related to the defined topic may be raised, while proposals on the topic are submitted by parliamentary factions and groups for consideration by the Conciliation Council.[2164]

Parliament and its bodies may invite members of the Government, representatives of other executive authorities and bodies of the security and defence sector to participate in parliamentary[2165] and committee hearings,[2166] as well as in meetings of temporary investigative commissions and temporary special commissions,[2167] in order to provide reports, explanations or answers to questions.

Assistance to Parliament, its bodies and MPs in their interaction with the Government and other executive authorities is provided by the Secretariat of the Verkhovna Rada. In particular, it interacts with executive authorities in preparing issues submitted for consideration by the Verkhovna Rada and its bodies; together with the relevant committees, parliamentary factions (parliamentary groups), it ensures preparation of the 'Government's Question Hour' and parliamentary hearings in the Verkhovna Rada; and it organises control over compliance with the time limits for considering MPs' requests and implementing instructions contained in acts of the Verkhovna Rada and issued at plenary sittings to the Cabinet of Ministers, ministries and other CEBs.[2168] MPs also receive individual assistance from their assistants consultants.[2169]

Indirect parliamentary oversight is exercised through:

- the Accounting Chamber, which, on behalf of Parliament, controls the receipt of funds into the State Budget of Ukraine and their use, and submits to Parliament and its bodies reports on the results of the external public financial control (audit) carried out by it;
- the Ukrainian Parliament Commissioner for Human Rights, who exercises parliamentary oversight of the observance of constitutional human and citizens' rights and freedoms and submits to Parliament annual reports on the observance of

2163 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 17.

2164 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 229.

2165 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 3–4 Article 6, Part 3 Article 234, Article 235, Part 2–3 Article 236.

2166 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Part 1 Article 29, Part 1 Article 48 and Part 3 Article 48.

2167 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Part 1 para. 6 Article 7; Part 2 Article 7; Part 1 paras. 4, 5 and 7 Article 12; Part 1 para. 11 Article 14; Article 24.

2168 On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769 of 25.08.2011.

2169 For more details on the Secretariat of the Verkhovna Rada of Ukraine and assistants-consultants to MPs, see the section 'Secretariat of the Verkhovna Rada of Ukraine'.

human and citizens' rights and freedoms in Ukraine and special reports on specific issues.[2170]

Information exchange and Government reporting

The Government submits to the Verkhovna Rada:

- an annual report on the progress and results of implementing the Government Programme — by 15 April of the year following the reporting year;
- an extraordinary report — upon the proposal of the Chairman of the Verkhovna Rada, at least three committees or at least one third of MPs from the constitutional composition of Parliament;
- a report on the implementation of the State Budget of Ukraine;
- information on the implementation of national programmes of economic, scientific and technical, social, national-cultural development and environmental protection.[2171]

The Cabinet of Ministers ensures the submission of analytical and background materials for parliamentary and committee hearings no later than five days before they are held, while such materials are prepared by the relevant central executive authority with the participation of other interested central and local executive authorities.[2172]

For committee hearings, analytical and background materials are provided to committee members by the committee holding the hearings no later than three days before they are held.

Legislation establishes special requirements for work with restricted information, including state secrets. MPs must give a written undertaking not to disclose state secrets, while other persons must obtain clearance in accordance with the established procedure.[2173]

Political responsibility of the Government

Following consideration of the report on the progress and results of implementing the PACM, the Verkhovna Rada may:

- recognise the Government's activities as satisfactory;
- provide recommendations;
- recognise the Government's activities as unsatisfactory.[2174]

2170 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 98 and 101. ↗; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Articles 31 and 32. ↗; For more details on the Accounting Chamber, see the subsection 'Control Exercised by the Verkhovna Rada through the Accounting Chamber; for the Commissioner for Human Rights, see the subsection 'Parliamentary Oversight Through the Human Rights Commissioner'.

2171 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 11. ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 228. ↗

2172 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, Rules of Procedure of the Cabinet of Ministers of Ukraine, § 129. ↗

2173 On State Secrets: Law of Ukraine No. 3855-XII of 21.01.1994, Articles 22 and 27. ↗; For more details on MPs' work with state secrets, see the section 'Parliamentary Oversight in the Security and Defence Sector'.

2174 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 228. ↗

The key mechanism of political responsibility of the Cabinet of Ministers is a resolution of no confidence, which results in the resignation of the Government.[2175]

At the same time, legislation does not provide separate rights for the parliamentary opposition: procedural decisions in cases defined by law are adopted by a constitutional majority of MPs, irrespective of whether they belong to the coalition or the opposition.

Progress and issues

The Verkhovna Rada has a weak oversight function, including because the Government Programme has not been approved. The absence of an approved Government Programme turns interaction between the branches of power into a process without clear reference points. The Government operates without officially defined priorities against which the success or failure of its work can be assessed and, at the same time, loses its one-year immunity from consideration of the issue of its responsibility.[2176] In turn, Parliament loses the main instrument of political oversight and assessment of the effectiveness of the Cabinet of Ministers through analysis of the implementation of agreed programme objectives, since it is impossible to demand results in implementing a programme that formally does not exist. This makes parliamentary oversight more dependent on situational political issues, individual requests or initiatives of specific committees.

The problem is also linked to the lack of proper synchronisation of strategic planning. The Government's Programme of Activities, the President's annual addresses and the National Programme for the Adaptation of Legislation to EU Law should be connected in a coherent framework; otherwise, parliamentary oversight is exercised without a single benchmark for state policy.[2177]

The Verkhovna Rada does not hear reports from state bodies, thereby undermining its parliamentary oversight function over these bodies. The Rules of Procedure provide that Parliament considers reports and presentations by certain state bodies and officials.[2178] In practice, such reports are often considered by the relevant committee instead of the Verkhovna Rada, effectively substituting committee consideration for parliamentary oversight. Following discussion of a report or presentation, the Verkhovna Rada may adopt a resolution taking it into account, assessing the activities of the state body or official whose report was considered and adopting other decisions provided for by the Rules of Procedure and recommended in the report. Particularly important is the power to consider the report of the Director of the State Bureau of Investigation, since a resolution

2175 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 87. ↗; On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 13–14. ↗

2176 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 2 Article 87. ↗

2177 Information provided by Respondent No. 59 during an interview conducted on 16.04.2026.

2178 The Verkhovna Rada annually considers: (1) the report of the Director of the State Bureau of Investigation on the results of the Bureau's activities for the calendar year, the status of fulfilment of its tasks, compliance with legislation and human and civil rights and freedoms, as well as areas and measures for improving the effectiveness of the SBI; (2) the Prosecutor General's report on the activities of the prosecution service; (3) the report of the Head of the Security Service of Ukraine on the activities of the Security Service of Ukraine; (4) the report of the Antimonopoly Committee of Ukraine on its activities; (5) the report of the State Property Fund of Ukraine on its work and the progress of privatisation of state property; (6) the report of the National Council of Television and Radio Broadcasting of Ukraine on its activities; and (7) the report of the Governor of the National Bank of Ukraine on the activities of the National Bank of Ukraine. On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 232[1]. ↗

of Parliament finding their performance unsatisfactory constitutes grounds for dismissal from office.[2179]

The ineffectiveness of parliamentary oversight mechanisms over the formation of state policy leads to a decline in the quality of legislation and creates risks of Ukraine failing to meet its international obligations. The lack of coordination at the stage of developing Government legislative initiatives has turned into a crisis of trust and effectiveness. This is confirmed by a significant decline in the level of support for Government initiatives — from 39% under the previous Government composition to 11.5%.[2180] This has aggravated the problem of fulfilling obligations related to international financing, since non-fulfilment of some conditions under EU and IMF programmes creates risks for the timely receipt of external support.[2181] This situation is caused by interrelated factors:

1. The failure of Government draft laws related to European integration and international obligations, in particular Nos. 13676,[2182] 14025,[2183] 6319,[2184] resulted from insufficient dialogue between the Government and the MPs. A situation in which only a few votes are lacking for a decision to be adopted indicates that positions have not been agreed in advance. MPs note insufficient communication with the Government and delays in the submission of documents, which makes the Government agenda unpredictable.[2185] The communication problem may arise even before consideration by Parliament because the Government does not always formulate and register its own proposal in good time, while responsibility for the delay is publicly shifted to the Verkhovna Rada.[2186]

2. The practice of revising Government draft laws in committees indicates insufficient quality of their preparation.[2187] During parliamentary consideration, substantial substantive comments are made on Government draft laws: unclear implementation mechanisms and violations of the principle of legal certainty,[2188] declarative provisions

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2179 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 7, Article 232[1]. ↗

2180 Support in the Rada for draft laws of the Svyrydenko Government has fallen — CHESNO analysis. CHESNO Movement, 2026. ↗

2181 Monitoring of the implementation of the IMF programme and EU assistance No. 25, March 2026. RRR4U Consortium, 2026, p. 3. ↗

2182 On Amendments to the Law of Ukraine 'On the Organisational and Legal Framework for Combating Organised Crime' regarding the establishment of the Interagency Coordination Commission in the field of combating organised crime (National Coordinator): Draft Law of Ukraine, registration No. 13676 of 21.08.2025. ↗

2183 'On Amendments to the Tax Code of Ukraine and the Law of Ukraine "On Banks and Banking" regarding the introduction of international automatic exchange of information on income received through digital platforms': Draft Law of Ukraine, registration No. 14025 of 09.09.2025. ↗

2184 On Amendments to the Law of Ukraine 'On Bodies of Self-Organisation of the Population' regarding improvement of the procedure for the organisation, activities and termination of a body of self-organisation of the population: Draft Law of Ukraine, registration No. 6319 of 18.11.2021. ↗

2185 Why is the Rada stalling during votes? Deputy head of the Servant of the People faction revealed the truth. Glavcom, 2026 ↗; Servant of the People expects 'little blood' from Yuliia Svyrydenko's Government. How to overcome the parliamentary crisis? LB.ua, 2026 ↗; Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

2186 Information provided by Respondent No. 47 during an interview conducted on 24.03.2026.

2187 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

2188 Decision of the Committee of the Verkhovna Rada of Ukraine on Anti-Corruption Policy on the Draft Law of Ukraine 'On Amendments to the Tax Code of Ukraine and the Law of Ukraine "On Banks and Banking" regarding the introduction of international automatic exchange of information on income received through digital platforms' (reg. No. 14025), p. 1. ↗

and the need to refine mechanisms for their implementation,[2189] inconsistency with current legislation[2190] and incomplete consideration of the EU Acquis.[2191]

In addition, there is a practice of 'workarounds', whereby Government draft laws are introduced through MPs in order to avoid lengthy internal procedural approvals within the Government.[2192] This effectively shifts to the level of specialised committees the work of addressing shortcomings and discrepancies that should have been resolved before a draft law was submitted to Parliament.[2193]

This indicates weak or absent parliamentary oversight at the early stages of policy formation. Without changes in approaches to the quality of document preparation and the establishment of a systematic dialogue between the Cabinet of Ministers and parliamentary committees, effective law-making and the fulfilment of international obligations will remain under constant threat. The Roadmap on the Functioning of Democratic Institutions provides for addressing this problem: by the fourth quarter of 2027, comprehensive legislation should be developed, adopted and implemented to ensure effective parliamentary oversight of policy formation by the Government and policy-legislation coherence.[2194]

Reporting by ministries to the Verkhovna Rada remains fragmented and non-unified. The current model of parliamentary oversight performs a communication function (exchange of information) but does not ensure accountability.

The main barriers to effective parliamentary oversight are:

1) the absence of a single unified format for planning and reporting — the format of ministries' planning and reporting documents does not provide a sufficiently robust basis for assessing policy results, achievement of policy objectives, justification of budget expenditures, identification of deviations from objectives during policy implementation and determination of mechanisms requiring adjustment. Such documents vary in their level of detail and apply different approaches to defining performance indicators.

A significant share of reporting documents is reduced to a list of measures implemented, documents prepared, funds used, information sent or monitoring carried out. The problem lies not only in the reporting format, but also in the quality of data. If the necessary statistics are absent or collected only fragmentarily, Parliament cannot fully assess the financial cost of a policy, its consequences or the justification of budget decisions.[2195]

2189 Opinion of the Committee of the Verkhovna Rada of Ukraine on Environmental Policy and Nature Management on the Draft Law on Biological Safety and Biological Security (reg. No. 14091 of 30.09.2025), p. 2. ↗

2190 Decision of the Committee of the Verkhovna Rada of Ukraine on Anti-Corruption Policy on the Draft Law of Ukraine 'On Amendments to Certain Laws of Ukraine regarding Support for the Development of Efficient and Sustainable District Heating' (reg. No. 14067), p. 1. ↗

2191 Minutes of the meeting of the Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union No. 252 of 20.02.2026, p. 11. ↗; Ibid, pp. 12–13.

2192 Information provided by Respondent No. 59 during an interview conducted on 16.04.2026 ; Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

2193 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

2194 Roadmap on the Functioning of Democratic Institutions, Measure 1 of Strategic Result 2 of subsection III.C, p. 15. ↗

2195 Information provided by Respondent No. 59 during an interview conducted on 16.04.2026.

For example, following consideration of the results of implementation of the Operational Plan of the Ministry of Education and Science (MoES) for 2025 and analysis of the draft Operational Plan for 2026, the Committee on Education, Science and Innovation recommended that the ministry revise the draft plan,[2196] emphasising the need to strengthen the results-oriented approach, clearly distinguish process indicators from result indicators, define baseline and target values and ensure that indicators are measurable and comparable over time.[2197] Based on a number of financial control measures, the Accounting Chamber also identified shortcomings in the planning and reporting of state bodies that limit the possibility of objectively assessing progress and the results of planned measures.[2198]

To address this problem, the Roadmap on the Functioning of Democratic Institutions provides that, by the fourth quarter of 2027, legislation should be developed, adopted and implemented to improve Government reporting procedures within parliamentary oversight, taking into account the Principles of Public Administration (SIGMA, 2023).[2199]

2) the absence of a single format and frequency for ministries' reporting to specialised committees (according to specific indicators, timeframes and expected results) makes systematic monitoring and comparison of progress towards objectives impossible. This deprives Parliament of the ability to correlate the results obtained with the budget resources spent, identify problems in good time and respond to them effectively.

Despite the intensive work of parliamentary committees (in 2025, 632 meetings were held, more than 4,000 issues were considered, and 10 committee hearings were organised[2200]), the function of oversight over the executive remains fragmented and reactive. Committee hearings allow explanations to be obtained from ministries and the Accounting Chamber, the Ombudsman, representatives of local authorities, business, civil society and international partners to be involved in discussion. At the same time, such oversight mostly focuses on individual topics or crisis situations, for example, problems faced by

2196 Information on the meeting of the Committee of the Verkhovna Rada of Ukraine on Education, Science and Innovation of 11.02.2026. Committee of the Verkhovna Rada of Ukraine on Education, Science and Innovation, 2026. ↗

2197 Ibid.

2198 Digitalisation in general secondary education institutions: performance audit report. Accounting Chamber, 2026, p. 36 ↗; Information notice on the implementation by the audited entity of the Accounting Chamber Decision No. 16-2 of 24.06.2025. 'On Consideration of the Report on the Results of Analysis of the Annual Report of the Ministry of Economy of Ukraine Containing an Analysis of the Functioning of the Public Procurement System and Summarised Information on the Results of Control in the Field of Procurement'. Accounting Chamber, 2025, pp. 2–3. ↗; Report on the results of the financial audit of special purpose financial statements under the project 'Investing in Social Protection for Inclusion, Resilience and Efficiency (INSPIRE)', supported by a loan from the International Bank for Reconstruction and Development. Accounting Chamber, 2025, p. 12. ↗; Development of innovations and technologies for defence needs during martial law: performance audit report. Accounting Chamber, 2025, p. 16. ↗; Assessment of Ukraine's national policy and measures on climate change using the innovative INTOSAI ClimateScanner tool: compliance audit report. Accounting Chamber, 2025, p. 60. ↗; On consideration of the compliance audit report on 'Recovery of settlements affected by the armed aggression of the Russian Federation': Decision of the Accounting Chamber No. 12-1 of 07.04.2026, p. 7. ↗; State support for agricultural producers through the State Agrarian Register: report. Accounting Chamber, 2025, p. 36. ↗

2199 Roadmap on the Functioning of Democratic Institutions, Measure 1 of Strategic Result 2 of subsection III.C, p. 11. ↗

2200 Legislative activity of the Verkhovna Rada of Ukraine in 2025. Verkhovna Rada of Ukraine, 2025. ↗

farmers in frontline territories[2201] or the verification of pension and social payments.[2202] The practice of considering reports and information from executive authorities is uneven: in different cases, committees analyse audit results,[2203] the implementation of individual laws,[2204] sectoral results,[2205] implementation of recommendations[2206] or responses to specific problems.[2207]

Addressing this problem is in line with Recommendation 14 of the Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada, according to which the Verkhovna Rada, together with the Cabinet of Ministers, should develop a unified format and structure for annual reports by ministries on the results of implementing relevant programme documents, and such reports should be submitted for consideration by the Verkhovna Rada and serve as the basis for oversight of policy implementation in the relevant area.[2208]

3) short-term planning — the planning of committees' oversight activities is limited to a single session horizon, which creates preconditions for situational responses to problems rather than systematic work. According to Recommendation 16 of the Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, each Verkhovna Rada committee should develop and approve an annual work plan for oversight (control) over the executive branch every year so that oversight powers are exercised systematically rather than situationally.[2209]

The insufficient effectiveness of mechanisms of parliamentary oversight and political responsibility leads to a decline in the accountability of the executive and to the formalisation of the Verkhovna Rada's oversight function. Ukrainian legislation does not provide a complete procedure for the political responsibility of the Cabinet of Ministers or individual ministers before the Verkhovna Rada. Existing instruments of parliamentary oversight — MPs' requests, the Government Question Hour, meetings of committees and temporary commissions — are primarily informational in nature and are not accompanied by effective response mechanisms in cases where lawful requirements of Parliament are not fulfilled. In practice, specialised ministers do not always participate in the Government Question Hour or committee meetings, which often prevents MPs from obtaining

2201 Committee hearings were held on the topic 'Current problems of farmers in frontline territories'. Verkhovna Rada of Ukraine, 2025. ↗

2202 Emergency hearings were held in the Committee on the topic: 'On the state of organisation and verification of payments and identification of persons receiving pensions and/or social payments'. Committee of the Verkhovna Rada of Ukraine on Social Policy and Protection of Veterans' Rights, 2026. ↗

2203 Minutes of the meeting of the Committee of the Verkhovna Rada of Ukraine on Economic Development No. 237 of 23.07.2025, pp. 5–6. ↗

2204 Minutes of the meeting of the Committee of the Verkhovna Rada of Ukraine on Education, Science and Innovation No. 198 of 11.02.2026, pp. 3–5. ↗

2205 Minutes of the meeting of the Committee of the Verkhovna Rada of Ukraine on Transport and Infrastructure No. 117 of 11.02.2026, pp. 2–4. ↗

2206 Letter-decision of the Committee of the Verkhovna Rada of Ukraine on Budget on consideration of the Accounting Chamber Decision No. 28-3 of 25.11.2025, Committee meeting of 16.02.2026, minutes No. 233, pp. 5–8. ↗

2207 Transcript of the meeting of the Committee of the Verkhovna Rada of Ukraine on Public Health, Medical Assistance and Medical Insurance of 27.02.2026, pp. 50–60. ↗

2208 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, pp. 15, 43. ↗

2209 Ibid, p. 15.

explanations directly from the official responsible for the decisions taken.[2210] This weakens the ability to direct oversight at the responsible official, since instead of a direct answer from the specialised minister, MPs may receive the Government's general position, an explanation from a deputy minister or a formal or incomplete answer on the merits.[2211]

Civil society monitoring, the practice of committees and the work of temporary investigative commissions indicate cases where officials fail to appear, ignore invitations, fail to provide information or provide formal responses instead of substantive explanations.[2212]

For example, in 2025, the temporary investigative commission on investigating possible violations of legislation in the implementation of measures for state defence faced ignored invitations from ministries, CEB, military formations and special services; because the relevant officials were absent, the commission's meeting was disrupted.[2213]

No representative of the Government leadership appeared at one of the meetings of the temporary investigative commission after the NABU materials concerning Operation 'Midas' were published.[2214]

In 2025, in the Energoatom case, following an application by a representative of the temporary investigative commission, information was entered into the URPTI under Article 351 of the CC of Ukraine[2215] in connection with the failure to provide replies to MPs' requests.[2216]

Problems also arise with access to information. ARMA[2217] provided replies to MPs' requests marked 'For Official Use Only' (FOUO), although similar information had previously been open and, according to the head of the specialised committee, was subject to disclosure under the law.[2218] The subsequent disclosure of this information revealed discrepancies between public statements by ARMA management and the actual data on the number of assets, the implementation of court rulings on their transfer and the income received from their management.[2219]

Parliamentarians also note that the adoption of recommendations by committees and temporary investigative or special commissions does not in itself guarantee their

2210 The systematic absence of the Minister of Defence from the 'Government's Question Hour' was recorded. In addition, an MP refused to ask a question because it was addressed to the Prime Minister, who had already left the Government box at that time. Transcript of the plenary sitting. Sitting 1 (continuation). Verkhovna Rada of Ukraine, 2026. ↗

2211 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

2212 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026 ; Officials and ministers appear when summoned by the Verkhovna Rada in only half of cases — CHESNO. CHESNO Movement, 2025. ↗ ; Information provided by Respondent No. 47 during an interview conducted on 24.03.2026 ; Verbatim bulletin of the plenary sitting of the Verkhovna Rada of Ukraine of 30.04.2025, pp. 30–31. ↗

2213 Verbatim bulletin of the plenary sitting of Verkhovna Rada of Ukraine of 30.04.2025, pp. 30–31. ↗

2214 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

2215 Criminal Code of Ukraine: Code of Ukraine No. 2341-III of 05.04.2001, Article 351. ↗

2216 Verbatim bulletin of the plenary sitting of Verkhovna Rada of Ukraine of 30.04.2025, p. 31. ↗

2217 National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes.

2218 Publication by the Member of Parliament Anastasiia Radina on the social network Facebook of 21.03.2025. ↗

2219 Ibid.

implementation — politically contentious issues require a separate mechanism for further control and support of the implementation of such recommendations.[2220]

Many parliaments use interpellation as an element of control over representatives of the executive branch — a separate formalised procedure with established conditions for submission, time limits for consideration, debates and possible subsequent consequences.[2221] No such mechanism has been formed in Ukrainian legislation.

In September 2025, the Verkhovna Rada adopted a Law[2222] providing for administrative liability for the failure of officials to appear when summoned by the Verkhovna Rada, its committees or temporary investigative or special commissions. The President did not support these provisions, referring to the insufficient legal certainty of the proposed mechanism, the existence of other parliamentary oversight instruments and the risk of excessive discretion in assessing the validity of reasons for non-appearance.[2223] Since October 2025, the draft law has been prepared for reconsideration with the President's proposals.

In December 2025, the Verkhovna Rada adopted a Law on strengthening parliamentary oversight over the activities of members of the Cabinet of Ministers[2224] and submitted it for signature by the President. As of May 2026, the President had neither signed the Law nor returned it to Parliament with comments and proposals. At the same time, the Law mainly concerns the procedure for appointing and dismissing members of the Government, including the obligation of a minister to be present and report when the issue of their dismissal at their own request is considered. Such changes improve the resignation procedure, but do not resolve the issue of responsibility for an improper response to parliamentary requests, evasion of answers or unsatisfactory performance results.

Since August 2025, Draft Law on Interpellation No. 13596[2225] has been under consideration by Parliament. It is expected that the adoption of this draft law will eliminate gaps in legislation on parliamentary oversight over the activities of the Government and ensure a more transparent and effective form of cooperation between the legislative and executive authorities. At the same time, the draft law contains a number of shortcomings. In particular, the responsibility of the Government and individual ministers before Parliament is not only legal, but primarily political. Instead, the draft limits the grounds for interpellation to several formal legal criteria that are not sufficiently clear and are exhaustive in nature,

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2220 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

2221 Review dossier on the use of interpellation as an element of parliamentary oversight. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗; Important draft laws. Issue 50: reboot of the SBI, interpellation of ministers, investigative jurisdiction of the NABU and new privatisation rules. VoxUkraine, 2025. ↗

2222 Proposals of the President of Ukraine to the Law of Ukraine 'On Amendments to the Code of Ukraine on Administrative Offences, the Criminal Code and the Criminal Procedure Code of Ukraine regarding ensuring respect for the court and the prompt consideration of criminal proceedings by the court': Draft Law of Ukraine, registration No. 11387 of 28.06.2024. Text signed by the Chairman of the Verkhovna Rada of Ukraine. ↗

2223 Ibid.

2224 On Amendments to Certain Legislative Acts of Ukraine regarding Improvement of the Procedure for Appointing and Dismissing Members of the Cabinet of Ministers of Ukraine: Draft Law of Ukraine, registration No. 3195 of 10.03.2020. ↗; Parliament adopted the Law of Ukraine 'On Amendments to Certain Laws of Ukraine regarding Improvement of the Procedure for Appointing and Dismissing Members of the Cabinet of Ministers of Ukraine'. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗

2225 On Interpellation: Draft Law of Ukraine, registration No. 13596 of 04.08.2025. ↗

which restricts the parliamentary oversight toolkit and diminishes the importance of the political component of Government officials' responsibility. The new provisions of the draft law on the interpellation procedure contain gaps that would have negative consequences if implemented in practice.[2226] In addition, this also raises the question of compatibility between this law and the Rules of Procedure of the Verkhovna Rada, which also provide for parliamentary oversight instruments.

At the end of 2025, Draft Laws Nos. 14215[2227] and 14215-1[2228] were submitted to the Verkhovna Rada on liability for failure to comply with the lawful requirements of parliamentary oversight bodies and for officials' failure to appear at plenary sittings without valid reasons. However, the proposed amendments do not yet ensure sufficient legal certainty, including with regard to the criteria for valid reasons for non-appearance, the limits of the obligation to appear and the proportionality of sanctions.

As a result, parliamentary oversight largely depends on the political will of officials rather than on the binding nature of compliance with the requirements of the Verkhovna Rada and its bodies, which weakens Parliament's oversight function and the mechanisms of political responsibility of the executive.

Recommendations

1. If the Koretskyi Government submits a Government Programme, consider it in accordance with the requirements of the Rules of Procedure of the Verkhovna Rada.
2. Ensure that reports and presentations of state bodies and officials are considered by the Verkhovna Rada, rather than parliamentary committees, in accordance with legislative requirements.
3. Ensure the development, adoption and implementation of comprehensive legislation to provide for effective parliamentary oversight of policy formation by the Government and to ensure policy-legislation coherence.
4. Ensure the development, adoption and implementation of legislation aimed at improving Government reporting procedures within parliamentary oversight, particularly regarding:
   - a unified format for ministries' plans and reports on the implementation of programme and strategic documents;
   - determining the periodicity and format of ministries' reporting to specialised committees of the Verkhovna Rada;
   - introducing an annual planning horizon for parliamentary committees' oversight activities to ensure systematic oversight of the executive branch.

2226 On Interpellation: opinion of the Main Scientific and Expert Department of the Verkhovna Rada on the Draft Law of Ukraine, registration No. 13596 of 04.08.2025. ↗

2227 On Amendments to the Code of Ukraine on Administrative Offences regarding the Restoration of Lawful Procedures of Parliamentary Oversight: Draft Law of Ukraine, registration No. 14215 of 14.11.2025. ↗

2228 On Amendments to the Code of Ukraine on Administrative Offences and Certain Laws of Ukraine regarding the Regulation and Improvement of the Effectiveness of Parliamentary Oversight: Draft Law of Ukraine, registration No. 14215-1 of 02.12.2025. ↗

5. Based on existing legislative initiatives, determine the optimal model of interpellation and integrate it into the Rules of Procedure of the Verkhovna Rada as an instrument of parliamentary oversight and political responsibility of members of the Government. The interpellation procedure should provide for the possibility for a group of MPs to summon Government representatives to the Verkhovna Rada and should define clear consequences arising from the results of interpellation.

Parliamentary Oversight in the Security and Defence Sector

State of play

The legal framework for state policy in the field of security and defence consists of the Constitution of Ukraine,[2229] the Laws of Ukraine 'On National Security of Ukraine',[2230] 'On Intelligence',[2231] 'On State Secrets',[2232] 'On Defence Procurement',[2233] 'On the Status of People's Deputy of Ukraine',[2234] 'On Committees of the Verkhovna Rada of Ukraine',[2235] 'On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine'[2236] and 'On the Rules of Procedure of the Verkhovna Rada of Ukraine'.[2237]

The security and defence sector consists of four interrelated components: security forces; defence forces; the defence-industrial complex; citizens and civil society organisations that voluntarily participate in ensuring national security.[2238]

The main powers of the Verkhovna Rada in the security and defence sector are defined by the Constitution of Ukraine.[2239] In the field of security and defence, Parliament:

- declares a state of war and concludes peace upon submission by the President and approves decisions by the President on the use of the Armed Forces of Ukraine (AFU) and other military formations in the event of armed aggression against Ukraine;
- approves decisions by the President on providing military assistance to other states, deploying units of the AFU to another state or admitting units of the armed forces of other states to the territory of Ukraine;

2229 Constitution of Ukraine: Law of Ukraine No. 254к/96-VR of 28.06.1996.

2230 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018.

2231 On Intelligence: Law of Ukraine No. 912-IX of 17.09.2020.

2232 On State Secrets: Law of Ukraine No. 3855-XII of 21.01.1994.

2233 On Defence Procurement: Law of Ukraine No. 808-IX of 17.07.2020.

2234 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992.

2235 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995.

2236 On Temporary Investigative Commissions and Temporary Special Commissions of Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019.

2237 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010.

2238 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018, Article 12.

2239 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 85.

- approves decrees of the President on the introduction of martial law or a state of emergency in Ukraine or in particular areas thereof, and on general or partial mobilisation;
- approves the general structure and strength of the AFU and other military formations established in accordance with the law;
- appoints the Minister of Defence and the Head of the Security Service of Ukraine upon submission by the President.

The Verkhovna Rada exercises parliamentary oversight and adopts laws that define and regulate the activities and powers of security and defence sector bodies, approves the relevant budget allocations and oversees their use.[2240]

Specific features of oversight in the security and defence sector

The Verkhovna Rada is a key element of the system of democratic civilian oversight of the security and defence sector.[2241] The specific nature of this oversight is due to the need to process restricted-access information, including state secrets, which cover information in the field of defence and national security as defined by law.[2242]

The Chairman of the Verkhovna Rada, his deputy chairpersons and all MPs have the right to access state secrets of all levels of classification by virtue of their office. This right is exercised after they provide a written undertaking to preserve secrecy.[2243]

An MP has the right to examine any confidential and classified information related to parliamentary activity. However, the MP is under an obligation not to disclose such information.

Matters involving state secrets are considered in closed session.

A closed plenary sitting is held only to consider specific issues, by decision of a majority of MPs following a brief discussion. In addition to MPs, the President of Ukraine and the Prime Minister have the right to attend. All participants are strictly prohibited from using any equipment: means of communication, such as telephones, voice recorders, photo cameras or video cameras. Documents are prepared by the Secretariat of the Verkhovna Rada under a special regime that completely prevents information leaks. Only at the end of the sitting do MPs decide by vote whether the voting results, adopted decisions or transcript may be made public.[2244]

Closed committee hearings are also held by decision of the committee if the information to be used during the hearing contains a state secret or another secret protected by law.[2245] Committee meetings may also be closed by decision of the committees concerned. The minutes, transcript and video recording of closed meetings are not made public.[2246]

2240 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018, Article 6. ↗

2241 Ibid.

2242 On State Secrets: Law of Ukraine No. 3855-XII of 21.01.1994, Article 8. ↗

2243 Ibid, Article 27.

2244 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 4. ↗

2245 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 29. ↗

2246 Ibid., Article 51, subparagraph 7 of paragraph 4 of Section VIII 'Final Provisions'.

These rules mean that only persons who have been granted access to state secrets may be admitted to closed committee meetings, committee hearings and parliamentary hearings — either under the simplified procedure provided for MPs or after obtaining security clearance, that is, after a vetting procedure, in the case of staff of the Secretariat of the Verkhovna Rada who prepare documents and keep the minutes and transcript of the meeting.

Parliamentary oversight in the security and defence sector

Parliamentary oversight in the security and defence sector is exercised:

1) Directly by MPs through parliamentary questions and inquiries, hearings (parliamentary and committee hearings), participation in 'Question Time with the Government', consideration of reports by state bodies, hearings of heads of relevant bodies and participation in personnel decisions (appointment and dismissal of the heads of the MoD and the SSU).

2) Through the work of permanent and temporary bodies:

   - Permanent bodies — the Committee on National Security, Defence and Intelligence,[2247] whose remit includes state policy in the fields of national security and defence.
   - The following committees are also relevant to parliamentary oversight within their respective areas: (1) the Committee on Anti-Corruption Policy, (2) the Committee on Law Enforcement, (3) the Committee on Social Policy and Protection of Veterans' Rights, (4) the Committee on Foreign Policy and Interparliamentary Cooperation (Committee on Foreign Policy) and (5) the Budget Committee. For example, the Committee on Law Enforcement plays an important role in parliamentary oversight of the security and defence sector, as its remit includes, in particular, military justice, as well as the organisation and activities of certain security and defence sector bodies, such as the NPU, the NGU, the SBGS and others.
   - The law provides for the establishment of a committee whose powers include ensuring the Verkhovna Rada's oversight functions over the activities of state bodies of special purpose with law enforcement functions, special-purpose law enforcement agencies and intelligence agencies. The purpose of such oversight is to guarantee these bodies' strict and unconditional compliance with the requirements of the Constitution of Ukraine on ensuring national security and to prevent their use for the usurpation of power or the violation of human and citizens' rights and freedoms. The main condition for the exercise of powers by MPs who are members of the committee and by staff of its secretariat is passing a special vetting procedure, obtaining security clearance and access to state secrets, as well as access to intelligence information.[2248]
   - Temporary collegial bodies composed of MPs — temporary investigative commissions and temporary special commissions, which conduct investigations

2247 Committee of the Verkhovna Rada of Ukraine on National Security, Defence and Intelligence. ↗

2248 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018, Article 6. ↗ ; On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Articles 14, 33^2. ↗ ; On State Secrets: Law of Ukraine No. 3855-XII of 21.01.1994, Article 27. ↗

or prepare and preliminarily consider issues in the field of security and defence and report to Parliament on the results of their work within the timeframe determined by Parliament.[2249] The term of office of such commissions may not exceed one year from the date of their establishment.[2250]

The law regulates the activities of temporary investigative commissions in detail, taking into account the specific nature of their work. In particular, their meetings may be held in closed session to protect restricted-access information, including state secrets. Information for the media is provided only on specific issues and exclusively by the chair or deputy chair of the commission, following a decision by the commission.[2251]

Thus, to investigate issues in the security and defence sector that are of public interest, Parliament established the Temporary Investigative Commission on Investigating Possible Violations of Ukrainian Legislation in the Implementation of State Defence Measures[2252] and the Temporary Investigative Commission on Possible Violations in the Field of Defence, Anti-Corruption Legislation and Respect for Human Rights and Freedoms during Martial Law.[2253]

To ensure parliamentary oversight of the use of international military assistance, Parliament established the Temporary Special Commission on the Receipt and Use of International Military Assistance during Martial Law.[2254] This commission continued the work of the previous commission following the Verkhovna Rada's consideration of its performance report.

3) Through the activities of the Ukrainian Parliament Commissioner for Human Rights (the Commissioner), who exercises parliamentary oversight of respect for the constitutional rights and freedoms of humans and citizens[2255] through the Representative of the Commissioner within the system of security and defence sector bodies.[2256] The Commissioner reports to Parliament through annual and special reports.[2257]

2249 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019. ↗; On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018, Article 6. ↗

2250 For details, see subsection 'Temporary Commissions of the Verkhovna Rada of Ukraine'.

2251 On Temporary Investigative Commissions and Temporary Special Commissions of the Verkhovna Rada of Ukraine: Law of Ukraine No. 400-IX of 19.12.2019, Articles 6, 8. ↗

2252 On the Establishment of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on Investigating Possible Violations of Ukrainian Legislation in the Implementation of State Defence Measures: Resolution of the Verkhovna Rada of Ukraine No. 4338-IX of 27.03.2025 ↗; Temporary Investigative Commission of the Verkhovna Rada of Ukraine on Investigating Possible Violations of Ukrainian Legislation in the Implementation of State Defence Measures. ↗

2253 On the Establishment of the Temporary Investigative Commission of the Verkhovna Rada of Ukraine on Investigating Possible Violations of Ukrainian Legislation in the Field of Defence, Anti-Corruption Legislation of Ukraine and Respect for Human Rights and Freedoms during Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 4731-IX of 17.12.2025. ↗

2254 On Certain Issues of Exercising Parliamentary Oversight over the Receipt and Use of International Military Assistance during Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 4506-IX of 18.06.2025. ↗

2255 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 101 ↗; On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Articles 4, 5(1), 10–11. ↗; For details, see subsection 'Oversight by the Verkhovna Rada through the Commissioner for Human Rights'.

2256 Representatives of the Commissioner. ↗

2257 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 18. ↗; Annual Report of the Ukrainian Parliament Commissioner for Human Rights on the State of Observance and Protection of Human and Citizens' Rights and Freedoms in Ukraine in 2025, Section 3. ↗

In September 2025, Ukraine introduced the institution of the Military Ombudsman. In particular, the Law 'On the Military Ombudsman'[2258] was adopted, the Office of the Military Ombudsman[2259] was established as a permanent auxiliary body under the President of Ukraine and Ukraine's first Military Ombudsman[2260] was appointed. The Military Ombudsman submits annual reports to the Verkhovna Rada, which are heard in Parliament, in closed session where necessary.[2261]

Analytical support for the activities of the Verkhovna Rada in the security and defence sector

Expert and analytical support on defence and security matters is provided by the relevant committees, primarily the Committee on National Security, Defence and Intelligence and its secretariat, and by the expert and analytical units of the Secretariat of the Verkhovna Rada — the Main Scientific and Expert Department of the Secretariat of the Verkhovna Rada of Ukraine and the Main Legal Department of the Secretariat of the Verkhovna Rada of Ukraine. The Main Scientific and Expert Department and the Main Legal Department, which review all draft laws, include thematic experts specialising specifically in security and defence matters.

The Research Service also provides analytical and educational support to Parliament by preparing thematic analytical and information materials and conducting training events for parliamentarians and staff of the Secretariat of the Verkhovna Rada on issues related to the security and defence sector. In the thematic section 'National Security and Defence',[2262] 2 legislative guides, 19 parliamentary studies, 20 analytical briefs, 4 briefing dossiers and 42 information notes have been published, and six training events have been held on the following topics: (1) international humanitarian law;[2263] (2) EU legislation on cybersecurity and the EU's new digital security architecture;[2264] (3) EU law in the field of border control;[2265] (4) implementation of the provisions of the Rome Statute of the International Criminal Court;[2266] (5) mutual legal assistance and Joint Investigation Teams;[2267] (6) international cooperation in the investigation and prosecution of international crimes.[2268]

2258 On the Military Ombudsman: Law of Ukraine No. 4603-IX of 17.09.2025. ↗

2259 On the Office of the Military Ombudsman: Decree of the President of Ukraine No. 691 of 19.09.2025. ↗

2260 On the Appointment of O. Kobylianska as Military Ombudsman: Decree of the President of Ukraine No. 792 of 14.10.2025. ↗

2261 On the Military Ombudsman: Law of Ukraine No. 4603-IX of 17.09.2025, Article 20. ↗

2262 National Security and Defence. Research Service of the Verkhovna Rada of Ukraine (assessed 31.07.2026). ↗

2263 Current Issues of International Humanitarian Law. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗

2264 The EU's New Digital Security Architecture. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗

2265 EU Law in the Field of Border Control. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗

2266 Educational Webinar 'Ways to Implement the Provisions of the Rome Statute of the International Criminal Court into National Legislation'. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗

2267 Educational Webinar 'Implementation of Mutual Legal Assistance Agreements: Tools of International Cooperation'. Research Service of the Verkhovna Rada of Ukraine, 2025. ↗

2268 Educational Webinar 'International Cooperation in the Investigation and Criminal Prosecution of International Crimes'. Research Service of the Verkhovna Rada of Ukraine, 2026. ↗

Progress and issues

Simplified access for MPs to state secrets does not ensure their protection. This is a fundamental conflict between the democratic mandate — the right of an elected representative to know everything — and the information security regime — minimising the circle of persons who have access to classified information.

The current procedure, under which MPs obtain access to state secrets 'by virtue of their office', based only on a written undertaking, creates critical vulnerabilities. Unlike ordinary citizens, who undergo a special SSU vetting procedure for the presence of links to the enemy or mental disorders, MPs are granted access in advance. Practice in 2024–2025 revealed two key types of risks in this context.

Risk of infiltration and high treason

Holding a parliamentary mandate does not guarantee loyalty to the state, although it may create opportunities for leaks of classified information.

The list of MPs of the ninth convocation who have been notified of suspicion or charged with **high treason** under Article 111 of the CC of Ukraine includes 15 MPs,[2269] 10 of whom are representatives of the party 'Opposition Platform — For Life', which is banned in Ukraine. In March 2026, a pre-trial investigation under Article 111(2) was launched against another MP of the ninth convocation.[2270]

One of the most recent cases concerns Yevhenii Shevchenko, who headed the relevant subcommittee on cooperation with law enforcement agencies on economic matters within the Committee on Economic Development.[2271] In November 2025, the SBI completed the investigation and sent the indictment to court. The evidence collected concerns three episodes of criminal offences, two of which relate to high treason before and after the start of the full-scale invasion of Ukraine by the Russian Federation.[2272]

The fact that a person had for years remained within the decision-making circuit for economic matters related to law enforcement agencies points to the weakness of Parliament's 'security filter'.

Risk of disclosure and undermining trust between oversight actors

The public profile of MPs often comes into conflict with the secrecy regime, leading to data leaks and blocking communication with the military leadership. For example, **Mariana Bezuhla's** activities involved access to state secrets. The MP held the position of Deputy Head of the Verkhovna Rada Committee on National Security, Defence and Intelligence and chaired the Temporary Investigative Commission on Investigating Violations that May

2269 Untouchable MPs: What Suspicions Have Been Served on MPs of This Convocation of the Verkhovna Rada. CHESNO Civil Movement. ↗; Results of the Rada — 2025: Main Absentees, New Suspects and Top 5 Lawmakers. CHESNO Civil Movement, 2025. ↗

2270 The SBI Confirmed the Opening of Proceedings against MP Bezuhla under Four Articles of the CC of Ukraine. Interfax-Ukraine, 2026. ↗

2271 Yevhenii Volodymyrovych Shevchenko. ↗

2272 The SBI Completed the Investigation into High Treason and Fraud by a Sitting MP (VIDEO). State Bureau of Investigation, 2025 ↗; MP Shevchenko to Stand Trial on Suspicion of High Treason and Fraud: He Faces Life Imprisonment. Suspilne News, 2025. ↗

Have Contributed to Undermining Ukraine's State Sovereignty, Territorial Integrity and Inviolability.[2273]

In 2024, the MP was removed from the Committee on National Security, Defence and Intelligence[2274] because information leaks following closed meetings with her participation led the military leadership to refuse to attend meetings.[2275] She subsequently moved to the Committee on Foreign Policy, where she headed the subcommittee on international forms and methods of countering aggression against Ukraine, while retaining access to state secrets.[2276]

Since March 2026, the SBI has been investigating possible criminal offences by the non-affiliated MP Mariana Bezuhla. According to media reports, one of the cases concerns high treason and the other concerns the MP's possible disclosure of a state secret. The high treason case was opened pursuant to a court ruling following an application by MPs Serhii Taruta and Fedir Venislavskyi, while the case concerning disclosure of a secret was opened following an application by Roman Chervinskyi, a former officer of the Defence Intelligence of Ukraine.[2277]

The cases of Shevchenko and Bezuhla, as well as the statement by Roman Kostenko, Secretary of the Committee on National Security, Defence and Intelligence, about the SSU opening a case concerning a leak of information from closed meetings with Kyrylo Budanov,[2278] indicate risks of disclosure of restricted-access information obtained in the course of parliamentary oversight in the security and defence sector. This, in turn, calls into question the ability of such oversight to ensure a proper balance between accountability and the protection of secrets, potentially weakening the effectiveness of democratic civilian oversight.

Draft Law No. 11395,[2279] which is aimed at addressing a number of problems in the field of State Secrets Protection, is under consideration by the Verkhovna Rada. In particular, it provides for confirmation of the absence of mental disorders and mandatory familiarisation of persons holding high public office, including MPs, with the requirements of the law before they undertake to preserve state secrets. In addition, the draft law establishes that, for persons holding elected office, access to state secrets may be terminated if the grounds defined by law are identified. At the same time, the draft law has been under consideration in Parliament for almost two years, delaying the resolution of problems, including those related to access by high-ranking officials to state secrets of all levels of classification.

2273 Mariana Volodymyrivna Bezuhla: All Positions during the Convocation. ↗

2274 On Amendments to the Resolution of the Verkhovna Rada of Ukraine 'On the Election of Heads, First Deputy Heads, Deputy Heads, Secretaries and Members of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation': Resolution of the Verkhovna Rada of Ukraine No. 3989-IX of 19.09.2024. ↗

2275 MP Mariana Bezuhla Disrupted a Closed Meeting of the Verkhovna Rada Committee on National Security, Defence and Intelligence with the Participation of Representatives of the Ministry of Defence of Ukraine. Ukrinform, 2025. ↗

2276 Take Her Word for It? How Mariana Bezuhla Shed Light on the Problem of Access to State Secrets. Hromadske, 2025. ↗

2277 Cases against MP Bezuhla Opened Pursuant to a Court Decision. Interfax-Ukraine, 2026. ↗ ; Criminal Proceedings Opened against Bezuhla. Suspilne News, 2026. ↗

2278 SSU Opens Case over Leak of Information from Budanov's Closed Meeting with MPs. UNN, 2025. ↗

2279 On Amendments to the Law of Ukraine 'On State Secrets' Regarding the Improvement of State Secrets Protection Measures: Draft Law of Ukraine, registration No. 11395 of 04.07.2024. ↗

The absence of a final decision on the format of the special committee that is to oversee the activities of special-purpose bodies and intelligence agencies limits the prospects for strengthening parliamentary oversight in the security and defence sector.

Back in 2020,[2280] Law No. 912-IX provided for the establishment of a committee *whose remit would include ensuring the Verkhovna Rada of Ukraine's oversight functions over the activities of special-purpose bodies with law enforcement functions, law enforcement agencies, special-purpose law enforcement agencies and intelligence agencies.*

The main condition that gives MPs who are members of the committee the right to exercise their powers, including receiving restricted-access information from special-purpose bodies and intelligence agencies and visiting these bodies without hindrance, is that they and the staff of the committee secretariat undergo a special vetting procedure, obtain security clearance and access to state secrets, as well as access to intelligence secrets.[2281]

MPs, on the one hand, identified the need to establish such an oversight committee, but, on the other hand, have failed over six years to define the key requirements and procedures for its work. This includes approving the requirements to be met by a committee member and a staff member of the committee secretariat, the procedure for organising and undergoing special vetting, its frequency and the procedure for appealing its results.

The establishment of such a committee also faces constitutional barriers. In particular, Article 89 of the Constitution of Ukraine does not provide for committees with an exclusive or priority oversight function. In addition, the legal position of the CCU clearly establishes that Verkhovna Rada committees are not independent subjects of parliamentary oversight. They merely facilitate its exercise at the stage of preliminary preparation and consideration of issues, whereas the right to make the final decision and the powers of the oversight subject belong exclusively to the Verkhovna Rada itself as a collegial body.[2282]

In parallel, discussion continues on the advisability of establishing a separate committee, since its functions could potentially be performed by the Committee on National Security, Defence and Intelligence, which already has a subcommittee with a similar name.[2283]

At the same time, in February 2023, the Verkhovna Rada clarified the remit of the Committee by removing issues related to the organisation and activities of security service, intelligence and counterintelligence bodies from its areas of responsibility. Instead, in its Resolution, the Verkhovna Rada introduced new wording regarding the Committee's powers, including 'legislative support for the activities of security and defence sector bodies, including the implementation of the principles and standards of the North Atlantic

2280 On Intelligence: Law of Ukraine No. 912-IX of 17.09.2020. ↗

2281 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 33² ↗; On Intelligence: Law of Ukraine No. 912-IX of 17.03.2020, Article 53. ↗

2282 Opinion of the Constitutional Court of Ukraine No. 1-v/2001 of 14.03.2001 in the case upon the application of the Verkhovna Rada of Ukraine for an opinion on the compliance of the Draft Law of Ukraine 'On Amendments to the Constitution of Ukraine (Articles 84, 85, 89, 92, 93, 94, 106, 147, 150, 151 and paragraph 6 of Section XV of the Constitution of Ukraine)' with the requirements of Articles 157 and 158 of the Constitution of Ukraine (case on amendments to Articles 84, 85 and other articles of the Constitution of Ukraine). ↗

2283 Green Paper 'Parliamentary Oversight of the Security and Defence Sector in the Context of the Correlation between NATO and Ukrainian Norms and Practices'. Agency for Legislative Initiatives, 2025. ↗

Treaty Organization (NATO) and the achievement of the criteria necessary for Ukraine to acquire NATO membership' and 'democratic civilian control'.[2284]

Overall, a situation in which the need to strengthen oversight is declared at the legislative level, while the actual mechanisms for its implementation have remained undefined for six years, creates conditions for mutual avoidance of responsibility: special-purpose bodies and intelligence agencies retain operational opacity, while parliamentarians avoid introducing stricter security standards for their own members.

Excessive secrecy of the relevant committees makes it difficult to assess the real impact of parliamentary oversight on addressing problems in the security and defence sector.

The current practice of the relevant committees is characterised by systemic opacity, which effectively makes external monitoring of the results of parliamentary oversight impossible. A critical imbalance can be observed in the Committee on National Security, Defence and Intelligence: although not all agenda items are restricted, public reporting on the Committee's activities is entirely absent.

This is confirmed by the state of the Committee's official website, where the sections 'Work Plans'[2285] and 'Reporting'[2286] have not been updated since the previous, eighth convocation of the Verkhovna Rada. The latest minutes of Committee meetings date back to February 2022,[2287] indicating that public information has been completely discontinued for the past four years. In these circumstances, parliamentary oversight loses the features of a public process, while the media, the public and international partners are deprived of the opportunity to track the Committee's real impact on the security and defence sector and on addressing the problems identified within it.

For the security and defence sector, such excessive secrecy is destructive, as it nullifies the role of Parliament as the body exercising oversight on behalf of society. A similar trend can also be observed in the activities of the Committee of the Verkhovna Rada of Ukraine on Law Enforcement. Despite the availability of publicly disclosed work plans[2288] and reports[2289] on the Committee's work, which also cover the exercise of its oversight function, the relevant information is presented mainly as a list of issues considered, appeals, inquiries and other oversight measures, making it difficult to assess the effectiveness of such parliamentary oversight. The reports for the 13th session state that, out of 68 issues

2284 On Amendments to the Annex to the Resolution of the Verkhovna Rada of Ukraine 'On the List, Number of Members and Remit of the Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation': Resolution of the Verkhovna Rada of Ukraine No. 2929-IX of 23.02.2023, subpara. 2 para. 1. ↗

2285 Committee Work Plan. Committee of the Verkhovna Rada of Ukraine on National Security, Defence and Intelligence. ↗

2286 Committee Activity Report. Committee of the Verkhovna Rada of Ukraine on National Security, Defence and Intelligence. ↗

2287 Minutes. Committee of the Verkhovna Rada of Ukraine on National Security, Defence and Intelligence. ↗

2288 Work Plans of the Committee of the Ninth Convocation. Committee of the Verkhovna Rada of Ukraine on Law Enforcement. ↗

2289 Committee Reporting. Committee of the Verkhovna Rada of Ukraine on Law Enforcement. ↗

of various types, six concerned oversights,[2290] while for the 14th session, five of the 18 issues considered by the Committee concerned oversight.[2291]

The existing forms of parliamentary oversight in the security and defence sector are applied inconsistently, making it difficult to ensure continuous oversight and weakening the personal accountability of officials. Despite the Verkhovna Rada's statutory right to require sector heads to attend plenary sittings, the practical use of this instrument remains limited.

The incident of 20 June 2025 was illustrative: despite an official invitation to the Minister of Defence, Rustem Umierov, he did not attend the sitting. Commenting on MPs' complaints, the Chairman of the Verkhovna Rada noted the lack of powers to ensure the attendance of Government members, while also pointing out that only 20 MPs were present during 'Government's Question Hour' itself.[2292] This case demonstrates a systemic gap between Parliament's formal powers and its actual capacity to exercise them.

Analysis of the transcripts of 'Government's Question Hour' for 2025 confirms that security issues appeared on the agenda only episodically — as an addition to other topics. Defence-related issues were discussed at sittings devoted to energy and energy security on 17 January,[2293] public administration on 18 April[2294] and preparations for the heating season on 22 August.[2295] At the same time, no 'Government's Question Hour' was dedicated to the security and defence sector.[2296]

During 2025, the MoD was mostly represented in the Verkhovna Rada during 'Government's Question Hour' not by ministers but by deputy ministers — First Deputy Minister of Defence of Ukraine Ivan Havryliuk and Deputy Minister of Defence of Ukraine Yevhen Moisiuk. This format of representation cannot be considered equivalent to a ministerial report and dilutes political responsibility for strategic decisions. The personal participation of the Minister of Defence in 'Government's Question Hour' in 2025 was recorded during one sitting — on 5 December 2025, when Denys Shmyhal answered MPs' questions. The answers were brief — one of the two interventions lasted only 25 seconds, while the total duration of both answers was 1 minute and 59 seconds.[2297]

In January 2026, Mykhailo Fedorov, on the day of his appointment as Minister of Defence, addressed the Verkhovna Rada with a speech summarising key achievements in the field of defence and setting out future priorities.[2298] Minister of Internal Affairs Ihor Klymenko spoke at parliamentary sittings four times in 2025, but the total duration of his answers

2290 Report of the Committee of the Verkhovna Rada of Ukraine on Law Enforcement for the Thirteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation (February – September 2025), p. 5. ↗

2291 Report of the Committee of the Verkhovna Rada of Ukraine on Law Enforcement for the Fourteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation (September 2025 – January 2026), p. 5. ↗

2292 Transcript of the Plenary Sitting. Sitting 1 (continuation). Verkhovna Rada of Ukraine, 20.06.2025. ↗

2293 Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 17.01.2025. ↗

2294 Transcript of the Plenary Sitting of the Verkhovna Rada of Ukraine of 18.04.2025. ↗

2295 Transcript of the Plenary Sitting. Sitting 1 (continuation). Verkhovna Rada of Ukraine, 22.08.2025. ↗

2296 According to calculations based on an analysis of the transcripts of the Verkhovna Rada.

2297 Timeline of the Plenary Sitting. Verkhovna Rada of Ukraine, 05.12.2025. ↗

2298 Mykhailo Fedorov Is the New Minister of Defence of Ukraine. Ministry of Defence of Ukraine, 2026. ↗

was approximately two minutes.[2299] This format of 'Government's Question Hour' does not ensure systematic and substantive ministerial accountability.

The situational nature of oversight is also confirmed by the statistics on parliamentary inquiries: in 2025, only 68 out of 538 were addressed to security and defence sector bodies, or 12.6% of the total. This indicates that, in the sector with the highest concentration of risks, parliamentary oversight is fragmented rather than systematic.

Without the introduction of mechanisms for publicly summarising recommendations and strict compliance with procedures for the personal reporting of senior officials, parliamentary oversight risks remaining a process of 'hearing information' without any real consequences for state policy in the field of security and defence.

Temporary investigative commissions have limited institutional capacity and weak mechanisms of influence, as a result of which parliamentary oversight is often reduced to recording violations without follow-up responses or real change.

The limited effectiveness of temporary investigative commissions stems from three factors: insufficient resources, limited powers and the absence of established working practices. This is reflected in the absence of reports by some temporary investigative commissions, the weak effectiveness of their recommendations and the lack of procedures for further monitoring of their implementation.[2300] MPs serving on temporary investigative commissions also face reluctance by public authorities to cooperate. Although the law requires officials to respond to requests from parliamentary investigative commissions, attend their meetings where necessary and provides for liability for failure to comply with these requirements, in practice officials may either fail to provide information in full or respond only formally, limiting themselves to pro forma replies.[2301] In December 2025, the Research Service also pointed to repeated cases of invited officials failing to appear before Parliament and the absence of a clear procedure for holding them liable for such non-appearance. This complicates the collection of information and weakens parliamentary oversight already at the information-gathering stage.[2302]

The Constitution and the law expressly provide that the conclusions and proposals of such commissions are not decisive for an investigation or court proceedings.[2303] This creates a need to strengthen the institutional capacity of temporary investigative commissions and increase the transparency of investigative procedures.[2304]

2299 Transcript of the Plenary Sitting. Sitting 1 (continuation), 17.01.2025. Verkhovna Rada of Ukraine, 2025. ↗; Timeline of the Plenary Sitting. Verkhovna Rada of Ukraine, 14.03.2025. ↗; Timeline of the Plenary Sitting. Verkhovna Rada of Ukraine, 18.04.2025. ↗; Timeline of the Plenary Sitting. Verkhovna Rada of Ukraine, 24.10.2025. ↗

2300 Parliamentary Oversight of the Security and Defence Sector in the Context of the Correlation between NATO and Ukrainian Norms and Practices: Green Paper, 2025, pp. 8, 67–83. ↗

2301 Temporary Commissions in Parliament: Oversight without the Ability to Influence. Parliament Journal. Agency for Legislative Initiatives. ↗

2302 Information Note on the Draft Law of Ukraine 'On Amendments to the Code of Ukraine on Administrative Offences and Certain Laws of Ukraine Regarding the Regulation and Improvement of the Effectiveness of Parliamentary Oversight' (registration No. 14215-1 of 02.12.2025). Research Service of the Verkhovna Rada of Ukraine. Analytical Materials. ↗

2303 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 89 ↗; On Temporary Investigative Commissions and Temporary Special Commissions: Law of Ukraine No. 400-IX of 19.12.2019, Article 22. ↗

2304 Parliamentary Study on the Legislative Framework for the Functioning of Temporary Investigative Commissions of the Verkhovna Rada of Ukraine and Parliamentary Investigative Commissions of European Union Member States. Research Service of the Verkhovna Rada of Ukraine. ↗

Recommendations

1. Expedite consideration of Draft Law No. 11395 on improving State Secrets Protection measures.[2305] As part of the reform of the State Secrets Protection system, introduce mandatory special vetting for MPs who obtain access to information constituting a state secret, as well as briefing on its protection.
2. Define the requirements for members of the committee that is to exercise oversight over special-purpose bodies and intelligence agencies, as well as for staff of its secretariat, and establish the procedure for organising, the frequency of and the procedure for undergoing special vetting to obtain security clearance for access to state secrets, as well as the mechanism for appealing its results. Take measures to establish such a committee or assign its functions to an existing committee of the Verkhovna Rada, taking into account the statutory requirements for members of such a committee and staff of its secretariat.
3. Ensure systematic updating of committee web resources, in particular by regularly publishing work plans, reports, minutes and transcripts of meetings held in open session.
4. Amend the Law 'On Committees of the Verkhovna Rada of Ukraine' to require the publication of summarised results of closed committee meetings and hearings. Define a clear format for presenting such information that would preclude the disclosure of secrets while including the list of issues considered, the substance of the recommendations adopted, deadlines for their implementation and the reporting procedure.
5. Introduce a mechanism of liability for disregarding parliamentary procedures. Establish a procedure for the Verkhovna Rada to respond to the unjustified failure of Government members to attend 'Government's Question Hour' or meetings of the relevant committees. Provide for sanctions for repeated non-appearance without valid reasons or failure to provide the requested materials and information.
6. Strengthen oversight of the implementation of the conclusions of temporary commissions. Establish an obligation for public authorities and officials to submit, within a defined period, a written report on the results of consideration of the recommendations of temporary investigative commissions and temporary special commissions. Introduce a procedure for mandatory follow-up consideration of the state of implementation of these recommendations at the level of the relevant committees of the Verkhovna Rada.

2305 On Amendments to the Law of Ukraine 'On State Secrets' Regarding the Improvement of State Secrets Protection Measures: Draft Law of Ukraine, registration No. 11395 of 04.07.2024. ↗

Oversight Powers of the Verkhovna Rada in the Field of Foreign Affairs, International Treaties and Diplomacy

State of play

Constitutional and legislative framework for the powers of the Verkhovna Rada in foreign policy

The legislative framework for the powers of the Verkhovna Rada in the field of foreign policy, international treaties and diplomacy is primarily defined by the Constitution,[2306] the Laws of Ukraine 'On the Principles of Domestic and Foreign Policy',[2307] 'On International Treaties of Ukraine'[2308] and 'On the Rules of Procedure of the Verkhovna Rada of Ukraine'.[2309]

In the field of foreign relations, Parliament exercises the following powers:[2310]

- determining the principles of foreign policy and implementing the state's strategic course towards Ukraine's full membership of the EU and the North Atlantic Treaty Organization (NATO);
- hearing the President's annual and extraordinary addresses on the domestic and foreign situation of Ukraine;
- appointing the Minister of Foreign Affairs upon submission by the President and deciding on their resignation;
- exercising oversight over the activities of the Cabinet of Ministers;
- approving decisions on Ukraine granting loans and economic assistance to foreign states and international organisations, as well as on Ukraine receiving loans from foreign states, banks and international financial organisations that are not provided for in the State Budget and exercising oversight over their use;
- approving decisions on providing military assistance to other states, sending units of the AFU to another state or admitting units of the armed forces of other states to the territory of Ukraine;
- granting consent to be bound by international treaties of Ukraine (ratification) and adopting decisions on their denunciation.

2306 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 9, 85. ↗

2307 On the Principles of Domestic and Foreign Policy: Law of Ukraine No. 2411-VI of 01.07.2010, Articles 11–13. ↗

2308 On International Treaties of Ukraine: Law of Ukraine No. 1906-IV of 29.06.2004. ↗

2309 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Chapter 32, Articles 192–196. ↗

2310 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 85. ↗

Role of Verkhovna Rada Committees in the field of foreign policy

These powers are exercised primarily through the work of two specialised committees of the Verkhovna Rada:[2311]

- the Committee on Foreign Policy is responsible for foreign policy activities, international organisations, NATO, interparliamentary cooperation, the diplomatic service, granting consent to be bound by international treaties and their denunciation, except for international treaties of Ukraine with the EU and its Member States;
- the Committee on EU Integration is responsible for legislative support for European integration, adaptation of legislation to EU law, assessment of draft laws for compliance with international legal obligations in the field of European integration, as well as consideration of international treaties with the EU and its Member States.

Other specialised Committees of the Verkhovna Rada of Ukraine also participate, within their remits, in the consideration of ratification draft laws and in parliamentary diplomacy.

Procedure for considering ratification draft laws

Parliament is responsible for granting consent to be bound by international treaties of Ukraine (ratification) and adopting decisions on their denunciation. Draft laws on ratification are considered by the Committee on Foreign Policy or by the Committee on Ukraine's Integration into the EU. Depending on the subject matter of the treaty, other specialised Committees are involved in the work.[2312] In addition, the Committee on Ukraine's Integration into the EU prepares expert opinions on compliance with the legal system of the EU, which includes (but is not limited to) EU legislation adopted within the framework of the European Community, the Common Foreign and Security Policy, and cooperation in the field of justice and internal affairs (EU Acquis) for all draft laws[2313] submitted for consideration by Parliament.[2314]

An important requirement is the comprehensive nature of the legislative process: if implementation of a treaty requires amendments to current legislation, the relevant draft laws are submitted and considered simultaneously with the draft law on ratification.[2315]

Implementation of international treaties and the limits of parliamentary oversight after ratification

After the Verkhovna Rada grants consent to be bound by an international treaty, the main responsibility for its implementation passes to the executive branch. Ministries and other executive authorities ensure compliance with the obligations undertaken under the treaty, monitor the exercise of treaty-based rights arising from the treaty and oversee the fulfilment of obligations by other parties. General supervision over the implementation of international treaties is exercised by the Ministry of Foreign Affairs of Ukraine (MFA).[2316]

2311 On the List, Numerical Composition and Remits of the Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019, Annex, para. 9. ↗

2312 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 197. ↗

2313 For more details, see the section 'European Integration'.

2314 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 93. ↗

2315 Ibid, Article 194.

2316 On International Treaties of Ukraine: Law of Ukraine No. 1906-IV of 29.06.2004, Articles 16, 17. ↗

The current model for coordinating foreign policy activities builds regular cycles of information exchange and reporting mainly within the executive branch.[2317]

The MFA immediately informs the Verkhovna Rada of the conclusion of an international treaty, the termination or suspension of its application, as well as the provisional application of such a treaty or part of it.[2318]

Organisational forms of parliamentary diplomacy

The Verkhovna Rada carries out foreign policy activities through the institutions of parliamentary diplomacy — permanent delegations, the Ukrainian delegation to the EU-Ukraine Parliamentary Association Committee (PAC),[2319] interparliamentary assemblies and parliamentary groups for interparliamentary relations with foreign states. As of 31 July 2026, there were nine permanent delegations, four interparliamentary assemblies, the Ukraine-NATO Interparliamentary Council and 114 parliamentary groups for interparliamentary relations with foreign states.[2320]

The activities of parliamentary groups for interparliamentary relations are coordinated by the Committee on Foreign Policy.[2321] Groups for interparliamentary relations are formed on the basis of the voluntary association of MPs, while direct organisational support for their work is provided by the Subcommittee on Interparliamentary Cooperation, Bilateral and Multilateral Relations.[2322] An MP of Ukraine may be a member of no more than eight groups and may head or co-chair no more than four groups.[2323]

The personal composition of parliamentary groups for interparliamentary relations is approved by the Chairman of the Verkhovna Rada on the basis of a submission from the Committee on Foreign Policy.[2324] The personal composition of permanent delegations to parliamentary bodies of international organisations is also approved by the Chairman of the Verkhovna Rada, taking into account proposals for candidates submitted by parliamentary

2317 State bodies are obliged to inform the MFA about activities in the field of foreign relations and the content of contacts with foreign representatives. Issues of Coordination of the State's Foreign Policy Activities: Decree of the President of Ukraine No. 671/2021 of 22.12.2021, para. 2, subpara. 2 para. 3, para. 4 ↗; Delegations and official representatives of Ukraine submit written reports to the MFA, in the established procedure, on the results of participation in international events. On Approval of the Procedure for Preparing Draft Directives, Instructions and Technical Assignments for Participation in International Events and Reports on Their Results: Resolution of the Cabinet of Ministers of Ukraine No. 903 of 04.11.2015 ↗; State authorities must report annually to the MFA on the status of implementation of international treaties. On Approval of the Form of the Annual Report of State Authorities on the Status of Implementation of International Treaties of Ukraine and Other Bilateral and Multilateral International Documents from Which Ukraine's Rights and Obligations Arise: Order of the Ministry of Foreign Affairs of Ukraine No. 443 of 29.12.2022 ↗; The MFA informs the President of Ukraine or the Cabinet of Ministers of Ukraine if facts of improper fulfilment of obligations are identified and submits proposals for an appropriate response. Issues of Coordination of the State's Foreign Policy Activities: Decree of the President of Ukraine No. 671/2021 of 22.12.2021, paras. 7, 8. ↗

2318 On International Treaties of Ukraine: Law of Ukraine No. 1906-IV of 29.06.2004, Parts 6–9 Article 9. ↗

2319 Ukrainian Part of the EU-Ukraine Parliamentary Association Committee. Verkhovna Rada of Ukraine. ↗

2320 International Activities. Verkhovna Rada of Ukraine (assessed 31.07.2026) ↗; Information Note on the Activities of Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations with Foreign States. Verkhovna Rada of Ukraine. 2026. ↗

2321 On the List, Quantitative Composition and Remits of the Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

2322 On the Regulation on Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 580 of 28.12.1998, paras. 1.1, 4.4. ↗

2323 Ibid, para. 3.3.

2324 On the Regulation on Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 580 of 28.12.1998, para. 3.8. ↗

factions and Committees of the Verkhovna Rada.[2325] An MP may be a member of only one permanent delegation.[2326]

The formation of parliamentary representations is based on the principles of inclusiveness and gender equality:

- parliamentary groups for interparliamentary relations: their leadership must include representatives of different factions and groups, based on the principle of gender equality;[2327]
- permanent delegations to international organisations: they are formed on the basis of fair political and gender representation. Fair political representation is achieved by distributing quotas in permanent delegations in proportion to the actual size of parliamentary factions. At the same time, each faction must be represented in a delegation by at least one MP, either as a member or substitute member of the delegation. Quotas for proportional political representation are determined by the Committee on Foreign Policy.[2328]

Fair gender representation is ensured by including women MPs in delegations. Their number must be no lower than the overall proportional ratio of women in the Verkhovna Rada to the actual number of MPs. Special requirements are established for the permanent delegation to PACE: at least eight seats for women, of which at least four must be positions of substitute members of the delegation.[2329]

Examples of compliance with cross-factional and gender representation include the composition of delegations to:

- the Parliamentary Assembly of the Council of Europe (PACE): Head — Mariia Mezentseva-Fedorenko (faction 'Servant of the People'), First Deputy Head — Serhii Sobolev (faction All-Ukrainian Union 'Batkivshchyna'), personal composition — 13 women MPs and 11 male MPs;[2330]
- the Parliamentary Assembly of the North Atlantic Treaty Organization (NATO PA): Head — Yehor Cherniev (faction 'Servant of the People'), Deputy Heads — Mariana

2325 On Approval of the Regulation on Permanent Delegations of the Verkhovna Rada of Ukraine to Parliamentary Bodies of International Organisations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1366 of 29.12.2023, paras. 10–11. ↗

2326 Ibid, paras. 10, 11.

2327 On the Regulation on Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 580 of 28.12.1998, para. 3.6 ↗ ; For example, in the parliamentary group for interparliamentary relations with the Republic of Singapore, the group's co-chairs are Oleksandr Kachura (faction of the political party 'Servant of the People') and Kira Rudyk (faction of the political party 'HOLOS'). Parliamentary Group of the Verkhovna Rada of Ukraine for Interparliamentary Relations with the Republic of Singapore. Verkhovna Rada of Ukraine ↗ ; In the group for interparliamentary relations with the Kingdom of Sweden, the co-chairs are Oleh Bondarenko (faction of the political party 'Servant of the People') and Inna Sovsun (faction of the political party 'HOLOS'). Parliamentary Group of the Verkhovna Rada of Ukraine for Interparliamentary Relations with the Kingdom of Sweden. Verkhovna Rada of Ukraine. ↗

2328 Regulation on Permanent Delegations of the Verkhovna Rada of Ukraine to Parliamentary Bodies of International Organisations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1366 of 29.12.2023, para. 8. ↗

2329 Ibid, para. 9.

2330 Permanent Delegation to the Parliamentary Assembly of the Council of Europe (assessed 31.07.2026). ↗

Bezuhla (non-affiliated) and Solomiia Bobrovska (faction 'Holos'), personal composition — five women MPs[2331] and 19 male MPs.[2332]

Since the beginning of the full-scale invasion by the Russian Federation, the role of women MPs in parliamentary diplomacy has increased: unlike men MPs, they were able to travel abroad and conduct effective advocacy for Ukraine's interests. In January 2023, Government restrictions on the travel abroad of all civil servants levelled the conditions for crossing the border, but women MPs remained active due to their motivation, experience in building cooperation and the necessary competences.[2333]

The age profile of MPs involved in parliamentary diplomacy generally corresponds to the average age of Parliament (48 years),[2334] but shows certain differences depending on the type of representation and the role of the MP.

- In parliamentary groups for interparliamentary relations, the average age of MPs is slightly lower than the parliamentary average. The youngest are group heads (45 years) and secretaries (45 years), while the average age of deputy heads is 47 years and members — 48 years.[2335] The lower average age in leadership positions in friendship groups indicates relatively open access to leading roles for younger MPs.
- In permanent delegations and interparliamentary assemblies, age indicators are more even across roles. The average age of deputy heads is 46 years, members — 48 years and heads — 47 years.[2336] Unlike friendship groups, there is no significant difference between leadership and non-leadership positions.

Reporting

Information on parliamentary diplomacy activities, including agendas, minutes and transcripts of meetings, is regularly published on the official web resources of the Verkhovna Rada and its Committees.[2337]

The heads of groups for interparliamentary relations must report on the group's activities to the Committee on Foreign Policy at least once a year and publish the reports on the website of this Committee. Failure to submit an annual report constitutes grounds for changing the group's leadership.[2338]

2331 In the Verkhovna Rada of the ninth convocation, women MPs account for approximately 21% of all MPs.

2332 Permanent Delegation to the NATO Parliamentary Assembly (assessed 31.07.2026). ↗

2333 Experience of Male and Female Parliamentarians During Martial Law in Ukraine. Agency for Legislative Initiatives. 2025, p. 38. ↗

2334 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2335 Ibid.

2336 Ibid.

2337 Committee on Foreign Policy and Interparliamentary Cooperation ↗; Committee on Ukraine's Integration into the European Union ↗; Reports on the Activities of Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations with Foreign States. ↗

2338 On the Regulation on Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 580 of 28.12.1998, paras. 4.6–4.8. ↗

The head of a permanent delegation must submit a written report on the results of a business trip after its completion.[2339]

MPs must submit individual reports to the leadership of Parliament[2340] and the Committee on Foreign Policy[2341] after each business trip. Failure to submit such reports may be grounds for refusing to approve a business trip.[2342]

Procedure for arranging business trips

Since 2023, the Government has restricted travel abroad by MPs by making business trip arrangements conditional on obtaining permission from the Chairman of the Verkhovna Rada, an information note from the MFA and an official invitation. The complicated travel procedure has attracted considerable criticism from MPs.[2343] In particular, MP Petro Poroshenko stated several times that he had been denied permission to travel abroad,[2344] and later challenged the restriction in court. The appellate court found the Government restriction[2345] unlawful.[2346] In July 2026, the Supreme Court upheld the legality of the restriction on crossing the border and set aside the appellate court's decision.[2347]

To prevent business trips from being used for personal purposes, the procedure for arranging them was clarified by the Chairman of the Verkhovna Rada: to have a trip approved, MPs must not only obtain talking points from the MFA but also provide a visit plan and, after its completion, a report. MPs may also not extend the duration of a business trip on their own.[2348]

Interaction between Parliament and executive authorities

The full-scale invasion gave impetus to stronger cooperation between MPs and the MFA in order to coordinate positions and promote Ukraine's 'one voice' abroad. Since 2024, business trips by MPs must be accompanied by talking points from the MFA — explanations on the state of cooperation with the country of the visit and the key topics for discussion. This innovation drew criticism from some MPs, but it did not limit them in promoting their own topics and ideas, since the talking points are only recommendatory in nature.[2349]

2339 Regulation on Permanent Delegations of the Verkhovna Rada of Ukraine to Parliamentary Bodies of International Organisations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1366 of 29.12.2023, para. 23. ↗

2340 On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Part 8 Article 33. ↗

2341 Interparliamentary Relations Groups. Agency for Legislative Initiatives. 2026 — unpublished.

2342 Performances and sport: Stefanchuk explained why MPs want to travel abroad. RBC-Ukraine. 2025. ↗

2343 Experience of Male and Female Parliamentarians During Martial Law in Ukraine. Agency for Legislative Initiatives. 2025, p. 38. ↗

2344 Poroshenko said he was banned from travelling to the Munich Security Conference. The VRU commented — what is known. Suspilne News. 2025. ↗

2345 The Government established that, during martial law, MPs and a significant number of officials of state bodies may cross the border only on the basis of official business travel decisions or on certain other grounds, for example for medical treatment or to accompany children. On Amendments to the Rules for Crossing the State Border: Resolution of the Cabinet of Ministers of Ukraine No. 69 of 27.01.2023. ↗

2346 Resolution of the Sixth Administrative Court of Appeal of 03.11.2025 in case No. 320/20473/24. ↗

2347 Ruling of the Supreme Court of 03.07.2026 in case No. 320/20473/24. ↗

2348 Ruslan Stefanchuk: everyone representing Ukraine abroad must support it with one voice. Holos Ukrainy. 2024. ↗

2349 Ibid.

During 2025 and early 2026, a number of working events took place involving representatives of the MFA and MPs:

- informal meetings of the heads of parliamentary groups with the MFA leadership and representatives of the consular corps;[2350]
- meetings of the specialised Committee with the participation of the Deputy Minister of Foreign Affairs;[2351]
- parliamentary discussions on Ukraine's participation in the Three Seas Initiative (January 2026).[2352]

Parliamentary diplomacy receives support from the executive branch, but MPs remain outside the most important diplomatic process — peace negotiations. Conducting negotiations and concluding international treaties are entrusted by the Constitution to the President of Ukraine, while the Verkhovna Rada is authorised to ratify international treaties.[2353] Accordingly, MPs feel responsibility for the decisions being discussed at peace negotiations and need communication from the parties involved in the negotiation process.[2354] Although there is no statutory requirement to involve the Verkhovna Rada in peace negotiations, the negotiating delegations in 2022 included four MPs: the Head of Delegation, Davyd Arakhamia, Head of the parliamentary faction 'Servant of the People', Rustem Umierov, Dmytro Lubinets and Andrii Kostin.[2355] After negotiations resumed in 2025, the delegation travelling to Saudi Arabia no longer included any MPs.[2356] As a result, MPs found themselves in an information vacuum regarding the course of negotiations. Minister of Foreign Affairs Andrii Sybiha, who was invited to the Rada to report on the negotiations, appeared before MPs more than a month later.[2357] Meanwhile, the lack of information about the negotiations in Riyadh became grounds for MPs' speculation, the spread of disinformation and negative public sentiment.[2358]

2350 On 23 July 2025, an informal meeting was held between the heads of VRU parliamentary groups for interparliamentary relations with foreign states, the MFA leadership, honorary consuls of Ukraine abroad and honorary consuls of foreign states in Ukraine. Committee on Foreign Policy and Interparliamentary Cooperation. 2025. ↗

2351 Transcript of the meeting of the Committee of the Verkhovna Rada of Ukraine on Foreign Policy and Interparliamentary Cooperation of 08.10.2025. ↗

2352 The Verkhovna Rada of Ukraine discussed the results of Ukraine's participation in the Three Seas Initiative in 2025 and priorities for 2026. Verkhovna Rada of Ukraine. 2026. ↗

2353 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 85, 106. ↗

2354 Bobrovska: the authorities must communicate with Parliament about the course and results of peace negotiations. Radio Liberty. 2025. ↗

2355 On the Delegation of Ukraine for Participation in Negotiations with the Russian Federation on the Preparation and Agreement of the Draft Treaty on Security Guarantees for Ukraine: Decree of the President of Ukraine No. 211/2022 of 04.04.2022. ↗; Rustem Umierov, Dmytro Lubinets and Andrii Kostin resigned their parliamentary mandates in connection with their transition to other positions.

2356 On the Delegation of Ukraine for Interaction with Ukraine's International Partners with a View to Ensuring the Negotiation Process for Achieving a Just Peace: Order of the President of Ukraine No. 14/2025-rp of 15.03.2025. ↗

2357 Transcript of the meeting of the Verkhovna Rada of Ukraine of 02.05.2025. ↗

2358 Chronicles of 'betrayal': how MPs manipulate the topic of peace negotiations. Channel 24. 2025. ↗

In 2025, rounds of negotiations took place without the participation of MPs, but as early as February 2026 Davyd Arakhamia returned to the negotiating delegation.[2359]

Resourcing of the Verkhovna Rada's activities in the field of foreign relations

The Verkhovna Rada has the basic institutional capacity to work on foreign affairs, including the work of committee secretariats, the Research Service with its open database of materials, the possibility of submitting requests and a system of professional training.

In 2025, the Research Service prepared analytical and information materials and conducted 83 webinars, 58 of which were dedicated to the negotiating chapters of Ukraine's EU accession process. In 2025, the Research Service also expanded cooperation with foreign parliamentary services and international organisations, particularly on the adaptation of legislation to EU law and support for the negotiation process.[2360]

Analytical and information, organisational and protocol, as well as logistical support for the activities of groups for interparliamentary relations is provided by the Secretariat of the Verkhovna Rada[2361] and the Secretariat of the Committee on Foreign Policy. Support for the activities of permanent delegations is provided by their secretariat, composed of employees of the Secretariat of the Verkhovna Rada who have knowledge of English or French at a level not lower than B2. The composition of the secretariat is approved by an Order of the Chairman of the Verkhovna Rada simultaneously with the approval of the personal composition of the permanent delegation.[2362]

Expenses related to the participation of a permanent delegation and its secretariat in the work of the parliamentary body of an international organisation, including business trips of members and substitute members, the secretary and deputy secretaries, are covered by the Verkhovna Rada or from other sources not prohibited by law.[2363]

In particular, the 2025 budget programme passport for 'visits of delegations/delegates of the Verkhovna Rada of Ukraine abroad' provided UAH 10,513.7 thousand, with planned indicators of 81 visits, 321 persons and 1,519 person-days abroad.[2364] In the revised passport (November 2025), funding was increased to UAH 15,513.7 thousand, while the planned indicators increased to 121 visits, 481 persons and 1,924 person-days.[2365] The 2026 budget programme passport provides UAH 10,718.2 thousand for the same area, with a plan of 87 visits, 321 persons and 1,519 person-days.[2366]

2359 Issue of the Delegation of Ukraine for Participation in the Negotiation Process with the United States of America and Other International Partners of Ukraine, as well as Representatives of the Russian Federation, Regarding the Achievement of a Just and Lasting Peace: Decree of the President of Ukraine No. 72/2026 of 23.01.2026. ↗

2360 Report on the Activities of the Research Service of the Verkhovna Rada of Ukraine for 2025. Research Service of the Verkhovna Rada of Ukraine. 2026. ↗

2361 Regulation on Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations with Foreign States, para. 5.1. ↗

2362 Regulation on Permanent Delegations of the Verkhovna Rada of Ukraine to Parliamentary Bodies of International Organisations: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1366 of 29.12.2023, para. 22. ↗

2363 Ibid, paras. 24, 26.

2364 Budget Programme Passport for 2025. Administrative Office of the Secretariat of the Verkhovna Rada of Ukraine. 2025. ↗

2365 Budget Programme Passport for 2025 (as amended by Order No. 220 of 17.11.2025). ↗

2366 Budget Programme Passport for 2026. ↗

The funds provided may be insufficient to cover the actual costs of activities in the field of parliamentary diplomacy. The Verkhovna Rada covers MPs' official travel expenses when they participate as members of permanent delegations. Business trips by MPs are covered at approximately 10% of their actual cost,[2367] while the rest is covered from personal funds, funds for the exercise of parliamentary powers or by third parties. For example, the activities of friendship groups largely lack guaranteed budget funding: resources for travel, hosting foreign delegations, organising meetings, logistics, accommodation, supporting materials and even basic representation expenses often have to be sought separately.[2368]

Progress and issues

Parliament does not have unified tools for monitoring the implementation of Ukraine's international treaties. The regulatory framework is focused mainly on the stages of preliminary consideration and ratification of international treaties, while systematic parliamentary oversight of their implementation is effectively absent. After ratification, the main scope of functions related to the fulfilment of international obligations passes to the executive branch. In the treaty implementation model, regular reporting is organised primarily within the executive branch rather than as a parliamentary review procedure. Current regulation does not establish a single procedure requiring the Government or another responsible body to report to the Verkhovna Rada, within a defined timeframe, on the status of implementation of international arrangements, the reasons for delays or the need for additional legislative decisions.

The gap between decision-making and oversight of results turns parliamentary oversight from a tool for preventing problems into a belated recording of problems that already exist. During the special meeting of the Committee on EU Integration on the European Commission's Report within the 2025 Enlargement Package, attention was drawn to insufficient dynamics in certain sectors and the need to complete the main scope of legislative work within the next 24 months.[2369]

Following the meeting, in order to combine efforts to implement European integration tasks, the Committee:

- recommended that the specialised Committees of the Verkhovna Rada of Ukraine ensure systematic monitoring of the implementation of the Action Plan for the implementation of the European Commission's recommendations;
- raised with the Government the issue of quarterly informing Parliament about the status of implementation of the Action Plan, the results achieved and the challenges arising in the course of implementation;
- proposed that the Government develop and implement an effective mechanism for monitoring the implementation of adopted laws and by-laws, as well as provide the

2367 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2368 Study on the Functioning of Interparliamentary Relations Groups of the Verkhovna Rada of Ukraine. Agency for Legislative Initiatives. 2026. ↗

2369 Transcript of the meeting of the Committee on Ukraine's Integration into the European Union dedicated to further steps to take into account and implement the recommendations of the European Commission's Report on Ukraine within the 2025 Enlargement Package (21.09.2025). ↗

Committee with a quarterly list of current European integration draft laws for the adaptation of the EU Acquis.[2370]

In February 2026, the Committee again emphasised the insufficient pace of European integration progress over the previous six months and drew the attention of CEBs to the need to inform Parliament and the Committee in a timely manner about the course of negotiations on accession to the EU, both regarding the opening of official procedures and the specifics of negotiations at the 'technical level'. It also raised with the Government the issue of providing monthly up-to-date information on the implementation of the Rule of Law Action Plan measures identified by Ukraine and the EU as priorities for implementation in 2026.[2371]

The absence of unified standards for planning, reporting and follow-up support for parliamentary diplomacy procedures makes it difficult to establish a link between foreign visits and subsequent state decisions.

Parliament continues to use parliamentary diplomacy tools through permanent delegations, parliamentary groups for interparliamentary relations and the interaction of Verkhovna Rada Committees with international partners. In particular, in 2025 the Committee on Foreign Policy held more than 42 meetings with representatives of foreign parliaments and governments, two joint online meetings with the Foreign Affairs Committee of the UK Parliament, a joint online meeting with the Foreign Affairs Committee of the National Assembly of the French Republic and six new parliamentary groups for interparliamentary relations were established.[2372]

At the same time, the high level of parliamentary diplomacy activity contrasts with the uneven openness of these processes. In many cases, the published materials do not make it possible to establish who initiated the international contact, what criteria were used to form the composition of participants, what the agenda was and what further actions were planned.

Reporting in the field of parliamentary diplomacy remains fragmented. The permanent delegations of the Verkhovna Rada, the international activities of the Chairman of the Verkhovna Rada and interparliamentary interaction by specialised Committees are not covered by a clearly defined regular reporting format, which is provided for parliamentary groups for interparliamentary relations[2373] and delegations of the National Parliamentary Group in the Inter-Parliamentary Union.[2374] At the same time, even where such an obligation exists, as of 31 July, only 54 of the 114 established groups for interparliamentary

2370 Transcript of the meeting of the Committee on Ukraine's Integration into the European Union dedicated to further steps to take into account and implement the recommendations of the European Commission's Report on Ukraine within the 2025 Enlargement Package (21.09.2025). ↗

2371 Minutes of Meeting No. 253 of 27.02.2026. Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union. ↗

2372 Information on the Committee's Work and Achievements in 2025. Committee on Foreign Policy and Interparliamentary Cooperation. 2025. ↗

2373 Regulation on Parliamentary Groups of the Verkhovna Rada of Ukraine for Interparliamentary Relations with Foreign States, paras. 4.6–4.8.

2374 Statute (Rules) of the National Parliamentary Group of Ukraine in the Inter-Parliamentary Union: approved by Resolution of the Verkhovna Rada of Ukraine No. 1059-XIV of 16.09.1999, Articles 12, 14. ↗

relations had submitted reports on their activities for the previous year.[2375] Information on the work of permanent delegations, in particular the delegation to the Inter-Parliamentary Union, dates back to 2019–2021.[2376] As a result, the Verkhovna Rada does not have a comprehensive and comparable body of data on the results of the international activities of its bodies and representatives, which complicates the assessment of their effectiveness and the planning of further steps. Similar procedural uncertainty also arises at the stage of parliamentarians' participation in working and negotiation formats related to the preparation of roadmaps and other European integration documents. MPs do not always have a clear mandate from a committee or faction and there is no mandatory mechanism for subsequently informing Committees about the results of such work. This weakens the link between participation in negotiations and subsequent parliamentary support for the relevant decisions.[2377]

Recommendations

1. Amend the Rules of Procedure of the Verkhovna Rada and the Law 'On International Treaties of Ukraine' by establishing a procedure for regular reporting by the Government to the specialised Committees on the status of implementation of ratified agreements, particularly those concerning financial and credit instruments.
2. Provide for the Government's obligation to inform Parliament and the Committee on EU Integration about the implementation of the European Commission's recommendations, the preparation of European integration draft laws and by-laws, the status of negotiating clusters and the challenges arising during the implementation of European integration measures.
3. Approve a unified form of report on foreign business trips for all actors, including delegations, friendship groups, the leadership of the Verkhovna Rada and individual trips by MPs. The report should be public, except for closed parts, and contain a specific list of the agreements reached and a plan of further steps within the competence of the Verkhovna Rada.
4. Introduce the practice of preparing an annual consolidated report on the results of parliamentary diplomacy, containing information on the activities of the leadership of the Verkhovna Rada, permanent delegations, groups for interparliamentary relations, interparliamentary assemblies and statistics on the international activities of MPs.
5. Introduce a procedure for the prior approval of the positions and mandate of MPs participating in working groups and negotiation formats for the preparation of roadmaps and other European integration documents, with mandatory reporting to the specialised Committee after each round of negotiations.

2375 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2376 Permanent Delegations of the Verkhovna Rada of Ukraine. ↗

2377 Information provided by Respondent No. 57 during an interview conducted on 02.04.2026 and 14.04.2026.

Parliamentary Oversight through the Human Rights Commissioner

State of play[2378]

Parliamentary mandate

The Verkhovna Rada has a Committee on Human Rights, De-occupation and Reintegration of Temporarily Occupied Territories of Ukraine, National Minorities and Interethnic Relations (the Human Rights Committee).[2379] Its remit includes, among other areas, respect for rights and freedoms and the introduction of European standards for the protection of human rights and fundamental freedoms into national legislation.

The Committee cooperates with key international organisations: the Council of Europe, the Organization for Security and Co-operation in Europe (OSCE), the Office of the United Nations High Commissioner for Refugees, the International Organization for Migration and the UN Human Rights Council.[2380]

National human rights institution (NHRI)

The Verkhovna Rada exercises parliamentary oversight over compliance with the constitutional rights and freedoms of individuals and citizens through the **Ukrainian Parliament Commissioner for Human Rights** (the Commissioner, the Ombudsman).

The status of the Commissioner is enshrined at the constitutional level,[2381] while the Commissioner's activities are regulated by the Laws of Ukraine 'On the Ukrainian Parliament Commissioner for Human Rights',[2382] 'On Personal Data Protection',[2383] 'On Principles of Preventing and Combating Discrimination in Ukraine',[2384] 'On Ensuring Equal Rights and Opportunities for Women and Men'[2385] and 'On Access to Public Information',[2386] as well as by the Rules of Procedure of the Verkhovna Rada in matters relating to appointment and relations with the Verkhovna Rada.[2387]

The Human Rights Committee ensures continuous liaison with the Ombudsman, in particular, by preparing in advance the consideration of the annual report at plenary meetings, as well as proposals to the Verkhovna Rada for a decision on the preparation and consideration of the Commissioner's special reports.[2388]

2378 For more details, see the subsection 'Parliamentary Oversight Through the Human Rights Commissioner'.

2379 On the List, Quantitative Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

2380 Ibid.

2381 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 101. ↗

2382 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997. ↗

2383 On Personal Data Protection: Law of Ukraine No. 2297-VI of 01.06.2010. ↗

2384 On Principles of Preventing and Combating Discrimination in Ukraine: Law of Ukraine No. 5207-VI of 06.09.2012. ↗

2385 On Ensuring Equal Rights and Opportunities for Women and Men: Law of Ukraine No. 2866-IV of 08.09.2005. ↗

2386 On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011. ↗

2387 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

2388 Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010. ↗

The Ombudsman's annual report on the state of observance and protection of human and citizen rights and freedoms in Ukraine is submitted to Parliament each year by 20 March. It contains a comprehensive analysis of the actions of state authorities, local self-government bodies, citizens' associations, enterprises, institutions, organisations and their officials and officers whose acts or omissions violated human and citizen rights and freedoms, as well as identified shortcomings in legislation on the protection of human and citizen rights and freedoms. The report also contains:

- an analysis of the results of inspections and the response measures taken;
- specific recommendations for improving the state of human rights observance;
- an assessment of the implementation of the recommendations provided in the previous year;
- proposals for eliminating shortcomings in national legislation.[2389]

Special reports on specific issues concerning the observance of human and citizen rights and freedoms in Ukraine may be presented by the Ombudsman on the Commissioner's own initiative or by decision of the Verkhovna Rada.

The legislation guarantees the institutional independence of the Commissioner: the Commissioner's powers are continuous and do not terminate in the event of the dissolution of Parliament or the introduction of martial law or a state of emergency.[2390] The legislation provides guarantees for the Ombudsman's unhindered activities.[2391]

The Ombudsman is vested with a broad range of rights. In particular, the Ombudsman has the right to:

- be received without delay by the President, the Chairman of the Verkhovna Rada, the Prime Minister of Ukraine, the presidents of the Constitutional Court, the Supreme Court and higher specialised courts, the Prosecutor General, heads of other state bodies, local self-government bodies, citizens' associations, enterprises, institutions and organisations, irrespective of their form of ownership and their officials and officers;
- attend sittings of Parliament, the Government, the Constitutional Court and the Supreme Court, higher specialised courts and collegial bodies;
- freely visit state authorities, local self-government bodies, enterprises, institutions and organisations, irrespective of their form of ownership and attend their meetings;
- review documents, including restricted-access information and obtain copies of them, including case files pending before courts;
- visit any places where persons are held compulsorily, including pre-trial detention facilities, penal colonies, psychiatric institutions, children's homes, military units and geriatric care homes, at any time and interview persons held there to verify the conditions of detention and treatment;

2389 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 18. ↗

2390 Ibid, Article 4.

2391 Ibid, Article 20.

- require officials to assist in inspecting the activities of enterprises, institutions and organisations under their control or subordination, allocate specialists to participate in inspections and expert examinations and provide relevant opinions;
- submit proposals for improving legislation in the field of protection of human and citizen rights and freedoms.[2392]

The Ombudsman's main instruments for responding to violations of human rights and freedoms are:

- applications to the Constitutional Court on the constitutionality of laws and other legal acts of public authorities in the area of human and citizen rights and freedoms, as well as on the official interpretation of the Fundamental Law;
- applications to court in the interests of persons who are unable to protect their rights and freedoms independently; participation in court proceedings, joining pending cases at any stage and initiating the review of court decisions;
- submission of response acts to the relevant public authorities, citizens' associations, enterprises, institutions and organisations of all forms of ownership to remedy the identified violations within one month.[2393]

The Commissioner's activities in exercising parliamentary oversight over the observance of constitutional human and citizen rights and freedoms and protecting the rights of everyone within the territory of Ukraine and under its jurisdiction are ensured on a permanent basis by the Secretariat.[2394] To exercise parliamentary oversight, the Commissioner also appoints representatives in the relevant field or region[2395] and establishes regional offices.[2396]

The Ombudsman's activities are financed from the State Budget of Ukraine, with funding allocated annually as a separate budget line.[2397] The Commissioner prepares the expenditure estimate, submits it to the Verkhovna Rada for approval and implements it independently.[2398] Total expenditure amounted to:

- 2025: UAH 413,709.9 thousand, approximately EUR 8.07 million;[2399]

2392 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 13. ↗

2393 Ibid, Articles 13, 15.

2394 On Approval of the Regulation on the Secretariat of the Ukrainian Parliament Commissioner for Human Rights: Order of the Ukrainian Parliament Commissioner for Human Rights No. 79.15/22 of 14.10.2022. ↗

2395 On Approval of the Regulation on Representatives of the Ukrainian Parliament Commissioner for Human Rights: Order of the Ukrainian Parliament Commissioner for Human Rights No. 84.15/22 of 20.10.2022, para. 2.1, subpara. 3.1.1. ↗

2396 On Approval of the Regulation on Regional Offices of the Ukrainian Parliament Commissioner for Human Rights: Order of the Ukrainian Parliament Commissioner for Human Rights No. 87.15/22 of 20.10.2022, paras. 1.1, 1.3 and 2.1. ↗

2397 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025. Annex 3 'Distribution of State Budget Expenditures of Ukraine for 2026'. ↗

2398 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 12. ↗

2399 Budget Programme Passport for 2025 under budget programme classification code 5991010 'Parliamentary Oversight over the Observance of Constitutional Human Rights and Freedoms', approved by Order of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights No. 8.15/25 of 23.01.2025, as amended by Order No. 144.15/25 of 26.11.2025 ; Budget Programme Passport for 2025 under budget programme classification code 5991020 'Measures to Implement the National Preventive Mechanism', approved by Order of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights No. 7.15/25 of 21.01.2025. ↗

- 2026: UAH 518,135.9 thousand, approximately EUR 10.10 million.[2400]

The Commissioner's mandate in Ukraine is among the broadest in the world[2401] and covers the national preventive mechanism (NPM),[2402] combating discrimination,[2403] personal data protection and access to public information.[2404]

National preventive mechanism

The Commissioner performs the NPM functions in accordance with OPCAT[2405] under the 'Ombudsman+' model. This model provides for regular unannounced visits to places of deprivation of liberty, the involvement of civil society organisations, academics, experts and other specialists on a contractual basis, interaction with the Subcommittee on Prevention of Torture of the Committee against Torture established under OPCAT, as well as with international organisations.[2406] In 2025–2026, the Commissioner and the leadership of the Secretariat held 154 meetings with representatives of foreign diplomatic missions, delegations and organisations, while the Commissioner personally spoke at 12 international events.[2407] The Commissioner also participated in interactive dialogues of the UN Human Rights Council, in particular on the rights of Ukrainian children,[2408] enforced disappearances and torture in the temporarily occupied territories[2409] and torture of Ukrainians.[2410]

Protection of human rights in the security and defence sector

In 2025, the protection of human rights in the security and defence sector was identified as one of the key areas of the Ombudsman's work. This area covers respect for the rights of service members, police officers, veterans, persons deprived of liberty and persons

2400 Budget Programme Passport for 2026 under budget programme classification code 5991010 'Parliamentary Oversight over the Observance of Constitutional Human Rights and Freedoms', approved by Order of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights No. 14.15/26 of 05.02.2026 ↗; Budget Programme Passport for 2026 under budget programme classification code 5991020 'Measures to Implement the National Preventive Mechanism', approved by Order of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights No. 8.15/26 of 28.01.2026. ↗

2401 Chart of the Status of National Institutions Accredited by the Global Alliance of National Human Rights Institutions, status as of 4 December 2025, p. 12 ↗; for more details, see the subsection 'Institution of the Ukrainian Parliament Commissioner for Human Rights (Ombudsman)'.

2402 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 19[1]. ↗

2403 On Principles of Preventing and Combating Discrimination in Ukraine: Law of Ukraine No. 5207-VI of 06.09.2012, Articles 9 and 10. ↗

2404 On Personal Data Protection: Law of Ukraine No. 2297-VI of 01.06.2010, Articles 22 and 23 ↗; On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 14 Parts 5 and 6. ↗

2405 Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT): international document of 18.12.2002. ↗

2406 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 191 Part 2 para. 4 ↗; 'Ombudsman+' Model. Ukrainian Ombudsman. ↗

2407 Between Chaos and Law — Human Rights. Issue No. 1, 2026. Ukrainian Ombudsman, 2026, p. 18. ↗

2408 Protecting the Rights of Ukrainian Children: Important Statement by the UN Special Representative at the Interactive Dialogue. Ukrainian Ombudsman, 2025. ↗

2409 UN: Enforced Disappearances of Civilians and Torture in the TOT of Ukraine Are Crimes against Humanity. Ukrainian Ombudsman, 2025. ↗

2410 Ukrainian Ombudsman Dmytro Lubinets Called on the World to Strengthen Russia's Accountability for the Torture of Ukrainians. Ukrainian Ombudsman, 2026. ↗

missing as a result of Russian aggression, as well as their families.[2411] To ensure expert and prompt oversight in the security and defence sector, the position of Representative of the Commissioner in the System of Security and Defence Sector Bodies was introduced.[2412] Under this area of work, the Commissioner received 44,783 applications, conducted 45 monitoring visits, processed 631 draft NLAs and opened 139 proceedings.[2413] In 2025, this area was also strengthened by the establishment of the Military Ombudsman institution under the President, which also reports to Parliament.[2414]

Personal data protection

Based on the results of the Ombudsman Office's work in 2025, 104 inspections on personal data protection were conducted and 72 orders were issued following those inspections.[2415] The inspection plan in the field of personal data protection for the I–III quarters of 2026 covers 87 entities, including 17 state statistics bodies, 10 district state administrations in the city of Kyiv, 9 departments of social and veteran policy and 7 services for children and families of those administrations, 4 main departments of the Pension Fund of Ukraine, 3 main departments of the State Tax Service of Ukraine, 2 main departments of the National Social Service of Ukraine, 4 healthcare institutions and 4 local self-government bodies, units or enterprises outside Kyiv. The remaining entities operate in the areas of military administration, employment, higher education, veteran policy at the regional state administration (RSA) level, construction at the RSA level and the State Service of Ukraine on Food Safety and Consumer Protection, as well as local self-government bodies and executive committees of city councils.[2416]

Throughout 2025 and in early 2026, work continued on updating legislation in the field of personal data protection and access to public information. Two draft laws were registered in the Verkhovna Rada: one aimed at aligning Ukrainian legislation with EU standards, Draft Law No. 8153,[2417] and another aimed at updating the institutional model of supervision over personal data protection and access to public information through the establishment of a specialised supervisory authority, Draft Law No. 6177.[2418]

2411 Regulation on the Department for Monitoring Respect for Rights in the Defence Sector and the Rights of Veterans, Service Members, Prisoners and Members of Their Families of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, approved by the Head of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights on 15.08.2022. ↗

2412 Representatives of the Commissioner. Ukrainian Ombudsman, 2026. ↗

2413 Between Chaos and Law — Human Rights. Issue No. 1, 2026. Ukrainian Ombudsman, 2026, p. 8. ↗

2414 On the Military Ombudsman: Law of Ukraine No. 4603-IX of 17.09.2025. ↗

2415 Between Chaos and Law — Human Rights. Issue No. 1, 2026. Ukrainian Ombudsman, 2026, pp. 24–25. ↗

2416 Inspection Plan in the Field of Personal Data Protection for the First Quarter of 2026. Ukrainian Parliament Commissioner for Human Rights, 2025. ↗; Inspection Plan in the Field of Personal Data Protection for the Second Quarter of 2026. Ukrainian Parliament Commissioner for Human Rights, 2026. ↗; Inspection Plan in the Field of Personal Data Protection for Q3 2026. Ukrainian Parliament Commissioner for Human Rights. 2026. ↗

2417 On Personal Data Protection: Draft Law of Ukraine, registration No. 8153 of 25.10.2022. ↗

2418 On the National Commission for Personal Data Protection and Access to Public Information: Draft Law of Ukraine, registration No. 6177 of 18.10.2021. ↗

Combating discrimination

In total, during 2025, the Ombudsman Office received 2,535 reports concerning cases of discrimination on various grounds.[2419] The Ombudsman Office processed 1,756 applications, conducted 70 monitoring visits, opened 199 proceedings and reviewed 365 draft normative legal acts.[2420] In November 2025, staff of the Ombudsman Office carried out monitoring visits to three communities in Zakarpattia region and visited a school attended by children from areas of compact residence of the Roma community.[2421]

Engagement with civil society

To improve the quality of parliamentary oversight, consultative and advisory bodies operate under the Ombudsman:

- the Advisory Council — a platform for accumulating and coordinating expert positions on a broad range of human rights issues;[2422]
- the Advisory Council on NPM Implementation — focuses on preventing torture and ill-treatment in places of deprivation of liberty, preparing strategic and analytical documents and involving public monitors in the implementation of NPM functions.[2423]

An important task of parliamentary oversight is to promote legal awareness among the population,[2424] which ensures regular interaction between Parliament, through the Ombudsman and civil society. This function is carried out through an extensive network of access to human rights protection tools — the Secretariat of the Commissioner, the system of regional offices and the network of public reception offices.[2425]

The results of the Ombudsman and the Ombudsman Office's activities in 2025 indicate a high intensity of engagement with citizens and an active response function of the institution, in particular:

- 152,592 applications were processed;
- 4,785 monitoring visits were carried out and 6,161 proceedings concerning human rights violations were opened;
- 151 submissions were prepared and 3,240 expert positions on draft laws and secondary legislation were processed;

2419 Zero Discrimination Day: For Equality for All. Office of the Ukrainian Ombudsman, 2026. ↗

2420 Between Chaos and Law — Human Rights. Issue No. 1, 2026. Ukrainian Ombudsman, 2026, p. 19. ↗

2421 Monitoring Visits in Zakarpattia: Communities Need Systematic Implementation of the Roma Strategy at Local Level. Office of the Ukrainian Ombudsman, 2025. ↗

2422 Advisory Council under the Commissioner. Ukrainian Ombudsman. ↗

2423 Advisory Council on NPM Implementation: Development Strategy for 2025–2027. Ombudsman of Ukraine. ↗

2424 On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 3. ↗

2425 On Amendments to the Procedure for Organising and Conducting Personal Reception of Applicants by the Ukrainian Parliament Commissioner for Human Rights, Representatives of the Ukrainian Parliament Commissioner for Human Rights and Officials of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights: Order of the Ukrainian Parliament Commissioner for Human Rights No. 37.15/23 of 03.04.2023, para. 1.4. ↗

- 24,363 recommendations were provided to state authorities and 35 protocols on administrative offences were drawn up.[2426]

Progress and issues

The mismatch between the financial model of the Commissioner's activities and international standards of independence, as well as the challenges of martial law, limits the institution's operational flexibility.

The UN Paris Principles provide that NHRIs should have adequate resources and financial autonomy. Such funding should enable an NHRI to have its own staff and premises, be independent from the Government and not be subject to financial control that could affect its independence.

Despite the annual increase in the Commissioner's budget, its amount remains insufficient for the performance of the Commissioner's tasks. In 2026, state funding for the Commissioner's exercise of parliamentary oversight over the observance of constitutional human rights and freedoms (budget programme classification code 5991010) increased by 25% overall, to UAH 515,743.3 thousand, or EUR 10,058.5 thousand. However, as before, state funding mainly covers salaries, 93%, as well as utilities, 2%. Research and development account for 0.002% and business travel for 0.9% of the total amount of funds received from the State Budget.[2427]

Budget expenditure for the performance of NPM powers has fallen sharply since 2022, by 19%.[2428] In 2026, expenditure on the NPM remained at the level of the previous year, 2025, and amounted to UAH 2,392.6 thousand, or EUR 46.7 thousand, of which 43% was expenditure on services, excluding utilities and 49% on business travel, with the remainder allocated to items, materials, equipment and inventory.[2429] This level of funding is lower than the 2020 figure, UAH 2,595.0 thousand and, when converted into euro, EUR 98.21 thousand in 2020,[2430] has more than halved.

The insufficiency of budget allocations for financing the NPM was noted in the report on the effectiveness of the NHRI, prepared by international experts in 2025. The report also drew attention to the Commissioner's significant dependence on external funding, thanks to which the NPM was able to maintain operational capacity and continue its development.[2431]

2426 The Ukrainian Ombudsman Presented the Annual Report for 2025 before the Relevant Committee! Ukrainian Ombudsman, 2026 ↗; According to data published on the official Telegram channel of the Ukrainian Parliament Commissioner for Human Rights, 'Ombudsman Dmytro Lubinets', in 2025 the Commissioner received 152,592 applications. ↗ ; Annual Report of the Ukrainian Parliament Commissioner for Human Rights on the State of Observance and Protection of Human and Citizen Rights and Freedoms in Ukraine in 2025. ↗

2427 Expenditure Estimate for 2026. Budget Programme Classification Code 5991010. Secretariat of the Ukrainian Parliament Commissioner for Human Rights. ↗

2428 Report on the Capacity Assessment of the Ukrainian Parliament Commissioner for Human Rights. Ukrainian Parliament Commissioner for Human Rights / ENNHRI / OHCHR / UNDP, 2023, p. 71. ↗

2429 Expenditure Estimate for 2026. Budget Programme Classification Code 5991020. Secretariat of the Ukrainian Parliament Commissioner for Human Rights. ↗

2430 As of 01.01.2020, EUR 1 — UAH 26.4220. Official Exchange Rate of the Hryvnia against Foreign Currencies. National Bank of Ukraine. ↗

2431 Evaluation of the Effectiveness of Ukraine's National Preventive Mechanism. Council of Europe, 2025, p. 17. ↗

The lack of adequate funding is a problem for NHRIs worldwide, but it is even more acute for institutions operating in extreme conditions, such as in Ukraine.[2432]

In addition, the current legislation does not provide for the Commissioner and the Commissioner's Secretariat to have the status of a chief administrator of budget funds. Chief administrators of funds of the State Budget of Ukraine are determined by the Budget Code and approved by the Law on the State Budget of Ukraine through the allocation of budget appropriations to them.[2433] The current version of the Budget Code does not include the Commissioner's Secretariat in the list of chief administrators of budget funds. In addition, the Code does not provide for the Commissioner's approval of proposals by the MoF to reduce the budget allocations envisaged for the Commissioner,[2434] which makes the institution dependent on the executive.

Draft Law No. 13248[2435] is aimed at addressing this problem and provides for amendments to the Budget Code to strengthen the financial guarantees for the Commissioner's activities. However, since May 2025, this draft law has remained at the status 'submitted for review'. This draft law is directly linked to Draft Law No. 13181,[2436] which the Verkhovna Rada adopted as a basis at first reading in May 2026.

The practice of selective consideration by the Verkhovna Rada of the Commissioner's special reports limits the impact of the Commissioner's recommendations and weakens parliamentary oversight in the field of human rights. The Human Rights Committee works with the Commissioner's annual and special reports, following consideration of which the Verkhovna Rada should adopt a resolution.[2437] The annual report for 2024 resulted in the adoption of Verkhovna Rada Resolution No. 4408-IX.[2438] In May 2026, the Verkhovna Rada considered the annual report for 2025.[2439]

However, a number of important draft resolutions on the Commissioner's special reports were withdrawn from consideration during 2025 and early 2026:

- No. 11250 on the state of prevention of torture in 2023;[2440]

2432 Report on the Capacity Assessment of the Ukrainian Parliament Commissioner for Human Rights. Ukrainian Parliament Commissioner for Human Rights / ENNHRI / OHCHR / UNDP. November 2023, p. 71. ↗

2433 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Article 22. ↗

2434 Ibid, Article 23.

2435 On Amendments to the Budget Code of Ukraine to Improve the Legal Framework for the Activities of the Ukrainian Parliament Commissioner for Human Rights: Draft Law of Ukraine, registration No. 13248 of 01.05.2025. ↗

2436 On the Ukrainian Parliament Commissioner for Human Rights: Draft Law of Ukraine, registration No. 13181 of 17.04.2025. ↗

2437 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 232^3 ↗; On the Ukrainian Parliament Commissioner for Human Rights: Law of Ukraine No. 776/97-VR of 23.12.1997, Article 18. ↗

2438 On the Annual Report of the Ukrainian Parliament Commissioner for Human Rights on the State of Observance and Protection of Human and Citizen Rights and Freedoms in Ukraine in 2024: Resolution of the Verkhovna Rada of Ukraine No. 4408-IX of 01.05.2025. ↗

2439 On the Annual Report of the Ukrainian Parliament Commissioner for Human Rights on the State of Observance and Protection of Human and Civil Rights and Freedoms in Ukraine in 2025: Resolution of the Verkhovna Rada of Ukraine No. 4872-IX of 13.05.2026. ↗

2440 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights 'On the State of Affairs Concerning the Prevention in Ukraine of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment in 2023': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 11250 of 09.05.2024. ↗

- No. 11366 on respect for the rights of national minorities and indigenous peoples;[2441]
- No. 9413 'Unbloomed' on violations of the rights of Ukrainian children in the temporarily occupied territories and in Russia;[2442]
- No. 10402 on observance of the constitutional right to information under martial law;[2443]
- No. 11010 on the state of observance of the social and economic rights of adults in need of guardianship and care;[2444]
- No. 13113[2445] on the special report on access to education for children and young people from the temporarily occupied territories;
- No. 13217[2446] on the special report on the state of prevention in Ukraine of torture and other cruel, inhuman or degrading treatment or punishment;
- No. 15216[2447] on preventing torture and other cruel, inhuman or degrading treatment or punishment in Ukraine in 2025.

The absence of final resolutions on the reports undermines the status of the Commissioner's recommendations and complicates the elimination of identified systemic violations of human rights and freedoms.

The low level of implementation of NPM recommendations reduces the effectiveness of its activities and does not ensure the proper elimination of identified human rights violations. In particular, according to the results for 2022, only 11% of recommendations were implemented, 45% were in the process of implementation and 44% remained unimplemented.[2448] The latest national snapshot of recommendations for 2023 showed a partial improvement: 16% of recommendations had been implemented, 58% were in the

2441 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights on Respect for the Rights of National Minorities (Communities) and Indigenous Peoples in the Context of the Armed Aggression of the Russian Federation against Ukraine for the Period from 24 February 2022 to 31 December 2023: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 11366 of 21.06.2024. ↗

2442 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights 'Unbloomed. Violations of the Rights of Ukrainian Children in the Temporarily Occupied Territories of Ukraine and in Russia: Deportation, Militarisation, Indoctrination': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 9413 of 23.06.2023. ↗

2443 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights on Observance of the Constitutional Right to Information under the Legal Regime of Martial Law: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 10402 of 11.01.2024. ↗

2444 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights on the State of Observance of the Social and Economic Rights of Adults in Need of Guardianship and Care under the Legal Regime of Martial Law: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 11010 of 12.02.2024. ↗

2445 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights on Access to Education for Children and Young People from the Temporarily Occupied Territories of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 13113 of 17.03.2025. ↗

2446 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights 'On the State of Affairs Concerning the Prevention in Ukraine of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment in 2024': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 13217 of 28.04.2025. ↗

2447 On the Special Report of the Ukrainian Parliament Commissioner for Human Rights 'On the State of Affairs Regarding the Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment in Ukraine in 2025': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15216 of 01.05.2026. ↗

2448 Evaluation of the Effectiveness of Ukraine's National Preventive Mechanism. Council of Europe, 2025, p. 28. ↗

process of implementation and 26% remained unimplemented.[2449] Despite the positive trend, the problem of proper implementation of NPM recommendations persists.

At the same time, in 2025, the mechanism remained operationally active: 562 visits to places of deprivation of liberty were carried out and 50 submissions were made regarding the elimination of violations of human and citizen rights and freedoms.[2450]

Recommendations

1. Ensure a comprehensive update of legislation to strengthen the institutional capacity of the Commissioner and modernise the mechanisms for implementing the Commissioner's mandate:
   - prepare Draft Law No. 13181 for the second reading, with substantial revision as regards an open and inclusive competition for the position of Commissioner;
   - adopt the related Draft Laws No. 13248, No. 13249 and No. 13250 to ensure the Commissioner's financial and procedural independence.
2. Introduce a mandatory practice of adopting Verkhovna Rada resolutions on each annual and special report of the Commissioner, as well as mechanisms for monitoring the implementation of the recommendations provided in those reports.
3. Regulate the mandatory implementation of NPM recommendations, by establishing at the legislative level the obligation of state authorities to provide a written report on the implementation of NPM recommendations within clearly defined timeframes.

Control Exercised by the Verkhovna Rada through the Accounting Chamber

State of play

Legal framework

The principles of parliamentary control over the receipt and use of funds from the State Budget of Ukraine are established by the Constitution of Ukraine — such control is exercised on behalf of the Verkhovna Rada by the Accounting Chamber.[2451] The organisation, powers and procedure for the activities of the Accounting Chamber are defined by the Law of Ukraine 'On the Accounting Chamber'.[2452] The organisational and methodological principles for conducting state external financial control (audit) are determined by the Accounting Chamber in accordance with the INTOSAI Framework of Professional Pronouncements (IFPP).[2453]

2449 Joint Efforts by the State, Civil Society and International Partners Strengthen Quality Results in the Implementation of the NPM. Ukrainian Ombudsman, 2025. ↗

2450 A Meeting of the NPM Advisory Council Was Held at the Ombudsman Office. Ukrainian Ombudsman, 2025. ↗

2451 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 98. ↗

2452 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015. ↗

2453 INTOSAI Framework of Professional Pronouncements (IFPP). Accounting Chamber of Ukraine. ↗

Legal status, composition and structure of the Accounting Chamber

The Accounting Chamber is the supreme state collegial body of financial control (audit), whose activities are based on the principles of legality, independence, objectivity, impartiality, transparency and neutrality. It is accountable to the Verkhovna Rada, while enjoying organisational, functional, political and financial independence.[2454] The independence of the Accounting Chamber is guaranteed through:

- the legally established procedure for appointing and dismissing its members and the special procedure for organisational support of its activities;
- a statutory prohibition on any unlawful influence, pressure or interference in its activities during the exercise of its powers, as well as liability for unlawful interference in the exercise of the powers granted to it by law;
- continuity of its activities — its powers may not be terminated or restricted in the event of the expiry or early termination of the Parliament's powers, or the introduction of martial law or a state of emergency in Ukraine or in certain areas thereof.[2455]

Members of the Accounting Chamber

The Accounting Chamber consists of 11 members — the Head, their deputy/deputies and other members of the Accounting Chamber. Members of the Accounting Chamber are officials to whom the Law of Ukraine 'On Civil Service'[2456] does not apply. As of 31 July 2026, only five members of the Accounting Chamber remained in office.

The Verkhovna Rada appoints the Head and other members of the Accounting Chamber and decides on their dismissal.[2457] Members of the Accounting Chamber are appointed through a competitive procedure: the competition is announced six months before the expiry of the term of office of a member of the Accounting Chamber or from the day following the early termination of their powers or dismissal from office. In Parliament, this process is handled by the Budget Committee,[2458] which, in particular, consolidates proposals from parliamentary factions and parliamentary groups on the composition of the Advisory Group of Experts (AGE), formulates the competition conditions for publication on the website, conducts a preliminary discussion of candidates selected by the AGE and submits to Parliament a decision on the competition together with the list of candidates.[2459]

The AGE is established by a decision of Parliament to conduct the preliminary selection of candidates for positions as members of the Accounting Chamber.[2460]

The AGE is established within 30 days of the announcement of the competition, consists of six persons appointed by the Verkhovna Rada upon the proposals of parliamentary

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2454 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Articles 1–3. ↗

2455 Ibid, Article 3.

2456 Ibid, Articles 17, 18.

2457 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 1 Article 20 ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 1 Article 208^2. ↗

2458 On the List, Quantitative Composition and Remits of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

2459 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208^2. ↗

2460 Ibid.

factions and parliamentary groups, has authority only if its full composition has been approved and ceases to exercise its powers after a member of the Accounting Chamber has been appointed following the competition.

As part of the 2024 reform of the Accounting Chamber, aimed at depoliticising the selection of its members and fulfilling Ukraine's international commitments to strengthening the independence of external state audit,[2461] a special procedure for forming the AGE remains in effect for eight years after the entry into force of Law No. 4042-IX:[2462]

- three persons — upon the proposals of international and foreign organisations that, over the past five years, have provided Ukraine with ITA in the field of financial control (audit) and/or preventing and combating corruption and/or reforming the Accounting Chamber;
- three persons — upon the proposals of parliamentary factions and parliamentary groups.[2463]

After receiving from the Budget Committee the documents submitted by the candidates, the AGE conducts preliminary selection in several stages: (1) reviewing the documents and examining materials concerning the candidates; (2) testing and, based on its results, determining the candidates to be invited for interviews; (3) selecting, based on the interviews, candidates to undergo special vetting; (4) holding an open vote on each candidate who has passed the testing, interview and special vetting; (5) compiling a list of candidates who have the best professional knowledge and moral qualities and demonstrate integrity (at least two candidates for one position), who are recommended for appointment to the position of member of the Accounting Chamber and submitting it to the Budget Committee for consideration.[2464]

After discussing the candidates selected by the AGE, the Budget Committee submits to Parliament a decision on the competition together with the list of candidates. Appointment to positions as members of the Accounting Chamber is carried out by the Verkhovna Rada in two stages:

- preferential voting — held openly for each candidate on the list;
- appointment of members of the Accounting Chamber — by the list determined based on the results of the preferential voting, according to the number of vacant positions. If the list does not receive the number of votes required for appointment, a repeat vote on that list is held, but no more than twice.[2465]

2461 Ukraine undertook to establish an Advisory Group of Experts to vet candidates for the Accounting Chamber by the end of April 2026 and to appoint all members of the Accounting Chamber from the pool of vetted candidates by the end of December 2026. Memorandum of Economic and Financial Policies, 13 February 2026, pp. 32, 122. In: IMF Country Report No. 26/58. Ukraine: Request for an Extended Arrangement under the Extended Fund Facility and Cancellation of the Current Arrangement — Press Release, Staff Report, Staff Supplement and Statement by the Alternate Executive Director for Ukraine. International Monetary Fund, 2026. ↗

2462 On Amendments to the Law of Ukraine 'On the Accounting Chamber' and Certain Other Legislative Acts of Ukraine: Law of Ukraine No. 4042-IX of 30.10.2024, entered into force on 19.12.2024. ↗

2463 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Section VIII, para. 44. ↗

2464 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 20^{1}. ↗

2465 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 20^{1} ; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208^{2}, Parts 2, 5, 7. ↗

The Head of the Accounting Chamber is appointed by Parliament upon the submission of the Chairman of the Verkhovna Rada from among the members of the Accounting Chamber.[2466]

The term of office of members of the Accounting Chamber is six years, and one person may not hold such a position for more than two terms.[2467]

Members of the Accounting Chamber are vested with a broad range of powers to exercise external financial control (audit) and related rights. To exercise their powers, they have the right to:

- examine the original documents of audited entities, receive originals/copies of documents, materials and information free of charge in paper and electronic form, including information from automated information and reference systems, registers and databases held or administered by state bodies or local self-government bodies;
- obtain access to databases, registers and automated systems created using state budget funds;
- obtain data on the movement of budget funds, the status of accounts of managers and recipients of budget funds, as well as information on tax and customs revenues from the State Tax Service, the State Customs Service, the SPFU, the National Bank and other financial institutions;
- participate in meetings of the Verkhovna Rada, the Cabinet of Ministers and boards of executive authorities on issues relating to the receipt and use of state budget funds;
- involve employees of controlling and law enforcement bodies, as well as specialists, auditors and relevant experts, including on a contractual basis, to support the exercise of their powers.[2468]

Staffing and expert support

The exercise of the Accounting Chamber's powers is supported by its Office. The structure and staffing table of the Office are approved by the Accounting Chamber within the limits of the maximum number of staff and budget allocations, in agreement with the Budget Committee.[2469] The Office of the Accounting Chamber consists of 23 independent structural units (17 departments, one division and five sectors) and seven territorial offices, which, on a regional basis, cover all regions of Ukraine, the AR Crimea and the city of Sevastopol. The Office of the Accounting Chamber currently has 850 staff positions.[2470] The Office is headed by the Secretary of the Accounting Chamber.[2471]

2466 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 3 Article 20 ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208², Part 9. ↗

2467 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 5 Article 20. ↗

2468 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 5 Article 8. ↗

2469 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 4 Article 17. ↗

2470 Budget Programme Passport for 2026 under CPC 6511010 'Leadership and Management in the Field of Control over the Execution of the State Budget'. Order of the Accounting Chamber No. 21 of 30.01.2026, p. 2. ↗

2471 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 22. ↗

The work of members of the Accounting Chamber is supported by the patronage service. A member of the Accounting Chamber may have no more than three advisers, who are appointed and dismissed by the Secretary of the Accounting Chamber upon the submission of the member of the Accounting Chamber.[2472]

To exercise the Accounting Chamber's powers in carrying out state external financial control (audit) measures, positions of state auditors have been established within its Office.[2473] Persons are appointed to these positions by the Secretary of the Accounting Chamber on a contractual basis (for 12 or 36 months) following competitive selection.[2474] The Office of the Accounting Chamber provides for 560 positions of state auditors.[2475]

The Accounting Chamber may establish temporary consultative, advisory and other auxiliary bodies.[2476]

The Consultative and Scientific Council of the Accounting Chamber provides the Accounting Chamber with scientific, methodological and advisory assistance. In particular, the Council examines problematic issues arising in the activities of the Accounting Chamber that require further consideration and prepares recommendations on matters related to ensuring the exercise of the powers vested in the Accounting Chamber. The Council is established for a term of five years. Its composition and the regulation governing it were most recently updated in July 2026.[2477]

Financial support and remuneration

The Accounting Chamber is financed from the state budget based on the funding needs it identifies in its budget request. Funds for the Accounting Chamber are provided in the state budget as a separate line under the budget programme 'Leadership and Management in the Field of Control over the Execution of the State Budget'. In 2025, the amount of budget allocations for the Accounting Chamber was UAH 947,017.1 thousand (approximately EUR 18.47 million),[2478] while for 2026 the Accounting Chamber has been allocated UAH 1,181,185.2 thousand (approximately EUR 23.04 million).[2479]

After the law on the state budget for the relevant year enters into force, the Accounting Chamber approves its own cost estimate.[2480]

2472 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Articles 17, 18.

2473 Ibid, Articles 17, 18; Regulation on Classifying Positions in the Office of the Accounting Chamber as Positions of State Auditors: Decision of the Accounting Chamber of Ukraine No. 4-2 of 20.02.2025.

2474 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 18; Auditors: Decision of the Accounting Chamber of Ukraine No. 3-5 of 30.01.2025.

2475 Budget Programme Passport for 2026 under CPC 6511010 'Leadership and Management in the Field of Control over the Execution of the State Budget'. Order of the Accounting Chamber No. 21 of 30.01.2026, p. 2.

2476 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 29.

2477 Regulation on the Consultative and Scientific Council of the Accounting Chamber: Decision of the Accounting Chamber No. 19-1 of 01.09.2021 (as amended by Decision of the Accounting Chamber No. 20-15 of 28.07.2026); Composition of the Consultative and Scientific Council of the Accounting Chamber: Annex to Decision of the Accounting Chamber No. 19-1 of 01.09.2021 (as amended by Decision of the Accounting Chamber No. 20-15 of 28.07.2026).

2478 On the State Budget of Ukraine for 2025: Law of Ukraine, Budget, Distribution, List No. 4059-IX of 19.11.2024, Annex 3.

2479 On the State Budget of Ukraine for 2026: Law of Ukraine, Budget, Distribution, List No. 4695-IX of 03.12.2025, Annex 3 'Distribution of Expenditures of the State Budget of Ukraine for 2026'.

2480 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 3 Article 5.

The law defines specific features of remuneration for members of the Accounting Chamber, the Secretary and their deputy, state auditors and advisers to members of the Accounting Chamber. The salary structure consists of an official salary, supplements for years of service and for work involving state secrets and a bonus of no more than 30% of the official salary.

For members of the Accounting Chamber, the official salary amounts to 55 subsistence minimums for able-bodied persons, in particular: for the Head of the Accounting Chamber — UAH 183,040, or approximately EUR 3,570; 50 subsistence minimums for the Deputy Head — UAH 166,400, or approximately EUR 3,245; and 48 subsistence minimums for another member of the Accounting Chamber — UAH 159,744, or approximately EUR 3,115. For the Secretary of the Accounting Chamber and their deputy, official salaries are set at 40 and 36 subsistence minimums respectively: UAH 133,120, or approximately EUR 2,600 and UAH 119,808, or approximately EUR 2,336.

For state auditors, the official salary ranges from 35 subsistence minimums for the director of an audit department (UAH 116,480, or approximately EUR 2,270) to 20 subsistence minimums for a state auditor of rank VI (UAH 66,560, or approximately EUR 1,300).[2481]

Organisation of the Accounting Chamber's work

The main organisational form of the Accounting Chamber's activities is open meetings, which MPs, representatives of state bodies and the public have the right to attend. Meetings are held at least once a month.[2482] Decisions of the Accounting Chamber are adopted at a meeting by open vote, by a majority of votes of the members present.[2483]

The Accounting Chamber operates on a planned basis. Plans are prepared using a risk-based approach to the selection of audited entities and state external financial control (audit) measures and are approved at a meeting of the Accounting Chamber.[2484]

The procedure for organising the work of the Accounting Chamber and its Office, relations between structural units, members and officials of the Office of the Accounting Chamber, other matters of internal organisation, as well as the procedure for carrying out external financial control (audit) measures, are determined by the Rules of Procedure of the Accounting Chamber, which are approved at a meeting by at least two thirds of the members of the Accounting Chamber actually appointed.[2485]

Conducting audits and monitoring the implementation of decisions

The Accounting Chamber exercises its powers by carrying out state external financial control (audit) measures, including financial audits, performance audits, compliance audits, examinations, analyses and other state external financial control (audit) measures.[2486]

2481 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 3 Article 24.

2482 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 3 Article 25.

2483 Ibid, Article 26.

2484 Ibid, Article 27.

2485 Rules of Procedure of the Accounting Chamber; Decision of the Accounting Chamber No. 15-1 of 29.03.2024; On Approval of the Rules of Procedure of the Accounting Chamber: Decision of the Accounting Chamber No. 15-1 of 29.03.2024.

2486 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 7.

State external financial control (audit) measures cover:

- the receipt and use of state budget funds, budget transfers, local budget funds and funds of mandatory state social and pension insurance;
- operations relating to state domestic and external borrowing, state guarantees, servicing and repayment of state debt and state-guaranteed debt;
- the use of funds from international credits (loans), grants and assistance;
- public procurement, the implementation of state target programmes and investment projects, state orders and the provision of state aid to business entities from state budget funds;
- treasury servicing of budget funds and the state of internal control of managers of budget funds;
- the management of state and municipal property and the activities of business entities in the state and municipal sectors of the economy;
- consolidated financial statements of public sector entities and budgets.[2487]

Both members and officials of the Office of the Accounting Chamber and officials of audited entities are liable under the law for unlawful acts or omissions committed during a control measure.[2488]

Based on the audit results, the Accounting Chamber adopts a decision and approves a report containing conclusions and recommendations (proposals).

The law establishes the procedure for preparing, discussing and considering the report. In particular, no later than 20 days before its consideration at a meeting of the Accounting Chamber, the draft report is sent to the audited entity and is also discussed by the relevant member of the Accounting Chamber and the head of the audited entity. The audited entity may, within ten days, submit written comments on the content of the draft report to the member of the Accounting Chamber responsible for carrying out the control measure.[2489] Following the discussion, the report is approved at a meeting of the Accounting Chamber and sent to the audited entity, the Verkhovna Rada and, where necessary, other public authorities.[2490]

The mechanism for monitoring the implementation of the Accounting Chamber's recommendations is then activated. Within one month the audited entity must submit to the Accounting Chamber the planned measures for implementing the recommendations provided in the report, the procedure and timeframe for their implementation and must subsequently inform the Accounting Chamber quarterly, unless otherwise determined by the Accounting Chamber, of the status of their implementation. If the audited entity fails to comply with this legal requirement, the Accounting Chamber informs Parliament, other public authorities where necessary and the public through the media.[2491]

2487 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 7. ↗

2488 Ibid, Articles 32–33.

2489 Ibid, Article 35.

2490 Ibid, Article 36.

2491 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 36. ↗

The Accounting Chamber monitors[2492] the implementation of its decisions in accordance with the Procedure for Monitoring the Implementation of Decisions, approved by a decision of the Accounting Chamber and publishes the relevant information on its official website on a quarterly basis.[2493] Where signs of a criminal or administrative offence are identified, the Accounting Chamber notifies law enforcement bodies, which inform it of the response measures taken following the consideration of the materials.[2494]

From 1 January 2025, pursuant to Law No. 4042-IX, the Accounting Chamber received new powers to audit local budgets. The Accounting Chamber's plan for 2026 identifies only one audited entity in this category — the budget of the Bucha Urban Territorial Community. For other local budgets, only a generalised analysis of the implementation of their key indicators is planned.

Interaction with the Verkhovna Rada and consideration of Accounting Chamber materials

As part of its interaction with Parliament and its bodies, the Accounting Chamber:

1. Informs the Verkhovna Rada and its bodies of the results of state external financial control (audit) measures carried out by the Accounting Chamber.

Decisions of the Accounting Chamber based on audit results, together with the relevant reports and other related information, are sent to the Verkhovna Rada.[2495] Within five days of receipt, such materials are forwarded to the committees according to their remits and to the Budget Committee, and are also provided to MPs.[2496] Following consideration of Accounting Chamber decisions, committees may develop proposals to improve legislation[2497] and initiate consideration of the relevant issues at a plenary sitting of the Verkhovna Rada.

Committees may verify the status of implementation of the Accounting Chamber's recommendations.[2498] For example, in November 2025, the Committee on Youth and Sports considered not only the audit report, but also the status of implementation of 12 recommendations of the Accounting Chamber, of which four had been implemented and seven were in the process of implementation.[2499] Similarly, in early 2026, the Committee on Education, Science and Innovation initiated a repeat consideration of the implementation of the Accounting Chamber's recommendations.[2500]

2492 Rules of Procedure of the Accounting Chamber: Decision of the Accounting Chamber No. 15-1 of 29.03.2024, para. 22, p. 12. ↗

2493 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Part 4 Article 36. ↗

2494 Ibid., para. 11 Part 1 Article 7 and Article 41.

2495 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 6 Article 232^2. ↗

2496 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Part 1 Article 31. ↗

2497 Ibid, Article 31.

2498 Ibid, Articles 14, 31.

2499 The Committee on Youth and Sports Considered the Results of the Accounting Chamber's Audit of the Efficiency of the Use of Budget Funds Allocated to Providing Housing for Young People. Press Service of the Office of the Verkhovna Rada of Ukraine, 2025. ↗

2500 Information on the Meeting of the Committee of the Verkhovna Rada of Ukraine on Education, Science and Innovation on 11 February 2026. Committee of the Verkhovna Rada of Ukraine on Education, Science and Innovation, 2026. ↗

2. Submits and presents to the Verkhovna Rada an annual report on the results of its activities, which must reflect not only the audits conducted and violations identified, but also the recommendations issued, the status of their implementation and the consequences of audited entities' responses.[2501]

The preliminary preparation of Parliament's consideration of the annual report of the Accounting Chamber is carried out by the Budget Committee. Following consideration of the annual report, the Verkhovna Rada, upon the proposal of the Accounting Chamber, may address state authorities and local self-government bodies to request that they take the necessary measures in cases of improper implementation or non-implementation of recommendations (proposals) issued by the Accounting Chamber.[2502]

3. Conducts an expert review of the draft law on the state budget for the relevant year submitted to the Verkhovna Rada and prepares the relevant conclusions, analyses the execution of the state budget and reports on its execution and analyses preferential tax regimes, the public procurement system and reports of the Antimonopoly Committee of Ukraine (AMCU) and the SPFU insofar as they affect the execution of the state budget.[2503]

The Budget Committee cooperated with the Accounting Chamber, using its materials when assessing state and local budget indicators. Following consideration of the Accounting Chamber's conclusions on the results of the analysis of the execution of the Law on the State Budget of Ukraine for 2025, the Budget Committee sent the Government recommendations aimed at improving the execution of the state budget.[2504]

The external assessment of the Accounting Chamber's activities is carried out in two forms. The Verkhovna Rada may initiate its external financial audit, while the Accounting Chamber itself applies to INTOSAI once every five years for an external assessment of its activities.[2505]

Progress and issues

The Accounting Chamber operates with an incomplete membership, which increases the workload on members of the Accounting Chamber and, at the same time, complicates the provision of systematic and timely external financial control.

The Accounting Chamber has operated with a limited composition since April 2024, when the Verkhovna Rada dismissed seven members of the Accounting Chamber due to the expiry of their terms of office.[2506]

2501 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Articles 1, 3, 30. ↗

2502 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 232^2. ↗

2503 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 7. ↗

2504 Report on the Main Results of the Work of the Budget Committee during the Fourteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation. Committee of the Verkhovna Rada of Ukraine on Budget, 2026. ↗

2505 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 43. ↗

2506 On Dismissal of Members of the Accounting Chamber from Office: Resolution of the Verkhovna Rada of Ukraine No. 3640-IX of 23.04.2024. ↗

The Accounting Chamber currently operates with five members: the Head, the Deputy Head and three members, among whom 12 areas of activity are distributed. In addition, one of the members submitted an application for dismissal.[2507] The relevant draft resolution on dismissal[2508] was registered in the Verkhovna Rada but had not been brought forward for consideration.

In September 2025, the Budget Committee again began preparations for measures related to holding a competition for six vacant positions of members of the Accounting Chamber. In particular, the Committee carried out the necessary work to receive and consolidate proposals on candidates for the AGE from parliamentary factions and groups and prepared draft Resolution No. 14012[2509] on the establishment of the AGE[2510] for consideration by the Verkhovna Rada. However, since its registration on 5 September 2025, the draft Resolution has remained without consideration.

Without the establishment of the AGE authorised to conduct the preliminary selection of candidates, the competition procedure for six vacant positions of members of the Accounting Chamber has effectively been suspended. Therefore, despite the formal launch of the updated competition procedure for positions of members of the Accounting Chamber on 19 December 2024,[2511] the actual selection of candidates has still not begun.

Dismissal of a member of the Accounting Chamber would entail another redistribution of powers among the remaining members and, accordingly, an additional workload. It would also trigger a new competition running simultaneously with the competition already launched in 2024.[2512] To enable a single competition, the Verkhovna Rada voted to amend its Rules of Procedure to allow competitions for Accounting Chamber members to be combined where they are conducted simultaneously.[2513] However, the amendments to the Rules of Procedure were introduced not by a separate law but through another draft law, No. 15111-d,[2514] concerning amendments to the Tax Code. Although the Verkhovna Rada adopted it on 9 June 2026, as of 31 July it remained unsigned by the President. Accordingly, the amendments to the Rules of Procedure allowing a single competition for positions of Accounting Chamber members were not yet in force.

2507 Committee on Budget Considers Application by Accounting Chamber Member Y. Pushko-Tsybuliak for Dismissal. Committee on Budget. 2026. ↗

2508 On the Dismissal of Y. Pushko-Tsybuliak from the Position of Member of the Accounting Chamber: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15220 of 06.05.2026. ↗

2509 On the Establishment of the Advisory Group of Experts to Conduct the Preliminary Selection of Candidates for Positions of Members of the Accounting Chamber: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14012 of 05.09.2025. ↗

2510 Preliminary consideration of the issue of establishing the Advisory Group of Experts was carried out by the Verkhovna Rada at the sitting of 19.08.2025 (draft Resolution of the Verkhovna Rada, registration No. 13323), but no decision was adopted following the vote. Minutes of Committee Meeting No. 226 of 05.09.2025. Committee of the Verkhovna Rada of Ukraine on Budget, 2025. ↗

2511 The Budget Committee Submitted to the Verkhovna Rada Candidates for the Advisory Group of Experts to Conduct the Preliminary Selection of Candidates for Positions of Members of the Accounting Chamber (as part of the repeated competition measures). Committee of the Verkhovna Rada of Ukraine on Budget, 2025 ↗; Strengthening Capacity and Preventive Control: What the European Commission Recommended for the Accounting Chamber and the State Audit Service. Transparency International Ukraine, 2025. ↗

2512 Staffing Collapse at the Accounting Chamber: A Deepening Crisis or a Chance for a Reset? Dzerkalo Tyzhnia. 2026. ↗

2513 Verkhovna Rada Heeds TI Ukraine Recommendations on Optimising the Competition for the Accounting Chamber. Transparency International Ukraine. 2026. ↗

2514 Text Signed by the Chairman of the Verkhovna Rada of Ukraine. Draft Law Card No. 15111-d of 06.04.2026. ↗

The staffing and financial support of the Accounting Chamber does not correspond to the actual scope of its powers and weakens its institutional capacity. In October 2025, the Accounting Chamber's budget allocations under the general fund were reduced by UAH 253.5 million,[2515] and implementation of the budget programme at year-end stood at 75.8%. In addition, 37% of the annual payroll allocations were provided only for December, which made it impossible to fill vacant positions in a timely manner.[2516] With a planned staffing level of 713 positions, the actual number of employees as of 31 December 2025 was 535.[2517]

Although in 2025 the Accounting Chamber conducted internal staff selection and competitive selection for positions of state auditors, the staffing process remained incomplete.[2518] In its report on the implementation of the 2025 budget programme, the Accounting Chamber itself linked adjustments to the work plan and deviations in the implementation of the audit activity area to the incomplete process of filling vacant state auditor positions. It also noted that the inability to fill vacancies had resulted in significant balances of unused allocations.[2519] In July 2026, the Accounting Chamber announced competitions for positions in the audit departments of its central office and territorial offices.[2520]

A separate mechanism for internal oversight of work quality has been established within the Accounting Chamber. In March 2026, an Audit Committee with two independent members began operating within the Accounting Chamber, authorised to consider issues of internal audit, risk management and the internal control system.[2521]

The practice of establishing audit committees is used by many leading supreme audit institutions worldwide and forms part of internal control and governance, as well as efforts to improve the effectiveness of internal audit. The establishment of such a committee by the Accounting Chamber may be regarded as a step towards strengthening internal mechanisms of institutional control.

The absence of a single algorithm for further parliamentary follow-up to decisions and reports of the Accounting Chamber reduces the effectiveness of parliamentary control over the receipt and use of state budget funds. In 2024, the Accounting Chamber covered 304 entities through control measures, approved 54 reports, audited resources amounting to almost UAH 3.7 trillion and identified violations and shortcomings amounting to UAH 217.5 billion.[2522] Given this volume of materials, no single mandatory procedure has

2515 Results of the Assessment of the Effectiveness of the Budget Programme for 2025 under CPCFEB 6511010 'Leadership and Management in the Field of Control over the Execution of the State Budget'. Accounting Chamber, 2026, pp. 2–3. ↗

2516 Ibid, p. 3.

2517 Results of the Assessment of the Effectiveness of the Budget Programme for 2025 under CPCFEB 6511010 'Leadership and Management in the Field of Control over the Execution of the State Budget'. Accounting Chamber, 2026, pp. 8–9 ↗; Information on the Implementation of the Budget Programme under CPCFEB 6511010 'Leadership and Management in the Field of Control over the Execution of the State Budget' for 2025, pp. 1–2. ↗

2518 Quality Management System in the Accounting Chamber in 2025: Achievements and Areas for Further Development. Accounting Chamber, 2025. ↗

2519 Report on the Implementation of the Budget Programme Passport for 2025 under CPCFEB 6511010 'Leadership and Management in the Field of Control over the Execution of the State Budget', pp. 2, 5, 7. ↗

2520 Accounting Chamber Expands Its Team of State Auditors. Accounting Chamber. 2026. ↗

2521 The Audit Committee Has Started Its Work in the Accounting Chamber. Accounting Chamber, 2026. ↗

2522 Annual Report of the Accounting Chamber for 2024, p. 6. ↗

been established for Verkhovna Rada committees to follow up on decisions and reports of the Accounting Chamber.

As a result, the reporting deadlines for addressees of recommendations, the form of the committee's response and the grounds for repeated consideration are determined by the practice of individual committees. This is confirmed by the response of the Budget Committee to the Accounting Chamber's annual report in May 2025, when the Committee adopted a decision on:

- preparing proposals on a mechanism for considering decisions of the Accounting Chamber;
- strengthening cooperation with the relevant committees of the Verkhovna Rada to increase the number of considerations of Accounting Chamber decisions following external audit measures, with a view to ensuring broad public discussion of the relevant results and proper implementation of the Accounting Chamber's recommendations.[2523]

During 2025–2026, committees applied different models of response to Accounting Chamber materials:

- taking the report note and providing recommendations to the addressees;[2524]
- setting a deadline for submitting information on implementation;[2525]
- scheduling repeated consideration;[2526]
- separately considering the status of implementation of recommendations.[2527]

This varied practice confirms the absence of a single algorithm for Parliament's follow-up to Accounting Chamber materials, both initial and subsequent, and, accordingly, the absence of an obligation for addressees of recommendations to report to the relevant committee on the results of their implementation, repeatedly where necessary.

In turn, the practice of implementing recommendations following individual audits shows that a significant share of measures remains at the implementation stage. For example, during 2020–2024, in the security and defence sector, the Accounting Chamber issued 247 recommendations, of which 183, or 74.1%, were implemented. Among security and

2523 The Budget Committee Considered the Accounting Chamber's Report for 2024. Committee of the Verkhovna Rada of Ukraine on Budget, 2025. ↗

2524 On the Results of Consideration of Issues at the Meeting of 17 October 2025. Committee of the Verkhovna Rada of Ukraine on Budget, 2025 ↗; Transcript of Committee Meeting No. 233 of 16.02.2026. Committee of the Verkhovna Rada of Ukraine on Budget, 2026. ↗

2525 A Meeting of the Committee of the Verkhovna Rada of Ukraine on Agrarian and Land Policy Was Held on 13 January 2026. ↗

2526 School Safety, Scientific Research and Specialised Sports Classes: A Meeting of the Committee on Education, Science and Innovation Was Held. Verkhovna Rada of Ukraine, 2026 ↗; On the Accounting Chamber's Report on the Results of the Compliance Audit of Measures Taken by the National Academy of Sciences of Ukraine to Support the Development of Priority Areas of Scientific Research and Scientific and Technical Developments: Decision of the Committee of the Verkhovna Rada of Ukraine on Education, Science and Innovation of 11.02.2026, p. 7. ↗

2527 Committee of the Verkhovna Rada of Ukraine on Budget. Minutes of Meeting No. 228 of 17.10.2025 ↗; Transcript of Committee Meeting No. 232 of 22.12.2025 ↗; Regarding Consideration of Decision of the Accounting Chamber No. 28-3 of 25.11.2025, pp. 7–8. ↗

defence sector bodies, the MoD had the largest number of recommendations (30%) and the lowest level of implementation (49.3%).[2528]

In the field of anti-corruption and law enforcement activities, of the 95 recommendations issued by the Accounting Chamber in 2024 following four audits, only 23 recommendations (24.2%) were implemented on time and in full, while another 64 were still in the process of implementation.[2529] The situation with recommendations on amendments to normative legal acts is particularly illustrative: of 50 such recommendations (52.6%), the Government, the Ministry of Internal Affairs and the State Emergency Service implemented only three (6%).[2530] A similar trend is observed in ARMA's activities: as of January 2026, seven of the 16 recommendations issued by the Accounting Chamber in December 2024 had been implemented, while nine recommendations remained in the process of implementation.[2531]

Despite the existence of a legally defined procedure for parliamentary control, even after audit materials have been considered and recommendations issued, the identified violations may remain unaddressed for a long time, while the addressees of recommendations may postpone their full implementation. In such circumstances, parliamentary control loses its practical effectiveness.

Systematic disregard for the procedure for considering the Accounting Chamber's annual report at plenary sittings undermines the effectiveness of parliamentary control over public finances. In 2025, the Accounting Chamber's annual report for 2024 was considered only by the Verkhovna Rada Budget Committee, which took note of it, provided recommendations to the Accounting Chamber and informed Parliament of the results of its consideration.[2532] In June 2026, a draft resolution on the Accounting Chamber's 2025 report was registered in Parliament, but as of 31 July 2026 it had not been considered at a plenary sitting.[2533]

At the same time, under the Rules of Procedure of the Verkhovna Rada, the Accounting Chamber's annual report must be considered specifically at a plenary sitting,[2534] while preliminary processing by the relevant committee is only a preparatory stage. Only in plenary format can the Verkhovna Rada adopt a decision to address state bodies and local self-government bodies regarding the need to take measures in cases of non-implementation or improper implementation of Accounting Chamber recommendations,[2535] as well as

2528 Information Notice on the Implementation of Decision of the Accounting Chamber No. 9-2 of 22.04.2025 'On Consideration of the Report on the Results of the Analysis of the Implementation of Recommendations (Proposals) Issued by the Accounting Chamber in the Field of Defence and Security'. Accounting Chamber, 2025, p. 1. ↗

2529 Report on the Results of the Analysis of the Implementation of Accounting Chamber Recommendations in the Field of Law Enforcement and Anti-Corruption Activities, approved by Decision No. 17-1 of 08.07.2025, pp. 9–11. ↗

2530 Information Notice on the Implementation by the Audited Entity of Decision of the Accounting Chamber No. 17-1 of 08 July 2025 'On Consideration of the Report on the Results of the Analysis of the Implementation of Accounting Chamber Recommendations in the Field of Law Enforcement and Anti-Corruption Activities'. Accounting Chamber, 2025. ↗

2531 ARMA Has Still Not Accepted All Seized Assets for Management: Monitoring the Implementation of Accounting Chamber Recommendations. Accounting Chamber, 2026. ↗

2532 Minutes of Committee Meeting No. 218 of 30.05.2025. Committee of the Verkhovna Rada of Ukraine on Budget, 2026. ↗

2533 On the Accounting Chamber's Report for 2025: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15291 of 03.06.2026. ↗

2534 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 232^2. ↗

2535 Ibid.

initiate an external financial audit of the Accounting Chamber itself.[2536] Disregarding this procedure breaks the cycle of parliamentary control over public finances. Parliament loses an analytical basis for the budget process and is also unable to assess the effectiveness of the Accounting Chamber's work.

The Accounting Chamber's annual report was last heard at a plenary sitting in 2019, and this was only the second such case since the establishment of the Accounting Chamber.[2537] During the work of the Parliament of the ninth convocation, no cases of hearing the Accounting Chamber's annual report have been recorded. Thus, Parliament has effectively withdrawn from performing its control function, leaving the Accounting Chamber's recommendations (proposals) on remedying violations without proper political and legal support and Parliament without proper analytical support for the exercise of its powers.

Recommendations

1. Adopt draft Resolution of the Verkhovna Rada No. 14012[2538] to unblock the establishment of the AGE and the competitive selection for vacant positions of members of the Accounting Chamber.
2. The Accounting Chamber should continue efforts to fill vacant positions of state auditors.
3. Amend the Rules of Procedure of the Verkhovna Rada and the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' to define an algorithm for committees' response to Accounting Chamber decisions based on the results of external financial control (audit), including the minimum content of decisions of the relevant committees: identification of addressees, specific response measures, the deadline for submitting written information to the committee and the Accounting Chamber on implementation, as well as the grounds for repeated consideration of the issue if this deadline is missed or if the Accounting Chamber provides information on improper implementation or non-implementation of the relevant recommendations. Until then, Verkhovna Rada committees should ensure substantive analysis and follow-up of reports received from the Accounting Chamber.
4. Ensure compliance with the requirements of the Rules of Procedure of the Verkhovna Rada regarding the mandatory annual hearing of the Accounting Chamber's report at a plenary sitting.

2536 On the Accounting Chamber: Law of Ukraine No. 576-VIII of 02.07.2015, Article 43. ↗

2537 The Budget Committee Summarised Its Work during the Tenth Session. Information Department of the Office of the Verkhovna Rada of Ukraine, 2019. ↗

2538 On the Establishment of the Advisory Group of Experts to Conduct the Preliminary Selection of Candidates for Positions of Members of the Accounting Chamber: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14012 of 05.09.2025. ↗

Selection of Judges of the Constitutional Court of Ukraine and Members of the High Council of Justice under the Parliament's Quota

State of play

The Verkhovna Rada exercises powers to appoint six judges of the CCU[2539] and to elect two members of the High Council of Justice (HCJ).[2540] In both cases, the law provides for competitive selection based on the criteria of professional competence, ethics and integrity, while preliminary assessment of candidates is carried out by advisory bodies whose establishment and operation are regulated by law. The final decision on the appointment of CCU judges and the election of HCJ members rests with Parliament.

The Parliament's powers to appoint CCU judges and elect HCJ members, as well as the mechanism for exercising these powers, are defined by the Constitution of Ukraine,[2541] the Laws of Ukraine 'On the Constitutional Court of Ukraine'[2542] and 'On the High Council of Justice',[2543] the Rules of Procedure of the Verkhovna Rada[2544] and, in part, the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine'.[2545]

The procedures for appointing CCU judges and electing HCJ members by the Verkhovna Rada follow a common logic. The model for forming the CCU and the HCJ is divided into two stages: vetting by independent expert bodies and political voting. Parliament cannot appoint CCU judges or elect HCJ members who have not undergone special vetting and assessment by independent expert bodies.[2546] This is an important step towards increasing the transparency and integrity of the selection process.

Independent expert bodies are established to conduct independent vetting and preliminary assessment of candidates' compliance with the established criteria. In the case of the appointment of CCU judges, the preliminary assessment is carried out by the AGE,[2547] while in the case of the election of HCJ members, candidates are preliminarily assessed by the Ethics Council.[2548]

2539 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 148. ↗ ; Law of Ukraine 'On the Constitutional Court of Ukraine' No. 2136-VIII of 13.07.2017. ↗

2540 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 131. ↗; On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Article 5; Part 1 Article 6; Article 9; Part 1 Article 9^{1}, Article 14^{20}; Part 1 Article 17. ↗

2541 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, clauses 16, 26 Part 1 Article 85; Part 2 Article 131; Article 148. ↗

2542 On the Constitutional Court of Ukraine: Law of Ukraine No. 2136-VIII of 13.07.2017, Article 9; Article 10^{1}; Article 10^{10}; Article 11. ↗

2543 On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Article 5; Part 1 Article 6; Article 9; Part 1 Article 9^{1}, Article 14^{20}; Part 1 Article 17. ↗

2544 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Parts 1–15, 24 Article 208^{1}; Article 208^{2}. ↗

2545 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Parts 5, 8 Article 18. ↗

2546 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 208^{1}, 208^{4}. ↗

2547 On the Constitutional Court of Ukraine: Law of Ukraine No. 2136-VIII of 13.07.2017, Article 10^{2}. ↗

2548 On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Articles 9, 9^{1}. ↗

A rule on the minimum number of candidates applies to both procedures. In particular, for one vacant position of CCU judge, the appointing/electing entity must receive at least two candidates recommended by the AGE, while for the election of HCJ members, the number of candidates recommended by the Ethics Council must be at least twice the number of vacant positions. If the number of candidates after the competitive selection is smaller, a new competition is announced.[2549]

In both cases, the principal body responsible for preliminary parliamentary consideration is the Committee on Legal Policy,[2550] which:

- verifies the completeness of documents submitted by applicants for the positions of CCU judge or HCJ member, as well as their compliance with the statutory requirements, including citizenship, education, professional experience, age and command of the state language, and adopts a decision to admit a candidate to the competition;
- forwards documents to the Secretariat of the Verkhovna Rada to organise the special vetting procedure under the Law of Ukraine 'On Prevention of Corruption' and forwards copies of candidates' documents to the relevant expert body for candidate assessment;
- conducts interviews with candidates for CCU judge positions of HCJ members who have undergone assessment and prepares recommendations for consideration by the Verkhovna Rada.[2551]

The procedures for appointing CCU judges and electing HCJ members differ in terms of the timing of competition announcements and the duration of the competition procedures, in particular:

- a competition for the position of CCU judge is announced no later than 90 days before the expiry of the judge's term of office or within 20 days from the date on which a vacancy arises if the powers of a CCU judge have been terminated or the judge has been dismissed on the grounds set out in the Constitution of Ukraine;[2552]
- a competition for the position of HCJ member is announced no later than six months before the expiry of the term of office of the current HCJ member or within 14 days in the event of early termination of that term.[2553]

As of 31 July 2026, competition procedures under the Parliament's quota are ongoing both for the positions of CCU judges and for the positions of HCJ members.

2549 On the Constitutional Court of Ukraine: Law of Ukraine No. 2136-VIII of 13.07.2017, Article 10^{8}. ↗; On the High Council of Justice' No. 1798-VIII of 21.12.2016, Part 15, clause 9 Part 20 Article 9^{1}. ↗; Law of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine' No. 1861-VI of 10.02.2010, Article 208^{4}. ↗

2550 On the List, Numerical Composition and Remit of the Committees of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

2551 On the Constitutional Court of Ukraine: Law of Ukraine No. 2136-VIII of 13.07.2017, Article 10^{1}. ↗; On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Article 6. ↗; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 208^{1}, 208^{4}. ↗

2552 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 149^{1}. ↗; On the Constitutional Court of Ukraine: Law of Ukraine No. 2136-VIII of 13.07.2017, Article 10^{5}. ↗

2553 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208^{1}. ↗

In particular, a competition is underway for two vacant positions of CCU judges under the Parliament's quota, announced on 14 October 2025.[2554] As part of this selection process, on 27–29 March 2026, the AGE held open interviews with 15 candidates, with the interviews broadcast live and recordings made publicly available to ensure maximum publicity of the process.[2555] On 7 April 2026, the AGE held an official meeting and adopted decisions on the compliance of 15 candidates with the criterion of high moral qualities.[2556] As a result, 10 candidates were assessed as 'meeting' the criterion of high moral qualities, four candidates were found not to meet this criterion and no decision was adopted in respect of one candidate, who also did not proceed to the next stage of assessment.[2557] On 14 April 2026, the AGE conducted a written assessment of candidates for the position of CCU judge.[2558] Following its meeting on 24 April 2026, the AGE decided not to hold additional interviews.[2559] On 6 May, the AGE announced the results of its assessment of candidates' competence: nine candidates received an assessment of 'COMPLIES'.[2560] In July 2026, the AGE compiled[2561] and submitted[2562] to Parliament a ranked list of candidates for two positions of the CCU judges under the Verkhovna Rada quota.

At the same time, the competition procedure for the election of two HCJ members is ongoing. The current HCJ members elected by Parliament, Roman Maselko and Mykola Moroz,[2563] were elected on 15 August 2022.[2564] Their four-year term of office[2565] expires in August 2026. A competition for two positions of HCJ members was announced on 9 February 2026.[2566]

Progress and issues

The model for appointments to the CCU and the HCJ has procedural limitations that affect the speed of filling vacancies and, accordingly, the institutional capacity of the CCU

2554 Announcement of the Launch of a New Competitive Selection Process for Two Vacant Positions of Judges of the Constitutional Court of Ukraine. Official web portal of the Verkhovna Rada of Ukraine, 2025. ↗; Committee of the Verkhovna Rada of Ukraine on Legal Policy. Decision on the Announcement of the Launch of a New Competitive Selection Process for Two Vacant Positions of Judges of the Constitutional Court of Ukraine, pp. 1–2. ↗

2555 Summary: The AGE Conducted Interviews with Candidates for the Positions of CCU Judges under the Parliament's Quota. Constitutional Court of Ukraine, 2026. ↗

2556 Minutes No. 24 of the Meeting of the Advisory Group of Experts of 07.04.2026, pp. 1, 3–19. ↗

2557 Competition under the Parliament's Quota: The AGE Summarised the Stage of Assessing Candidates' Moral Qualities. Constitutional Court of Ukraine, 2026. ↗

2558 The AGE Conducted a Written Assessment of Candidates for the Position of CCU Judge. Constitutional Court of Ukraine, 2026. ↗

2559 Publication by the Advisory Group of Experts on the social network Facebook, 2026. ↗

2560 Publication by the Advisory Group of Experts on the social network Facebook. 2026. ↗

2561 Publication by the Advisory Group of Experts on the social network Facebook. 2026. ↗

2562 Publication by the Advisory Group of Experts on the social network Facebook. 2026. ↗

2563 The Verkhovna Rada of Ukraine Elected New Members of the High Council of Justice. Verkhovna Rada of Ukraine, 2022. ↗

2564 Composition of the High Council of Justice. ↗

2565 On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Article 5. ↗

2566 Announcement of the Competition for Two Positions of Members of the High Council of Justice and the Start of Acceptance of Documents from Persons Seeking to Participate in the Competition. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

and the HCJ. The common problems in the selection procedure for both bodies include the following:

1. **The requirement for a minimum number of candidates per vacancy.** Although this requirement is aimed at ensuring competition, it may potentially lead to repeated competitions and delays in appointments even where there are candidates who fully meet the criteria. It may also lead to 'endless cycles' of selection, where a body remains understaffed because of the formal absence of an alternative candidate for voting.

2. **The absence of clear deadlines for Parliament to consider the opinions of expert bodies** creates risks of procedural delays. In both cases, the legislator has not set a final deadline for completing the competition. In other words, the legislation, including the Rules of Procedure of the Verkhovna Rada, does not require Parliament to appoint a person by a certain date.

   The CCU judge selection procedure illustrates this problem. After the AGE transferred all legally required materials concerning the candidates to the Committee on Legal Policy on 19 February 2025, the procedure for appointing CCU judges remained unfinished for a long time.[2567] The Committee did not complete its consideration of the candidates and did not submit them for consideration by the Verkhovna Rada: the interviews scheduled for 21 March 2025 were postponed,[2568] and as of 14 April 2025 the candidates had still not been submitted to Parliament.[2569] As a result, this competition under the parliamentary quota ended without any appointments: at the plenary meeting on 8 October 2025, the Verkhovna Rada did not appoint any of the four candidates from the AGE ranked list and instructed the Committee on Legal Policy to announce a new competitive selection process.[2570]

   During this period, seven positions of CCU judges remained vacant and, from 27 January 2025, the CCU had no quorum.[2571] After the President appointed two CCU judges,[2572] five positions of CCU judges have remained vacant since September 2025,[2573] two of them under the Parliament's quota.

3. **The issue of the scope of materials transferred by expert bodies to the Committee on Legal Policy** proved controversial and led to a procedural conflict. In July 2025, the Committee on Legal Policy adopted a decision clarifying certain provisions of the Law of Ukraine 'On the Constitutional Court of Ukraine' concerning the status and activities of the AGE. In this clarification, the Committee stated that the AGE,

2567 AGE Statement on the Clarification by the VRU Committee on Legal Policy. Constitutional Court of Ukraine. ↗

2568 Transcript of the Meeting of the Committee of the Verkhovna Rada of Ukraine on Legal Policy of 19.09.2025, pp. 8–9. ↗

2569 Status of Competitions for the Positions of CCU Judges. Constitutional Court of Ukraine, 2025. ↗

2570 Transcript of the Plenary Meeting. Meeting 1 (continued). Verkhovna Rada of Ukraine, 2025. ↗

2571 Status of Competitions for the Positions of CCU Judges. Constitutional Court of Ukraine, 2025. ↗

2572 On the Appointment of O. Vodiannikov as a Judge of the Constitutional Court of Ukraine: Decree of the President of Ukraine No. 438/2025 of 27.06.2025. ↗; Oleksandr Vodiannikov Assumed the Powers of a Judge of the Constitutional Court of Ukraine. Constitutional Court of Ukraine, 2025. ↗; On the Appointment of Yu. Barabash as a Judge of the Constitutional Court of Ukraine: Decree of the President of Ukraine No. 687 of 17.09.2025. ↗; Yurii Barabash Assumed the Powers of a Judge of the Constitutional Court of Ukraine. Constitutional Court of Ukraine, 2025. ↗

2573 Judges. Constitutional Court of Ukraine. ↗

as an auxiliary body of the Verkhovna Rada, was obliged to ensure that MPs could familiarise themselves with all documents of candidates for the position of CCU judge, referring to the requirement in the Rules of Procedure of the Verkhovna Rada that materials be provided to MPs five days before consideration of the appointment of CCU judges. The Committee also emphasised its right to request and receive all documents submitted by candidates to the AGE either on their own initiative and/or at the AGE's request.[2574]

In response to these clarifications, the AGE stated that all documents required by law had been transferred as early as 19 February 2025, while the requests for additional materials had no legal basis. In the AGE's view, the public accusations against it showed signs of politicisation of the process and attempts to exert pressure on an independent body, as well as attempts to shift responsibility onto it for the almost five-month delay in appointing CCU judges. The AGE also specifically noted that in 2024, during a similar procedure, the Committee on Legal Policy had not made such requests.[2575]

Although the situation arose during the selection of CCU judges in 2025, similar conflicts may also potentially arise in the procedure for electing HCJ members.

The procedure for appointing CCU judges contains a timing imbalance that effectively guarantees a period during which positions under the Parliament's quota remain vacant. A competition is announced 90 days before the expiry of a judge's term of office, yet the preparatory stage alone may take up most of this period. In particular, the submission of documents lasts up to 30 days, with an additional five days for accepting documents sent by post. The Committee on Legal Policy then has another 20 days from the end of the document submission period to consider them. In addition, the Committee may give applicants up to 10 working days to correct shortcomings in the submitted documents or provide explanations, and the Rules of Procedure of the Verkhovna Rada provide for another three days from the date of the decision to admit candidates to the competition, during which the Committee must send the documents to the AGE for candidate assessment.[2576] As a result, the preparatory stage alone takes more than half of the time before the vacancy arises. A critical gap is the absence of a deadline for the Committee to adopt a decision on admitting candidates to the competition.

The situation is further complicated by the fact that the AGE has its own statutory assessment period of up to four months[2577] from the date on which it receives the documents from the Committee. Although the current candidate assessment procedure shows that the AGE is capable of completing assessments more quickly, the law allows the AGE to use this period in full. Taken together, the formally defined deadlines alone already exceed 180 days.

2574 Decision on Clarifying Certain Provisions of the Law of Ukraine 'On the Constitutional Court of Ukraine' Concerning the Status and Activities of the Advisory Group of Experts. Committee of the Verkhovna Rada of Ukraine on Legal Policy, pp. 1–3. ↗

2575 AGE Statement on the Clarification by the VRU Committee on Legal Policy. Constitutional Court of Ukraine. ↗

2576 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 8 Article 208^4. ↗

2577 On the Constitutional Court of Ukraine' No. 2136-VIII of 13.07.2017, Article 10^8. ↗

If the unregulated parliamentary stages are added to this, including interviews in the Committee after the AGE stage, the preparation of decisions and the submission of the matter to the plenary hall, a time gap emerges between the announcement of the competition and the actual filling of the vacancy. Thus, the current selection procedure effectively builds prolonged understaffing into the procedure of the CCU under the Parliament's quota.

The competition for the election of HCJ members is announced six months before the vacancy arises, which creates a relatively sufficient timeframe for the work of the Ethics Council and subsequent consideration of candidates by Parliament. At the same time, in this procedure, the Rules of Procedure of the Verkhovna Rada also do not set a clear final deadline for Parliament to consider the matter, which may also lead to delays in the election of HCJ members. Given the expected opening of a significant number of vacancies in 2026–2027 under different quotas, this creates a risk of renewed staffing instability.[2578]

Recommendations

1. Revise the requirement for a minimum number of candidates.[2579] In particular, it is proposed to abandon the mandatory requirement for at least two candidates per vacancy at the final stage or, alternatively, clearly regulate the procedure for cases where fewer than two candidates remain after the assessment. For example, appointment could be allowed if only one candidate fully meets the established criteria, or another mechanism could be provided to complete the competition without its automatic restart. This would make it possible to avoid repeated competitions due to the formal absence of an alternative.
2. Enshrine in the Rules of Procedure of the Verkhovna Rada maximum time limits for the Committee on Legal Policy to adopt decisions and complete the competition after receiving the conclusions of expert bodies.[2580] In particular, set a deadline for conducting interviews and a mandatory period, for example two plenary weeks, for putting the matter to a vote.
3. Clearly distinguish at the legislative level between internal working documents of expert bodies and materials provided to MPs. This would make it possible to avoid conflicts between Parliament and expert bodies, duplication of candidate assessment and delays in the competition procedure.
4. Eliminate the timing imbalance in the CCU selection procedure. Synchronise the deadlines by at least doubling the period for announcing a competition before a vacancy arises to 180 days.

2578 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208[1]. ↗

2579 The recommendation previously provided by civil society in the Shadow Report 2025 regarding the review of the competition procedure involving the Advisory Group of Experts (p. 112), in particular the problem of the statutory requirement for at least two candidates for each vacant position of CCU judge (p. 109), remains relevant but has been further clarified. ↗

2580 The recommendation previously provided by civil society in the 2025 Shadow Report regarding the need to consider and appoint CCU judges under the quotas of appointing entities as soon as possible and to review the competition procedure involving the Advisory Group of Experts (p. 112) remains relevant but has been further clarified. ↗

5. Set a clear deadline for the Committee on Legal Policy to adopt a decision on admitting candidates. This would make it possible to balance the preparatory stage of the competition and the assessment stage.

Interaction between the Verkhovna Rada and the Judicial Branch

State of play

Judicial power in Ukraine is exercised in accordance with the constitutional principle of separation of powers.[2581] Justice is administered exclusively by courts, and its administration is ensured by judges and, in cases determined by law, jurors.[2582] The Constitution expressly prohibits any influence on a judge in the administration of justice.[2583]

The Constitution and laws of Ukraine set out the requirements for candidates for judicial office, the appointment procedure based on the results of a qualification examination, special vetting, an assessment of personal moral and psychological qualities and a competition to fill a vacant judicial position.[2584]

A judge is appointed by the President of Ukraine upon the submission of the High Council of Justice, without any additional verification of compliance with the statutory requirements for candidates for judicial office or with the selection or qualification assessment procedure.[2585] Upon taking office, a judge takes the oath to the Ukrainian people during a solemn ceremony in the presence of the President, to which the President of the Supreme Court, the Head of the Council of Judges, the Head of the High Council of Justice and the Head of the High Qualification Commission of Judges are invited.[2586]

One of the key guarantees of judicial independence is the special procedure for financing the judiciary. The Constitution requires the state to ensure proper conditions for the functioning of courts and the work of judges.[2587] In the State Budget of Ukraine for the relevant year, taking into account the proposals of the High Council of Justice, expenditures are provided as separate budget lines, including for the Supreme Court, the High Council of Justice, the appeal chamber of the higher specialised court and local and appellate courts. The 2026 State Budget provides for expenditures totalling UAH 25,886,886.1 thousand[2588] (EUR 504.886 million), including:

- State Judicial Administration (SJA) — UAH 22,705,305.2 thousand for ensuring the administration of justice by local and appellate courts and the functioning of bodies

2581 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 6.

2582 Ibid, Articles 124, 127.

2583 Ibid, Article 126.

2584 Ibid, Article 128. ; On the Judiciary and the Status of Judges: Law of Ukraine No. 1402-VIII of 02.06.2016, Section IV.

2585 On the Judiciary and the Status of Judges: Law of Ukraine No. 1402-VIII of 02.06.2016, Article 80.

2586 Ibid, Article 57.

2587 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Part 1 Article 130.

2588 On the State Budget of Ukraine: Law of Ukraine No. 4695-IX of 03.12.2025, Annex 3.

and institutions of the justice system, and for enforcing court decisions in favour of judges, court staff and employees of bodies and institutions of the justice system;

- Supreme Court (SC) — UAH 2,613,965.7 thousand for the administration of justice;
- Specialised District Administrative Court (SDAC) — UAH 34,308.8 thousand for the administration of justice;
- Specialised Administrative Court of Appeal (SACA) — UAH 19,996.8 thousand for the administration of justice;
- High Anti-Corruption Court (HACC) — UAH 511,051.8 thousand for the administration of justice by the HACC and its Appeal Chamber;
- High Intellectual Property Court (HIPC) — UAH 2,257.8 thousand for the administration of justice.

The relationship between the Verkhovna Rada and the judicial branch is defined by the Constitution of Ukraine,[2589] the laws 'On the Judiciary and the Status of Judges',[2590] 'On the High Council of Justice',[2591] 'On Committees of the Verkhovna Rada of Ukraine'[2592] and the Rules of Procedure of the Verkhovna Rada.[2593]

The Verkhovna Rada:

- adopts laws defining the judiciary, the status of judges, guarantees of judicial independence and the principles governing the functioning of judicial governance bodies;[2594]
- elects two members of the High Council of Justice;[2595]
- adopts laws on the establishment, reorganisation or liquidation of courts;[2596]
- adopts the State Budget of Ukraine, which, among other things, determines the amount of budget funding for the judicial system.[2597]

The Parliament has a Committee on Legal Policy, whose remit includes, among other things, the judiciary, the status of judges and the status of judicial governance bodies.[2598] The Committee also considers proposals from bodies and institutions of the justice system concerning the financial support of justice and, following their consideration, adopts

2589 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Articles 6, 124, 125, 126, 130, 131, 148.

2590 On the Judiciary and the Status of Judges: Law of Ukraine No. 1402-VIII of 02.06.2016.

2591 On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Articles 1, 5, 9[1].

2592 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Articles 14, 15, 49.

2593 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208[1].

2594 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 85, para. 14 Part 1 Article 92.

2595 Ibid, Article 131. ; On the High Council of Justice: Law of Ukraine No. 1798-VIII of 21.12.2016, Article 17 ; On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 208[1].

2596 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 125.

2597 Ibid, Article 85, para. 1 Part 2 Article 92.

2598 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019.

decisions, conclusions or recommendations.[2599] For example, the Committee on Legal Policy supported the SJA's appeal to the Cabinet of Ministers regarding the introduction of an additional coefficient increasing official salaries for civil servants working in the offices (secretariats) of courts, bodies and institutions of the justice system.[2600]

Progress and issues

A key challenge for the judicial system remains the legal uncertainty surrounding the procedure for forming the High Qualification Commission of Judges of Ukraine (HQCJ), which directly complicates the filling of vacant judicial positions amid a significant shortage of judges. The powers of the previous composition of the Selection Commission for the selection of HQCJ members, which operated with the participation of international experts, expired on 1 June 2025. The Law of Ukraine 'On the Judiciary and the Status of Judges' no longer provides for the involvement of international experts.[2601] Under the current provision of the law, the new commission is to be formed exclusively by national bodies: the Council of Judges of Ukraine (CJU) with three quotas, and the Council of Prosecutors of Ukraine (CPU), the Bar Council of Ukraine (BCU) and the National Academy of Legal Sciences of Ukraine with one quota each.

In view of this, as early as 24 July 2025, the High Council of Justice announced a competition to form the commission under this model, while the CJU, CPU and BCU launched their internal selection of candidates. However, this arrangement has been strongly criticised by civil society because some of the bodies involved in forming the commission remain unreformed, as discussed in detail in the Shadow Report 2025.[2602]

In June 2025, Draft Law No. 13382[2603] was submitted to Parliament. It proposes extending the participation of international experts with a decisive vote in the selection of HQCJ members for another three years, which would make it possible to form the next composition of the HQCJ before the term of office of current HQCJ members expires in June 2027 under a transparent procedure. However, as of 31 July 2026, this draft law remains under consideration by the Committee on Legal Policy. The absence of a final decision by Parliament keeps the problem unresolved: the procedure for forming the future Selection Commission and retaining the international oversight mechanism remain uncertain, blocking the stable and predictable renewal of Ukraine's entire judiciary.[2604]

There has been some progress in the financing of the judiciary, but budgetary support remains insufficient, limiting the staffing, material and infrastructural capacity of

2599 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Parts 1 and 3 Article 14; Part 1 Article 15; Part 1 Article 49. ↗

2600 Ibid.

2601 On the Judiciary and the Status of Judges: Law of Ukraine No. 1402-VIII of 02.06.2016, Part 4 Article 95[1], para. 50 Section XII. ↗

2602 The issues previously outlined by civil society in the Shadow Report 2025 concerning the expiry of the term of the Selection Commission for the selection of HQCJ members and the failure to preserve the participation of international experts in future competitions (pp. 39–40) remain relevant. ↗

2603 On Amendments to the Law of Ukraine 'On the Judiciary and the Status of Judges' to Improve the Competition Procedure for the Position of Member of the High Qualification Commission of Judges of Ukraine: Draft Law of Ukraine, registration No. 13382 of 18.06.2025. ↗

2604 21-448/26. High Qualification Commission of Judges of Ukraine, 2026. ↗

courts.[2605] Funding for the judiciary in the 2025 State Budget covered only about 61% of needs.[2606] During the preparation of the Budget Declaration for 2026–2028, the Committee on Legal Policy formally recorded the need for a substantial increase in expenditures on justice,[2607] but these comments were taken into account only partially in the 2026 State Budget.

The SJA's activity plan for 2026 states that only 59.4% of needs are covered, while the payroll fund is covered at 67%, utilities at 58.2%, other consumption expenditures at 58.3%, development expenditures at 19% and the enforcement of court decisions in favour of judges and employees of the system at only 0.4%.[2608] The SJA estimated the financial resource shortfall for 2026 at UAH 15,513.3 thousand. In other words, only the special fund was adjusted, from UAH 3.6 billion to UAH 4.2 billion, while the ceiling for the general fund remained unchanged at UAH 18.5 billion.[2609] At the same time, the overall level of coverage of the system's needs decreased.

The problem is systemic and is linked to insufficient funding of the judiciary, the low level of remuneration of local court staff and the lack of funds for current and capital expenditures of local and appellate courts. As a result, chronic underfunding of remuneration for court staff, as well as of the development and maintenance of courts, persists.

The network of local general courts has still not been brought into line with the new administrative-territorial structure and does not take into account judges' workload, staffing capacity or the need to ensure access to justice.[2610] The collection of analytical data and assessment of the system's capacity are currently ongoing. In particular, in May the CJU updated the interactive map of courts with workload standards calculated for the first quarter of 2026.[2611] These data serve as the basis for refining the methodology that will be used to determine the new maximum number of judges at each court instance. In addition, in March 2026, the Accounting Chamber launched a compliance audit on the optimisation of the court network in the context of the administrative-territorial reform, with consideration of the audit report scheduled for September 2026.[2612]

Recommendations

1. Adopt Draft Law No. 13382 on amendments to the Law of Ukraine 'On the Judiciary and the Status of Judges' regarding the participation of international experts in the selection of members of the High Qualification Commission of Judges of Ukraine

2605 The issues previously outlined by civil society in the Shadow Report 2025 concerning chronic underfunding of the judiciary, in particular local and appellate courts, the critically low level of remuneration of court staff and insufficient funding for development expenditures (pp. 131–135) remain relevant. ↗

2606 Ukraine 2025 Report. Communication on EU enlargement policy, p. 34. ↗

2607 Minutes of meeting No. 200 of the Committee of the Verkhovna Rada of Ukraine on Legal Policy of 26.09.2025, pp. 4–5. ↗

2608 Activity Plan of the State Judicial Administration of Ukraine as the Chief Administrator of Budget Funds for 2026 and 2027–2028. State Judicial Administration of Ukraine, 2026, p. 4. ↗

2609 Ibid, p. 4.

2610 The issues previously outlined by civil society in the Shadow Report 2025 concerning the optimisation of the court network (pp. 81–82) remain relevant. ↗

2611 The Council of Judges of Ukraine updated the interactive map of courts of Ukraine with calculations of workload standards for the first quarter of 2026. Council of Judges of Ukraine, 2026. ↗

2612 Optimisation of the Court Network: Accounting Chamber Launches Audit. Accounting Chamber, 2026. ↗

and provide that each selection commission completes the competitive procedures it has initiated.[2613] It would also be advisable to define the consequences of missing the deadlines for forming a new composition of the selection commission and the procedure to be followed by the HCJ in such a case.

2. Increase funding for the judiciary to a level that ensures its proper functioning, with local and appellate courts treated as a separate priority, remuneration of court staff, modernisation of court infrastructure and the uninterrupted operation of courts.[2614] Within the budget process, it would be advisable to provide for a mandatory public summary of the judiciary's needs before consideration of the Budget Declaration and the draft law on the State Budget, indicating the requests submitted, the proposals accepted and rejected and the reasons for those decisions.

3. Based on the results of the compliance audit and the revised methodology for determining the maximum number of judges in courts, prepare legislative amendments to optimise the network of local general courts.

Interaction between the Verkhovna Rada and the Subnational Level

State of play

The Constitution of Ukraine and laws clearly define the roles and powers of the Parliament, local self-government bodies and local executive authorities (local state administrations). The Verkhovna Rada, as the only legislative body in Ukraine:

- defines the territorial structure of Ukraine, the principles of local self-government, the organisation and activities of executive authorities and the specific features of local self-government and executive power in the cities of Kyiv and Sevastopol;
- adopts decisions on the formation and liquidation of districts, the establishment and alteration of the boundaries of districts and cities, the classification of settlements as cities, the naming and renaming of settlements and districts and the calling of regular and early local elections.[2615]

Local state administrations exercise executive power in regions and districts, in the cities of Kyiv and Sevastopol, and ensure the implementation of the Constitution and laws of Ukraine, acts of the President, the Government and other executive authorities in the relevant territory, as well as the exercise of powers delegated by local councils.[2616]

2613 The recommendation previously provided by civil society in the Shadow Report 2025 on adopting draft law No. 13382, which would return international experts to the selection of HQCJ members for three years, and on ensuring that any selection commission completes the procedures it has initiated (p. 53) remains relevant but has been further specified. ↗

2614 The recommendation previously provided by civil society in the Shadow Report 2025 on increasing funding for the judiciary to a level that ensures its proper functioning, as well as proper funding of court offices and modernisation of court infrastructure (p. 135) remains relevant, but has been further specified. ↗

2615 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 7, paras. 29, 30 Part 1 Article 85, paras. 12, 13, 15, 16, Part 1 Article 92, Articles 132, 140–146. ↗

2616 On Local State Administrations: Law of Ukraine No. 586-XIV of 09.04.1999, Articles 1, 2. ↗; Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 118, 119. ↗

The Constitution defines local self-government as the right of a territorial community to independently resolve issues of local significance.[2617] This right is exercised by the territorial community both directly and through local councils and their executive bodies. District and regional councils represent the common interests of the territorial communities of villages, settlements and cities.[2618]

Under martial law, the state's relations with local self-government bodies (LSG bodies) and local state administrations are governed by special rules established by the Law on Martial Law.[2619] In particular, temporary state bodies — military administrations of settlements (MAC), districts and regions — may be established in territories where martial law has been introduced. Their main tasks are to ensure the application of the Constitution and laws of Ukraine in the relevant territory and, together with the military command, to ensure the introduction and implementation of measures under the martial law, defence, civil protection, public security and order, the protection of critical infrastructure and the rights and freedoms of citizens.[2620] If a military administration is established, the Verkhovna Rada, upon a submission by the President of Ukraine, may decide that, during martial law and for 30 days after its termination or cancellation, the head of the military administration of a settlement or settlements also exercises the powers of a village, settlement or city council, its executive committee and the village, settlement or city mayor. A regional and/or district military administration may exercise the powers of the relevant regional and/or district council for the period of martial law and for 30 days after its termination or cancellation in the event of temporary occupation or encirclement of the administrative centre of a region, or if the Verkhovna Rada adopts the relevant decision upon a submission by the President of Ukraine.[2621]

The Parliament's interaction with the local level takes place through several formalised channels:

- MP powers — MPs have the right to submit an MP's request and MP's inquiry to LSG bodies, to attend sessions of local councils in an advisory capacity and to obtain the necessary information.[2622]
- Specialised committee — the Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning. The remit of this Committee includes the administrative and territorial structure, local self-government, the activities of local executive authorities, regional development and urban planning.[2623]

2617 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 140. ↗

2618 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, Articles 2, 5, 10, 11, 16. ↗

2619 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Articles 2, 4, 9, 10, 15. ↗

2620 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 4. ↗

2621 Ibid, Parts 2, 3 Article 10.

2622 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 86. ↗; On the Status of People's Deputy of Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Articles 15, 16, Parts 7, 9 Article 17, Parts 1, 2 Article 19. ↗

2623 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019, Annex, para. 13. ↗

- Procedural formats — representatives of LSG bodies are involved in discussions on local self-government issues through committee[2624] and parliamentary hearings.[2625]
- Organisational and consultative formats — through the activities of 18 working groups,[2626] the Platform for Consultations with LSG Bodies,[2627] open meetings with live broadcasts and the involvement of all-Ukrainian associations of LSG bodies.[2628]

The practice of 2025–2026 shows that the Parliament's interaction with LSG bodies took place, in particular, through consultations,[2629] joint studies,[2630] roundtables[2631] and forums.[2632] In legislative work, the Committee considered Government Draft Law No. 14412[2633] on the principles for delimiting and distributing powers between levels of public governance, processed comments from associations of LSG bodies. In April 2026, the draft law was adopted as a basis at first reading.

The interaction of all-Ukrainian associations of LSG bodies with the Parliament takes the form of consultations, including during the preparation and implementation of decisions affecting the sphere of local self-government, in particular on draft laws concerning local and regional development.[2634] In 2025, the Association of Ukrainian Cities reported its participation in the work of the Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning during consideration of the Law of Ukraine No. 4677-IX[2635] on legality and transparency in the activities of LSG bodies.[2636] Representatives of the Association of Ukrainian Cities, the All-Ukrainian Association of Communities, the Association of Amalgamated Territorial Communities and the Ukrainian

2624 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Article 29. ↗

2625 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Chapter 39. ↗

2626 Working Groups. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2026. ↗ ; Decision on the status of the Working groups of the Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning of the Verkhovna Rada of Ukraine of the Ninth Convocation, dated 11.05.2026. ↗

2627 Platform for Consultations with Local Self-Government Bodies. ↗

2628 On Associations of Local Self-Government Bodies: Law of Ukraine No. 1275-VI of 16.04.2009, Articles 17, 18. ↗

2629 The Committee holds a consultation with representatives of LSG bodies on the powers of village, settlement and city mayors under martial law. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗

2630 On 9 October 2025, the Committee presented the results of the study 'Practices of Application and Assessment of the Effectiveness of Implementing Legislation on Ensuring Transparency of Local Self-Government', prepared at the Committee's request by the U-LEAD with Europe Programme. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗ ; The Committee is conducting a study of the practice of application and effectiveness of legislation on international territorial cooperation. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗

2631 The Committee held the roundtable 'Practice of Administrative Service Centres: Current State and Prospects. Regional Dimension. Volyn'. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗

2632 Bucha Forum 'Reforms. Decentralisation. European Integration' (01.12.2025). Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗

2633 On the Principles for Delimiting and Distributing Powers between Levels of Public Governance: Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗

2634 On Associations of Local Self-Government Bodies: Law of Ukraine No. 1275-VI of 16.04.2009, Articles 17, 18. ↗

2635 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies: Law of Ukraine No. 4677-IX of 05.11.2025. ↗

2636 The VRU Committee supported Draft Law No. 14048. Association of Ukrainian Cities, 2025. ↗

Association of District and Regional Councils took part in a committee meeting in February 2026 during consideration of Draft Law No. 14412.[2637] In March 2026, the Association of Ukrainian Cities submitted written comments to the Committee on the draft law on delimiting powers between levels of public governance.[2638]

In the budgetary sphere, the Parliament's interaction with LSG bodies has specific procedural features. The Budget Committee may obtain information from executive authorities and LSG bodies on the execution of the state and local budgets.[2639] Certain Government decisions on the allocation or reallocation of inter-budgetary transfers between local budgets are adopted with the approval of this Committee (during martial law, the requirement for Government decisions to be agreed with the Committee does not apply).[2640] In particular, following the results of 2025, the Budget Committee noted that, in January–November 2025, transfers from the state budget to local budgets amounted to UAH 179.9 billion and, as of 15 December 2025, some grants and subventions still required Government decisions on their allocation.[2641] During consideration of the draft State Budget for 2026, the Budget Committee analysed in detail the amounts of grants and subventions for local budgets. For 2026, 32 transfers to local budgets were proposed, including grants for the exercise of LSG powers in affected territories, educational subventions and subventions in the fields of healthcare, social protection and infrastructure recovery.[2642]

Progress and issues

The new model of oversight of the legality of acts of LSG bodies remains controversial and deferred, which preserves legal uncertainty during martial law and at the beginning of post-war recovery. The Verkhovna Rada adopted Law No. 4677-IX, which systematises the mechanism for ensuring the legality of acts of LSG bodies, defines the competence of oversight actors, introduces preventive and consultative procedures and establishes a special judicial procedure for responding to unlawful acts of LSG bodies.[2643] On the one hand, the Parliament created a comprehensive legal framework instead of fragmented and duplicated control mechanisms.[2644] On the other hand, the Law will be put into effect only 12 months after the termination or cancellation of martial law. In addition, the Law focuses oversight mainly on acts adopted in the exercise of delegated powers, which already at the finalisation stage prompted polarised assessments:

2637 Minutes of Committee Meeting No. 178 of 26.02.2026. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2026, pp. 1–3. ↗

2638 Opinion on the Draft Law of Ukraine on the Principles for Delimiting and Distributing Powers between Levels of Public Governance, registration No. 14412 of 30.01.2026. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2026. ↗

2639 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Part 2 Article 109. ↗

2640 Ibid, Part 6 Article 108, clause 12 subpara. 1 para. 22 of Final and Transitional Provisions.

2641 The Budget Committee considered the Conclusions of the Accounting Chamber on the analysis of implementation of the Law on the State Budget for 2025 in January–September and for the first three quarters of 2025 in terms of general fund revenues, as well as information on the current state of implementation of the State Budget in 2025. Budget Committee of the Verkhovna Rada of Ukraine, 2025. ↗

2642 Minutes of Committee Meeting No. 228 of 17.10.2025. Budget Committee of the Verkhovna Rada of Ukraine, 2025. ↗

2643 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies: Law of Ukraine No. 4677-IX of 05.11.2025, Section I; Section II para. 1. ↗

2644 Proportionate Oversight for Local Self-Government Bodies. Association of Ukrainian Cities, 2025. ↗

- the Ministry for Development of Communities and Territories of Ukraine noted that this model duplicates existing control mechanisms and is not a logical continuation of the reform;
- the Association of Ukrainian Cities supported this approach as a way to bring order to chaotic and duplicated inspections;[2645]
- public debate included criticism that the scope of oversight had been narrowed excessively, which may make it insufficient to protect the interests of the state.[2646]

After the Law is put into effect, this situation may lead to conflicting interpretations of the limits of oversight, uneven law enforcement practice and new disputes between the state and LSG bodies.

The consultations organised by the relevant Committee do not guarantee balanced representation of all types of territories and do not fully cover communities operating in the most difficult conditions. The Committee uses various formats for consultations with LSG bodies and all-Ukrainian associations.[2647] At the same time, standard participation formats are more effective where the usual system of representation and communication has been preserved. It is noteworthy that some consultations within the Platform for Consultations with LSG Bodies are addressed only to registered city, settlement and village mayors, as well as heads of regional and district councils.[2648] Under martial law, this narrows the opportunities to properly take into account the positions of those territories where elected bodies in fact do not exercise their powers or where their activities are substantially restricted.[2649] Electronic consultations with LSG bodies remain a pilot tool for now, since despite the involvement of a significant number of local self-government officials, this format has technical and communication limitations.[2650] This adversely affects the quality of legislative decisions concerning such territories, complicates their further implementation, deepens distrust between the central and local levels of government and reinforces the need for a separate, sustainable consultation procedure. Even when the Committee collects the positions of associations, experts and other stakeholders, these materials mostly remain within the Committee's internal consideration, which reduces transparency as to how the collected positions are taken into account.[2651]

2645 Draft law on the legality of decisions of LSG bodies: what stakeholders think about its revision. Decentralisation Portal, 2025. ↗

2646 How the mono-majority sold Europeans hot air: EUR 560 million for 'oversight without oversight'. Ukrainska Pravda, 2025. ↗

2647 Report of the Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning for the Fourteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation (September 2025 – February 2026). Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2026, pp. 17–24. ↗

2648 The Committee holds a consultation with representatives of LSG bodies on the powers of village, settlement and city mayors under martial law. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2025. ↗

2649 Ukraine Report 2025. Communication on EU enlargement policy, p. 24. ↗

2650 Information provided by Respondent No. 53 during an interview conducted on 27.03.2026.

2651 Ibid.

Recommendations

1. Prepare and adopt legislative amendments to ensure the coherent functioning of the system of state oversight over the legality of local self-government activities and to complete the reform of local state administrations, while minimising the risks of excessive bureaucratisation and duplication of procedures.
2. Introduce a separate consultation procedure for draft laws concerning local self-government for de-occupied and frontline territories, as well as territories where the powers of LSG bodies are temporarily exercised by military administrations. Such consultations should involve not only heads of communities and councils but also council secretaries, starostas, heads of executive bodies and heads of the relevant military administrations. The results of consultations should be published in the form of summarised information on the proposals submitted, whether they were taken into account and the reasons for rejecting them.

Secretariat of the Verkhovna Rada

Legal Status of the Secretariat of the Verkhovna Rada and Its Structural Units

State of play

The Secretariat of the Verkhovna Rada of Ukraine is a body of Parliament authorised to provide legal, research, organisational, documentation, information, expert-analytical, financial, logistical and technical support for the activities of the Verkhovna Rada, its bodies and MPs. Legislation provides that the Secretariat should be a legal entity.[2652]

The legal basis for the functioning of the Secretariat of the Verkhovna Rada and its units consists of the Constitution of Ukraine,[2653] the Laws of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine' and 'On Civil Service',[2654] the Order of the Chairman of the Verkhovna Rada 'On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine',[2655] the Resolution of the Verkhovna Rada 'On the Structure of the Secretariat of the Verkhovna Rada of Ukraine',[2656] regulations on individual structural subdivisions,[2657] the General Rules of Ethical Conduct for Civil Servants and Local Self-Government Officials[2658] and other acts. These acts regulate the status of the Secretariat of the Verkhovna Rada, its structure, areas of activity and the powers of its staff.

The staffing schedule of the Secretariat of the Verkhovna Rada, effective from 13 February 2026, sets the Secretariat's authorised staffing level at 1,069 full-time positions.[2659] As of

2652 On Approval of Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769/11-RH of 25.08.2011, para. 1, para. 5.

2653 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 85, Article 88.

2654 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015.

2655 On Approval of Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769/11-RH of 25.08.2011.

2656 On the Structure of the Secretariat of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1678-III of 20.04.2000.

2657 For example, On the Main Scientific and Expert Department of the Secretariat of the Verkhovna Rada of Ukraine: Regulation approved by Order of the Chairman of the Verkhovna Rada of Ukraine No. 515 of 14.06.2000.

2658 On Approval of the General Rules of Ethical Conduct for Civil Servants and Local Self-Government Officials: Order of the National Agency of Ukraine on Civil Service No. 158 of 05.08.2016.

2659 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

March 2026, 861 people were employed in the Secretariat, while 208 staff positions were vacant.[2660]

The structure of the Secretariat comprises 17 separate structural units (departments and divisions). In addition, it also includes the Secretariat of the Chairman of the Verkhovna Rada, the Secretariat of the First Deputy Chairperson of the Verkhovna Rada, the Secretariat of the Deputy Chairperson of the Verkhovna Rada, as well as the secretariats of committees, parliamentary factions and groups. Overall management, organisation and coordination of the work of the Secretariat's structural units are carried out by the Head of the Secretariat.[2661] The current Head of the Secretariat (Viacheslav Shtuchnyi) was appointed in November 2021.[2662]

The Research Service functions as a separate legal entity.[2663] This institution is authorised to provide research, information and analytical support for the activities of Parliament, its bodies, MPs, parliamentary factions and groups, as well as professional training, including advanced professional development for MPs, staff of the Secretariat of the Verkhovna Rada and assistants-consultants to MPs.[2664] The Research Service was established in 2022 on the basis of the Institute of Legislation of the Verkhovna Rada.[2665] This step ensured the implementation of Recommendation No. 37 of the European Parliament Mission Roadmap.[2666] The procedure for establishing the Research Service, its tasks, areas of activity and development are defined in the Rules of Procedure of the Verkhovna Rada of Ukraine,[2667] the Regulation on the Research Service of the Verkhovna Rada of Ukraine, [2668] the Development Strategy of the Research Service of the Verkhovna Rada of Ukraine until 2027[2669] and the Communication Strategy of the Research Service of the Verkhovna Rada of Ukraine for 2026–2028.[2670] The staffing level of this body is 60 positions.[2671] As of April 2026, 49 people actually worked in the Research Service, including 37 analysts.[2672]

2660 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2661 On the Structure of the Secretariat of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1678-III of 20.04.2000, para. 2. ↗

2662 On the Appointment of V.V. Shtuchnyi as Head of the Secretariat of the Verkhovna Rada of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 1863-IX of 04.11.2021. ↗

2663 On the Research Service of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 438 of 11.08.2022, para. 5. ↗

2664 General Information. Research Service of the Verkhovna Rada of Ukraine. Verkhovna Rada of Ukraine, 2024. ↗

2665 On the Research Service of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 438 of 11.08.2022, para. 1. ↗

2666 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015–February 2016, p. 49. ↗

2667 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 6 Article 7. ↗

2668 On the Research Service of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 438 of 11.08.2022. ↗

2669 Development Strategy of the Research Service of the Verkhovna Rada of Ukraine until 2027. Research Service of the Verkhovna Rada of Ukraine, 2022. ↗

2670 Communication Strategy of the Research Service of the Verkhovna Rada of Ukraine for 2026–2028, approved by Order of the Head of the Research Service of the Verkhovna Rada of Ukraine No. 136-o.d. of 17.12.2025. ↗

2671 On the Research Service of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 438 of 11.08.2022, para. 3. ↗

2672 Information provided by Respondent No. 60 during an interview conducted on 17.04.2026.

Document management

The Secretariat of the Verkhovna Rada provides documentation support for the Verkhovna Rada, its committees and commissions, parliamentary factions (parliamentary groups).[2673] The document flow procedure in Parliament is regulated by the Regulation on the Procedure for Working with Documents in the Verkhovna Rada of Ukraine.[2674] This Regulation defines the general principles of documenting parliamentary activities and organising records management, the specific features of documenting the legislative procedure, monitoring of the movement of documents in the Verkhovna Rada, archival storage of documents and so on. These processes are additionally regulated by the Technological Scheme for the Movement of Documents in the Unified Automated System[2675] and the Scheme for Entering Documents into the 'Legislation of Ukraine' Database.[2676]

The main form of records management in the Verkhovna Rada is electronic. Electronic document flow is carried out through the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine (UAS).[2677]

The Technological Scheme defines in detail the procedure for access to electronic documents entered into the UAS.[2678] In particular, it regulates access to documents and information (depending on their type and content) for members and bodies of Parliament, the Head and structural units of the Secretariat of the Verkhovna Rada, as well as auxiliary bodies (the Ethics Council and advisory groups of experts that assist Parliament in selecting candidates for the positions of CCU judges, HCJ members and members of the Accounting Chamber). In addition, the Technological Scheme defines the documents and information to be published on the official website of the Verkhovna Rada, thereby ensuring public access to them and transparency of Parliament's work.

Paper documents are used in clearly defined cases — as of 31 July 2026, 67 categories of documents had been designated as those prepared exclusively in paper form.[2679] At

2673 On Approval of Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769/11-RH of 25.08.2011, subpara. 1 para. 8. ↗

2674 Regulation on the Procedure for Working with Documents in the Verkhovna Rada of Ukraine: Annex 1 to Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

2675 Technological Scheme for the Movement of Documents in the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine: Annex 2 to Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

2676 Scheme for Entering Documents into the Database of Normative Legal Information 'Legislation of Ukraine': Annex 3 to Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

2677 On Certain Issues of Ensuring Document Flow in the Verkhovna Rada of Ukraine in Electronic and Paper Forms. Regulation on the Procedure for Working with Documents in the Verkhovna Rada of Ukraine, Section I, subsection 1, para. 4, 5: Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021 ↗; On the Organisation of Measures for Putting the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine into Commercial Operation. Regulation on the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine: Order of the Secretariat of the Verkhovna Rada No. 41 of 21.02.2023. ↗

2678 Technological Scheme for the Movement of Documents in the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine: Annex 2 to Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021, para. 303. ↗

2679 On Certain Issues of Ensuring Document Flow in the Verkhovna Rada of Ukraine in Electronic and Paper Forms. Regulation on the Procedure for Working with Documents in the Verkhovna Rada of Ukraine, para. 4, 5; Annex 4 to Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021. ↗

the same time, where circumstances make electronic records management impossible, paper form becomes the main form of records management.[2680]

Documents containing restricted official information are marked 'For Official Use Only' (FOUO). The list of such documents is compiled by the permanent Commission on Working with Official Information, established by the Head of the Secretariat of the Verkhovna Rada. Special requirements apply to working with FOUO documents, regulating access to such documents, their registration, storage, review (at least once every five years), destruction of documents not subject to permanent or long-term storage whose retention period has expired.[2681]

In accordance with legislation on archives and records management, the Secretariat of the Verkhovna Rada ensures the systematisation and storage of documents in paper and electronic form.[2682] Documents are kept in its archival unit for up to 15 years, after which they are transferred to the Central State Archive of Supreme Bodies of Power and Government of Ukraine and the Central State Electronic Archive of Ukraine (except for personal files and documents on payroll calculation and payment of salaries, which are kept in the archival unit for 75 years).[2683]

Digital tools and technologies

The Verkhovna Rada is gradually introducing new digital tools and technologies into its operation. A Strategic Executive Framework (SEF) for the Secretariat of the Verkhovna Rada of Ukraine for 2026–2030 has been developed. It provides for the development of a digital parliament, through the implementation of six projects,[2684] as well as the introduction of a digital human resources management platform.

At present, the UAS is the main digital technology ensuring uninterrupted, secure and remote work for both MPs and staff of the Secretariat of the Verkhovna Rada.[2685]

Digital technologies are widely used to communicate with the public. In particular, the official website of Parliament hosts the 'Electronic Petitions' e-service (as of 31 July 2026, during the ninth convocation, citizens had initiated 1,432 electronic petitions) and the 'Citizen's E-Cabinet' web portal has been launched.[2686]

2680 Regulation on the Procedure for Working with Documents in the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021, para. 4, 5. ↗

2681 Regulation on the Procedure for Working with Documents in the Verkhovna Rada of Ukraine: Annex 1 to Order of the Chairman of the Verkhovna Rada of Ukraine No. 19 of 08.02.2021, para. 348–363[1]. ↗

2682 Ibid, subsections 30-31.

2683 Ibid, subsection 32.

2684 Project No. 1 'Digital Ecosystem of Plenary Sittings and Parliamentary Committee Meetings', Project No. 2 'Cybersecurity of Parliament', Project No. 3 'Electronic Platform "Legislation of Ukraine"', Project No. 4 'Electronic Archive of Parliament', Project No. 5 'Automated Transcription 2.0', Project No. 6 'Integration of AI Tools into the Work of Parliament'.

2685 This technology allows electronic voting using an MP's personal smartphone, the exchange of electronic documents between the Secretariat of the Verkhovna Rada and central executive authorities (in particular, registration of Government draft laws in the system), and transfer into the system of draft laws registered during the first session of the ninth convocation. On the Organisation of Measures for Putting the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine into Commercial Operation. Regulation on the Unified Automated System for Working with Documents in the Verkhovna Rada of Ukraine: Order of the Secretariat of the Verkhovna Rada No. 41 of 21.02.2023. ↗
Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2686 For more details — in the subsection 'Public Consultations'.

To strengthen cybersecurity, a Security Operations Centre (SOC) was established in 2025. Modern solutions and services have been introduced to store backup copies of Verkhovna Rada databases so that work can be restored in the event of an emergency or the physical destruction of IT infrastructure as a result of hostilities. A departmental cloud storage facility has also been created for the placement and storage of the most important documents by structural units of the Secretariat in the event of a full transition to a remote working format.[2687]

A cooperation agreement had been concluded with the State Service of Special Communication and Information Protection of Ukraine (SSSCIP), on the basis of which connection to the Vulnerability Detection and Cyber Incident Response System was completed. In addition, a network sensor for detecting vulnerabilities and threats was received from the SSSCIP and installed within the Verkhovna Rada's IT infrastructure, while the exchange of operational information on identified risks and recommended response methods was ensured. Close cooperation has also been established with the Inter-Parliamentary Union, the EP and national parliaments on the development of an innovative digital parliament, the use of artificial intelligence (AI) technologies in the law-making process and cybersecurity.[2688]

Funding

Expenditures for financing Parliament's activities are determined annually by the law on the state budget for the relevant year. The chief spending unit authorised to support the activities of the Verkhovna Rada is the Administrative Office of the Secretariat of the Verkhovna Rada.[2689]

The Law on the State Budget of Ukraine for 2026 provides the Administrative Office of the Secretariat of the Verkhovna Rada with total expenditures of UAH 3,882,560,200 (EUR 75,720 million) under three budget programmes, namely:

- for legislative activity — UAH 2,024,610,000 (EUR 39,486 million). Of this amount, salaries account for UAH 1,259,481,000 (EUR 24,563 million);
- for servicing and organisational, information and analytical, logistical and technical support for the activities of the Verkhovna Rada — UAH 1,777,076,000 (EUR 34,658 million). Of this amount, salaries account for UAH 1,332,931,400 (EUR 25,996 million);
- for coverage of the activities of the Verkhovna Rada by the Rada parliamentary television channel and financial support for the Holos Ukrainy newspaper — UAH 80,874,200 (EUR 1,577 million).[2690]

The allocation of appropriations is provided for in the 2026 Estimate of the Verkhovna Rada (the main planning financial document)[2691] and detailed in the passports of the

2687 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2688 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2689 Budget Code of Ukraine: Law of Ukraine No. 2456-VI of 08.07.2010, Article 22. ↗

2690 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, Annex 3. ↗

2691 Budget Code of Ukraine: Law of Ukraine No. 2456-VI of 08.07.2010, Article 2. ↗; On the Estimate of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4696-IX of 03.12.2025. ↗

relevant budget programmes,[2692] which define the objective, tasks, areas of use of budget funds, responsible implementers, performance indicators and other characteristics of the budget programme.

The official website of the Verkhovna Rada publishes documents related to the financial and economic activities of the Secretariat of the Verkhovna Rada, including budget planning, execution of the estimate, public procurement, internal audit, receipt and use of ITA and management of state property supporting the activities of the Verkhovna Rada.[2693]

The Accounting Chamber audited the activities of the Verkhovna Rada in 2020.[2694] In 2024, the Accounting Chamber conducted another audit of the effectiveness of management of state-owned facilities with financial implications for the state budget, as well as public procurement by bodies supporting the activities of the Verkhovna Rada.[2695] In the same audit, the Accounting Chamber provided consolidated data on the implementation of recommendations from the previous audit conducted in 2020 and found that around 80% of the recommendations had been implemented.

The Chairman of the Verkhovna Rada is required to ensure that a report on the implementation of the budget estimate of the Verkhovna Rada for the previous year is submitted for consideration by the Verkhovna Rada.[2696] However, such a report has never been considered by the Verkhovna Rada of the ninth convocation. As of July 2026, the report for 2025 had been published by budget programme.[2697] The Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada considers the report of the Administrative Office of the Secretariat of the Verkhovna Rada.[2698]

Public procurement

Public procurement, including by Parliament, is regulated by the Law of Ukraine 'On Public Procurement'.[2699] Information on Parliament's public procurement is published on the website of the Verkhovna Rada.[2700] In particular, justifications of the technical and qualitative characteristics of the procurement item, the amount of budget allocation and the expected value of the subject of procurement are published. Information on public

2692 Budget Code of Ukraine: Law of Ukraine No. 2456-VI of 08.07.2010, Article 2. ↗

2693 Financial and Economic Activities. ↗

2694 Report on the Results of the Audit of the Efficiency of Using State Budget Funds and Managing State Property by the Secretariat of the Verkhovna Rada of Ukraine with Financial Consequences for the State Budget: Decision of the Accounting Chamber No. 20-1 of 04.08.2020. ↗

2695 Report on the Results of the Audit of the Efficiency of Management of State-Owned Facilities with Financial Consequences for the State Budget and Public Procurement by Bodies Supporting the Activities of the Verkhovna Rada of Ukraine: Decision of the Accounting Chamber No. 56-3 of 17.12.2024. ↗

2696 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, para. 24 Part 1 Article 78. ↗

2697 Report on the Execution of the Estimate for 2025. Verkhovna Rada of Ukraine. 2026. ↗

2698 Decision on the Report of the Administrative Office of the Secretariat of the Verkhovna Rada of Ukraine on the Execution of the Estimate of the Verkhovna Rada of Ukraine for 2025 (letters of the Administrative Office of the Secretariat of the Verkhovna Rada of Ukraine of 25.02.2026 (electronic document cards (2159192) and (2159205). Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of the Work Verkhovna Rada of Ukraine, 2026. ↗

2699 On Public Procurement: Law of Ukraine No. 922-VIII of 25.12.2015. ↗

2700 Public Procurement. Verkhovna Rada of Ukraine. ↗

procurement by Parliament (represented by the Administrative Office of the Secretariat of the Verkhovna Rada) is also published on the Prozorro website.[2701]

Improving operational performance

The Secretariat of the Verkhovna Rada has a practice of collecting and taking into account feedback from MPs on the effectiveness of its work.[2702] At the same time, this quality assessment is unstructured and is not based on a clearly defined methodology with agreed criteria. Conflicts sometimes arise between MPs of Ukraine and representatives of the Secretariat of the Verkhovna Rada, in particular at the level of committee heads and heads of secretariats.[2703]

Progress and issues

A conceptual vision for updating the structure and functions of the Secretariat of the Verkhovna Rada has been developed. The current structure of the Secretariat of the Verkhovna Rada needs to be optimised to ensure more effective interaction between structural units, overcome institutional silos and strengthen communication and cooperation.[2704] In this context, discussions were under way on updating the structure of the Secretariat of the Verkhovna Rada.

1. The Strategic Executive Framework (SEF) for the Secretariat of the Verkhovna Rada of Ukraine for 2026–2030 has been developed. It outlines areas for reforming the structure of the Secretariat. The document provides for five strategic objectives to be achieved through the implementation of interlinked projects, forming a system for managing limited resources with an emphasis on people, results, innovation and meeting society's needs.[2705]
2. The Concept for Improving Legal, Expert and Research Support for the Activities of the Verkhovna Rada of Ukraine has been developed. It is envisaged that modernisation of legal and expert support for draft laws will be carried out through: 1) merging the Main Legal Department and the Main Scientific and Expert Department into a single expert unit of the Secretariat of the Verkhovna Rada; 2) institutional separation of the research component of expert examination of draft laws from the Secretariat of the Verkhovna Rada. It is envisaged that, after modernisation is completed, expert legal support for Parliament's legislative activity will be provided by committees of the Verkhovna Rada and the Legal and Expert Department of the Secretariat of the Verkhovna Rada, while research, information and analytical support will fall within the competence of the Research Service, which was created for this purpose. In addition, the updated structure of the Secretariat provides for the creation of secretariats for parliamentary assemblies.[2706]

2701 Prozorro. ↗

2702 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2703 Information provided by Respondent No. 53 and No. 56 during an interview conducted on 27.03.2026.

2704 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2705 Ibid.

2706 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

3. The first steps have been taken towards creating auxiliary offices — the Law-Drafting Office (to assist MPs of Ukraine in exercising their right of legislative initiative)[2707] and the Parliamentary Budget Office (to provide MPs with analytical support on public finance issues when working on draft laws, analysing and assessing the implementation of adopted laws, as well as developing draft laws with relevant financial and economic justifications).[2708]

Although the roll-out of the new service units is scheduled for the fourth quarter of 2027,[2709] progress has been recorded in developing concepts for the operation of these offices, in particular:

1) a concept for the functioning of the Law-Drafting Office has been prepared, taking into account best international practice, which ensured the implementation of one of the planned stages of this measure.

The Research Service prepared an information brief[2710] on the establishment of the Law-Drafting Office, presenting foreign experience in creating and operating law-drafting entities and proposing three possible models for the organisational and legal form of the Law-Drafting Office under the Verkhovna Rada. International experience in the functioning of law-drafting offices and relevant recommendations for Ukraine were also presented in donor programme materials.[2711] It is envisaged that, within the updated structure of the Secretariat, the Law-Drafting Office will function as a structural unit of the Change Management Department.[2712]

2) gradual progress is visible in implementing the initiative to establish the Parliamentary Budget Office.

A working group was established in the Verkhovna Rada Committee on Budget to determine how to implement the task of creating this institution. As of the end of 2025, work was ongoing to develop models for the operation of this office.[2713] Under the plans to update the structure of the Secretariat, the Parliamentary Budget Office is planned to become a structural unit of the Change Management Department.[2714] According to MPs of Ukraine, the creation of such a unit will reduce Parliament's dependence on the executive branch (in particular on data provided to Parliament by the MoF) when analysing draft state budgets and providing economic forecasts.[2715] The key functions of the Parliamentary Budget Office are expected to include assessing macro-forecasts and

2707 Roadmap on the Functioning of Democratic Institutions. Measure 9 of Strategic Result 1 Subsection III.C. ↗

2708 Ibid. Measure 1 of Strategic Result 3 Subsection III.C.

2709 Ibid. Measures 9 of Strategic Result 1 and Measure 1 of Strategic Result 3 of Subsection III.C.

2710 Information Brief on Establishing a Parliamentary Law-Drafting Office in Ukraine. Research Service of the Verkhovna Rada of Ukraine. ↗

2711 For example, The USAID RADA: Next Generation Programme prepared the material 'Law-Drafting Offices: International Experience and Recommendations for the Verkhovna Rada of Ukraine' ↗; At the same time, the USAID Programme had already wound down its activities in early 2025 due to the suspension of US funding. ↗

2712 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2713 Report on the implementation status of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, for the fourth quarter of 2025, p. 32.

2714 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2715 P. Frolov. Why We Are Creating a Parliamentary Budget Office. Ekonomichna Pravda, 2024. ↗

fiscal risks, as well as modelling alternative scenarios for decision-making.[2716] As of July 2026, a draft law defining the status and functions of the Parliamentary Budget Office had already been prepared.[2717]

The Secretariat of the Verkhovna Rada of Ukraine is not a registered legal entity. The Regulation on the Secretariat of the Verkhovna Rada explicitly states its status as a legal entity, which, by law, requires mandatory state registration and the public disclosure of its constituent documents in the Unified State Register of Legal Entities, Individual Entrepreneurs and Public Organisations.[2718] However, the Secretariat is not actually listed in the register. Instead, for over 34 years, only a structural unit of the Secretariat — the Administrative Office — has been registered in the Unified State Register of Legal Entities, Individual Entrepreneurs and Public Organisations[2719] as a separate legal entity. This creates a paradoxical situation in which a subsidiary structure possesses full civil legal capacity and capacity to act, while the main institution (the Secretariat) remains outside the scope of regulations. This state of affairs not only contradicts the requirements of the legislation on state registration but also prevents the unambiguous determination of the Secretariat's legal status in civil and administrative relations.

The staff of the Secretariat of the Verkhovna Rada of Ukraine does not always ensure high-quality expert support for Parliament. According to MPs of Ukraine, despite the significant number of professional staff (almost 900 people), the Secretariat of the Verkhovna Rada sometimes lacks professional expertise in certain areas of law-making activity.[2720] This indicates a need to improve the quality of expert and analytical support for the law-making process.

The absence of a consolidated act regulating the work of the Secretariat of the Verkhovna Rada creates barriers to understanding the specifics of its functioning. The European Parliament Mission recommended developing such a single set of internal rules for the Secretariat, including on staffing policy, back in 2016 (Recommendation No. 36 of the Roadmap).[2721] However, ten years later, the recommendation has not been implemented.[2722]

Full implementation of this recommendation is impossible because the status of staff of the Secretariat of the Verkhovna Rada is regulated by the general provisions of the Law of Ukraine 'On Civil Service'. As of 31 July 2026, a separate law on parliamentary service (draft law No. 4530)[2723] had not been adopted. This makes it impossible to distinguish the

2716 Information provided by Respondent No. 62 during an interview conducted on 20.04.2026.

2717 Information provided by Respondent No. 62 during an interview conducted on 20.04.2026.

2718 On State Registration of Legal Entities, Individual Entrepreneurs and Public Organisations: Law of Ukraine No. 755-IV (as amended) of 15.05.2003, Article 4. ↗

2719 Unified State Register of Legal Entities, Individual Entrepreneurs and Public Organisations. Ministry of Justice of Ukraine. ↗

2720 Information provided by Respondent No. 48 during an interview conducted on 24.03.2026.

2721 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015–February 2016. ↗

2722 Reform of the Secretariat of the Verkhovna Rada of Ukraine: Parliamentary or Public Administration Reform? Agency for Legislative Initiatives, 2025. ↗

2723 On Parliamentary Service: Draft Law of Ukraine, registration No. 4530 of 21.12.2020. ↗

specific features of service in the Secretariat and consolidate acts on its structural units into a single document until a special law is adopted.[2724]

Limited access to public information reduces Parliament's institutional transparency. Since the Secretariat of the Verkhovna Rada is not a public authority within the meaning of the Law of Ukraine 'On Access to Public Information', it considers and responds to information requests concerning the activities of the Verkhovna Rada of Ukraine as a public authority. At the same time, as a legal entity financed from the budget, the Secretariat is a separate, independent holder of information concerning its use of budget funds.[2725]

In practice, this means that some information on internal processes — including decision-making procedures within the Secretariat, the existence of policies or instructions, the organisation of work of structural units and other aspects of the parliamentary administration's activities — is unavailable either in open sources or through information requests. This reduces trust in the Secretariat and limits public oversight of the parliamentary administration.

A situation in which information whose access is not restricted by law[2726] remains unpublished creates, on the one hand, artificial informational and time barriers to exercising the right to information and, on the other hand, increases the administrative burden on the Secretariat, which must spend resources processing similar requests instead of publishing documents once.

The imbalance between the workload and resources of the Research Service causes high staff turnover. As of April 2026, only 37 analysts worked in the body. As a result, the Service is forced to operate with maximum functional flexibility, where analytical functions are performed even by staff of administrative units (for example, those responsible for public procurement).[2727] The shift from the purely academic work of the Institute of Legislation, on the basis of which the Research Service was established, to intensive practical analysis and interchangeability of roles, combined with a heavy workload and disproportionate funding, led specialised experts to leave for other research institutions. Increasing the number of staff within the existing staffing level and budget would worsen the financial situation of current employees, since it would require redistribution of funds from the existing salary fund. During the war, the issue of increasing staffing levels and funding was not considered.

Budget constraints also mean that external experts are involved and staff training is conducted mostly on a pro bono basis.[2728] In December 2025, in its Communication Strategy for 2026–2028, the Research Service directly identified limited human resources, staff turnover and an insufficient number of analysts to cover all areas of work as key weaknesses in its analysis of the current situation.[2729]

2724 For more details — in the subsection 'Human Resources Capacity, Parliamentary Service and Internships'.

2725 Information provided by the Secretariat of the Verkhovna Rada of Ukraine in letter No. 09/13-2026/53984 of 13.03.2026.

2726 On Information: Law of Ukraine No. 2657-XII of 02.10.1992 ↗; On State Secrets: Law of Ukraine No. 3855-XII of 21.01.1994 ↗; On Access to Public Information: Law of Ukraine No. 2939-VI of 13.01.2011. ↗

2727 Information provided by Respondent No. 60 during an interview conducted on 17.04.2026.

2728 Information provided by Respondent No. 60 during an interview conducted on 17.04.2026.

2729 Communication Strategy of the Research Service of the Verkhovna Rada of Ukraine for 2026–2028, approved by Order of the Head of the Research Service of the Verkhovna Rada of Ukraine of 17.12.2025 No. 136-o.d, p. 4–5. ↗

As of April 2026, the Development Strategy of the Research Service until 2027 had been 90% implemented.[2730] **As of April 2026, the process of approving the quality management concept**[2731] of the Research Service was still under way. In particular, the Quality Management System of the Research Service, developed on the basis of the ISO 9000 series of standards and the European Common Assessment Framework for improving public sector organisations through self-assessment (CAF), was being tested.[2732]

The consolidation of administrative and analytical support for Parliament remains incomplete. In particular, to organise expert and information support for the Verkhovna Rada, the European Parliament Mission recommended in the Roadmap on Internal Reform of the Verkhovna Rada that the Research Service be integrated into the structure of the Secretariat of the Verkhovna Rada and that a separate parliamentary library be established as an information support unit (Recommendation No. 37 of the Roadmap).[2733]

As of July 2026, the Research Service continued to function as a separate institution outside the structure of the Secretariat of the Verkhovna Rada. There is no consensus among stakeholders on whether the Research Service should be integrated into the unified structure of the Secretariat or continue to function as a separate legal entity.[2734]

The Secretariat of the Verkhovna Rada demonstrates progress in introducing digital technologies into Parliament's activities.

As of March 2026, three pilot projects (Proof of Concept — PoC) had been developed and implemented on the basis of AWS services, automating routine processes, including machine translation (AWS Translate), speech recognition and transcription (AWS Transcribe) and face and image recognition (AWS Rekognition).

A fourth AI project (Proof of Concept — AI Legislative Assistant) — an intelligent assistant for working with normative legal acts — is close to completion.

These pilot solutions already form the basis for the practical application of AI technologies in the daily work of the Verkhovna Rada to increase the speed, accessibility and efficiency of information processing.[2735]

Recommendations

1. Register the Secretariat of the Verkhovna Rada as a legal entity and ensure that all rights and obligations are transferred from the Administrative Office to the Secretariat of the Verkhovna Rada (including personnel management for all parliamentary staff, representation in courts, the role of chief administrator of budget funds, etc.).

2730 Information provided by Respondent No. 60 during an interview conducted on 17.04.2026.

2731 Quality management is coordinated activity aimed at directing and controlling an organisation with regard to quality.

2732 Information provided by Respondent No. 60 during an interview conducted on 17.04.2026.

2733 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015–February 2016, p. 49. ↗

2734 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2735 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2. Adopt a law on parliamentary service that consolidates the legal regulation of the status of Secretariat staff and distinguishes the general rules of civil service from the professional specifics of supporting the legislative process.
3. Ensure proactive publication of information and documents governing the organisation of the parliamentary administration's work that do not contain restricted-access information.
4. Ensure an adequate resource base for the activities of the Research Service. In particular, explore opportunities to engage external experts and trainers on a paid basis, which would make it possible to move away from the practice of working exclusively on a pro bono basis.
5. Ensure that, by the end of 2026, the preparatory stage for establishing the Law-Drafting Office and the Parliamentary Budget Office is completed, in particular by developing the regulatory framework for their activities, determining staffing levels and establishing the amount of funding within the budget for the next period.

Human Resources Capacity, Parliamentary Service and Internships

State of play

The Secretariat of the Verkhovna Rada provides staff support for Parliament's activities.[2736] The powers of the Head of the Secretariat include overall management of the selection and placement of personnel in the Secretariat, formation of the talent pool, organisation of training and advanced training for Secretariat staff.[2737] Heads of structural units of the Secretariat of the Verkhovna Rada participate in the selection and placement of personnel, in ensuring advanced training and training for staff of their structural unit and in creating the unit's talent pool.[2738]

The organisation of staffing support for Parliament falls within the competence of the Personnel Department of the Secretariat of the Verkhovna Rada.

The regulatory basis for the activities of this structural unit consists of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine and the Regulation on the Personnel Department of the Secretariat of the Verkhovna Rada of Ukraine.[2739]

Political neutrality of parliamentary servants

Staff of the Secretariat of the Verkhovna Rada are civil servants whose activities are regulated by the Law of Ukraine 'On Civil Service'.[2740] One of the civil service principles

2736 On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769/11-RH of 25.08.2011, subpara. 23 para. 7. ↗

2737 Ibid, subpara. 8 para. 14.

2738 Ibid, subpara. 8 para. 15.

2739 On Approval of the Regulation on the Personnel Department of the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1242-k of 20.12.2021. ↗

2740 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015. ↗

followed by parliamentary civil servants is political neutrality — preventing political views from influencing the actions and decisions of civil servants, refraining from demonstrating their own political views and their attitude towards political parties.[2741] This principle is implemented in the day-to-day work of staff of the Secretariat of the Verkhovna Rada, who provide expert support to all MPs regardless of their political affiliation.

In January 2021, the Verkhovna Rada adopted Draft Law No. 4530 at first reading. The draft law provides for the establishment of a separate parliamentary service and also for enshrining the principle of political neutrality, which entails equal treatment of every MP, assistant-consultants, staff of the secretariats of parliamentary factions (parliamentary groups) and other staff of the parliamentary patronage service.[2742]

In addition to civil servants, the Secretariat of the Verkhovna Rada includes patronage service positions. These include staff of the secretariats of the Chairman of the Verkhovna Rada of Ukraine, the First Deputy Chairperson and the Deputy Chairperson, staff of the secretariats of parliamentary factions (parliamentary groups) in the Verkhovna Rada of Ukraine and assistant consultants to MPs of Ukraine. A patronage service employee is appointed for the term of office of the relevant official or for the period of activity of the parliamentary faction (parliamentary group) whose patronage service they join. Employment of a patronage service employee terminates on the day the relevant official's powers end or the parliamentary faction (group) ceases to operate.[2743] Patronage service staff are not subject to the Law of Ukraine 'On Civil Service'. Their remuneration is determined by the relevant resolution of the Cabinet of Ministers of Ukraine.[2744] It includes an official salary, determined under the relevant salary scale using a coefficient in relation to two subsistence minimums for able-bodied persons, an allowance for work intensity and an allowance for performing particularly important work, each of up to 100% of the official salary. Patronage service staff may also receive bonuses.

Selection for vacant positions

The Secretariat of the Verkhovna Rada is currently integrated into the general civil service system. Therefore, the procedure for selection for vacant positions is regulated by the Law of Ukraine 'On Civil Service'.[2745] At the same time, Parliament independently implements civil service standards. In particular, the appointing authority is the Head of the Secretariat of the Verkhovna Rada, which limits direct administrative interference by the executive branch in the staffing processes of the legislative body.

Under ordinary conditions, the procedure for staff selection in the Secretariat of the Verkhovna Rada provides for competitive merit-based selection.[2746] For the period of martial law, competitive selection has been suspended[2747] and appointments are made under a simplified procedure — without competition. At present, the recruitment process includes

2741 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015. Para. 8 Part 1 Article 4, Article 10. ↗

2742 On Parliamentary Service: Draft Law of Ukraine, registration No. 4530 of 21.12.2020, Article 5. ↗

2743 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015, Article 92. ↗

2744 On the Conditions on Renumeration for employees of state authorities not covered by the Law of Ukraine 'On Civil Service' : Resolution of the Cabinet of Ministers of Ukraine No. 1112 of 24.12.2019. ↗

2745 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015, Article 21. ↗

2746 Ibid.

2747 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 10. ↗

interviews and testing[2748] for candidates. Persons selected in this way undergo a six-month probationary period aimed at adaptation and completion of professional training. After the probationary period ends, testing is repeated.[2749]

Information on vacant positions in the Secretariat of the Verkhovna Rada is published on the website of the Personnel Department.[2750] To expand the pool of candidates, the Secretariat uses a multi-channel approach — publishing vacancies on job search portals, coordinating with the NAUCS and attracting specialists through professional networks.[2751]

A separate area of staffing policy is the social integration and recruitment of war veterans into civil service. As of March 2026, 25 veterans worked in the Secretariat and at state enterprises supporting the activities of the Verkhovna Rada.[2752] Preparatory work is also under way to conclude a Memorandum of Cooperation with the Ministry of Veterans Affairs of Ukraine (Ministry of Veteran's Affairs) to further facilitate the recruitment of veterans to civil service.[2753]

Under martial law, decisions to fill vacant positions are taken on the basis of priority — vacancies are filled first for positions whose duties are critically necessary to ensure the uninterrupted functioning of the Secretariat and Parliament as a whole.[2754]

Patronage service staff are appointed outside competitive procedures because they are not civil servants.

The head and deputy head of the secretariat of a parliamentary faction or group are appointed and dismissed by the Head of the Secretariat upon submission by the head of the relevant parliamentary faction or group. Citizens of Ukraine who hold at least a bachelor's degree and are fluent in Ukrainian may be appointed as head, deputy head or other staff members of the secretariat of a parliamentary faction.[2755]

The Head of the Secretariat of the Chairman of the Verkhovna Rada is appointed and dismissed by the Head of the Secretariat upon submission by the Chairman of the Verkhovna Rada, while staff members are appointed upon submission by the Head of the Chairman's Secretariat agreed with the Chairman of the Verkhovna Rada.[2756]

2748 Testing of knowledge of legislation and English.

2749 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2750 Vacancies. Personnel Department of the Secretariat of the Verkhovna Rada of Ukraine. ↗

2751 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2752 Ibid.

2753 Ibid.

2754 Ibid.

2755 On Approval of the Regulation on the Secretariat of a Parliamentary Faction (Parliamentary Group) in the Verkhovna Rada of Ukraine: Order of the Speaker of the Verkhovna Rada of Ukraine No. 899-k of 07.12.2020. ↗

2756 On Approval of the Regulation on the Secretariat of the Chairman of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 911-k of 10.12.2020. ↗

Development of staff capacity

The staffing policy of the Secretariat of the Verkhovna Rada was defined in the Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada of Ukraine until 2022.[2757]

At present, the development of the staff capacity of civil servants of the Secretariat of the Verkhovna Rada is based on the system of annual performance evaluation and improvement of professional competence.[2758]

Performance evaluation is carried out on the basis of the Procedure for Evaluating the Performance of Civil Servants of the Secretariat of the Verkhovna Rada of Ukraine[2759] and the relevant Methodological Recommendations.[2760] Performance evaluation makes it possible to identify a civil servant's needs for professional development and advanced training.[2761]

The organisational principles for improving the professional competence of civil servants of the Secretariat of the Verkhovna Rada are defined by the Regulation on Professional Training of Civil Servants of the Secretariat of the Verkhovna Rada of Ukraine.[2762] Professional competence is improved in the following forms: 1) obtaining higher education at the second (master's) level under educational and professional master's programmes in the speciality 'Public Management and Administration'; 2) advanced training under general and specialised professional (certificate) programmes; 3) advanced training under general and specialised short-term programmes; 4) internships away from service for 1–6 months in another public authority or abroad; 5) training abroad; 6) self-education, including through online learning on web platforms, mentoring and so on.[2763] Civil servants of the Secretariat of the Verkhovna Rada prepare individual programmes for improving professional competence/professional development. Recommendations and templates for preparing such programmes are available on the website of the Personnel Department.[2764] The results of annual evaluation serve as a benchmark for determining an individual professional learning pathway, which is reflected in the individual programme.

Internships in the Secretariat of the Verkhovna Rada

Internships for civil servants and for young people (as external candidates) in the Secretariat of the Verkhovna Rada are separate.

2757 On the Strategy for Building Human Resources Capacity of the Secretariat of the Verkhovna Rada until 2022: Order of the Head of the Secretariat of the Verkhovna Rada of Ukraine No. 3359-k of 05.12.2019. ↗

2758 Staff Development. Personnel Department Verkhovna Rada of Ukraine. ↗

2759 Procedure for Evaluating the Performance of Civil Servants of the Secretariat of the Verkhovna Rada of Ukraine. ↗

2760 On Approval of the Methodological Recommendations on Defining Tasks and Key Performance, Efficiency and Quality Indicators for Civil Servants Holding Category B and C Civil Service Positions, Monitoring Their Implementation and Reviewing Them: Order of the National Agency of Ukraine on Civil Service of 20.11.2020. No. 217-20. ↗

2761 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2762 On Approval of Regulation on Professional Training of Civil Servants of the Secretariat of the Verkhovna Rada of Ukraine: Order of the Secretariat of the Verkhovna Rada of Ukraine No. 1649-k of 19.09.2022. ↗

2763 Types and Forms of Improving Professional Competence of Civil Servants of the Secretariat and Websites of Educational Institutions. Personnel Department Verkhovna Rada of Ukraine. ↗

2764 Individual Programme for Improving Professional Competence/Professional Development of a Civil Servant of the Secretariat of the Verkhovna Rada of Ukraine. Personnel Department Verkhovna Rada of Ukraine. ↗

For civil servants, internships, including abroad, are one of the forms of improving professional competence. The general conditions for such internships are regulated by the Procedure for Internships of Civil Servants.[2765] The content of a civil servant's internship is determined by an individual plan.[2766]

For young people, internships in the Secretariat of the Verkhovna Rada[2767] are aimed at familiarising them with the specific features of the legislative process and the functioning of the civil service in the Secretariat, involving them in the law-making process and in the public decision-making.[2768]

Professional ethical standards

Ethical requirements for the activities of civil servants of the Secretariat of the Verkhovna Rada are defined in the General Rules of Ethical Conduct for Civil Servants and Local Self-Government Officials,[2769] which establish a model of conduct for civil servants and prohibitions applicable to their area of activity. In general terms, this document describes the duties of civil servants, requirements for integrity, the procedure for information exchange and rules on the use of their official position and state resources. The list of disciplinary sanctions and the procedure for applying them are regulated by the Law 'On Civil Service'.[2770] Staff of Secretariat of the Verkhovna Rada, like other civil servants, are subject to these rules, the procedure for considering cases of violations of the rules, sanctions and the procedure for applying them. The possibility of separate regulation of ethical standards for parliamentary service will be ensured if a law on parliamentary service is adopted.

Reform of parliamentary service

The issue of reforming staffing support for the legislative body has long been at the centre of professional discussions. Since 2020, the need to move to a separate parliamentary civil service has been actively discussed. In December 2020, draft law No. 4530[2771] was registered to implement this initiative, and its adoption should separate service in the Secretariat of the Verkhovna Rada from civil service. The need for this step is justified by two key factors:

- the specific nature of the work — civil and patronage service in the Secretariat of the Verkhovna Rada has a number of specific features not covered by the provisions of the Law of Ukraine 'On Civil Service';[2772]

2765 On Approval of the Procedure for Internships of Civil Servants: Order of the National Agency of Ukraine on Civil Service No. 48 of 03.03.2016. ↗

2766 Individual Internship Plan: Annex 1 to the Procedure for Internships of Civil Servants. ↗

2767 On Approval of the Procedure for Internships in the Secretariat of the Verkhovna Rada of Ukraine for Young Citizens Who Do Not Hold Civil Service Positions: Order of the Secretariat of the Verkhovna Rada No. 2360-K of 10.10.2024. ↗

2768 Internship Programme in the Verkhovna Rada of Ukraine. League of Interns. ↗
For more details — in the subsection 'Inclusive Practices of the Verkhovna Rada of Ukraine'

2769 On Approval of the General Rules of Ethical Conduct for Civil Servants and Local Self-Government Officials: Order of the National Agency of Ukraine on Civil Service No. 158 of 05.08.2016. ↗

2770 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015, section VIII. ↗

2771 On Parliamentary Service: Draft Law of Ukraine, registration No. 4530 of 21.12.2020. ↗

2772 On Parliamentary Service: explanatory note to the draft law registration No. 4530 of 21.12.2020. ↗

- international practice — the experience of foreign countries confirms the effectiveness of separate legal regulation of parliamentary service.[2773]

In January 2021, Draft Law No. 4530 was adopted as a basis and the main committee[2774] was instructed to prepare it for second reading.

The draft law provides for: (1) requirements for persons seeking appointment to parliamentary civil service positions; (2) competitions for category 'A' positions — First Deputy Heads and Deputy Heads of the Secretariat — to be conducted not by the Senior Civil Service Commission established by the Cabinet of Ministers of Ukraine, but by a Commission for the Selection of Category 'A' Parliamentary Civil Servants established directly by the Head of the Secretariat; (3) streamlined regulation of parliamentary civil servants' careers, with the Head of the Secretariat required to approve the Procedure for Promotion of Parliamentary Civil Servants, the Procedure for Evaluating Performance and the procedure for youth internships; (4) establishment by the Chairman of the Verkhovna Rada of a Disciplinary Proceedings Commission to conduct disciplinary proceedings and determine the existence and degree of fault and the nature and gravity of disciplinary misconduct by parliamentary civil servants holding category 'A' positions, among other matters.

However, this draft law does not create a new type of public service — a 'parliamentary service' — but merely establishes certain specific features of civil service employment in the Verkhovna Rada of Ukraine. It is aimed not so much at regulating parliamentary service as a whole as at regulating **parliamentary civil service**.[2775]

Pay reform

For a long time, parliamentary civil servants remained outside the reform of civil service remuneration based on position classification. The central element of the remuneration reform was to fix the ratio of the basic and variable components of pay at '70/30'. The reform began in January 2024 under the Law of Ukraine 'On the State Budget of Ukraine for 2024'.[2776] However, an exception was established for civil servants in the parliamentary administration. Without position classification having been carried out, they retained the possibility of receiving incentive payments based on a decision of the head of the civil service, while the payroll fund was maintained at no less than the level provided for in 2023.

The Law of Ukraine 'On the State Budget of Ukraine for 2025'[2777] provided that, until the first position classification was carried out for civil servants in state bodies that had not conducted position classification in 2024, the remuneration conditions established for 2024 would continue to apply, but no later than 1 April 2025. In 2025, as part of

2773 On Parliamentary Service: explanatory note to the draft law registration No. 4530 of 21.12.2020. For example, the Research Service of the Verkhovna Rada prepared an analytical note on foreign experience of parliamentary service, using Japan as an example.

2774 The main committee for the preliminary consideration and preparation of Draft Law No. 4530 is the Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning.

2775 Reform of the Secretariat of the Verkhovna Rada of Ukraine: Parliamentary or Public Administration Reform? Agency for Legislative Initiatives, 2025.

2776 On the State Budget of Ukraine for 2024: Law of Ukraine, No. 3460-IX of 09.11.2023, para. 22 of Final Provisions.

2777 On the State Budget of Ukraine for 2025: Law of Ukraine, No. 4059-IX of 19.11.2024, para. 19 of Final Provisions.

the broader reform of civil service pay, classification of civil service positions in the Secretariat of the Verkhovna Rada was under way. In April 2025, regulation of this issue for parliamentary servants was separated — the Government approved a salary scale for staff of the Secretariat of the Verkhovna Rada.[2778] It was also established that the catalogue of typical positions is approved by the Chairman of the Verkhovna Rada.[2779]

Progress and issues

A positive development in strengthening the professional capacity of the Secretariat of the Verkhovna Rada is the introduction of training on gender legal expert assessment. The relevant training under a specialised short-term advanced training programme is conducted on the basis of the Research Service[2780] and aims to improve the quality of expert support provided to Parliament by Secretariat staff.

The absence of competitions for positions in the Secretariat of the Verkhovna Rada creates risks for the meritocratic model of civil service in the Secretariat. As of 31 July 2026, the provision of the Law of Ukraine 'On the Legal Regime of Martial Law' remained in force, suspending competitive selection for the period of martial law and for a further six months after its termination or cancellation.[2781] The absence of competitions is one of the reasons for problems in recruiting qualified staff to the Secretariat of the Verkhovna Rada.[2782]

The Verkhovna Rada plans to restore competitive recruitment through adoption of Draft Law No. 13478-1.[2783] In April 2026, the draft law was adopted as a basis and is being prepared for second reading.

The absence of an up-to-date staffing strategy limits the systemic development of personnel and creates risks of fragmented reform implementation in the Secretariat. The last Strategy expired in 2022.[2784] However, as of 31 July 2026, a new Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada had not been developed. This points to inconsistent implementation of the recommendations of the European Parliament Mission, since implementation of Recommendation No. 39[2785] on developing a Strategy was a one-off exercise and was not subsequently continued.

The absence of a special law on parliamentary service limits Parliament's autonomy from the executive branch and limits the potential for parliamentary development.

2778 Certain Issues of Remuneration of Civil Servants of the Secretariat of the Legislative Body: Resolution of the Cabinet of Ministers of Ukraine No. 419 of 11.04.2025. ↗

2779 Reform of the Secretariat of the Verkhovna Rada of Ukraine: Parliamentary or Public Administration Reform? Agency for Legislative Initiatives, 2025. ↗

2780 Integration of the Gender Approach and Gender Legal Expert Assessment in the Verkhovna Rada of Ukraine. Research Service of the Verkhovna Rada of Ukraine, 2026. ↗

2781 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 10. ↗

2782 Information provided by Respondent No. 59 during an interview conducted on 16.04.2026.

2783 On Amendments to Certain Laws of Ukraine on Restoring Competitions and Improving the Procedure for Entering, Passing and Terminating Civil Service: Draft Law of Ukraine, registration No. 13478-1 of 16.07.2025. ↗

2784 On the Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada until 2022 : Order of the Head of the Secretariat of the Verkhovna Rada of Ukraine No. 3359-k of 05.12.2019. ↗

2785 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015–February 2016, p. 29. ↗

Draft Law No. 4530 has been under preparation for the second reading since 2021.[2786] A number of comments have been made on the text of the draft law, in particular:

- the broad scope of the draft law and the internal inconsistency of its provisions remain debatable;[2787]
- the provisions of the draft law are not aligned with Recommendation No. R (2000) 6 of the Committee of Ministers of the Council of Europe;[2788]
- the draft law does not resolve the problem of dual influence over committee secretariats;[2789]
- the provisions of the draft law would only partially address the problem of dependence on the executive branch.[2790]

In addition, the current version of Draft Law No. 4530 does not contain provisions on professional ethics in parliamentary service. Despite the universal nature of the general rules of ethical conduct,[2791] defining the specific features of parliamentary service in a special law without establishing standards of ethical conduct that reflect the specific functions of parliamentary servants leaves the regulation incomplete.

At the end of 2025, the Committee of the Verkhovna Rada on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning established a working group for further revision of the draft law.[2792] Discussions are currently being held on determining the place of the draft law in the ongoing public administration reform, taking into account European integration processes.[2793]

Format of human resources management in the draft law is adapted specifically to Parliament's needs. One of the initiatives to improve the functioning of human resources management is the establishment of the Human Resources Management Service of the Secretariat of the Verkhovna Rada,[2794] with a number of additional powers,[2795] instead of the Personnel Department. However, the relevant human resources management service of the Secretariat of the Verkhovna Rada has not yet been created because Draft Law

2786 On Parliamentary Service: Draft Law of Ukraine, registration No. 4530 of 21.12.2020.

2787 On Parliamentary Service: opinion of the Main Scientific and Expert Department on the draft law, registration No. 4530 of 21.12.2020.

2788 On Parliamentary Service: opinion of the Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union on the Draft Law of Ukraine, registration No. 4530 of 21.12.2020.

2789 Ibid.

2790 Reform of the Secretariat of the Verkhovna Rada of Ukraine: Parliamentary or Public Administration Reform? Agency for Legislative Initiatives, 2025.

2791 On Approval of the General Rules of Ethical Conduct for Civil Servants and Local Self-Government Officials: Order of the National Agency of Ukraine on Civil Service No. 158 of 05.08.2016.

2792 Report on the implementation status of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, for the fourth quarter of 2025, p. 29.

2793 In the context of Reform 2 'Civil Service Selection Procedure', provided for in the Ukraine Facility Plan 2024–2027. Report on the implementation status of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, for the fourth quarter of 2025, p. 29.

2794 Reform of the Secretariat of the Verkhovna Rada of Ukraine: Parliamentary or Public Administration Reform? Agency for Legislative Initiatives, 2025.

2795 On Parliamentary Service: Draft Law of Ukraine, registration No. 4530 of 21.12.2020.

No. 4530 has not been adopted. Both Secretariat staff and MPs emphasise the importance of Draft Law No. 4530 and expect its adoption.[2796]

Pay in the Secretariat of the Verkhovna Rada remains insufficient and uncompetitive in the labour market due to insufficient funding.[2797] Despite positive structural changes, the level of pay in the Secretariat of the Verkhovna Rada, especially for mid-level and lower-level staff, remains uncompetitive compared with the private sector and other segments of the labour market.

The specific nature of the Secretariat of the Verkhovna Rada's work entails a heightened level of responsibility, intensive work, tight deadlines and ensuring the continuity of Parliament's functioning, including under martial law. At the same time, after the pay reform, opportunities for material incentives for staff are limited: there are no mechanisms for bonuses for overtime work or allowances for work intensity and so on.[2798]

This complicates the recruitment and retention of qualified specialists, particularly in legal support for the law-making process, analysis, approximation of legislation to EU law, communications and inter-institutional coordination.[2799] In addition, the Secretariat of the Verkhovna Rada faces a problem common to the civil service: pay disparities by grade within a single public authority. Staff of units directly supporting the law-making process have a higher level of pay, while staff of administrative and support units (for example, accounting) receive significantly lower remuneration under similar conditions of responsibility and work intensity,[2800] which may lead to staff turnover.

Recommendations

1. Revise and adopt in the second reading the draft law on amendments to certain laws of Ukraine on restoring competitions and improving the procedure for entering, serving in and terminating civil service (No. 13478-1), which will create a legal basis for restoring competitive selection for civil service positions in the Secretariat of the Verkhovna Rada.
2. Adopt and implement a new Strategy for Building the Human Resource Capacity of the Secretariat of the Verkhovna Rada. Regularly monitor progress and conduct reviews of such a strategy.
3. Revise and adopt draft law on parliamentary service (No. 4530) in the second reading. Supplement the draft law with provisions on rules of ethical conduct for parliamentary servants or define the powers to approve them at the level of a subordinate act. Such rules should apply to all parliamentary servants and set clear expectations regarding their professionalism, ethical conduct, integrity, accountability and non-partisanship.
4. Continue the pay reform, particularly by ensuring an adequate level of budget funding for pay and reviewing official salary levels in light of the complexity and responsibility of positions.

2796 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2797 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026; Information provided by Respondent No. 59 during an interview conducted on 16.04.2026.

2798 Ibid.

2799 Ibid.

2800 Ibid.

Assistants to Members of Parliament of Ukraine

State of play

Positions of assistants-consultants to MPs of Ukraine are patronage service positions.[2801] Assistants to MPs are appointed for the term of office of respective MPs.[2802]

The legal framework defining the status and working conditions of assistants includes the Laws of Ukraine 'On Civil Service'[2803] and 'On the Status of People's Deputy of Ukraine',[2804] as well as the Regulation on the Assistant-Consultant to a People's Deputy of Ukraine,[2805] which were developed back in the 1990s.

Only a citizen of Ukraine who is fluent in the state language and meets the applicable statutory restrictions may serve as an assistant consultant to an MP.[2806] Each MP may have up to 31 assistants. Parliamentarians independently determine the number of assistants and independently select them and distribute duties among them.[2807] However, it is the Secretariat of the Verkhovna Rada (rather than the Verkhovna Rada or individual MPs) that is recognised as their employer.[2808] Information on the assistants of each MP is published on MPs' pages.[2809] All assistants are issued an identification card.[2810]

Assistants work under fixed-term employment contracts (on a full-time basis or concurrently) or on a pro bono basis.[2811] Information on the basis on which each assistant works is indicated on the relevant MPs' pages.[2812] As of 31 July 2026, **there were more than 4,000 assistant consultants to MPs**. Only one quarter of all assistant consultants worked on a permanent basis under fixed-term employment contracts.[2813]

Assistants are paid from and within the annual fund allocated to each MP for the remuneration of their assistants-consultants. In 2026, the fund per MP amounts to

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2801 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015, Article 92.

2802 Ibid.

2803 Ibid.

2804 On the Status of People's Deputy in Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992. Articles 28, 34.

2805 On Approval of Regulation on the Assistant-Consultant to a People's Deputy in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 379/95-VR of 13.10.1995.

2806 Article 27 of the Law of Ukraine 'On Prevention of Corruption' expressly prohibits the employment of a close person as an assistant consultant to an MP of Ukraine.

2807 On the Status of People's Deputy in Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 34.

2808 In particular, the position on the status of the Secretariat of the Verkhovna Rada as the employer of assistants-consultants to MPs is presented in a number of court decisions: Resolution of the Administrative Cassation Court within the Supreme Court of 30.11.2023 in case No. 640/22951/21 (para. 9); Resolution of the Administrative Cassation Court within the Supreme Court of 26.09.2023 in case No. 640/2534/21 (para. 24); Resolution of the Administrative Cassation Court within the Supreme Court of 29.06.2023 in case No. 640/13028/21 (para. 10).

2809 Members of Parliament of Ukraine. Verkhovna Rada of Ukraine.

2810 On Approval of Regulation on the Assistant-Consultant to a People's Deputy in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 379/95-VR of 13.10.1995, Article 5.3.

2811 On Approval of Regulation on the Assistant-Consultant to a People's Deputy in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 379/95-VR of 13.10.1995, Part 3 Article 1.1.

2812 Members of Parliament of Ukraine. Verkhovna Rada of Ukraine.

2813 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

UAH 145,766.4 (EUR 2,840) per month and UAH 1,749,196.8 (EUR 34,114) per year.[2814] The monthly salary fund for assistants is distributed personally by the MP.[2815]

Progress and issues

A number of aspects of the legal status of assistants-consultants to MPs remain unregulated, creating risks of blurred responsibility and inefficient use of budget funds.[2816] Article 34 of the Law of Ukraine 'On the Status of People's Deputy of Ukraine' was last substantially[2817] updated only in 2020. The Regulation on the Assistant-Consultant to a Member of Parliament of Ukraine has not undergone any amendments since 2020. As a result, the current legal regulation still does not take into account a number of recommendations of the European Parliament Mission Roadmap.

As of 31 July 2026, Ukrainian legislation still did not contain requirements for approving job instructions for MPs' assistants. This measure, defined in the recommendation of the European Parliament Mission Roadmap, was to have been implemented back in 2016. It was envisaged that such job descriptions would cover all assistants without exception, regardless of whether they work on a paid or pro bono basis.[2818]

Draft Law No. 4530 also fails to regulate this issue, as it does not include MPs' assistant consultants among the parliamentary patronage service staff to whom the draft law would apply.

Assistant consultants, like most patronage service staff of the Verkhovna Rada, are not required to submit asset declarations. Nor are they subject to restrictions on concurrent employment and combining office with other activities or to the requirement of political neutrality.

One of the measures under the FDI Roadmap provides for the development, adoption and implementation of updated legal regulation of MPs' assistants concerning their registration and submission of asset declarations.[2819] Organisational measures are under way to develop a draft law updating the legal status of MPs' assistants, including with regard to their registration and declaration requirements. A draft concept for the relevant legislative amendments has already been prepared. In particular, the NACP planned to prepare and submit the relevant draft law to the Cabinet of Ministers of Ukraine in July 2026.[2820]

2814 On the Estimate of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4696-IX of 03.12.2025. Annex 'Expenditure limits per People's Deputy of Ukraine'. ↗

2815 On Approval of Regulation on the Assistant-Consultant to a People's Deputy in Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 379/95-VR of 13.10.1995, Article 3.1. ↗

2816 For example, regarding completion of adaptation courses to improve the professional level of patronage service staff, the need to extend the declaration requirement to these persons, changes regarding statutory setting of the maximum number of assistants-consultants and so on.

2817 One further amendment also entered into force in 2022, but it concerns not the direct exercise of assistants' powers but the payment of financial assistance for recovery.

2818 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015 – February 2016. Recommendation No. 42. ↗

2819 Roadmap on the Functioning of Democratic Institutions Measure 11 of Strategic Result 1 of Section III.C. ↗

2820 Report on the Status of Implementation of the Roadmap on the Functioning of Democratic Institutions, approved by Order of the Cabinet of Ministers of Ukraine No. 475-r of 14 May 2025, for the first quarter of 2026.

At the same time, some MPs express reservations about extending financial control requirements to their assistants-consultants, as this may make it harder to attract and retain specialists.[2821]

The number of assistants-consultants to an MP remains excessive, entrenching the risks of 'shadow' lobbying and non-public external influence on an MP's activities. Despite Recommendation No. 43 of the European Parliament Mission, no measures have been taken to limit the number of assistants for one MP. The European Parliament Mission experts emphasised the need to establish a realistic but small number of assistants to an MP, since their excessive number creates risks of external interests influencing the legislative agenda.[2822]

Although implementation of this measure was planned back in 2017,[2823] parliamentarians have consistently retained the right to have up to 31 assistants since 2002.[2824]

Usually, the number of assistants-consultants to an MP ranges from four to ten people, of whom between one and five work on a full-time basis under a fixed-term employment contract.[2825] Isolated cases of involving a much larger staff, including up to 27 assistants in the Verkhovna Rada of the ninth convocation, are exceptions and are not systemic.[2826] MPs consider that the optimal number of assistants-consultants is at least two. Committee heads should have a larger number of assistants.[2827]

An analysis of the Verkhovna Rada estimates for 2025 and 2026 shows an increase in expenditures on the assistants' salary fund:

- in 2025: UAH 1,591,516.8 per year (UAH 132,626.4 per month), i.e. EUR 33,054.6 per year (EUR 2,754.6 per month);[2828]
- in 2026: UAH 1,749,196.8 per year (UAH 145,766.4 per month),[2829] i.e. EUR 34,114.2 per year (EUR 2,842.9 per month).

An assistant's identification card gives the holder the right to unrestricted access to the currently closed premises of the Verkhovna Rada, a number of state bodies and institutions, prisons and other specialised institutions, to attend meetings of local authorities and to use free of charge the information databases and telecommunications networks of the Verkhovna Rada and local self-government bodies, among other rights.[2830]

2821 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

2822 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015 – February 2016, p. 28. Recommendation 43. ↗

2823 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine, prepared by the European Parliament Needs Assessment Mission. September 2015 – February 2016, p. 29. ↗

2824 On the Status of People's Deputy in Ukraine: Law of Ukraine No. 2790-XII of 17.11.1992, Article 34. ↗

2825 Members of Parliament of Ukraine. Website of the Verkhovna Rada of Ukraine. ↗

2826 Mustafa Dzhemiliev. MP Profile (assessed 31.07.2026). ↗

2827 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

2828 EUR 1 = 48,1481 UAH. Official exchange rate of the hryvnia against foreign currencies as of 31.07.2025. National Bank of Ukraine. ↗

2829 On the Estimate of the Verkhovna Rada of Ukraine for 2026: Resolution of the Verkhovna Rada of Ukraine No. 4696-IX of 03.12.2025. ↗

2830 There's no end in sight: how many assistants do members of the Verkhovna Rada have and who are they? CHESNO movement, 2026. ↗

The function of an assistant consultant is to facilitate the exercise of an MP's parliamentary powers.[2831] At the same time, there are known cases in which assistants have been held criminally liable, including for involvement in the improper use of an MP's mandate.[2832] This underscores the need to establish in legislation the status and tasks of assistant consultants, as well as ethical rules for both MPs and patronage service staff, including MPs' assistant consultants.

Recommendations

1. Update the regulations governing the status of assistants-consultants to an MP (in particular, regarding the description of their duties in job instructions, reducing the maximum number of such assistants, and improving staff provision) by adopting new regulations (on a temporary basis) or by reviewing and adopting draft law No. 4530.
2. Reduce the maximum number of assistants-consultants to MPs and distinguish between their status when working on a permanent basis and on a voluntary basis. Establish an exhaustive list of grounds and procedures for exercising the rights granted by law to assistant consultants.

Inclusive Practices of the Verkhovna Rada of Ukraine

State of play

Political diversity

The 2019 early parliamentary elections were held in accordance with the provisions of Law of Ukraine No. 4061-VI,[2833] under a mixed electoral system, whereby 225 MPs were to be elected under the proportional system in a single nationwide election district based on electoral lists of political parties, while another 225 MPs were to be elected under the first-past-the-post system in single-mandate election districts. Due to the temporary occupation of the AR Crimea and parts of Donetsk and Luhansk regions, the 2019 early elections were not held in the single-mandate districts located in these territories, meaning that 26 MPs were not elected to Parliament. Five political parties that passed the 5% electoral threshold qualified for the distribution of parliamentary seats under the proportional system.

A citizen of Ukraine who has reached the age of 21 by election day, has the right to vote and has resided in Ukraine for the last five years may be elected as an MP.[2834]

2831 On Approval of the Regulation on the Assistant-Consultant of the People's Deputy of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 379/95-VR of 13.10.1995. ↗

2832 SSU, SBI and OPG have detained the assistants to Ukrainian MPs who were involved in 'schemes for draft dodgers'. Security Service of Ukraine, 2026 ↗; HACC Sentences MP Marchenko and Her Assistant Kolesnik to 2 Years in Prison. TI Ukraine, 2026. ↗

2833 On Elections of People's Deputies of Ukraine: Law of Ukraine No. 4061-VI of 17.11.2011. ↗

2834 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 2 Article 76. ↗

However, the right to stand for election is not absolute and is subject to lawful restrictions, including the ineligibility of persons with an unexpunged or outstanding conviction and the prohibition of political parties for unconstitutional activities. The CEC refuses to register all candidates nominated by a party where:

- it establishes that the party's election programme contains provisions aimed at eliminating Ukraine's independence, violently changing the constitutional order, violating the sovereignty or territorial integrity of the state, undermining its security, unlawfully seizing state power, promoting war or violence, inciting interethnic, racial or religious hatred, infringing human rights and freedoms or harming public health;
- the candidates are nominated by a party that promotes communist and/or National Socialist (Nazi) totalitarian regimes or their symbols and whose activities, name and/or symbols have been found, under the procedure established by the Government,[2835] not to comply with the requirements of the Law of Ukraine 'On the Condemnation of the Communist and National Socialist (Nazi) Totalitarian Regimes in Ukraine and Prohibition of Propaganda of Their Symbols'.[2836]

The results of the 2019 parliamentary elections generally reflected the level of electoral support for political parties in the proportional component. However, its combination with the first-past-the-post system led to a partial distortion of representation. In particular, the 'Servant of the People' party, having received 43.16% of the votes, won 254 seats in Parliament, which accounted for around 59% of its composition,[2837] including due to a significant number of victories in single-mandate election districts. Other parliamentary parties demonstrated a closer-to-proportional ratio between the support they received and the number of seats won, although their representation was significantly limited in the first-past-the-post component.

The electoral threshold and the specific features of the mixed system affected the level of representation of political forces. A number of political parties that received between 2% and 4% of the votes[2838] did not pass the electoral threshold and, accordingly, did not obtain representation in Parliament under the proportional system. Some political parties won a limited number of seats only in single-mandate election districts, which ensured their partial presence in Parliament.

In December 2019, the Verkhovna Rada adopted the Electoral Code,[2839] which updated the legislation governing all types of elections. For parliamentary elections, it provided for a shift from the mixed electoral system to a proportional system using open party lists, while retaining the electoral threshold of five per cent.[2840] When the Election Code was

2835 On the procedure for making decisions regarding the non-compliance of the activities, name and/or symbols of the legal entity, political party, its regional, city/town, district organisations or other structural units provided by the statute of the political party, public associations, public association without legal entity status with the requirements of the Laws of Ukraine 'On Condemnation of Communist and National-Socialist (Nazi) Totalitarian Regimes in Ukraine and Prohibition of Propaganda of their Symbol', ' On Condemnation and Prohibition of Propaganda of Russian Imperial Policy in Ukraine and Decolonization of Place Names' : Resolution of the Cabinet of Ministers of Ukraine No. 354 of 27.05.2015. ↗

2836 Electoral Code of Ukraine: Law of Ukraine No. 396-IX of 19.12.2019, Article 159. ↗

2837 OSCE/ODIHR Final Report on the Observation of the 2019 Parliamentary Elections, p. 40. ↗

2838 OSCE/ODIHR Final Report on the Observation of the 2019 Parliamentary Elections, p. 40. ↗

2839 Electoral Code of Ukraine: Law of Ukraine No. 396-IX of 19.12.2019. ↗

2840 For details on elections, including procedures for the registration of candidates and parties in elections, see the section 'Elections'.

drafted and adopted, the challenges associated with holding post-war elections were not taken into account because they could not have been foreseen.[2841] In December 2025, the Verkhovna Rada established a Working Group on Preparing Comprehensive Legislative Proposals on the Specific Features of Organising and Conducting Elections during a Special Period and/or Post-War Elections in Ukraine, consisting of seven subgroups.[2842] Political discussions are currently under way on the specific features of Ukraine's first post-war elections, including whether the electoral system should be changed.[2843]

Participation of women in parliamentary activities

The Constitution enshrines the principle of equality and the prohibition of discrimination,[2844] which also apply to the activities of Parliament. General requirements for preventing discrimination are established by the Laws of Ukraine 'On Principles of Preventing and Combating Discrimination in Ukraine'[2845] and 'On Ensuring Equal Rights and Opportunities for Women and Men'.[2846] The latter provides that, when nominating candidates for MPs, political parties and electoral blocs must ensure the representation of women and men on electoral lists.

The Verkhovna Rada of the ninth convocation includes 84 women MPs, accounting for 21.5% of all MPs.[2847] This is the highest share of women in the history of the Verkhovna Rada. A total of 69 women[2848] were elected to Parliament from party lists, representing around 27% of the total number of MPs elected under the proportional system.

The first requirements for the minimum level of representation of women and men on the electoral list of candidates for MPs nominated by a political party — at least 30% of the total number of candidates — appeared in 2013[2849] in the Law of Ukraine 'On Political Parties'. However, the corresponding amendments to the law regulating the election of MPs were never introduced. In the 2014 elections, this gender quota did not produce the expected results, as 20 out of 29 parties failed to comply with it, since it was not backed by appropriate sanctions and did not provide for a clear placement of women candidates in the winnable part of the list.[2850] At the same time, compliance with this quota has, since 2015, made it possible to receive additional public funding for statutory activities. Such funding is granted to the relevant party if the number of MPs of one sex elected to Parliament from the party list does not exceed two thirds of the total number of MPs from

2841 Elections in Ukraine: How to Prepare and When to Hold? OPORA, 2025. ↗

2842 A meeting of the Working Group on the preparation of legislative proposals regarding elections in special or post-war period was held. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2025. ↗

2843 How to Involve as many Citizens as Possible in the Electoral Process and Protect Against Foreign Interference? OPORA, 2026. ↗

2844 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 24. ↗

2845 On Principles of Preventing and Combating Discrimination in Ukraine: Law of Ukraine No. 5207-VI of 06.09.2012. ↗

2846 On Ensuring Equal Rights and Opportunities for Women and Men: Law of Ukraine No. 2866-IV of 08.09.2005. ↗

2847 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2848 Ibid, as of 31.07.2026.

2849 On Amendments to Certain Legislative Acts of Ukraine on Improving Legislation on the Conduct of Elections: Law of Ukraine No. 709-VII of 21.11.2013. ↗

2850 O. Martseliak. Gender Policy in Modern Electoral Law. Law and Public Administration, 2023. No. 2, p. 377. ↗

that party.[2851] In 2019, two parliamentary parties received additional public funding under the 'gender quota': 'Holos' and 'European Solidarity'.[2852]

During the 2019 parliamentary elections, 13 of the 22 party lists complied with the 30% gender quota requirement, although no enforcement mechanism was provided to ensure compliance with this requirement. Women accounted for 23% of the total number of registered candidates. Although women represented 31% of registered candidates in the nationwide election district, only 16% of women were registered to stand in single-mandate election districts.[2853]

In December 2019, the Verkhovna Rada adopted the Electoral Code, which establishes gender quotas requiring at least 40% representation of each sex when national and regional electoral lists are formed.[2854]

The Rules of Procedure of the Verkhovna Rada and other laws of Ukraine regulating the activities of MPs or parliamentary bodies do not provide for formal requirements, quotas or procedures governing the representation of women in parliamentary committees or in the leadership of Parliament. The composition of parliamentary bodies and the distribution of positions within them are formed mainly through political agreements, without institutionalised mechanisms to ensure balanced representation.

An analysis of the distribution of leadership positions in parliamentary bodies shows an uneven picture of gender representation. The leadership of the Verkhovna Rada consists of two men — the Chairman of the Verkhovna Rada and the First Deputy Chairperson of the Verkhovna Rada — and one woman, the Deputy Chairperson of the Verkhovna Rada. Among the heads of parliamentary factions and groups, there are five men and four women.[2855]

Women account for 25% of committee heads, 13.3% of deputy heads, 13.3% of first deputy heads and only 6.3% of secretaries. Higher levels of women's representation are observed among heads of subcommittees — 25.3%.[2856] Thus, an imbalance persists at committee level, especially in key management positions. In seven committees, women do not hold any leadership positions — head, deputy head or secretary — while in four committees, the share of women among heads of subcommittees is below 20%.[2857] In addition, women are not represented in one committee.[2858]

2851 On Amendments to Certain Legislative Acts of Ukraine on Preventing and Combating Political Corruption: Law of Ukraine No. 731-VIII of 08.10.2015. ↗

2852 The NACP Distributed Public Funding to Parliamentary Parties. National Agency on Corruption Prevention, 2020. ↗

2853 OSCE/ODIHR Final Report on the Observation of the 2019 Parliamentary Elections, p. 16. ↗

2854 For more details, see the subsection 'Electoral Rights of Women'.

2855 The parliamentary faction of the political party 'European Solidarity' is headed by two co-heads: one man and one woman. According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2856 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2857 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2858 Committee on Freedom of Speech.

In February 2021, MPs registered Draft Law No. 5005,[2859] which proposed that leadership positions in committees should be distributed with due regard to the principle of gender equality. It also proposed that at least one third of the positions of committee heads, as well as one third of the positions of first deputy heads, deputy heads and secretaries of committees, should be held by representatives of each sex. The committee of primary responsibility recommended that the Verkhovna Rada adopt this draft law as a basis.[2860]

Information on the sex of MPs is publicly available, through official MP profiles and open data sources. At the same time, Parliament does not conduct systematic monitoring or regular reporting on the gender balance in the composition of parliamentary bodies and their leadership. There are no official reports or analytical materials that would summarise the relevant indicators,[2861] track their dynamics or assess the level of representation of different groups. Thus, the availability of open primary data is not accompanied by institutionalised practices for its analysis and use them to assess the inclusiveness of Parliament.

Gender mainstreaming

Parliamentary legislation does not contain provisions on gender mainstreaming[2862] — Parliament has no strategies or action plans for introducing the principles of gender equality in parliamentary procedures. Gender mainstreaming is an important cross-cutting element of equality and inclusion policy, enabling society to involve representatives of different groups, including those traditionally under-represented, more effectively in policymaking.[2863] The key challenge is that gender equality in Parliament still exists largely as a principle whose importance is recognised at the declarative level. It has not yet become a fully embedded organising principle for all parliamentary work, part of the Verkhovna Rada's legal culture, the law-making process and the evaluation of its outcomes.[2864]

In the Verkhovna Rada of the ninth convocation, legislative support for equal rights and opportunities for women and men falls within the remit of the Committee on Human Rights, De-occupation and Reintegration of Temporarily Occupied Territories of Ukraine, National Minorities and Interethnic Relations.[2865] The Committee on Foreign Policy has

2859 On Amendments to Certain Legislative Acts of Ukraine on Ensuring Equal Rights and Opportunities for Women and Men, Combating Discrimination and Compliance with Ethical Standards by Members of Parliament of Ukraine: Draft Law of Ukraine, registration No. 5005 of 02.02.2021. ↗

2860 Opinion of the Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine on Draft Law of Ukraine No. 5005 'On Amendments to Certain Legislative Acts of Ukraine on Ensuring Equal Rights and Opportunities for Women and Men, Combating Discrimination and Compliance with Ethical Standards by Members of Parliament of Ukraine' of 20.05.2024. ↗

2861 Unlike the updated website of the Verkhovna Rada, the old version makes it possible to distinguish groups of MPs by sex. Members of Parliament of Ukraine. Verkhovna Rada of Ukraine. ↗

2862 Gender mainstreaming is a strategy for ensuring the integration of a gender perspective in the development, implementation and evaluation of all policies, programmes and measures to promote gender equality and combat discrimination. What is gender mainstreaming? European Institute for Gender Equality. ↗

2863 Best Practices of Gender Mainstreaming in the European Parliament and Legislative Bodies of EU Member States. Information Note. NGO 'Internews', 2024. ↗

2864 Gender-Sensitive Lawmaking in the Verkhovna Rada of Ukraine: National Experience and International practices. Jurfem, 2026. ↗

2865 On the List, Numerical Composition and Remit of Committees of the Verkhovna Rada of Ukraine of the Ninth Convocation: Resolution of the Verkhovna Rada of Ukraine No. 19-IX of 29.08.2019. ↗

established and operates a Subcommittee on Ukraine's Compliance with International Commitments in the Field of Human Rights Protection and Gender Policy.[2866]

However, the existence of these structures is not sufficient for a comprehensive and holistic approach to gender issues. The efforts of individual MPs, international organisations and CSOs have not yet made this process sustainable, while the institutional and individual capacity of committee secretariats and the expert and analytical units of the Secretariat of the Verkhovna Rada requires systematic support and training.[2867]

The Verkhovna Rada also has the 'Equal Opportunities' IFA. It was first established by MPs of the sixth convocation and has been renewed in every convocation since then, indicating that gender equality has been an important issue for MPs of recent convocations. The association also has a Public Council on Gender Issues, which helps coordinate the efforts of MPs, civil society activists and international organisations.[2868] 'Equal Opportunities' aims to improve the position of women in society and intensify public dialogue on ensuring gender equality in various areas of socio-political life. Among the association's best-known achievements is its advocacy for the ratification of the Istanbul Convention.[2869]

The Verkhovna Rada ratified the United Nations Convention on the Elimination of All Forms of Discrimination against Women.[2870] Accordingly, in 2022, Ukraine presented its ninth periodic report on the implementation of this Convention.[2871] Ahead of this, committees held joint committee hearings on Ukraine's fulfilment of its international obligations under the Convention and issued relevant recommendations.[2872]

The Verkhovna Rada applies the principle of ensuring equal rights and opportunities for women and men in its legislative work.[2873] In practice, this may be ensured through gender-based legal review, which is carried out in respect of current legislation and draft legal acts. However, its actual impact is extremely limited, while gender-based legal review itself mostly concerns only the text of a law or draft law. In addition, gender-based legal review is carried out by the MoJ in respect of draft laws initiated by the Government. There is no such obligation with regard to gender-based legal review of draft laws submitted by MPs. At present, the Secretariat of the Verkhovna Rada has no designated persons or units that can or are required to conduct gender-based legal review. The development, adoption and implementation of legislation on conducting gender-based legal review of draft laws is one of the commitments set out in the Roadmap on the Functioning of Democratic Institutions.[2874]

2866 Subcommittees. Committee on Foreign Policy and Interparliamentary Cooperation. 2024. ↗

2867 Gender Policy in Regulatory Documents. Part 1. OSCE, 2020. ↗

2868 Page of the Public Council on Gender Issues on the social network Facebook. ↗

2869 On Ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence: Law of Ukraine No. 2319-IX of 20.06.2022. ↗

2870 United Nations Convention on the Elimination of All Forms of Discrimination against Women. ↗

2871 The Government Delegation of Ukraine Took Part in the Defence of Ukraine's Ninth Periodic Report on the Implementation of the UN Convention on the Elimination of All Forms of Discrimination against Women. Government Portal, 2022. ↗

2872 Committee hearings on 'Ukraine's Fulfilment of International Obligations under the United Nations Convention on the Elimination of All Forms of Discrimination against Women'. Committee on Foreign Policy and Interparliamentary Cooperation, 2021. ↗

2873 On Ensuring Equal Rights and Opportunities for Women and Men: Law of Ukraine No. 2866-IV of 08.09.2005, Article 8. ↗

2874 Roadmap on the Functioning of Democratic Institutions. Measure 7 of Strategic Result 1 of Section III.C. ↗

As regards current legislation, annual plans for gender-based legal review are approved by the MoJ. The relevant plan for 2025[2875] included seven normative legal acts, six of which were laws, while the plan for 2026[2876] includes five normative legal acts, only one of which is a law.

The Law of Ukraine 'On Law-Making Activity' proposes certain steps to strengthen the role of gender mainstreaming in the law-making process, including gender impact assessment of draft laws and the use of gender-neutral language.[2877]

Inclusive institutional practices

Ukrainian legislation establishes the principles of non-discrimination and equal access, which also apply to the personnel policy of the Secretariat of the Verkhovna Rada. In particular, the Law of Ukraine 'On Civil Service'[2878] provides for equal access to civil service and prohibits any form of discrimination in entering and performing civil service, as well as providing for career advancement based on professional competence and performance. Practical mechanisms for implementing these principles are defined by the Procedure for Conducting a Competition for Civil Service Positions,[2879] which establishes open competitive selection in compliance with the principles of equal access, non-discrimination and transparency, and provides for the possibility of reasonable accommodation for persons with disabilities during participation in a competition.

Information on vacancies in the Secretariat of the Verkhovna Rada is published openly,[2880] and candidate requirements are formulated primarily in terms of professional competences and do not contain direct discriminatory restrictions. According to the Regulation on the Secretariat of the Verkhovna Rada of Ukraine,[2881] the Secretariat organises the functioning of civil service and provides HR support to employees of the Secretariat, MPs and assistant consultants, as well as selecting, hiring and transferring employees.

The Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada of Ukraine until 2022[2882] identified ensuring gender equality among its implementation principles and provided for a gender audit of human resources management. Following this gender audit,[2883] the Secretariat of the Verkhovna Rada was recommended to institutionalise the function of ensuring equal rights and opportunities, in particular by creating a relevant position or unit and including provisions on guarantees of gender equality in labour relations in the collective agreement. However, the Secretariat

2875 Plan for Conducting Gender-Based Legal Review of Legislation for 2025. Ministry of Justice of Ukraine. ↗

2876 Plan for Conducting Gender-Based Legal Review of Legislation for 2026. Ministry of Justice of Ukraine. ↗

2877 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, Articles 30 and 35. ↗

2878 On Civil Service: Law of Ukraine No. 889-VIII of 10.12.2015, Articles 4, 7, 18 and 19. ↗

2879 Procedure for Conducting a Competition for Civil Service Positions: Resolution of the Cabinet of Ministers of Ukraine No. 246 of 25.03.2016, paras. 3, 4 and 20. ↗

2880 Secretariat of the Verkhovna Rada of Ukraine, HR Department. Competition for Civil Service Positions. ↗

2881 On Approval of the Regulation on the Secretariat of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 769/11-RH of 25.08.2011, subparas. 24–25, para. 7. ↗

2882 On the Strategy for Building the Human Resources Capacity of the Secretariat of the Verkhovna Rada of Ukraine until 2022: Order of the Head of the Secretariat of the Verkhovna Rada of Ukraine No. 3359-k of 05.12.2019. ↗

2883 Gender Audit of the Secretariat of the Verkhovna Rada of Ukraine (2019–2020). UNDP in Ukraine, 2020. ↗

had identified a list of authorised employees of structural units responsible for ensuring gender equality standards.[2884]

Despite the significant predominance of women among employees of the Secretariat of the Verkhovna Rada — two thirds of staff — women hold almost half of management positions and positions involving the management of units.

Under martial law, the lives and health of MPs, as well as other citizens of Ukraine, are exposed to heightened risks. Legislation allows committee meetings to be held by videoconference,[2885] which expands the technical possibilities for MPs to participate in the work of parliamentary bodies. At the same time, these mechanisms were introduced as a tool for ensuring the functioning of Parliament during the pandemic and subsequently under martial law, and do not provide for a separate policy to support parenthood or a gender-sensitive organisation of work.

In parliamentary work, male and female MPs often face the need to be constantly involved in plenary meetings and sessions of Parliament, working groups and urgent voting, which may take place outside regular working hours. This often undermines work-life balance, especially for those who have children or have to care for relatives who need support due to age or illness. In such circumstances, the unequal distribution of care responsibilities may become a serious obstacle for women seeking to engage in political activity.[2886] During the full-scale war, MPs have often faced difficulties in combining the performance of their parliamentary powers with family responsibilities, in particular childcare.[2887]

The Rules of Procedure of the Verkhovna Rada establish that, at a plenary meeting, an MP must not use offensive language or obscene words or call for unlawful actions. An MP against whom offensive language has been used has the right to make a response or to apply to the Committee on the Rules of Procedure with a statement concerning the remarks made by another MP.

The Rules of Procedure also establish a limited list of types of liability for breaches of ethics — interruption of a speech, deprivation of the right to speak until the end of the plenary meeting and deprivation of the right to participate in a plenary meeting. However, they apply only to breaches of the rules of conduct in the session hall, exclusively during a plenary meeting and only where another MP or a parliamentary faction or group has been insulted.[2888] Women MPs indicate that this has sometimes been the reason why a complaint against another MP was not considered, as inappropriate or offensive remarks were made outside a plenary meeting or in personal communication.[2889]

2884 Annual Report on the Development of Parliamentary Civil Service, prepared as part of the EU–UNDP Parliamentary Reform Project. Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, 2021. ↗

2885 On Committees of the Verkhovna Rada of Ukraine: Law of Ukraine No. 116/95-VR of 04.04.1995, Part 5 Article 42. ↗

2886 Towards a Gender-Sensitive Parliament: Current Situation. NGO 'Internews', 2024. ↗

2887 Experience of Male and Female Parliamentarians During Martial Law in Ukraine. Agency for Legislative Initiatives, 2025. ↗

2888 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Articles 51–52. ↗

2889 Information provided by Respondent No. 58 during an interview conducted on 15.04.2026.

The regulatory framework does not contain any other specialised internal procedure for considering complaints, including confidentially, regarding discrimination or sexual harassment among MPs, nor does it include provisions aimed at preventing and combating violence against women in politics, in particular in the activities of MPs. Hidden gender stereotypes persist in the parliamentary environment. Responses to cases of gender bias or inappropriate behaviour in the parliamentary environment often take place through informal mechanisms, including public disclosure or direct remarks to colleagues.[2890]

In December 2022, MPs registered draft law No. 8327,[2891] which enshrines the principles and rules of ethical conduct for MPs and proposes to establish a self-regulation mechanism by assigning the function of overseeing compliance with parliamentary ethics to a specially established parliamentary committee. The committee would consider complaints against MPs who violated parliamentary ethics in the exercise of their powers and decide on issues of their liability. In March 2026, MPs submitted a revised draft law No. 8327 for consideration. The committee of primary responsibility recommended that the Verkhovna Rada adopt this draft law as a basis.[2892]

Issues of preventing discrimination and inappropriate behaviour in the Secretariat of the Verkhovna Rada are regulated by the Law of Ukraine 'On Civil Service' and the General Rules of Ethical Conduct for Civil Servants.[2893] These normative legal acts prohibit discrimination, degrading statements, sexual harassment and mobbing, and provide for disciplinary liability for such violations. Additional occupational health and safety measures for employees are defined by the collective agreement of the Secretariat,[2894] which provides, in particular, for vouchers to health and recreation facilities, the organisation of transport for employees by service buses in emergencies and financial assistance to the families of employees in the event of their death as a result of armed aggression.

The Research Service provides training for employees of the Secretariat of the Verkhovna Rada, including on gender issues. For example, it offers employees the opportunity to complete advanced training programmes such as 'Integrating a Gender Approach and Gender-Based Legal Review in the Verkhovna Rada of Ukraine' or 'Professional Etiquette for Employees of the Secretariat of the Verkhovna Rada of Ukraine'.[2895]

Ukrainian is the only state language in Ukraine.[2896] The working language of the Verkhovna Rada, its bodies and officials is the state language. A foreigner or stateless person may speak at meetings of the Verkhovna Rada or its bodies in another language, with the Secretariat providing simultaneous or consecutive interpretation into the state language.

2890 Experience of Male and Female Parliamentarians During Martial Law in Ukraine. Agency for Legislative Initiatives, 2025. ↗

2891 On Amendments to Certain Laws of Ukraine on the Ethics of Members of Parliament of Ukraine: Draft Law of Ukraine, registration No. 8327 of 30.12.2022. ↗

2892 Opinion of the Committee on the Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine on Draft Law of Ukraine No. 8327 'On Amendments to Certain Laws of Ukraine on the Ethics of Members of Parliament of Ukraine' of 06.04.2026. ↗

2893 On Approval of the General Rules of Ethical Conduct for Civil Servants and Local Self-Government Officials: Order of the National Agency of Ukraine on Civil Service No. 158 of 05.08.2016. ↗

2894 Collective Agreement of the Secretariat of the Verkhovna Rada of Ukraine of 25.10.2018. ↗

2895 Calendar Plan of Educational Events. Research Service of the Verkhovna Rada of Ukraine. ↗

2896 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 1 Article 10. ↗ ; On Ensuring the Functioning of Ukrainian as the State Language: Law of Ukraine No. 2704-VIII of 25.04.2019, Article 1. ↗

A speech or part of a speech delivered in a foreign language at a meeting of the Verkhovna Rada or its bodies is included in the transcript in translation into the state language.[2897]

All information on the website of the Verkhovna Rada — transcripts of plenary meetings, committee opinions and decisions, information on MPs, news and other materials — is available in the state language. Some information is also available in English. With one exception,[2898] committees of the Verkhovna Rada do not have English-language versions of their websites.

Representation of minorities[2899]

Ukrainian legislation guarantees the equality of citizens before the law and prohibits privileges or restrictions based on race, religious or other beliefs, ethnic or social origin, language or other characteristics. Citizens have the right to participate in the administration of state affairs and to freely elect and be elected to public authorities.[2900] Electoral legislation specifies the right to stand as a candidate for MP by establishing uniform general requirements for citizens running for Parliament.[2901]

Specialised Law No. 2827-IX[2902] establishes that persons belonging to national minorities (communities) have the right to participate in elections and referendums, to freely elect and be elected to public authorities and places an obligation on the state to create conditions for the effective participation of such persons in the administration of state affairs.

Law No. 1616-IX[2903] guarantees the indigenous peoples of Ukraine the right to participate in economic, social and cultural life, and establishes the state's obligation to promote the representation of indigenous peoples in the Verkhovna Rada. However, this provision is not accompanied by a special procedure for its implementation in electoral or parliamentary legislation.

Legislation does not provide for special measures to promote the participation of national minorities, indigenous peoples or other under-represented groups in the Verkhovna Rada in the form of quotas, reserved seats or separate electoral mechanisms. However, the current inclusive policy is producing visible results. The Verkhovna Rada of the ninth convocation includes a significant number of representatives of national minorities (communities) and indigenous peoples of Ukraine, including representatives of the Crimean Tatar people, as well as Jewish, Georgian and other national minorities (communities).[2904]

In practice, the participation of under-represented groups in the Verkhovna Rada is most clearly observed in the context of the Crimean Tatar people. A separate format

2897 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Parts 3, 5 and 6 Article 2. ↗

2898 The Committee on Ukraine's Integration into the European Union has an English-language version of its website, but its content is much more limited than the Ukrainian-language version.

2899 For more details, see the subsection 'Electoral Rights of National Minorities (Communities) and Indigenous Peoples'.

2900 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 24 and 38. ↗

2901 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Article 134. ↗

2902 On National Minorities (Communities) of Ukraine: Law of Ukraine No. 2827-IX of 13.12.2022. ↗

2903 On Indigenous Peoples of Ukraine: Law of Ukraine No. 1616-IX of 01.07.2021. ↗

2904 Sixth Periodic Report of Ukraine on the Implementation of the Framework Convention for the Protection of National Minorities. State Service of Ukraine on Ethnic Policy and Freedom of Conscience. ↗

of parliamentary advocacy is the work of the 'Crimean Platform' IFA, whose co-heads include Crimean Tatar MPs and which plays a leading role in the parliamentary track of the Crimean Platform format and promotes active cooperation within the parliamentary assemblies of international organisations.[2905]

Access to the Verkhovna Rada

The procedure for physical access to the buildings of the Verkhovna Rada is established by Law of Ukraine No. 160/98-VR,[2906] according to which the buildings where the Verkhovna Rada operates are facilities under state protection, as well as by the relevant Order of the Head of the Verkhovna Rada, which determines the procedure for admission to parliamentary buildings and the rules for staying in them.[2907] Entry to the buildings of the Verkhovna Rada is carried out through security posts upon presentation of an identity document and completion of security screening, while visitors are admitted to the premises of Parliament on the basis of a pre-arranged entry request.[2908]

Following the start of the full-scale invasion, access to the territory of the 'Government Quarter', where the buildings of the Verkhovna Rada, committee premises and some other state bodies are located, has been restricted by checkpoints and the requirement to obtain additional admission. In public communication, restrictions on physical access to the administrative building of Parliament are explained by the legal regime of martial law, which allows additional security measures to be introduced, including reinforced protection of certain facilities and a special regime for their operation.

Before the start of the full-scale invasion, the legal framework also provided for separate procedures for citizens' access to open plenary meetings of the Verkhovna Rada[2909] and participation in open visiting events in Parliament.[2910] At the same time, given the operation of martial law, open visiting events are not held in the administrative building of Parliament on Hrushevskyi Street.[2911]

Specialised Law of Ukraine No. 875-XII[2912] establishes the state's obligation to create conditions for a person with a disability to exercise all human rights and fundamental freedoms without any discrimination on the grounds of disability.

The Rules of Procedure of the Verkhovna Rada and internal acts of Parliament defining the procedure for access to parliamentary premises focus mainly on procedural and security aspects and do not contain separate provisions on ensuring access for persons with disabilities to the Parliament building, parliamentary procedures or information.

2905 Crimean Platform. Crimean Platform. ↗

2906 On State Protection of Public Authorities of Ukraine and Officials: Law of Ukraine No. 160/98-VR of 04.03.1998. ↗

2907 On Ensuring the Legal Regime of State Protection of Administrative Buildings, Structures and Service Premises of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 37/20-RH of 31.01.2020. ↗

2908 Ibid.

2909 On the Procedure for Access of Persons to Open Plenary Meetings of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 694/14-RH of 27.10.2014. ↗

2910 On Approval of the Regulation on the Procedure for Organising and Holding Open Visiting Events in the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 582/04-RH of 24.05.2004. ↗

2911 How to Visit the Educational Centre? Official website of the Educational Centre of the Verkhovna Rada of Ukraine. ↗

2912 On Fundamentals of Social Protection of Persons with Disabilities in Ukraine: Law of Ukraine No. 875-XII of 21.03.1991. ↗

The Parliament building has certain accessibility elements, including ramps, lifts and platform lifts. However, their use is accompanied by a number of practical limitations. In particular, access to the building is complicated by the presence of stairs and heavy doors, while movement inside the building may take a long time and depends on the availability of elevators.[2913] There have also been recorded cases where platform lifts are technically installed but do not operate continuously, in particular because they are switched off. Certain elements of the infrastructure, including ramps and internal movement routes, have been adapted gradually as part of adjusting the building for the work of MPs with disabilities.[2914] At the same time, as of March 2026, the plenary hall still does not provide conditions for the full participation of persons with disabilities in the work of Parliament. In particular, there is no properly equipped access to the rostrum of the Verkhovna Rada, while access to it is effectively blocked.[2915]

In 2024, as part of ITA, an accessibility audit of the administrative buildings of the Verkhovna Rada was conducted for persons with reduced mobility, along with an audit of the digital accessibility of the Verkhovna Rada's web resources for users with visual, hearing, mobility, speech and intellectual impairments.[2916] Following the accessibility assessment of facilities for persons with reduced mobility, relevant reports and recommendations were prepared to improve the inclusiveness of the physical environment and services.[2917]

As of March 2025, the Verkhovna Rada's web resources demonstrate a limited level of accessibility for persons with visual impairments.[2918] According to the results of monitoring of the accessibility of state websites, Parliament's official portal meets only certain basic requirements: in particular, alternative text for images and text labels for buttons are available, while other components — text contrast, navigation accessibility, correct markup, keyboard navigation support and others — remain unfulfilled. This indicates the absence of a systematic approach to ensuring the digital accessibility of information for users with visual impairments.

At the same time, Parliament provides access to information about its activities in various formats. For example, transcripts of plenary meetings are published in video, audio and text formats, which expands opportunities for different categories of users to obtain information. However, the accessibility of these formats remains uneven. Official broadcasts of Verkhovna Rada meetings are not accompanied by subtitles,[2919] which limits access to information for persons with hearing impairments, while subtitles are partially available for videos published on Parliament's official YouTube channel.[2920] At the same time, there are no signs of the systematic use of other adapted formats, in particular sign language interpretation or simplified, 'easy-to-read' versions of information materials.

2913 Dignity and Equality: Parliament on the Path to Barrier-Free Accessibility. Holos Ukrainy, 2024. ↗

2914 Yana Zinkevych: on a Scandalous Priest, Poroshenko, Zelenskyy, Yarosh and Sexism. Parlament.ua, 2021. ↗

2915 Publication by European Solidarity on the social network Facebook, 2026. ↗

2916 Breakdown of International Technical Assistance Received in 2025 (Equipment, Services). Secretariat of the Verkhovna Rada of Ukraine, 2025. ↗

2917 Information provided by the Secretariat of the Verkhovna Rada of Ukraine in letter No. 09/13-2026/53980 of 13.03.2026.

2918 Web Accessibility of Websites of Public Authorities: Report Based on the Results of 2025 Monitoring. UNDP, 2025. ↗

2919 Rada Online. Website of the Verkhovna Rada of Ukraine. ↗

2920 Official Rada TV Channel on YouTube. ↗

Taken together, this indicates that access to information is ensured only partially, does not cover all groups of persons with disabilities and has not been institutionalised at the level of policies or standards.

Youth engagement

The Constitution of Ukraine[2921] establishes different age requirements for active and passive electoral rights: citizens who have reached the age of 18 have the right to vote in elections, whereas a citizen who has reached the age of 21 by election day, has the right to vote and has resided in Ukraine for the last five years may be elected as an MP. The legal framework governing elections and the activities of Parliament and its bodies does not contain provisions aimed at ensuring youth representation in the Verkhovna Rada.

In terms of age balance, the composition of Parliament and its leadership is relatively homogeneous. At the time of taking the MP's oath, almost 40% of MPs were under the age of 40. The average age at which MPs took the oath in the ninth convocation was 42, compared with 44 in the previous convocation. Compared with the eighth convocation, the share of MPs under 30 in the Verkhovna Rada of the ninth convocation more than doubled. The share of MPs under 40 also increased from 34.9% to 47.4%. As of 31 July 2026, the average age of MPs was 49, while the average age of persons in leadership positions was 50, which does not indicate a significant shift towards either older or younger age groups. MPs aged 30–39 account for around 16% of the total composition of Parliament.[2922] The increase in the share of younger MPs is more inertial in nature than the result of a targeted policy to support youth representation.

Information on the age of MPs is publicly available through official MP profiles and open data sources. At the same time, Parliament does not conduct systematic monitoring or reporting on the age balance in the Verkhovna Rada or its bodies.[2923]

Parliament does not have a separate committee, subcommittee or other body composed specifically of young MPs or focused specifically on supporting their activities. State youth policy falls within the remit of the Committee on Youth and Sports, but there is no information on its targeted activities concerning young MPs. The Verkhovna Rada has accessible professional development mechanisms, including training and webinars, but no separate environment has been specifically identified to support young parliamentarians. At the same time, some MPs participate in the EP's 'Young Political Leaders' programme,[2924] which aims to facilitate contacts between young Ukrainian parliamentarians and their European counterparts.

Youth engagement in policymaking and in the activities of the Verkhovna Rada takes place in various ways.

2921 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 70 and 76. ↗

2922 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 31.07.2026.

2923 Unlike the updated website of the Verkhovna Rada, the old version makes it possible to distinguish groups of MPs by age. Members of Parliament of Ukraine. Verkhovna Rada of Ukraine. ↗

2924 Young Political Leaders Programme. European Parliament. ↗

Specialised Law No. 1414-IX[2925] establishes that youth participation in the formation and implementation of youth policy is ensured by taking young people's views into account when decisions concerning youth are adopted and by involving youth work actors in the implementation of youth policy. In the specialised Committee on Youth and Sports, youth engagement takes place through committee hearings[2926] or consultations during discussions of draft laws.

To involve young people in the activities of the Verkhovna Rada and its bodies, and to create opportunities for taking young people's views into account, including when preparing issues for consideration at meetings of the Verkhovna Rada, the Youth Council under the Head of the Verkhovna Rada was established.[2927] The Youth Council operates on a permanent basis, with its membership rotated every two years. The Youth Council consists of 31 persons, who participate in its work on a voluntary basis. In April 2025, its composition was approved[2928] and its first meeting was held.[2929] It is envisaged that meetings of the Youth Council will be convened quarterly.

At the instruction of the Chairman of the Verkhovna Rada, the Youth Council may analyse current legislative regulation of the activities of the Verkhovna Rada and its bodies, prepare proposals for the Head of the Verkhovna Rada on areas and mechanisms for engaging young people in the work of the Verkhovna Rada, initiate public consultations and discussions, and so on. In January 2026, the Youth Council held a roundtable discussion on the effectiveness of the operational plan, achievements, challenges and next steps for development.[2930] This indicates the presence of certain elements for assessing the implementation of youth initiatives and reviewing further approaches to its work.

The Youth Council is also implementing the Open Parliament Lab project[2931] — an educational and practical initiative for young people aged 18–30,[2932] under which selected candidates will develop competences in open data, parliamentary analysis and public monitoring.

The Secretariat of the Verkhovna Rada offers youth[2933] traineeships for persons under the age of 35, aimed at familiarising young people with the activities of the Verkhovna Rada, the specific features of civil service in its Secretariat and deepening their knowledge of parliamentarism and democracy.

2925 On the Basic Principles of Youth Policy: Law of Ukraine No. 1414-IX of 27.04.2021. ↗

2926 Committee hearings: 'The Situation of Youth in Ukraine: Challenges and Adaptation under Martial Law'. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

2927 On the Youth Council under the Head of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 1601/24-RH of 06.12.2024. ↗

2928 On Approval of the Composition of the Youth Council under the Head of the Verkhovna Rada of Ukraine: Order of the Chairman of the Verkhovna Rada of Ukraine No. 528 of 15.04.2025. ↗

2929 Publication by the Chairman of the Verkhovna Rada on the social network Facebook, 2025. ↗

2930 Publication by the Youth Council under the Head of the Verkhovna Rada of Ukraine on the social network Facebook, 2026. ↗

2931 Open Parliament Lab. ↗

2932 Publication by the Youth Council under the Head of the Verkhovna Rada of Ukraine on the social network Instagram, 2026. ↗; Publication by the Youth Council under the Head of the Verkhovna Rada of Ukraine on the social network Facebook, 2026. ↗

2933 On Approval of the Procedure for Traineeships in the Secretariat of the Verkhovna Rada of Ukraine for Young Citizens Who Do Not Hold Civil Service Positions: Order of the Secretariat of the Verkhovna Rada No. 2360-K of 10.10.2024. ↗

Recruitment of interns for the Traineeship Programme is conducted annually. As a rule, the traineeship takes place in person, on a full-time or part-time basis, for up to six months. If martial law or a state of emergency is introduced, the traineeship may be suspended by an Order of the Head of the Secretariat or conducted remotely or in a mixed format. Thus, young people who began their traineeship back in January 2022 completed it only in April 2025.[2934]

In November 2025, 35 young professionals who did not hold civil service positions began a six-month traineeship in the Secretariat of the Verkhovna Rada and the Research Service in in-person and remote formats — the 30th selection round.[2935] As of March 2026, 26 persons were undergoing traineeships in 14 structural units of the Secretariat in in-person, remote and mixed formats, on both a full-time and part-time basis.[2936] This includes the participation of interns in the work of the secretariats of parliamentary committees, the Educational Centre, legal, information and research units, as well as bilateral meetings with representatives of the parliamentary leadership on the work of Parliament.[2937] Up to 30 interns undergoing full-time traineeships may receive a scholarship amounting to two subsistence minimums.[2938] The latest stage of the Youth Internship Programme concluded in May 2026.[2939]

The intern is involved in performing the tasks and functions of the relevant structural unit, as well as in preparing and processing draft documents. The intern has the right to attend meetings of parliamentary committees and plenary meetings of the Verkhovna Rada, as well as to participate in conferences, meetings, working group sessions and other events relating to the competence of the relevant structural unit. Training events, training sessions and seminars are held for interns.[2940] Interns report monthly on their activities during the traineeship, while the template for such a report includes a section for proposals and suggestions on improving the traineeship process, making it possible to collect interns' feedback and ensure follow-up communication.

Youth traineeships in the Secretariat of the Verkhovna Rada provide an opportunity to involve interns in the work of Parliament. According to respondents' estimates, around 20–30% of interns go on to work in the Secretariat after completing the traineeship.[2941] The Research Service has also reported successful cases of employment following traineeships.[2942] In addition, attempts are currently being made to regulate the procedure for traineeships in the Secretariat of the Verkhovna Rada at the legislative level — the

2934 Youth Building the Future: Interns of the Verkhovna Rada of Ukraine Successfully Completed the Traineeship Programme. HR Department of the Secretariat of the Verkhovna Rada of Ukraine, 2025. ↗

2935 Information from the Facebook page of the NGO 'League of Interns', 2025. ↗

2936 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2937 Publication by Olena Kondratiuk on the social network Facebook, 2026. ↗

2938 As of 31 July 2026, the subsistence minimum for able-bodied persons as of 1 January of the calendar year is UAH 3,328. Accordingly, the scholarship amount is UAH 6,656.

2939 The Secretariat of the Verkhovna Rada of Ukraine Presented Certificates to Participants of the Youth Internship Programme. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

2940 On Approval of the Procedure for Traineeships in the Secretariat of the Verkhovna Rada of Ukraine for Young Citizens Who Do Not Hold Civil Service Positions: Order of the Secretariat of the Verkhovna Rada No. 2360-K of 10.10.2024. ↗

2941 Information provided by Respondent No. 49 during an interview conducted on 24.03.2026.

2942 Information provided by Respondent No. 60 and No. 61 during an interview conducted on 17.04.2026.

relevant provisions are reflected in Draft Law of Ukraine 'On Parliamentary Service' No. 4530.[2943]

Progress and issues

The Verkhovna Rada is taking steps to create conditions for combining parenthood with the exercise of parliamentary powers. In July 2026, a Space for Children and Parents was opened in the Verkhovna Rada, specially equipped for use by MPs with children from birth to two years of age and providing areas for play, sleep, feeding and hygiene.[2944] In addition, a group of MPs registered Draft Law No. 15371,[2945] which would allow an MP to attend open plenary sittings and open meetings of committees and temporary commissions with a child under the age of two whose father, mother or legal representative the MP is.

The Verkhovna Rada continues its successful youth internship programme. Since the Programme was launched, more than 2,200 young people have completed internships in the Secretariat of the Verkhovna Rada of Ukraine.[2946] In June 2026, the Secretariat announced a competitive selection for internships for war veterans, both women and men. The programme is intended to support defenders in returning to civilian life and identifying their future professional path.[2947]

The imbalance in the distribution of leadership positions in committees indicates a possible limitation on women's representation in the work of the Verkhovna Rada. Accordingly, women have fewer opportunities to influence agenda-setting, which reduces the scope for their substantive representation in the work of Parliament.

Parliament does not analyse the gender and age ratio of MPs in the Verkhovna Rada or its bodies. This makes it impossible to objectively assess the extent to which Parliament represents the interests of particular social groups and complicates access to information on the age and gender composition of the Verkhovna Rada.

The Verkhovna Rada has no strategy, plan or any other document for implementing gender policy. Gender issues remain secondary, are not integrated into the legislative process and their discussion depends on the initiative of individual MPs. Gender issues are present on the agenda and certain structures, and consultation mechanisms exist, but there is no complete institutional cycle or permanent, systematic and sustained focus.[2948] A significant share of draft laws is developed without a systematic assessment of their impact on specific social groups, namely a gender impact assessment, which leads to unintended consequences when legislative initiatives are implemented.

2943 On Parliamentary Service: Draft Law of Ukraine, registration No. 4530 of 21.12.2020. ↗

2944 Verkhovna Rada Opens Space for parents and Children, Registers Bill to Support Parenthood. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

2945 On Ensuring Guarantees of Labour Rights for People's Deputies of Ukraine with Child : Draft Law of Ukraine, registration No. 15371 of 30.06.2026. ↗

2946 The Secretariat of the Verkhovna Rada of Ukraine Presented Certificates to Participants of the Youth Internship Programme. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

2947 Opportunities for male and female veterans: a competitive selection process has been announced for internships at the Secretariat of the Verkhovna Rada of Ukraine. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

2948 Gender-Sensitive Lawmaking in the Verkhovna Rada of Ukraine: National Experience and International practices. Jurfem, 2026. ↗

The Verkhovna Rada lacks practices of gender-sensitive law-making and systematic gender-legal review of draft laws. On the one hand, the Law of Ukraine 'On Ensuring Equal Rights and Opportunities for Women and Men' expressly requires the principle of equal rights and opportunities to be taken into account in the legislative activities of the Verkhovna Rada and formally extends gender-legal review to draft regulatory legal acts. On the other hand, the current texts of the Rules of Procedure of the Verkhovna Rada and the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' contain no express reference to gender-legal review or even to 'gender-sensitive law-making' as a separate stage. This means that a specific parliamentary procedure clearly defining the body responsible, the stage at which the review is conducted, its consequences and the procedure for taking the conclusions of gender-legal review into account in relation to draft laws has still not been detailed.[2949]

The introduction of the principle of gender equality in the activities of the Secretariat of the Verkhovna Rada remains fragmented, without institutionalised functions related to gender policy. Although the principle of gender equality was included in the Strategy for Building the Human Resources Capacity of the Secretariat until 2022, the Secretariat has not approved a new strategy of this kind, or any other document, policy or action plan. The absence of an internal gender equality policy and of a specialised body for monitoring and analysing the gender sensitivity of internal practices in the Verkhovna Rada indicates the need to introduce these mechanisms to ensure fair working conditions and gender parity.[2950]

The absence of a coherent institutional system of parliamentary ethics and mechanisms for responding to breaches of ethical standards limits Parliament's ability to effectively uphold the principles of equality and non-discrimination in its own activities. Although the Rules of Procedure of the Verkhovna Rada contain general requirements concerning respect for the honour and dignity of others, draft law No. 8327 has not yet been considered. As a result, responses to such breaches of ethics are often handled through informal mechanisms, including individual remarks by colleagues, which does not ensure a systematic and institutionally regulated approach to resolving such situations.

The Verkhovna Rada has not developed policies aimed at preventing discrimination, sexism and sexual harassment, which creates ethical risks that may affect the internal political culture in the Verkhovna Rada. As a result, unacceptable behaviour may remain without an appropriate response, as there are simply no formal mechanisms for addressing inappropriate conduct, no instructions for MPs who have experienced discrimination, no response standards and so on. This damages the reputation of Parliament, as the public expects MPs to comply with the highest standards of ethics and rules of conduct, and also hinders the development of an inclusive political environment.

Persons with disabilities do not have full and unobstructed access to the buildings and premises of the Verkhovna Rada. Despite the presence of certain accessibility elements, the physical infrastructure remains fragmented: access to the building is complicated by structural barriers, while movement inside depends on the functioning of individual technical devices. This indicates the absence of a systematic implementation

2949 Gender-Sensitive Lawmaking in the Verkhovna Rada of Ukraine: National Experience and International practices. Jurfem, 2026. ↗

2950 Towards a Gender-Sensitive Parliament: Current Situation. NGO 'Internews', 2024. ↗

of barrier-free solutions and limits the possibility for persons with disabilities to participate independently in parliamentary processes.

The official web portal of the Verkhovna Rada demonstrates a low level of basic accessibility — according to the results of web accessibility monitoring of websites of state authorities for 2025, it received two points.[2951] The Verkhovna Rada web portal has certain barriers that complicate or make access to electronic services impossible for certain groups of users, in particular persons with disabilities.

Electoral legislation does not provide for special mechanisms to promote the representation of young people or other under-represented groups.[2952] This approach indicates selectivity in the application of inclusiveness tools and the absence of systemic measures aimed at expanding youth representation. As a result, youth participation in Parliament is shaped mainly without targeted institutional support.

Recommendations

1. Ensure that the principles of gender balance are taken into account when forming the membership of committees and distributing leadership positions within them.
2. Monitor and analyse the gender and age balance of MPs in the Verkhovna Rada and its bodies.
3. Develop and approve a comprehensive document under which Parliament would commit to introducing a gender mainstreaming approach in the activities of the Verkhovna Rada. This document should define the objectives, tools and plan for achieving them, as well as measures for monitoring and evaluating progress achieved.
4. Formalise the principle of gender equality at the level of the Secretariat by adopting a separate document or a new Human Resources Capacity Building Strategy that would enshrine this principle. The Secretariat of the Verkhovna Rada should designate a responsible person or structural unit to be responsible for implementing this principle in practice and monitoring compliance with it.
5. Make gender-legal review mandatory and define the body responsible for conducting it (the relevant committee whose remit includes equal rights and opportunities for women and men, a structural unit of the Secretariat, etc.), the timeframe for conducting the review and its role in the legislative process.
6. Introduce Parliament's internal policy on ethical conduct and combating discrimination, which would define the principles and standards of conduct for MPs, as well as procedures for responding to breaches of these standards, by adopting Draft Law No. 8327.
7. Develop and implement a comprehensive preventive mechanism to prevent cases of discrimination, sexism or sexual harassment. Such a mechanism may include defining examples of unacceptable behaviour, standards of professional ethics, regular training for MPs and employees of the Secretariat of the Verkhovna Rada, as well as a monitoring system that would allow risks to be identified in a timely manner.

2951 Web Accessibility of Websites of Public Authorities: Report Based on the Results of 2025 Monitoring. UNDP, 2025. ↗

2952 For more details, see the section 'Electoral Rights of National Minorities (Communities) and Indigenous Peoples'.

8. Ensure the modernisation of Parliament's physical infrastructure in accordance with barrier-free standards by implementing the results of the accessibility audit, establishing mandatory technical requirements and introducing a mechanism to monitor their implementation.
9. Take into account the recommendations on web accessibility[2953] during the next update of the Verkhovna Rada website, which would make it possible to improve its basic accessibility.
10. Provide mechanisms in electoral and parliamentary legislation to promote the representation of young people and other under-represented groups.

2953 Web Accessibility of Websites of Public Authorities: Report Based on the Results of 2025 Monitoring. UNDP, 2025. ↗

CENTRE FOR DEMOCRACY
AND RULE OF LAW

Civil Society



From September 2025 to July 2026, it is difficult to identify any fundamental positive changes in the framework for the functioning of civil society. Rather, the problems and negative trends identified in the European Commission's Ukraine 2025 Report under the EU Enlargement Package (EU Enlargement Package 2025 Report) have intensified.

According to the latest sociological studies,[2954] as of 2025 Ukrainians place the greatest trust in the Armed Forces of Ukraine (AFU) (+88%), volunteer units (+70%), volunteer organisations (+66%), the Church (+42%) and the Security Service of Ukraine (SSU) (+37%). The highest level of distrust is observed towards political institutions (-60%): the Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament), the civil service and political parties. Distrust in public authorities may slow the implementation of necessary reforms, including European integration reforms.

The trend of staff leaving civil society organisations (CSO) for international projects and humanitarian organisations continues, due to the funding gap created by the suspension of USAID assistance in January 2025.[2955] Alongside the absence of large institutional support programmes, the number of projects aimed at advocacy in support of democratic reforms has decreased significantly. As early as January 2026, during meetings of the Ministry of Justice of Ukraine (MoJ) working group on developing an action plan for the implementation of the Roadmap on the Functioning of Democratic Institutions (FDI Roadmap), there was a noticeable decrease in the number of CSOs and their representatives willing to continue supporting the Cabinet of Ministers of Ukraine (Government) and Parliament.[2956] At the same time, the state's demand for expert support from the professional civil society sector is growing and is often stereotyped by the state as a need to engage a public association (PA) implementing international technical assistance (ITA) projects, formulate terms of reference for it and receive a ready-made study with recommendations for action.[2957] Throughout 2025, the civil society sector actively contributed to the preparation of Government roadmaps[2958] on the rule of law, public administration reform and the functioning of democratic institutions. In December, it also provided its proposals to the draft National Programme for the Adaptation of Legislation to European Union Law (EU acquis) (the National Programme) in order to help the Government shape a framework for comprehensive legislative changes.[2959] The importance of civil society expertise in the European Union (EU) accession process is beyond doubt.[2960] This indirectly indicates growing trust among representatives of public authorities in the work of CSOs, reflecting the general public attitude towards CSOs during the war.

2954 Analysis of Ukrainians' Trust in Public Institutions (2015–2025): Who Ukrainians Trust the Most and the Least? VoxUkraine, 2026. ↗

2955 USAID Suspended Funding in Ukraine: How This Will Affect Socially Important Projects and Who 'Rejoices' at Such Changes. Ukrinform, 2025. ↗

2956 Information provided by Respondent No. 65 during an interview conducted on 17.03.2026.
Information provided by Respondent No. 71 during an interview conducted on 25.03.2026.

2957 According to CEDEM data obtained during cooperation with public authorities in various working groups and committees.

2958 The Cabinet of Ministers Approved the Roadmaps Required for Opening EU Accession Negotiations. ZMINA, 2025. ↗

2959 Politically, One Cannot Be against the EU Now. If You Are against EU Accession, You Are a Kremlin Agent'. European Pravda, 2025. ↗

2960 Speeding up European Integration: Why the State Should Involve CSOs in Work on Legislative Changes. Centre for Democracy and Rule of Law, 2025. ↗

The role of civil society in the European integration process is clearly illustrated by the situation with the official Ukrainian translation of the entire body of the legal system of the European Union, which comprises acts of European Union legislation (but is not limited to them) adopted within the framework of the European Community, the Common Foreign and Security Policy and Cooperation in the field of Justice and Home Affairs (EU acquis), to which Ukraine must adapt its legislation within record timeframes. Without the involvement of projects implemented by the civil society sector in this process, the completion and publication of all official translations will be significantly delayed and may take place only after Ukraine acquires EU membership. This entails a high risk of problems in the approximation and subsequent implementation of provisions due to the absence of an unambiguous interpretation of terms and regulations. It should be noted that the Interagency Working Group on Ensuring the Negotiation Process for Ukraine's Accession to the EU and the Approximation of Ukrainian Legislation to EU Law (Interagency Working Group) preliminarily approved the draft National Programme in December 2025,[2961] without holding public consultations on its text.

On 1 April 2026, the **National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis)**[2962] was approved. It is a comprehensive document that defines a systematic approach to fulfilling commitments within the negotiation process for EU accession and sets out the tasks, deadlines and responsible actors for their implementation. The National Programme includes the Rule of Law Roadmap, the Public Administration Reform Roadmap, the FDI Roadmap, the Action Plan on the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine[2963] and action plans for implementing the recommendations of the European Commission presented in the Ukraine progress reports within the EU Enlargement Package. Monitoring of the state's implementation of the National Programme is expected to be carried out through the Pulse of Accession[2964] electronic system, access to which is currently available only to government officials, although the Government has also announced a component with a public domain to inform society.[2965] The National Programme sets extended deadlines for bringing Ukrainian legislation into line with the EU acquis, for example regarding accession to the Single Euro Payments Area (SEPA).

Ukraine's continued receipt of comprehensive support from international partners depends on the timely fulfilment of the commitments it has made to them. In September 2025, the first reporting on the implementation of the roadmaps took place. The Government prepared and submitted the relevant report to the European Commission and held meetings of the working negotiation groups to discuss its content. An independent assessment[2966]

2961 The Interagency Working Group Approved the National Programme for the Adaptation of Ukrainian Legislation to EU Law, 2025. ↗

2962 On Approval of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis): Resolution of the Cabinet of Ministers of Ukraine No. 438 of 01.04.2026. ↗

2963 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

2964 The Government Approved the Regulation on the 'Pulse of Accession' Information System for Monitoring the Fulfilment of European Integration Commitments. Government Portal, 2025. ↗

2965 Certain Issues of Reporting, Monitoring and Evaluating the Effectiveness of Ukraine's Fulfilment of Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

2966 Brief on the Status of Implementation of the Roadmaps on the Rule of Law and Public Administration Reform. CPLR, 2025. ↗

of the status of roadmap implementation identified certain delays in fulfilling individual commitments within the established deadlines.

As regards implementation of the Ukraine Facility Plan,[2967] the measure under the section 'Fight against Corruption and Money Laundering', which was due to be completed in the fourth quarter of 2025, is overdue and remained unimplemented as of July 2026: *'The next National Risk Assessment has been prepared and conducted in accordance with the updated Methodology for Conducting the National Risk Assessment of Money Laundering and Terrorist Financing in Ukraine'*. The State Financial Monitoring Service (SFMS) is responsible for this measure, with the participation of the Ministry of Finance of Ukraine (MoF).

Against the backdrop of the need for intensive approximation of Ukrainian legislation to the EU acquis, Parliament additionally needs civil society expertise. Instead, since September 2025, the centralisation of key decision-making has continued, along with the strengthening of the role of the Office of the President of Ukraine (Office of the President) amid the 'crisis of the mono-majority in Parliament'.[2968] Nevertheless, the civil society sector has continued to counterbalance this situation through participation in European integration processes, advocacy for necessary changes, the development of joint positions in crisis situations and coalition-building. However, the fifth year of the full-scale war continues to increase the challenges facing civil society. CSOs remain heavily involved in humanitarian response on a scale that exceeds the resources available to the state: (1) evacuating the population from frontline territories, (2) supporting the military, (3) supporting internally displaced persons and communities affected by hostilities and (4) documenting crimes. This is taking place against the backdrop of deteriorating access to banking services and the absence of development projects in communities from which crisis humanitarian support projects have been withdrawn.[2969] This diverts CSO human resources away from oversight and monitoring functions, as well as from international advocacy for the state's interests.

2967 Ukraine Facility Implementation Plan 2024-2027. ↗ ; Reforms for Four Years and EUR 50 Billion from the European Union. Business Climate, Judicial System, Financial Sector, Environment and 11 Other Areas of Reform. Forbes Studied the Ukraine Facility Plan. Forbes, 2024. ↗

2968 Fear and Loathing in the Verkhovna Rada. How and Why Ukraine's Parliament Lost Its Capacity to Function. BBC, 2026. ↗

2969 Ukraine: One Year On. The Implications of US Foreign Aid Cuts on Humanitarian, Government and Development Programmes. ACAPS, 2025. ↗

Framework for the Functioning of Civil Society

Operating Environment for Civil Society

State of play

The role of civil society in Ukraine's socio-economic processes is visible to the international community and reflected in relevant public documents. Thus, the European Union (EU) Enlargement Package 2025 Report states that Ukrainian civil society remains one of the most dynamic in the region and plays a key role in supporting democratic processes, assisting communities and exercising public oversight over Government policy.[2970] In its Presidency conclusions on enlargement, the Council of the EU noted the importance of strengthening the protection of fundamental rights, including ensuring an enabling environment for civil society.[2971] It also underlined the need to expand meaningful public consultations and respond to documented cases of pressure on anti-corruption activists, human rights defenders and civil society organisations.

During the period covered by the report, work continued to improve the legal environment for the activities of civil society organisations (CSO), activists and volunteers. The main efforts of civil society organisations and the expert community were aimed at promoting better legislation:

- for citizens' access to decision-making;[2972]
- for carrying out volunteering activities;[2973]
- to counter the negative unintended consequences of implementing legislation in the field of anti-money laundering and countering the financing of terrorism (AML/CFT);[2974]

2970 Ukraine 2025 Report. European Commission, 2025. ↗

2971 Presidency Conclusions of Enlargement. Council of the European Union, 2025. ↗

2972 How to Influence Decisions in a Community: Instructions, Common Pitfalls and What Results to Expect. Rubryka, 2025 ↗; A Year of Systemic Changes and Decisions for the Development of Democracy: Key Achievements of the UICPR in 2025. UICPR, 2025. ↗

2973 Ukraine Will Have a Programme for the Development of Volunteering. Ministry of Social Policy, Family and Unity of Ukraine, 2026 ↗; Volunteering as Part of Public Policy: Why CSOs Should Join the Discussion of the Programme That Will Define the Next Five Years in the Development of Volunteering. CEDEM, 2026. ↗

2974 Internal AML/CFT Risk Assessment — A Reliable Financial Security Tool for Public and Charitable Organisations. CEDEM, 2026. ↗

- to minimise the risks of lobbying legislation affecting the lawful activities of CSOs;[2975]
- to ensure the participation of CSOs in the Government's development of the negotiating position on Ukraine's accession to the EU.[2976]

The state did not introduce additional restrictions on citizens' right to peaceful assembly. Therefore, as in previous years under martial law, there is a balance between the exercise of this right and national security considerations.

Regulation of the provision of social services and humanitarian aid by civil society organisations remains unchanged. Social services provided by CSOs were exempted from value added tax (VAT) in 2025 by Law of Ukraine No. 4505-IX. This step reduces operating costs and expands CSOs' access to social services.[2977] Law No. 4505-IX also improved management procedures and the transparency of the distribution of humanitarian aid. Work to update the procedures for registering vehicles imported as humanitarian aid, as set out in Resolution of the Cabinet of Ministers of Ukraine No. 550,[2978] and to introduce legislative amendments expanding the list of vehicles that may be transferred as humanitarian aid, including for use by municipal carriers in regions affected by hostilities,[2979] has now been completed with the adoption of the Resolution of the Cabinet of Ministers of Ukraine 'Certain Issues of Acquiring and Losing the Status of a Verified Humanitarian Organisation' No. 954 of 15 July 2026.[2980]

Civil society is demonstrating a steady trend towards strengthening the role of civil society coalitions. The National Coalition of Civil Society Organisations Providing Social Services, established in 2025, continues to expand with a view to advocating improvements to legislation in the field of social service provision.[2981] Coalitions of organisations dealing with the protection of the rights of victims of the armed aggression against Ukraine,[2982]

2975 Advocacy, Lobbying or GR: What Changes from 1 September 2025 and How the Civil Society Sector Can Use It. Hromadskyi Prostir, 2026. ↗

2976 Analytics, Advocacy and Coordination: CEDEM Summarised the Results of Its One-Year European Integration Project. CEDEM, 2026 ; Successful EU Accession: What Is the Role of Civil Society and What Are Organisations Doing? ZMINA, 2026 ; Ukraine's Successful Progress towards EU Membership Requires Continuous Cooperation between the Authorities and Civil Society, — Taras Kachka. Government Portal, 2025. ↗

2977 On Amendments to the Tax Code of Ukraine and Other Laws of Ukraine to Expand Patients' Access to Medicinal Products Subject to Procurement by the Person Authorised to Conduct Procurement in the Field of Healthcare through Managed Access Agreements: Law of Ukraine No. 4505-IX of 18.06.2025. ↗

2978 On Approval of the Procedure and Time Limits for the Transfer by a Service Member of the Original Personal Instruction to the Commander of a Military Unit, Commander/Head of a Unit of a Body (Service, Military Formation) for Storage in the Personal File: Resolution of the Cabinet of Ministers of Ukraine No. 550 of 14.05.2024. ↗

2979 The work is carried out within the framework of meetings on humanitarian response chaired by the Deputy Head of the Office of the President of Ukraine, which are held monthly, and working subgroups established by the Ministry of Social Policy, Family and Unity of Ukraine, which meet weekly with broad involvement of civil society organisations.

2980 Certain Issues of Acquiring and Losing the Status of a Verified Humanitarian Organisation: Resolution of the Cabinet of Ministers of Ukraine No. 954 of 15.07.2026. ↗

2981 Coalition of Social Service Providers. ↗

2982 Position of the Coalition of Organisations Dealing with the Protection of the Rights of Victims of the Armed Aggression against Ukraine on the Draft Law on Amendments to Certain Laws of Ukraine to Ensure the Exercise of the Right to Acquire and Retain Ukrainian Citizenship, registration No. 11469. Right to Protection, 2025 ↗ ; Position of the Coalition of Organisations Dealing with the Protection of the Rights of Victims of the Armed Aggression against Ukraine on the Draft Resolution of the Cabinet of Ministers of Ukraine 'On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine on the Procedure for Making Certain Pension and Insurance Payments'. Donbas SOS, 2026. ↗

'Ukraine. 5 AM',[2983] the Reanimation Package of Reforms[2984] and many others continue their intensive work.

Progress and issues

Key systemic problems and challenges include the following:

The EU Enlargement Package 2025 Report mentions the following critical aspects of CSO functioning: (1) reduced international support, (2) the overburdening of organisations due to the growing needs of communities, (3) denial of access to financial services, including banking services, due to excessive financial monitoring measures and (4) the need to strengthen systemic interaction between public authorities and CSOs. The low level of localisation of humanitarian resources[2985] indicates that international assistance projects supporting the activities of CSOs in Ukraine are not coordinated sufficiently effectively. At the same time, the gap between local and national-level CSOs is widening rapidly. This gap is reflected both in the volume of funding and in the capacity to continue statutory activities. There is a growing trend of organisations deciding to liquidate because their teams are unable to secure the minimum funding needed for administration. Many organisations are reducing staff, moving teams to remote work and giving up offices. If analytical and advocacy centres choose this path, it will clearly lead to a decline in the volume of expert and analytical support provided to the Government and Parliament in implementing democratic reforms.[2986]

The practice of imposing unjustified and unpredictable restrictions and bans on peaceful assemblies continues. Such restrictions do not always depend on the distance of the assembly venue from the frontline or the border with the aggressor state. The normative legal acts[2987] regulating the prohibition of and procedure for holding peaceful assemblies under martial law have still not been amended, contrary to expert recommendations on taking measures to prevent and reduce this practice.[2988]

Institutional fatigue continues to deepen among CSOs involved in evacuating civilians from frontline territories. Such CSOs record a significant increase in demand for their services due to the escalation of hostilities and growing humanitarian needs.[2989] Charitable and public organisations performing the functions of evacuating citizens and providing further support to internally displaced persons (IDPs) are operating at the limit of their resources and expect the state to strengthen its role systematically in carrying out these tasks. At the same time, they emphasise the need for a clear division of powers between the state and civil society.

2983 Statement by Coalition Organisations on the Extension of the Mandate of the Independent International Commission of Inquiry on Ukraine. Ukraine. 5 AM Coalition, 2026. ↗

2984 Reanimation Package of Reforms. ↗

2985 The purpose of localisation is to transfer the management of humanitarian resources and the ability to make decisions on them to local civic initiatives, rather than maintaining a long chain of intermediaries, approvals and waiting. In other words, institutional donors directly fund local organisations instead of transferring money and resources through international representative offices in the country or by other means. ↗

2986 Information provided by Respondent No. 65 during an interview conducted on 17.03.2026.

2987 On the Legal Regime of Martial Law : Law of Ukraine No. 389-VIII of 12.05.2015, para. 8, Part 1 Article 8. ↗

2988 The situation has not changed significantly compared with August 2025 and the state of affairs described in the Shadow Report 2025. Restrictions on Peaceful Assemblies: Is There Really 'Betrayal' in This News? Glavcom, 2025. ↗

2989 Publication by the Coordination Humanitarian Centre on the social network Facebook, 2025. ↗

The resources available to CSOs are insufficient[2990] **to meet the demand from territorial communities for support in developing their statutes on time**. Communities themselves often lack the necessary skills and resources to develop their statutes and therefore turn to specialised CSOs for assistance. The legislative requirements for developing statutes must be fulfilled by 1 January 2027.[2991] Only a few national donors support this type of assistance, meaning that they cover only a small number of communities. There are currently no statistics on the number of territorial communities with updated statutes.

Legislation in the field of humanitarian response is outdated and requires comprehensive revision, both at the level of the Law of Ukraine 'On Humanitarian Aid'[2992] and the Tax Code of Ukraine,[2993] as well as at the level of subordinate normative legal acts. The practice of introducing targeted amendments for the period of martial law continues, without offering a systemic solution to the problems faced by CSOs after the full-scale invasion. Despite the involvement of expert CSOs in the development of state policy through dialogue platforms of the Office of the President of Ukraine (Office of the President) and the Ministry of Social Policy, Family and Unity of Ukraine (Ministry of Social Policy), a number of issues remain unresolved: simplification of procedures for transferring vehicles between service members and taxation of charitable assistance.

Positive developments include the following:

On 19 June 2026, the Ministry of Social Policy developed and published for public consultation **Draft Law of Ukraine 'On Amendments to Article 1 of the Law of Ukraine "On Humanitarian Aid" Regarding Harmonisation of the Definition of the Term "Humanitarian Aid"'**.[2994] It was developed to implement the task set out in item 11 of Section 30 'External Relations' of Cluster 6 of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis). The draft act proposes amendments to Article 1 of the Law of Ukraine 'On Humanitarian Aid' to harmonise the definition of the term 'humanitarian aid' and to distinguish between the status of a recipient and an acquirer of humanitarian aid. The proposed amendments are aimed at approximating national legislation to European Union law.

On 15 July 2026, the Cabinet of Ministers of Ukraine adopted Resolution No. 954,[2995] which **regulates the procedure for acquiring and losing the status of a verified humanitarian organisation, entering data on its employees into the automated humanitarian aid registration system for crossing the state border**, as well as requirements for vehicles of verified humanitarian organisations imported into the customs territory of Ukraine as humanitarian aid and the specific features of their registration.

2990 Level of Resilience and Participation of Civil Society Organisations in the Recovery and Reconstruction Processes of Territorial Communities: Analytical Report on the Results of the Study / O. Reznik, M. Parashchevin, M. Homaniuk; edited by V. Kuprii. Kyiv: Buria Olena Dmytrivna PE, 2025, p. 5. ↗

2991 On Amendments to Certain Laws of Ukraine on Democracy at the Level of Local Self-Government: Law of Ukraine No. 3703-IX of 09.05.2024, subparas. 1, 4, Section II. ↗

2992 On Humanitarian Aid: Law of Ukraine No. 1192-XIV of 22.10.1999. ↗

2993 Tax Code of Ukraine No. 2755-VI of 02.10.2010. ↗

2994 On Amendments to Article 1 of the Law of Ukraine 'On Humanitarian Aid' Regarding Harmonisation of the Definition of the Term 'Humanitarian Aid'. Draft Law. Ministry of Social Policy, Family and Unity of Ukraine. ↗

2995 Certain Issues of Acquiring and Losing the Status of a Verified Humanitarian Organisation: Resolution of the Cabinet of Ministers of Ukraine No. 954 of 15.07.2026. ↗

Digitalisation of procedures for registering public associations. In autumn 2025, the launch of the online registration procedure for public associations through the Unified State Web Portal of Electronic Services (Diia Portal) was postponed for technical reasons and pilot testing of the resource was conducted from November 2025.[2996] The launch of the service through Diia Portal[2997] was publicly announced on 21 April 2026.[2998] On 31 July 2026, almost 400 public organisations had already been registered through the Diia Portal.[2999] At the same time, compliance with legislation on the identification of ultimate beneficial owners (UBO) will need to be monitored, since during the registration of a public association (PA), the system will automatically generate information on the UBO and ownership structure based on the data submitted. It is important that, at the online registration stage, CSOs ensure that these data have been generated correctly to avoid discrepancies in UBO data in the future.[3000]

Progress has been noted in the development of participatory democracy at the local level: CSOs participated[3001] in the development of territorial community statutes based on methodological recommendations developed with their involvement.[3002] These methodological recommendations were developed by the Ministry for Development of Communities and Territories of Ukraine (Ministry for Development) in accordance with Law of Ukraine No. 3703-IX,[3003] which aims to expand citizen participation in decision-making processes at the local level.

A positive development is the **strengthening of cooperation and coordination within civil society**. Among other things, in January 2026, a Memorandum of Interaction and Cooperation was signed within the Coalition of Expert Civil Society Organisations in the field of financial monitoring, anti-money laundering and terrorist financing.

Institutional dialogue between civil society and the Government also continued to develop. Throughout 2025, organisations involved in volunteering and humanitarian activities held regular coordination meetings with the Office of the President to discuss legal and regulatory issues affecting the sector. The results of this dialogue include:

- the preparation of the draft State Target Social Programme for the Development of Civil Society until 2030 and its submission for approval by central executive bodies

2996 Be the First in Ukraine to Register a Public Organisation Online through the Diia App! UICPR, 2025. ↗

2997 Registration of a Public Association on the Basis of a Model Statute. Diia. ↗

2998 Publication by the Ministry of Justice of Ukraine on the social network Facebook, 2026. ↗

2999 According to CEDEM data obtained during meetings, consultations and other events involving representatives of state institutions and experts implementing the online procedure for registering public associations.

3000 Registration of a Public Organisation Online. Publication by the Ukrainian Independent Centre for Political Research on the social network Facebook, 2026. ↗

3001 Competition 'Supporting the Development of Statutes of Territorial Communities 2.0'. International Renaissance Foundation, 2026. ↗

3002 Methodological Recommendations 'Statute of a Territorial Community'. Ministry for Development of Communities and Territories of Ukraine, 2025. ↗

3003 On Amendments to Certain Laws of Ukraine on Democracy at the Level of Local Self-Government: Law of Ukraine No. 3703-IX of 09.05.2024. ↗

(CEB),[3004] as well as the State Target Social Programme for the Development of Volunteering in Ukraine until 2030 approved by the Government;[3005]

- the adoption by Parliament and signing by the President of Ukraine of Law of Ukraine No. 4816-IX 'On Amendments to Section IV "Final Provisions" of the Law of Ukraine "On the Legal Status of Foreigners and Stateless Persons" Regarding the Non-Application of Visa Requirements to Certain Categories of Foreigners and Stateless Persons for the Period of Martial Law';[3006]
- the development, with the participation of CSOs, of a number of draft subordinate normative legal acts[3007] in the field of humanitarian response, which are currently being approved by CEBs.

Recommendations

1. Ensure the full functioning of registration services in Diia Portal, including the introduction of amendments to founding documents.[3008]
2. Regulate by law the exercise of freedom of peaceful assembly under martial law, taking into account the diversification of risks and specifying the grounds and conditions for holding such assemblies. Regulate the discrepancies between para. 8, Part 1, Article 8 and Part 1, Article 19 of the Law of Ukraine 'On the Legal Regime of Martial Law',[3009] and clearly define the powers to prohibit peaceful assemblies, namely who may decide to prohibit a specific peaceful assembly or to prohibit assemblies in a certain territory as a whole and under what conditions.
3. Finalise the development and adopt an updated version of the Law of Ukraine 'On Humanitarian Aid', which should comprehensively regulate the provisions introduced during martial law to simplify the activities of CSOs.

Registration of Civil Society Organisations

State of play

As of 1 January 2025, almost 106,000 PA, 2,500 public unions, 32,000 charitable organisations (CO) and 1,800 bodies of self-organisation of the population were registered

3004 On Approval of the Concept of the State Target Social Programme for the Development of Volunteering until 2030: Order of the Cabinet of Ministers of Ukraine No. 715 of 15.07.2025. ↗

3005 On Approval of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030: Order of the Cabinet of Ministers of Ukraine No. 396 of 29.04.2026. ↗

3006 On Amendments to Section IV 'Final Provisions' of the Law of Ukraine 'On the Legal Status of Foreigners and Stateless Persons' Regarding the Non-Application of Visa Requirements to Certain Categories of Foreigners and Stateless Persons for the Period of Martial Law: Law of Ukraine No. 4816-IX of 12.03.2026. ↗

3007 For example: Certain Issues of the Transfer by Recipients of Humanitarian Aid in the Form of Buses, Electric Buses, Tram Cars, Trolleybuses and Metro Cars to Acquirers for the Period of the Legal Regime of Martial Law in Ukraine: Draft Resolution of the Cabinet of Ministers of Ukraine of 2025. ↗

3008 CSO Barometer 2025: State, Trends and Development Priorities of Ukrainian Civil Society. ICAP Ednannia, 2025. ↗

3009 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015. ↗

in Ukraine.[3010] As of 31 July 2026, the State Statistics Service of Ukraine[3011] had not yet published information on the increase in the number of non-profit organisations. At the same time, according to the MoJ, in 2025 the interregional departments of the Ministry of Justice of Ukraine (MoJ) registered a total of 4,620 civic formations.[3012] These include various forms of CSOs, in particular: 3,462 PA, 733 separate subdivisions of PA, 216 structural formations of political parties, 60 trade unions, 140 organisational units of trade unions, 5 employers' organisations, 1 association of employers' organisations and 1 territorial branch of all-Ukrainian creative unions. Overall, this increase continues the trends of previous years.

Legislation regulating the establishment and activities of CSOs in Ukraine is generally quite favourable.[3013] Progress in introducing a mechanism for the online registration of public associations through the Diia Portal was marked by the Government's adoption in April 2025 of Resolution No. 460 'On the Implementation of an Experimental Project to Enable the Operation of a Public Association on the Basis of a Model Statute'.[3014] This Resolution approved the text of the model statute and the procedure for implementing the experimental project, which is to run for two years. The status of implementation of this project has remained unchanged since September 2025 — 'expected'. According to the MoJ,[3015] certain practical issues are currently being agreed with the State Tax Service and software is being developed. At the stage of introducing the model statute, the work of state registrars should be subject to oversight and monitoring to avoid the risk that organisations are encouraged to use this version of the founding document to simplify registrars' work when analysing statutes. The Law of Ukraine 'On State Registration of Legal Entities, Individual Entrepreneurs and Public Formations'[3016] provides for the possibility of extending, for up to 15 working days, the consideration of documents submitted for state registration of a public association but does not provide a list of grounds for such an extension. This means that the relevant provision leaves room for abuse by registration authorities.[3017]

Progress and issues

The legislative regulation of CSO registration procedures does not meet the needs of CSOs due to delays in the consideration of Draft Law No. 8084.[3018] Government Draft Law No. 8084 was adopted as a basis at the first reading in 2023. The draft law proposes

3010 Number of Registered Legal Entities by Organisational and Legal Forms of Business Activity with Distribution by Sex of the Head as of 01.01.2025. State Statistics Service of Ukraine, 2025. ↗

3011 Ibid.

3012 In 2025, Interregional Departments of the MoJ Registered More than 4.6 Thousand Civic Formations. Ministry of Justice of Ukraine, 2026. ↗

3013 The preliminary assessment of the state of play in the Shadow Report 2025 (p. 477) remains relevant. ↗

3014 On the Implementation of an Experimental Project to Enable the Operation of a Public Association on the Basis of a Model Statute: Resolution of the Cabinet of Ministers of Ukraine No. 460 of 18.04.2025. ↗

3015 Information provided by Respondent No. 65 during an interview conducted on 17.03.2026.

3016 On State Registration of Legal Entities, Individual Entrepreneurs and Public Formations: Law of Ukraine No. 755-IV of 15.05.2003, Part 2 Article 26. ↗

3017 For more detail, see other sections of the report.

3018 On Amendments to Certain Laws of Ukraine on Regulating the Activities and State Registration of Public Associations: Draft Law, registration No. 8084 of 28.09.2022. ↗

reducing registration timeframes and increasing the number of authorities responsible for registering public associations. The draft law remains stalled in Parliament. On 16 December 2025, another comparative table was prepared for the second reading. In February 2026, the draft law was included on Parliament's agenda for the second reading, but it was never considered.

Updating UBO data remains complicated. After the launch of the system for reporting[3019] discrepancies in UBO data in September 2024, the problem of identifying UBOs for CSOs emerged on a new scale. Law No. 361[3020] and the Methodology for the Identification of UBOs by Legal Entities[3021] do not exclude situations where a CSO or another legal entity has no UBO. However, Methodology takes into account recommendations on the direct or indirect decisive influence of an individual over the activities of such a non-profit organisation. This includes the right to control, use or dispose of all assets or a share thereof, the right to exercise decisive influence over the formation of the composition and voting results of governing bodies, as well as the conclusion of transactions and adoption of binding decisions that have a decisive influence on the activities of a non-profit organisation (NPO).[3022] If the indicators defined in paragraph 34[3023] of this Methodology are absent and there are any doubts as to whether the identified person is the ultimate beneficial owner, it is recommended to examine information on persons who hold management positions in the organisation and have the right to represent it without a power of attorney. Until the termination of martial law and for 90 days after its end, the mandatory submission by legal entities of information on UBOs has been postponed.[3024] This postponement applies only to organisations registered before the legislation in the field of anti-money laundering and combating the financing of terrorism (AML/CFT) entered into force. Organisations that are being established must already submit UBO information when registering a legal entity, while existing organisations must do so if the UBO in the organisation changes. However, the launch of the online service 'Registration of a Public Association' in Diia Portal on 21 April 2026 makes it possible to register a public association with the automatic generation of information on UBOs and ownership structure. In addition, some CSOs have already submitted information on the absence of UBOs to the Unified State Register of Legal Entities, Individual Entrepreneurs and Public Formations (USREOU). When updating client data, banks[3025] do not accept information that a CSO has no UBO and require a specific

3019 The MoJ Launches an Online Service for Reporting Discrepancies in UBO Data. Centre for Democracy and Rule of Law, 2024. ↗

3020 On Prevention and Counteraction to Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of Proliferation of Weapons of Mass Destruction: Law of Ukraine No. 361-IX of 06.12.2019. ↗

3021 On Approval of the Methodology for Determining the Ultimate Beneficial Owner by a Legal Entity: Resolution of the Cabinet of Ministers of Ukraine No. 1011 of 19.09.2023. ↗

3022 On Approval of the Methodology for Determining the Ultimate Beneficial Owner by a Legal Entity: Resolution of the Cabinet of Ministers of Ukraine No. 1011 of 19.09.2023, para. 34. ↗

3023 Ibid.

3024 On Amendments to Certain Laws of Ukraine on Improving the Regulation of Ultimate Beneficial Ownership and Ownership Structure of Legal Entities: Law of Ukraine No. 2571-IX of 06.09.2022. ↗

3025 Banks are guided by the following normative legal acts when conducting financial monitoring measures:
1. On Prevention and Counteraction to Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of Proliferation of Weapons of Mass Destruction: Law of Ukraine No. 361-IX of 06.12.2019 ↗;
2. Regulation on Financial Monitoring by Banks, approved by Resolution of the Board of the National Bank of Ukraine No. 65 of 19.05.2020 ↗;
3. On Due Diligence Measures for Public Associations: Letter of the National Bank of Ukraine No. P/25-0005/82964 of 29.11.2022. ↗

person or persons to be indicated as the UBO,[3026] for example the founders or head of the organisation.[3027] This already constitutes a discrepancy that organisations must correct by submitting UBO information to state registration authorities. The situation is also complicated by the emergence of the possibility to remove information on the founder of a public association[3028] — this information will no longer appear in the extract from the USREOU for the legal entity. However, it will remain in the personal file and will be reflected in the detailed extract, which banks usually require from their clients.

In addition, the website of the Ministry of Finance of Ukraine (MoF)[3029] contains sample schematic representations of ownership structures, including for NPO, which make it possible to identify UBOs or confirm their absence and are submitted to state registration authorities for the entry of the relevant information in the USREOU. However, these samples do not comply with the updated requirements approved by the MoF for non-profit CSOs.[3030] At the same time, on 3 September 2024, amendments to the MoJ order entered into force,[3031] defining the Procedure for Notifying the MoJ of Discrepancies Identified between the UBO data contained in the USREOU and the data obtained by banking institutions from clients.[3032] This means that CSOs may face problems as a result of discrepancy notifications, since banking institutions often require a UBO to be identified and do not accept information on the absence of a UBO, while the USREOU usually contains information that CSOs have no UBO. It should be noted that in July 2024, the MoF received relevant recommendations from civil society but has still not published updated ownership structure schemes for NPO, which makes it more difficult for CSOs to understand the legislative requirements.

In their communication with banking institutions, CSOs are advised to indicate founders as UBOs,[3033] which is incorrect for PA, since the powers of the founder of a PA end immediately after its state registration — in essence, this is a one-off function of an individual in relation to the organisation. As a result, CSOs may face fines ranging from

3026 Why Do Banks Block the Accounts of Public Associations and Can Anything Be Done about It? ZMINA, 2022. ↗

3027 Financial Monitoring in the Banking Services Provided to Civil Society Organisations (CSOs): The Banks' Perspective. CEDEM, 2023. ↗

3028 How to Exclude Information on the Founders of a Public Association: Explanation by the MoJ. Ministry of Justice of Ukraine, 2025. ↗

3029 On Approval of the Methodology for Determining the Ultimate Beneficial Owner by a Legal Entity: Resolution of the Cabinet of Ministers of Ukraine No. 1011 of 19.09.2023, para. 34 ↗; UBO Methodology and Ownership Structure of Legal Entities. Ministry of Finance of Ukraine. ↗

3030 On Amendments to Order of the Ministry of Finance of Ukraine No. 163 of 19 March 2021: Order of the Ministry of Finance of Ukraine No. 161 of 02.04.2024, para. 2. ↗

3031 On Approval of the Procedure for the Transfer by the Holder of the Unified State Register of Legal Entities, Individual Entrepreneurs and Public Formations of Information on Discrepancies between Information on Ultimate Beneficial Owners and/or the Ownership Structure of a Legal Entity Obtained by a Primary Financial Monitoring Entity as a Result of Due Diligence of a Legal Entity and the Relevant Information Contained in the Register, as well as Information on the Primary Financial Monitoring Entity That Identified Such Discrepancies, to the Specially Authorised Body: Order of the Ministry of Justice of Ukraine and the Ministry of Finance of Ukraine No. 2513/5/378 of 10.07.2023. ↗

3032 On Amendments to the Procedure for Notifying the Holder of the Unified State Register of Legal Entities, Individual Entrepreneurs and Public Formations of Identified Discrepancies between Information on Ultimate Beneficial Owners and/or the Ownership Structure of a Legal Entity Obtained by a Primary Financial Monitoring Entity as a Result of Due Diligence and the Information Contained in the Unified State Register of Legal Entities, Individual Entrepreneurs and Public Formations: Order of the Ministry of Justice of Ukraine No. 2531/5 of 27.08.2024. ↗

3033 How to Protect CSOs from Banking Challenges Caused by the War. CEDEM, 2023. ↗

UAH 17,000 to UAH 340,000 for discrepancies in information.[3034] Although the application of such sanctions has not yet been recorded, the risks remain significant.

At the same time, according to MoJ data,[3035] only a small proportion of cases involving discrepancies in UBO data in the USREOU concern the non-profit sector. It is evident that most CSOs, according to their founding documents, demonstrate the absence of a UBO. As of May 2025, of the 101,276 PAs with legal entity status registered in Ukraine, 1,946 had indicated information on the UBO and ownership structure, while 36,564 had indicated the absence of a UBO. Of the 30,452 registered COs, 4,525 had indicated information on the UBO and ownership structure, 12,482 had indicated the absence of a UBO and 2,225[3036] had indicated information on the UBO without an ownership structure. State authorities have not yet commented on what is happening with PAs and COs that fall outside this statistic. At the same time, the very existence of this conditional 'grey zone' indicates insufficient communication by state authorities on the reform of the UBO identification system, as well as the absence of clear explanatory materials.

Recommendations

1. Adopt Draft Law No. 8084 to regulate the activities and state registration of public associations.
2. When developing any amendments to legislation regulating UBOs and CSO registration, take into account the specific features of the legal forms of PAs and COs to avoid introducing provisions that may create a new range of unintended negative consequences of implementing AML/CFT legislation for the activities of CSOs.
3. The MoF should update the sample schematic representations of ownership structures for the submission of UBO information by CSOs and improve interaction between primary and state financial monitoring entities.

Legislative Regulation of Volunteering

State of play

The legislation regulating the activities of volunteers and organisations that engage them is framework legislation and does not restrict volunteering. The legislative basis for regulating volunteering and the engagement of volunteers by non-profit institutions and organisations is the Law of Ukraine 'On Volunteering'.[3037] It provides basic regulation of the engagement of volunteers, as well as the rights and obligations of volunteers and the organisations that engage them. Issues that need to be addressed to improve conditions in the field of volunteering concern not only sector-specific legislation, but also tax, labour

3034 Code of Ukraine on Administrative Offences: Code of Ukraine No. 8073-X of 07.12.1984, Article 166[11]. ↗

3035 Data obtained by CEDEM during meetings, consultations and other events involving representatives of the Ministry of Justice of Ukraine.

3036 Information from the Ministry of Justice training module within the course 'Financial Monitoring of the Civil Society Sector' ; recordings are available at. ↗

3037 On Volunteering: Law of Ukraine No. 3236-VI of 19.04.2011. ↗

and migration legislation. Most of these problems were formulated by CSO representatives in 2020 in Section 5 'Development of Volunteering' of the Map of Legal Reforms for CSOs.[3038] Some progress in addressing them was achieved through the adoption in 2022 of Laws of Ukraine Nos. 2519-IX[3039] and 2520-IX.[3040] These laws expanded the list of areas in which volunteering may be carried out, including areas related to countering COVID-19 and other epidemics, Russia's invasion and the reconstruction of infrastructure damaged as a result of hostilities. Amendments were also made to the Tax Code of Ukraine, under which organisations' expenses for medical examinations, vaccinations and business trips of volunteers with whom a volunteering agreement has been concluded are not taxed. In addition, amendments to the Tax Code of Ukraine exempt the reimbursement of a volunteer's documented expenses, according to the list set out in Article 11 of the Law of Ukraine 'On Volunteering', from personal income tax (PIT), within the amounts and limits established by Resolution of the Cabinet of Ministers of Ukraine No. 98.[3041]

In 2023, Section 5 of the Map of Legal Reforms for CSOs was updated to take into account the new challenges caused by Russia's full-scale invasion of Ukraine.[3042] Issues of state assistance for volunteers affected by hostilities, volunteer insurance and conditions for the activities of foreign volunteers in Ukraine became particularly urgent. However, other issues also require resolution, including: (1) encouraging a contractual basis for cooperation between volunteers and organisations, (2) removing age restrictions on involvement in volunteering, with the current minimum age being 14 and (3) encouraging systematic and long-term volunteering.

The context of the full-scale war has led to volunteering being equated with activities related to humanitarian response, despite the different legal regulation of these issues. Both CSO representatives and representatives of public authorities use the term 'volunteer organisation' when referring to organisations that involve volunteers and provide beneficiaries with charitable or humanitarian aid, although no such definition exists in Ukrainian legislation. Volunteer councils are being actively established and operate in the regions.[3043] In essence, these are advisory bodies composed of representatives of CSOs working with the same charitable or humanitarian aid. Volunteering is regulated by the Law of Ukraine 'On Volunteering', while the issues of registering, providing and distributing humanitarian aid are regulated by the Law of Ukraine 'On Humanitarian Aid'.[3044]

In 2025, civil society expected the adoption of the State Target Social Programme for the Development of Volunteering until 2030 — a document that should lay the foundations for

3038 Map of Legal Reforms for Civil Society in Ukraine. Centre for Democracy and Rule of Law, 2023. ↗

3039 On Amendments to the Law of Ukraine 'On Volunteering' Regarding Support for Volunteering: Law of Ukraine No. 2519-IX of 15.08.2022. ↗

3040 On Amendments to the Tax Code of Ukraine to Promote the Development of Volunteering and the Activities of Non-Profit Institutions and Organisations under the Conditions of the Armed Aggression of the Russian Federation against Ukraine: Law of Ukraine No. 2520-IX of 15.08.2022. ↗

3041 On the Amounts and Composition of Expenses for Business Trips of Civil Servants and Other Persons Sent on Business Trips by Enterprises, Institutions and Organisations Fully or Partially Maintained or Financed from Budget Funds: Resolution of the Cabinet of Ministers of Ukraine No. 98 of 02.02.2011. ↗

3042 Section 5. Development of Volunteering 2.0 of the Map of Legal Reforms for Civil Society in Ukraine. Centre for Democracy and Rule of Law, 2023. ↗

3043 Results of the All-Ukrainian Forum of Volunteer Councils: Network of Volunteer Councils and Support for the Regions. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3044 On Humanitarian Aid: Law of Ukraine No. 1192-XIV of 22.10.1999. ↗

systematic state policy on the development of volunteering. In July 2025, the Government approved the Concept of the future programme. In January 2026, the Ministry of Social Policy submitted for public consultation and public discussion the draft Order of the Cabinet of Ministers of Ukraine approving this state target social programme.[3045]

Progress and issues

On 29 April 2026, the **Government approved the State Target Social Programme for the Development of Volunteering in Ukraine until 2030**.[3046] The Programme provides for measures aimed at state recognition and support of organisations that engage volunteers, recognition of volunteering experience, promoting the engagement of children and young people in volunteering, improving legislation in the field of volunteering (in particular concerning foreign volunteers, volunteer insurance and state support for volunteers affected by hostilities), promoting the development of local volunteering support programmes and so on. At the same time, the effectiveness of the Programme's implementation will depend on ensuring adequate funding, timely implementation of the planned measures and active involvement of civil society organisations in its implementation and monitoring.[3047]

An important legislative change was **Parliament's adoption in March 2026 of Draft Law No. 13071**,[3048] which will significantly simplify the involvement of foreign volunteers in activities in Ukraine for the period of martial law and one year after its end. This concerns the temporary abolition of the requirement to obtain a long-stay type D visa for foreigners and stateless persons arriving in Ukraine to participate as volunteers in the activities of non-profit organisations and to work in branches and representative offices of organisations that are recipients of humanitarian aid. The adopted amendments will allow volunteers from countries with which Ukraine has a visa-free entry regime to avoid the bureaucratic burden of obtaining and paying for a long-stay type D visa. For citizens of such countries, this visa is not required as a ground for entry, but only as a document needed to obtain a temporary residence permit. On 30 March 2026, the law No. 4816-IX adopted by Parliament was signed by the President.[3049]

Throughout 2025, CSO representatives actively cooperated with the Security Service of Ukraine (SSU), the State Migration Service of Ukraine (SMS) and Members of Parliament of Ukraine (MP) to develop a compromise version of Draft Law No. 13071 for the second reading. At the end of January 2026, the Verkhovna Rada committee responsible for considering the draft law issued a repeated opinion and an updated version of the draft law for the second reading, developed by representatives of state institutions and CSOs. However, during the vote in Parliament's plenary hall, Parliament did not support the agreed amendments. As a result, the draft law was adopted in a text identical to the

3045 On Approval of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030: Draft Order of the Cabinet of Ministers of Ukraine of 09.01.2026. ↗

3046 On Approval of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030: Order of the Cabinet of Ministers of Ukraine No. 396 of 29.04.2026. ↗

3047 The Government Adopted the Volunteering Development Programme until 2030. Centre for Democracy and Rule of Law, 2026. ↗

3048 On Amendments to the Law of Ukraine 'On the Legal Status of Foreigners and Stateless Persons' Regarding the Non-Application of Visa Requirements to Certain Categories of Foreigners and Stateless Persons Who Are Humanitarian Workers and Volunteers for the Period of Martial Law: Draft Law of Ukraine, registration No. 13071 of 11.03.2025. ↗

3049 On Amendments to Section IV 'Final Provisions' of the Law of Ukraine 'On the Legal Status of Foreigners and Stateless Persons' Regarding the Non-Application of Visa Requirements to Certain Categories of Foreigners and Stateless Persons for the Period of Martial Law: Law of Ukraine No. 4816-IX of 12.03.2026. ↗

version adopted as a basis at the first reading. The adopted text is fully acceptable to CSOs[3050] and the SMS, which will implement the relevant legislative provisions, but is opposed by the SSU.

The new provisions for foreign volunteers and humanitarian workers adopted by Parliament took effect on 1 July 2026.[3051] The Law also provides for a special transitional mechanism to regulate the legal status of certain categories of foreigners who arrived in Ukraine after 24 February 2022 and exceeded the permitted period of stay. Within 60 days from the date of entry into force of Law No. 4816-IX, they may apply for a temporary residence permit and, while this mechanism is in effect, their stay in Ukraine is considered lawful.[3052]

At present, the **state has made no progress in addressing the issue of better social guarantees for volunteers** involved in countering and eliminating the consequences of Russia's armed aggression against Ukraine, although this category of volunteers operates in conditions that pose a particular risk to their life and health. In 2025, at least five volunteers[3053] were killed, while the number of those wounded, injured to varying degrees or caught under shelling cannot be accurately recorded. In these circumstances, a favourable legislative environment for volunteer insurance is critically important. Draft Law No. 10040,[3054] registered in 2023, which was intended to reduce the tax burden on organisations that insure volunteers, has not moved forward in Parliament, as it did not receive support from the MoF. Against this background, Draft Laws Nos. 13515[3055] and 13515-1,[3056] registered by MPs in July–August 2025 and aimed at introducing state insurance of volunteers' life, health and capacity to work, appear rather populist. They provide neither a mechanism for implementing such insurance nor specific details on the categories of volunteers to which such insurance could apply. Taking into account the position of CSOs, the main committee recommended that both draft laws be sent back for revision.

The state support instruments for the families of volunteers who have been killed and for volunteers who have acquired a disability, as provided for under current legislation, are applied extremely restrictively. The mechanism for providing financial support[3057]

3050 Joint Appeal by Ukrainian CSOs and International Organisations to the President of Ukraine Regarding the Draft Law 'On Amendments to the Law of Ukraine "On the Legal Status of Foreigners and Stateless Persons"'. Centre for Democracy and Rule of Law, 2026. ↗

3051 On Amendments to the Law of Ukraine 'On the Legal Status of Foreigners and Stateless Persons' Regarding the Abolition of Visa Requirements for Foreigners and Stateless Persons Who Are Humanitarian Workers and Volunteers for the Period of Martial Law: Law of Ukraine No. 4816-IX of 12.03.2026 ↗; New Rules for Foreign Volunteers: What Changed from 1 July. Centre for Democracy and Rule of Law, 2026. ↗

3052 Ibid.

3053 We Lost Five Volunteers in a Year': Yevhen Koliada on Evacuation in Kharkiv Region. Suspilne, 2026. ↗

3054 On Amendments to the Tax Code of Ukraine to Support Volunteering under Martial Law: draft Law of Ukraine, registration No. 10040 of 13.09.2023. ↗

3055 On Amendments to the Law of Ukraine 'On Volunteer Activities' Regarding Compulsory State Insurance of the Life, Health and Capacity for Work of Volunteers: Draft Law of Ukraine, registration No. 13515 of 21.07.2025. ↗

3056 On Amendments to the Law of Ukraine 'On Volunteer Activities' Regarding Compulsory State Insurance of the Life, Health and Capacity for Work of Volunteers: Draft Law of Ukraine, registration No. 13515-1 of 01.08.2025. ↗

3057 Certain Issues of Payment of One-Off Financial Assistance in the Event of the Death or Disability of a Volunteer as a Result of a Wound, Contusion, Injury or Mutilation Sustained While Providing Volunteer Assistance in the Area of the Anti-Terrorist Operation, the Implementation of Measures to Ensure National Security and Defence, Repel and Deter the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, the Implementation of Measures Necessary to Ensure the Defence of Ukraine, the Protection of the Security of the Population and the Interests of the State in Connection with the Military Aggression of the Russian Federation and/or Another Country Against Ukraine, Hostilities and Armed Conflicts: Resolution of the Cabinet of Ministers of Ukraine No. 604 of 19.08.2015. ↗

to the families of volunteers who have been killed and to volunteers who have acquired a disability while carrying out volunteering activities related to supporting the country's defence capability during the war still provides for assistance only to volunteers who were affected while helping service members and law enforcement officers.

CSO experts working to improve legislation on volunteering note that, in late 2025 and early 2026, during working communication with CSOs, representatives of the Ministry of Social Policy[3058] stated their readiness to work on amendments to the above procedure in order to expand the scope of the Resolution and enable other categories of volunteers and families of those killed, including those affected during evacuation missions, to receive assistance. As of 31 July 2026, the Ministry of Social Policy had held several rounds of discussions with CSOs on the necessary amendments to the text of the Resolution,[3059] which establishes the mechanism for providing financial support. At the same time, the Ministry of Social Policy had not published an official notice on the launch of public consultation on the text of the amendments, meaning that preliminary discussions within a narrow expert community are ongoing.

Recommendations

1. Ensure information and awareness-raising work and proper implementation of the provisions of Law of Ukraine No. 4816-IX 'On Amendments to the Law of Ukraine "On the Legal Status of Foreigners and Stateless Persons" Regarding the Non-Application of Visa Requirements to Certain Categories of Foreigners and Stateless Persons Who Are Humanitarian Workers and Volunteers for the Period of Martial Law'.
2. Introduce the necessary legislative amendments to reduce the tax burden on non-profit organisations when insuring volunteers.
3. Develop a Government procedure for providing financial assistance to the families of volunteers who have been killed and to volunteers who acquired a disability while providing assistance to civilians.

3058 Information provided by Respondent No. 71 during an interview conducted on 25.03.2026. Information provided by Respondent No. 74 during an interview conducted on 30.03.2026.

3059 Certain Issues of the Payment of One-Off Financial Assistance in the Event of the Death or Disability of a Volunteer as a Result of a Wound (Concussion, Injury or Mutilation) Sustained while Providing Volunteer Assistance in the Area of the Anti-Terrorist Operation, Carrying Out Measures to Ensure National Security and Defence, Repel and Deter the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, Carrying Out Measures Necessary to Ensure the Defence of Ukraine, Protect the Security of the Population and the Interests of the State in Connection with the Military Aggression of the Russian Federation and/or Another Country against Ukraine, Hostilities and Armed Conflicts: Resolution of the Cabinet of Ministers of Ukraine No. 604 of 19.08.2015. ↗

Financial Monitoring and Banking Services for Civil Society Organisations

State of play

CSOs continue to be affected by the unintended consequences of implementing legislation in the field of ML/TF.

The National Risk Assessment (NRA) 2025 report, has not been approved and, as of 31 July 2026, there is no information on the status of its preparation by the State Financial Monitoring Service of Ukraine (SFMS). The National Bank of Ukraine (NBU) denies the existence and scale of bank de-risking affecting NPO, while international experts[3060] confirm its existence and point to a negative trend, with the relevant statistical data provided in the SFMS study.[3061] Problems related to bank de-risking are also reflected in the Council of Europe technical report on banking legislation.[3062]

An important nuance of the current state of affairs in Ukraine is the absence of any evolution in the philosophy underlying Ukraine's financial monitoring system. Despite fundamental changes in the **Financial Action Task Force (FATF) approaches** — from the 2001 standards, based on a 'maximisation of restrictions' approach, to the modern principle that restrictions must be justified, proportionate and proven necessary to achieve a defined purpose — representatives of the MoF and the SFMS are not implementing this approach in the national system. Thus, in the FATF Best Practices,[3063] think tanks are effectively excluded from the FATF definition of NPOs and, accordingly, from the scope of Recommendation 8. In Ukraine, this is not taken into account either in the draft NRA 2025 or at the legislative level.

Progress and issues

As part of the fourth NRA 2025 in the area of money laundering and terrorist financing, the SFMS involved CSOs in the preparation process for the first time. Through participation in a specially established working subgroup, expert CSOs provided analytical materials prepared for incorporation into the NRA 2025 Report.[3064] In February 2026, at the request of civil society, the SFMS invited CSOs to continue the dialogue within the relevant working group and shared part of the draft NRA 2025 Report, '3.2 Assessment of the Risks of Abuse of the Non-Profit Sector (NPOs) for Money Laundering and Terrorist Financing (ML/TF)' (the draft NRA 2025 on NPOs). The CSO coalition prepared and formally submitted expert opinions on this draft to the SFMS. To consider these proposals,

3060 Data from a closed meeting of the State Financial Monitoring Service, the Ministry of Finance, the NBU, Ukrainian CSOs and international experts within the EU Global AML Facility project on 26 March 2026.

3061 Review of the Use of Non-Profit Organisations for the Purposes of Legalisation (Laundering) of Proceeds of Crime and Terrorist Financing. State Financial Monitoring Service of Ukraine, 2024, p. 31. ↗

3062 Update to the Technical Paper on the Assessment of the Response of the Government of Ukraine to the Requirements of FATF Recommendation 8 and Immediate Outcome 10. Partnership for Good Governance III, Project on Enhancing Anti-Money Laundering, Counter-Terrorist Financing and Asset Recovery Regime in Ukraine, ECCD-PGGIII-UA-TP01-2024.

3063 Best Practices on Combating the Abuse of Non-Profit Organisations, FATF, 2023. ↗

3064 The 2025 National Risk Assessment Process in the NPO Sector Has Been Launched: Civil Society Notes Positive Trends. CEDEM, 2025. ↗

a further meeting of the working subgroup was convened with the participation of state and regulatory authorities and NPOs.

In January 2026, a **number of expert CSOs signed a Memorandum of Interaction** and Cooperation within the Coalition of Expert Civil Society Organisations in the field of financial monitoring, AML/CFT to develop a common position and ensure effective communication with state authorities. The coalition is coordinated by the Centre for Democracy and Rule of Law.

In fulfilment of FATF recommendations, **civil society prepared and published, in partnership with the SFMS**, a template Policy on Preventing and Countering Money Laundering and Terrorist Financing (the Policy).[3065] This is a practical tool for PAs and COs registered in Ukraine, aimed at strengthening internal safeguards against the risks of involvement in money laundering, terrorist financing and related financial crimes. The Policy was discussed and agreed with other expert CSOs and was also assessed by the relevant project of the Council of Europe Office in Ukraine.[3066]

In February–March 2026, at the initiative of the MoF, **dialogue between state authorities and civil society intensified**. The MoF requested proposals for the implementation of item 72 of the Priorities for the implementation of the Roadmap on the Functioning of Democratic Institutions (FDI Roadmap) in 2026,[3067] prepared by the MoJ in January 2026 (measure 72[3068]). The deadline for implementing this measure is defined as the fourth quarter of 2027. To discuss ways of implementing this measure, on 26 March 2026 the MoF organised a meeting in Warsaw with the participation of the SFMS, the NBU, international experts and representatives of the CSO coalition.[3069]

The meeting helped identify a systemic problem in the functioning of Ukraine's national financial monitoring architecture, namely that its underlying philosophy and principles lag behind current international approaches. As international experts explained, when the FATF was established, the key task for states was to create a framework of the strictest possible restrictions to prevent money laundering and terrorist financing. Over time, however, after the FATF itself identified numerous cases in which authoritarian regimes, or regimes tending towards authoritarianism, had abused FATF standards to put pressure on and persecute civil society and business, the FATF standards were revised towards a risk-based approach. The current FATF philosophy is that states should build a national prevention system that is justified and proportionate and should be able to prove the necessity of specific preventive measures.

3065 Policy on Countering Money Laundering and Terrorist Financing of a Civil Society/Charitable Organisation. State Financial Monitoring Service of Ukraine, 2026. ↗

3066 Presentation of the Internal Policy on Countering Money Laundering and Terrorist Financing of a Civil Society/Charitable Organisation Registered in Ukraine. CEDEM, 2026. ↗

3067 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

3068 This measure provides for the following: with the involvement of civil society institutions, legislation on the prevention and countering of the legalisation (laundering) of proceeds of crime, terrorist financing and financing of the proliferation of weapons of mass destruction has been developed and implemented, aimed at implementing the provisions of the FATF and EBA Recommendations, in terms of introducing targeted, proportionate and risk-based measures that do not disrupt or discourage the legitimate activities of non-profit organisations.

3069 The EU Global Facility AML project, with the support of the European Commission, organised a consultation with international experts on 26.03.2026. This consultation took place with the participation of the Ministry of Finance, the State Financial Monitoring Service, the NBU, international experts and representatives of the CSO coalition in Warsaw.

Civil society submitted its proposals on the implementation of measure 72 to the responsible state authorities. In the field of AML/CFT, the EU acquis[3070] focuses on: (1) establishing rules on customer due diligence in line with a risk-based approach, (2) creating a UBO register and storing UBO information in it and (3) strengthening cooperation between financial intelligence units. In addition, there is an agreed EU policy[3071] towards third countries that have deficiencies in their AML/CFT regimes, aimed at protecting the Union's financial system. The updated FATF Recommendation 8[3072] provides for the introduction at national level of focused, proportionate and risk-based measures to encourage NPOs to operate transparently and promote accountability, rather than obstruct their lawful work.[3073]

At the same time, the problems in this area are broader in scale and more restrictive for CSOs.

The number of cases of bank de-risking[3074] affecting NPOs in Ukraine is increasing, which leads to the cessation of services by banks to some CSOs. De-risking is inconsistent with FATF Recommendations and raises serious concerns among the international community, including the FATF,[3075] the European Banking Authority (EBA)[3076] and FATF-style regional bodies.[3077] The development of solutions that can prevent and minimise de-risking in the EU currently falls within the competence of the relatively recently established Authority for Anti-Money Laundering and Countering the Financing of

3070 EU Directive 2024/1640 of 31.05.2024 establishes mechanisms that Member States must implement to prevent money laundering and terrorist financing in the financial system at national level. Member States must implement this Directive by 10.07.2027 ↗; Directive (EU) 2018/843 of the European Parliament and of the Council of 20.05.2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and amending Directives 2009/138/EC and 2013/36/EU ↗; Directive (EU) 2015/849 of the European Parliament and of the Council of 20.05.2015 on the prevention of the use of the financial system for the purposes of money laundering and terrorist financing, amending Regulation (EU) No. 648/2012 of the European Parliament and of the Council and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC, as amended by Directive (EU) 2018/843 of the European Parliament and of the Council of 30.05.2018. ↗

3071 Commission adds Russia to list of high-risk jurisdictions to strengthen international fight against financial crime European Commission, 2025. ↗

3072 International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation. The FATF Recommendations. FATF, 2025. ↗

3073 States should understand the different degrees of terrorist financing risk for NPOs and take into account that certain NPOs may be low-risk, may have internal regulatory measures for countering and controlling risk or may already operate in accordance with specific rules established by law, in which case additional preventive measures are not required. *Organisations working in the not-for-profit realm, which are not in scope of the FATF functional definition, include organisations that primarily conduct research and/or advocate for changes in public policy but do not raise or disburse funds for NPO causes, FATF Recommendation 8.*

3074 Banking de-risking is a *situation where a financial institution terminates or restricts business relations with a particular client or category of clients to avoid risks rather than manage them effectively through a risk-based approach. Put simply, a bank refuses to service a client because it identifies potential risks.* In the realities of many European countries, including Ukraine, banks often regard civil society and charitable organisations as low-profit clients with a high degree of risk. FATF, an intergovernmental body whose purpose is to develop and promote international standards for combating money laundering, has also drawn attention to the practice of unjustified de-risking. As a result, in 2023 FATF amended its Recommendation 8. The changes require countries to protect non-profit organisations (NPOs), which is fully justified, as NPOs are important for the global economy and many national financial systems. De-risking, however, complicates the work of non-profit organisations, which negatively affects Ukraine's wartime economy and threatens its financial stability. Source: The Roundtable 'Banking De-Risking: The Phenomenon, Causes, Impact on Ukraine's Financial Stability. Seeking Joint Solutions' Took Place. CEDEM, 2024. ↗

3075 FATF Takes Action to Tackle De-Risking, FATF. ↗

3076 The EBA's Work on Derisking. The European Banking Authority. ↗

3077 Specifically, AMLA. The New EU Authority for Anti-Money Laundering and Countering the Financing of Terrorism. ↗

Terrorism (AMLA)[3078] and national stakeholders should closely monitor the development of approaches for timely implementation in the national system. Among other things, AMLA conducts public consultations.[3079] De-risking may lead to financial exclusion, reduced transparency and greater exposure to money laundering and terrorist financing risks. A sharp increase in the number of de-risking cases, from several dozen to several thousand, was recorded during a review conducted by the SFMS:[3080] according to data provided by banks, several thousand cases were recorded in which banks terminated services to CSO clients after the publication and start of implementation of the previous, third, NRA 2022.[3081] Despite the provisions of the updated FATF Recommendation 8, NPOs in Ukraine are considered high-risk for the purposes of the AML/CFT system and face systemic restrictions in access to banking services. A risk-based approach to NPOs is not applied in Ukraine.[3082] Instead, the financial monitoring system is built on unjustified restrictions imposed by the state and the banking system.

The NRA 2025 Report was not approved within the statutory deadline of December 2025. This means that since the beginning of 2026 **the civil society sector continued to be labelled as 'high-risk' for the purposes of the financial monitoring system**. As a result, account blocking, denial of services and delays in transfers of funds from foreign donors will remain part of CSOs' routine operations. In addition, the late approval of the NRA 2025 Report has strategic negative consequences for Ukraine as a state. During the mutual evaluation by the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL),[3083] currently planned for 2027, the existence and quality of this report will be one of the key factors used to assess the state's financial reliability and transparency. A negative MONEYVAL assessment may result in the state being placed on the FATF 'grey' or 'black' list. This would lead to significant problems in receiving international assistance, which Ukraine, as a democracy engaged in a prolonged and unequal war against the aggressor, cannot afford.

The comprehensive administrative reporting system does not perform its functions of collecting and analysing data on NPOs and requires improvement.[3084] In particular, the system does not provide for the possibility of collecting and processing information on NPOs, nor does it provide information on the number of convictions concerning NPOs.

3078 EU AML in transition: how AMLA and the new AML regulations obligate banks to take action, ZebBankingHub, 2026. ↗

3079 AMLA consults on group-wide requirements and business-wide risk assessment, AMLA, 2026. ↗

3080 Review of the Use of Non-Profit Organisations for the Purposes of Legalisation (Laundering) of Proceeds of Crime and Terrorist Financing. State Financial Monitoring Service of Ukraine, 2024, p. 31. ↗

3081 The 2022 NRA Report has not been published by the State Financial Monitoring Service and is provided upon request for public information within the framework of current Ukrainian legislation. Information on the Publication of the Report on the National Risk Assessment (2022). State Financial Monitoring Service of Ukraine, 2024. ↗

3082 Non-Profit Organisations in Focus: What the Typological Study of the State Financial Monitoring Service Shows. CEDEM, 2026. ↗

3083 Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). State Financial Monitoring Service of Ukraine, 2019. ↗; Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism. Council of Europe. ↗

3084 The system of comprehensive administrative reporting in the field of AML/CFT is a mechanism for collecting, generating and publishing data on countering money laundering and terrorist financing. It should include indicators of the activities of law enforcement agencies and financial monitoring entities. See On Approval of the Procedure for the Formation and Publication of Comprehensive Administrative Reporting in the Field of Prevention and Countering the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction: Resolution of the Cabinet of Ministers of Ukraine No. 692 of 5.08.2020. ↗

This makes it impossible to assess the real risks and threats facing NPOs in the field of ML/TF.[3085] An independent assessment of the non-profit sector identified gaps in the evidence base used by the SFMS.[3086] Similar problems are observed in the system of judicial statistics and statistics on pre-trial proceedings.

In its current form, the **risk assessment of the NPO sector in the draft NRA 2025 Report could not be considered high-quality or reflective of the real situation in the country**. It created serious risks for the functioning of the sector, by generating unjustified and disproportionate regulatory pressure and de-risking. The draft NRA Report did not take into account data obtained during the independent risk assessment of the non-profit sector in Ukraine.[3087] Analysis of the section of the draft NRA 2025 Report on NPOs indicated significant methodological and substantive shortcomings that affect the validity of the assigned risk level and call into question its objectivity and reliability:

- the draft NRA Report did not clearly distinguish between the concepts of 'vulnerability', 'threat', 'risk' and 'risk level', which creates internal methodological confusion.[3088] It also used flawed reasoning to argue that only some types of NPOs have been identified as objects of terrorist financing risk assessment;[3089]
- the methodology for calculating the levels of threat, vulnerability and risk is unclear, as, during the preparation of the draft NRA 2025 Report, the SFMS did not provide this methodology to members of the working subgroup. Accordingly, it is impossible to establish how the relevant levels in the tables at the end of the document were calculated.

As of 31 July 2026, state authorities continued to work on the preparation of the 2025 NRA, a process that requires monitoring and expert support from the European Commission and the Council of Europe Office in Ukraine.

Problems with banking services[3090] remain a key concern for civil society. The fact that these problems not only remain unresolved, but continue to worsen, runs counter to the approach of the EBA, according to which access to basic financial products and services is a prerequisite for participation in economic and social life. For the most vulnerable persons, including refugees and homeless people, this may be a matter of survival. In the case of PAs and COs, without such access, humanitarian aid may not reach those

3085 Comprehensive Administrative Reporting in the Field of Prevention and Countering the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction for 2023. State Financial Monitoring Service of Ukraine. ↗

3086 Report on the Independent Risk Assessment of the Non-Profit Organisation Sector in Ukraine in the Field of Prevention and Countering the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction. Centre for Democracy and Rule of Law, 2024. ↗

3087 Report on the Independent Risk Assessment of the Non-Profit Organisation Sector in Ukraine in the Field of Prevention and Countering the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction. Centre for Democracy and Rule of Law, 2024. ↗

3088 According to the FATF Guidance on conducting a national risk assessment, vulnerability is a weakness in an environment or system, threat is a potential source of harm, risk is the result of the combination of a threat and a vulnerability and risk level is an analytically substantiated assessment of the likelihood and consequences of the risk materialising. The imprecise use of these categories in the draft NRA text makes it impossible to determine the risk level correctly.

3089 Because these organisations allegedly have heightened indicators of vulnerability, including the ability to: (1) accumulate funds, (2) carry out cross-border transactions, (3) implement humanitarian or religious projects and (4) operate in conditions of limited transparency.

3090 For more details, see the subsection 'CSO Registration'.

who need it most. Denial of access to such services should not be based on AML/CFT legislation without sufficient grounds.[3091]

The main problems in banking services for CSOs are as follows:[3092]

1. Ambiguity in the requirements of the Regulation on Financial Monitoring by Banks,[3093] which often results in financial monitoring measures that are irrelevant to CSOs, **the requirement to identify and update information on the founders of PAs**. This approach does not take into account the generally recognised fact that the powers of a founder end upon the state registration of a PA.[3094]
2. Automatic classification of PAs and COs as **medium- and high-risk** under the NRA 2022 without proper justification.
3. Lack of understanding among client relationship managers of the specific nature of CSO activities and the special legislation regulating their work.
4. A small number of banks willing to treat CSOs (NPOs) as a separate category of clients and introduce products or solutions for them other than basic ones, such as current accounts.
5. Refusal by some banks to service COs due to the high cost of financial compliance procedures and their lack of profitability for the bank.
6. Practices whereby banks make oral requests for additional documents by telephone.
7. Problems in receiving international transfers from abroad caused by EU restrictive measures on financing partially or fully de-occupied territories of Ukraine.
8. Absence of a convenient tool, namely an information system, that Ukrainian and foreign banks could use for financial monitoring purposes.
9. Difficulty in identifying the UBO, or confirming its absence, for CSOs.

When implementing AML/CFT legislation, the state should pay attention to introducing the FATF principles on financial inclusion and preventing de-risking in relation to correspondent banking operations, money or value transfers and NPOs for the purposes of AML/CFT measures adopted in 2025.[3095] The following obstacles hinder the exercise of CSOs' right to unhindered access to banking services:[3096]

3091 Opinion of the European Banking Authority EBA/Op/2022/01. European Business Association, 2022. ↗

3092 Report on the Independent Risk Assessment of the Non-Profit Organisation Sector in Ukraine in the Field of Prevention and Countering the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction. Centre for Democracy and Rule of Law, 2024. ↗

3093 On Approval of the Regulation on Financial Monitoring by Banks: Resolution of the Board of the National Bank of Ukraine No. 65 of 19.05.2020. ↗

3094 On Public Associations: Law of Ukraine No. 4572-VI of 22.03.2012, Part 7 Article 7. ↗

3095 FATF Guidance. Financial Inclusion and Anti-Money Laundering and Terrorist Financing Measures. FATF, 2025. ↗

3096 To implement the recommendations of the European Commission Enlargement Reports, the European Banking Authority Opinion on de-risking EBA/Op/2022/01, the FATF Guidance (paragraph 54, point 1.5.3 and Table 3) and Regulation (EU) 2024/1624 (recital 53 and Article 20), ensure unhindered access of non-profit organisations (NPOs) to banking services.

- the provisions of NBU Resolutions Nos. 65[3097] and 107;[3098]
- inconsistencies at the level of subordinate normative legal and/or regulatory acts issued by the MoJ, the NBU and the MoF, which regulate the system for providing and processing information on the UBO;
- the absence of updated forms and ownership structure schemes for legal entities.

In addition, the absence of official translations of a large number of EU acquis acts and international standards is a separate problem that arises in the process of legislative approximation and is clearly illustrated by the situation with the implementation of FATF Recommendation 8. The website of the MoF contains an unofficial version[3099] that includes terminological discrepancies with the original and directly contributes to distorted interpretation in Ukraine. Ensuring the official translation of the updated FATF Recommendations into Ukrainian requires additional financial resources, which the state currently does not have.[3100] The Government Office for Coordination of European and Euro-Atlantic Integration of the Secretariat of the Cabinet of Ministers of Ukraine (Government Office) is responsible for organising and planning the translation into Ukrainian of the EU acquis acts, and the translation into English of Ukrainian legislation. The state institution 'Entrepreneurship and Export Promotion Office'[3101] ensures the translation into Ukrainian of the EU acquis acts, the translation into English of Ukrainian legislation and the updating of the glossary of terms of the EU acquis acts. However, given the scale of this work, there is currently no official information on when exactly these official translations will be provided.

There is also a risk that sectoral documents that will directly or indirectly affect the operational activities of CSOs in the context of the functioning of the financial monitoring system may be adopted without assessing the risks of their implementation and without involving experts from civil society. At present, provisions creating risks for CSO activities are contained both in legislative amendments already adopted and in draft laws under consideration by the Verkhovna Rada:

- Law No. 4903-IX, adopted on the basis of Draft Law No. 15111-d revised by the Verkhovna Rada Committee on Finance, Tax and Customs Policy, provides for amendments to the Tax Code of Ukraine and other legislative acts of Ukraine regarding the introduction of international automatic exchange of information on income received through digital platforms and taxation of such income. The Law was adopted on 9 June 2026 and sent to the President for signature on 12 June 2026.[3102]

3097 On Approval of the Regulation on Financial Monitoring by Banks: Resolution of the Board of the National Bank of Ukraine No. 65 of 19.05.2020. ↗

3098 On Approval of the Regulation on Financial Monitoring by Institutions: Resolution of the Board of the National Bank of Ukraine No. 107 of 28.07.2020. ↗

3099 International Standards on Combating Money Laundering, the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction. FATF Recommendations. Ministry of Finance of Ukraine, 2025. ↗

3100 According to CEDEM data obtained during meetings, consultations and other events involving representatives of the Ministry of Justice of Ukraine and the Ministry of Finance of Ukraine.

3101 Resolution of the Cabinet of Ministers of Ukraine No. 451 of 02.05.2023. ↗

3102 On Amendments to the Tax Code of Ukraine and Other Legislative Acts of Ukraine Regarding the Introduction of International Automatic Exchange of Information on Income Received through Digital Platforms and Taxation of Such Income: Draft Law of Ukraine, registration No. 15111-d of 06.04.2026. ↗

- Draft Law No. 14327-1[3103] and Draft Law No. 14327-d,[3104] revised by the Verkhovna Rada Committee on Finance, Tax and Customs Policy. According to the National Programme for the Approximation of Legislation, the preparation and submission of Ukraine's application to the European Payments Council for accession to SEPA is planned for December 2026, after the relevant legislation has been adopted.

Recommendations

1. The NBU should develop and take measures to reduce cases of de-risking affecting non-profit organisations.
2. Complete the 2025 AML/CFT NRA, taking into account the results of the independent risk assessment of the NPO sector and applying a risk-based approach, and publish its Report. The draft 2025 NRA should be revised in line with the findings of the independent risk assessment, with the involvement of expert CSOs and international partners (in particular, the Council of Europe Office in Ukraine). Should resources and time for revision be limited, approve the Report on the Risk Assessment of the NPO Sector in Ukraine, together with its findings and recommendations, as an annex to the 2025 NRA Report.
3. Improve the comprehensive administrative reporting system. To determine the threat assessment for NPOs, the responsible state authorities should add an additional criterion for collecting statistical data to the existing forms on relevant predicate offences, namely whether NPOs were used to commit the offence or whether the offences were committed by persons managing NPOs. To this end, it is proposed to introduce the relevant amendments to the comprehensive administrative reporting forms.
4. Ensure training for participants in the AML/CFT system on the specific features of the legal regulation and activities of CSOs to enable the correct application of the risk-based approach, taking these specific features into account.
5. Develop subsequent updates to the Methodology for the National ML/TF Risk Assessment in Ukraine with the involvement of CSOs and through active and comprehensive consultations with international experts and partners.
6. Amend the Regulation on Financial Monitoring by Banks, approved by Resolution of the Board of the NBU No. 65 of 19 May 2020, and the Regulation on Financial Monitoring by Institutions, approved by Resolution of the Board of the NBU No. 107 of 28 July 2020. In particular, it is necessary to remove the obligation of banks to verify information on the founders of PA, exclude the activities of NPOs, including charitable activities, the activities of religious organisations and political parties, except associations of co-owners of apartment buildings, from the customer-type risk criteria and exempt banks from the obligation to examine information on the founder of such a legal entity when identifying the UBO of a PA or CO.

3103 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Compliance with European Union Legal Acts and Relevant Criteria Established by the European Payments Council for the Purpose of Ukraine's Accession to the Single Euro Payments Area (SEPA): Draft Law of Ukraine, registration No. 14327-1 of 09.01.2026. ↗

3104 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Compliance with European Union Legal Acts and Relevant Criteria Established by the European Payments Council for the Purpose of Ukraine's Accession to the Single Euro Payments Area (SEPA): Draft Law of Ukraine, registration No. 14327-d of 06.04.2026. ↗

7. The NBU should conduct information and awareness-raising work with banks to ensure the application of a risk-based approach.
8. Improve CSOs' access to banking services by creating opportunities for NPOs to attract credit financing through banks, ensuring cash collection services for charitable organisations and simplifying the receipt of international transfers from EU countries, taking into account restrictive measures.
9. When developing any amendments to the current legislation of Ukraine on financial monitoring of civil society, state authorities should be guided by the provisions of the updated FATF Recommendation 8 and FATF Best Practices. The draft law No. 14327-d requires close attention and analysis, as well as the involvement of CSOs in their revision between parliamentary readings.
10. Create an intersectoral dialogue platform to ensure cooperation and coordination between state authorities, the regulator, banks and the civil society sector for systemic interaction.
11. Create an information portal on AML/CFT issues for NPOs, which would provide information on legislation, standards and requirements in the field of anti-money laundering and terrorist financing.
12. Submit a request to the Venice Commission of the Council of Europe to prepare an expert opinion on whether the provisions of Draft Law No. 14327-d, after its revision for the second reading, comply with European standards of law, democracy and the rule of law, and ensure the participation of the expert community and CSOs in the process of revising the text of the draft law between the first and second readings in order to prevent its adoption in a version that would restrict the lawful activities of CSOs and create unjustified obstacles to access to banking services.

Effective Engagement of Civil Society Organisations in Governance

State–Civil Society Interaction and Public Participation in Decision-Making and Policy Implementation

State of play

Article 38 of the Constitution of Ukraine[3105] guarantees citizens the right to participate in the administration of state affairs. The use of instruments for citizen participation in decision-making, particularly at the local level, and ensuring access for citizens and CSOs to information on the activities of public authorities have been complicated by the conditions of the full-scale war. The Law of Ukraine 'On Local Self-Government in Ukraine'[3106] establishes both the right of members of a territorial community to participate in local self-government and the forms of citizen participation in addressing issues of local significance, namely local referendums, general meetings (conferences) of residents, local initiatives, public hearings, residents' participation in the planning and allocation of local budget funds, public consultations, citizen participation in consultative and advisory bodies under local self-government bodies and/or officials and public evaluation of the activities of local self-government bodies and officials. A significant step forward in the legislative regulation of citizen participation in decision-making was the adoption and entry into force in January 2025 of the Law of Ukraine 'On Amendments to Certain Laws of Ukraine on Democracy at the Level of Local Self-Government',[3107] which provides for the mandatory approval of statutes for territorial communities from 1 January 2027. It is in the statutes of territorial communities that the forms and procedure for exercising public oversight over the activities of local self-government bodies and officials are determined.[3108]

An equally important issue for ensuring genuine citizen participation in decision-making on matters of local significance is the effective use of the mechanism for establishing and

3105 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Article 38. ↗

3106 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, Articles 3, 61. ↗

3107 On Amendments to Certain Laws of Ukraine on Democracy at the Level of Local Self-Government: Law of Ukraine No. 3703-IX of 09.05.2024, sub-para. 2, para. 1, Section II. Final and Transitional Provisions. ↗

3108 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, para. 5, Part 3, Article 19. ↗

operating bodies of self-organisation of the population. The possibility of establishing such bodies is provided for in Article 14 of the Law of Ukraine 'On Local Self-Government in Ukraine'[3109] as a form of citizen participation in addressing matters linked to their place of residence. A body of self-organisation of the population is a representative body established by residents who lawfully reside within the territory of a village, settlement, city or parts thereof and to which certain powers of executive authorities may be delegated.[3110] The sectoral Law of Ukraine 'On Bodies of Self-Organisation of the Population'[3111] has not undergone any significant updates since its adoption in 2001, which complicates the establishment and operation of such bodies in Ukraine. The FDI Roadmap provides for amendments to the Law of Ukraine 'On Bodies of Self-Organisation of the Population' to simplify the procedure for their establishment, define their powers and territory of activity, eliminate inaccuracies concerning the procedure for establishing such bodies, their term of office and membership, state registration and other matters. The FDI Roadmap set the deadline for implementing this measure as the end of 2025.[3112]

Progress and issues

On 17 June 2026, the Government approved the Action Plan for the Implementation of the Open Government Partnership Initiative for 2026–2027.[3113] According to expert assessments,[3114] the Action Plan includes 40 measures aimed at developing open government in various areas of public policy. A distinctive feature of this Plan is that it is based on the principle of multistakeholder partnership, whereby most measures are implemented not only by public authorities but also with the participation of civil society institutions, international organisations, businesses and local self-government bodies (LSG bodies). For civil society organisations, the measures aimed at developing public participation mechanisms are of greatest importance. In particular, the Plan provides for the involvement of CSOs in implementing public participation mechanisms in the planning and monitoring of public investment and community recovery, including through the DREAM system (Digital Restoration Ecosystem for Accountable Management — a state ecosystem for transparent management of public investment and recovery). It also provides for the development of a public participation methodology, the creation of feedback mechanisms and tools enabling citizens and civil society organisations to participate in oversight of the implementation of investment projects at local and regional levels. The Action Plan for the Implementation of the Open Government Partnership Initiative for 2026–2027 is important for the development of civil society in Ukraine, as it establishes an approach to public policy-making based on the principles of openness, partnership and broad public engagement. Unlike the traditional model, under which CSOs mainly performed an advisory function, the new Plan provides for their active participation

3109 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997. ↗

3110 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, para. 12 Article 1, Part 1 Article 14, Part 8 Article 16, para. 20 Part 1 Article 26. ↗

3111 On Bodies of Self-Organisation of the Population: Law of Ukraine No. 2625-III of 11.07.2001. ↗

3112 Roadmap on the Functioning of Democratic Institutions, measure 1 of strategic outcome 6 of subsection IV.C 'Broader context for creating an enabling environment' of Section IV. 'The Role of Civil Society'. ↗

3113 On Approval of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2026–2027. Cabinet of Ministers of Ukraine, 17 June 2026. ↗

3114 Analysis of the Order 'On Approval of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2026–2027'. UICPR, 25 June 2026. ↗

not only in the preparation but also in the implementation and monitoring of a significant share of the measures. At the same time, achievement of its objectives will largely depend on the practical implementation of the declared interaction mechanisms, the openness of public authorities to cooperation and adequate resourcing for the implementation of the planned measures.

In July 2026, the Ministry of Social Policy **published for public consultation a draft Resolution of the Cabinet of Ministers of Ukraine approving the Model Regulation on the Council on Volunteering, Charity and Humanitarian Response.**[3115] The draft establishes a broad framework for institutionalising interaction between public authorities and civil society at the local level, defining the principles governing the activities of consultative and advisory councils, their composition, powers and procedures, as well as the methodological and coordination role of the Ministry of Social Policy. At the same time, the draft requires revision in terms of the definitions used, as its title and individual provisions use the categories 'volunteers', 'benefactors' and 'humanitarian organisations', whereas in fact it concerns a much broader mechanism for interaction between public authorities, civil society institutions and other representatives of the active public. In addition, the advisory status of the Councils, without mechanisms requiring their recommendations to be taken into account, may limit the effectiveness of this instrument of public participation. The process of approving and subsequently implementing the Resolution should also be monitored to prevent the creation of a state instrument for unjustified control over CSO activities.

On 14 November 2025, the Ministry for Development of Communities and Territories of Ukraine (Ministry for Development) published Methodological Recommendations on Developing the Statute of a Territorial Community,[3116] which include a draft statute that communities may use as a basis. Representatives of CSOs were involved in the development of these methodological recommendations.[3117]

The process of adopting and updating the statutes of territorial communities is slow and requires greater expert support. Given the deadline of the end of 2026, communities have little time left to adopt statutes or update existing ones. **The results of surveys and studies in the regions indicate a systemic problem and low rates of adoption of territorial community statutes**. A study of the specific features of informing and involving community residents under martial law, which surveyed representatives of 268 communities from 23 regions of Ukraine, excluding Luhansk region and the Autonomous Republic of Crimea (AR Crimea), shows that almost 40% of the surveyed communities still do not have a statute, while the vast majority of those that do adopted it before the new legislation entered into force and therefore effectively require an update.[3118] The data of the Analytical Report[3119] on the status of updating statutes and participation instruments

3115 On Approval of the Model Regulation on the Council on Volunteering, Charity and Humanitarian Response. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3116 Methodological Recommendations on Developing the Statutes of Territorial Communities. Ministry for Development of Communities and Territories of Ukraine, 2025. ↗

3117 Methodological Recommendations on Developing the Statute of a Territorial Community. Ukrainian Independent Centre for Political Research, 2025. ↗

3118 The Polaris Programme Presented the Results of a Study on Informing and Involving Community Residents under Martial Law. Polaris, 2026. ↗

3119 How Many Communities in Volyn Have Approved Their Own Statutes? Sharing the Results of the Study. Volyn Institute of Law, 2026. ↗

in communities of Volyn region showed that only 18 of the 38 communities studied have statutes, while 20 communities do not have this document. At the same time, 18 communities with approved statutes adopted them in 2025, that is, after the entry into force of the Law of Ukraine 'On Amendments to Certain Laws of Ukraine on Democracy at the Level of Local Self-Government'.

Overall, there are 1,439 communities in Ukraine,[3120] meaning that the **timely adoption of statutes may remain a challenge** for most of them. **The quality of statutes adopted in haste may also become a problem**. Communities have limited opportunities to involve experts in developing statutes, while the number of experts able to provide such support is also limited.[3121] Projects are being implemented[3122] to support communities in drafting statutes, but they are insufficient to cover all communities.

A problem in legislative regulation is that statutes must be adopted by bodies that do not represent communities, namely military administrations (MA). This may result in weaker consideration of community interests and undermine the legitimacy of the statutes. The legislation does not provide for exceptions for communities where MAs have been established — statutes must still be adopted. A community statute is a document that defines the general characteristics and specific features of a territorial community, the principles governing relations between local self-government bodies and officials, bodies of self-organisation of the population, associations of citizens, other entities and so on. Therefore, the development and adoption of statutes require a representative body, public discussion and consideration of the views of organised and non-organised civil society.[3123] In communities with MA, the decision to adopt a statute will not be taken by a council as a representative body, but by the head of the MA acting alone. As this is an appointed official, this significantly reduces the legitimacy of the statute as the community's key document.

Limited possibilities for implementing forms of democracy by relocated administrations in the absence of a connection with the territory of the community. Following the start of Russia's full-scale invasion of Ukraine, many communities found themselves under occupation and their authorities were forced to evacuate to territory controlled by the Government of Ukraine. However, receipts to treasury accounts and the replenishment of these communities' budgets, as well as their expenditure, did not cease: budgetary processes in these communities continue.[3124] The implementation of most forms of public participation for representatives of relocated communities is complicated or unavailable. For example, the statutes of territorial communities must determine the procedure for initiating, organising and holding general meetings (conferences) of residents, which are a form of direct citizen participation in addressing local self-government matters. However, for relocated and frontline communities, holding such meetings is almost impossible. Therefore, for communities that are under occupation but continue to manage budget

3120 Territorial Communities. Decentralisation. ↗

3121 Information provided by Respondent No. 66 during an interview conducted on 20.03.2026.

3122 Results of the Competition 'Supporting the Development of Statutes of Territorial Communities 2.0'. International Renaissance Foundation, 2026. ↗

3123 Should Military Administrations Approve the Statutes of Territorial Communities? Association for Promoting Self-Organisation of the Population, 2025. ↗

3124 Budgets in Exile: A Project Has Been Launched to Strengthen the Influence of Residents of Temporarily Occupied Communities on the Budget Process. Hromadskyi Prostir, 2026. ↗

funds, it is necessary to create conditions for increasing the level of citizen participation in administrative decision-making, to reduce the risks of improper or inefficient use of resources through monitoring and public participation instruments. It is important to help strengthen trust between relocated administrations and citizens.

The current procedure for establishing, operating and terminating bodies of self-organisation of the population[3125] is complex and requires updating. Ukrainian civil society therefore expected the adoption of draft law No. 6319,[3126] which proposed systemic amendments to the legislation governing the activities of bodies of self-organisation of the population:

- simplifying the procedure for establishing a body of self-organisation of the population;
- regulating issues concerning the powers and territory of activity of a body of self-organisation of the population;
- clarifying the right to elect and be elected to a body of self-organisation of the population;
- clarifying the procedure for terminating the powers of the membership of a body of self-organisation of the population and terminating such a body.

On 11 March 2026, Parliament did not support the draft law at second reading. It fell short of adoption by 21 MP votes. The text of the draft law for the second reading was developed by a working group[3127] with the participation of representatives of CSOs and MPs. MP Tamila Tasheva has stated[3128] that she is ready to register a new draft law. Representatives of CSOs who were involved in the working group on preparing draft law No. 6319 for the second reading are concerned about a possible deterioration of the text of the new draft law.[3129]

On 10 April 2026, Draft Law No. 15165[3130] was registered. It largely replicates the provisions of Draft Law No. 6319 as prepared for the second reading, except for the provision on grants as a possible source of financial support for the activities of bodies of self-organisation of the population. However, even if the draft law is adopted without the wording on grants, the text still contains provisions on charitable donations and other forms of non-repayable financial assistance, which should keep the possibility of donor support available. On 11 May 2026, the Verkhovna Rada Committee on the Organisation of State Power, Local

3125 Bodies of self-organisation of the population are one of the forms of participation of residents of territorial communities of villages, settlements, cities and districts in cities in addressing matters of local significance.

3126 On Amendments to the Law of Ukraine 'On Bodies of Self-Organisation of the Population' to Improve the Procedure for the Organisation, Activities and Termination of a Body of Self-Organisation of the Population: Draft Law of Ukraine, registration No. 6319 of 18.11.2021. ↗

3127 On the Activities of the Committee Working Group on Reviewing and Preparing for the Second Reading the Draft Law on Improving the Procedure for the Organisation, Activities and Termination of a Body of Self-Organisation of the Population, registration No. 6319. Verkhovna Rada of Ukraine, 2025. ↗

3128 Publication by MP Tamila Tasheva on the social network Facebook, 2026. ↗

3129 Information provided by respondent No. 69 during an interview conducted on 23.03.2026.

3130 On Amendments to Certain Laws of Ukraine to Improve the Legal Conditions for the Activities of Bodies of Self-Organisation of the Population: Draft Law of Ukraine, registration No. 15165 of 10.04.2026. ↗

Self-Government, Regional Development and Urban Planning recommended that Draft Law No. 15165 be adopted as a basis at first reading.[3131]

At the same time, demand is growing for the establishment of bodies of self-organisation of the population, especially at village level,[3132] where, following amalgamation into territorial communities with other settlements, village councils no longer exist as legal entities. The establishment of bodies of self-organisation of the population could make it possible to delegate to them part of the functions of the executive body of a territorial community and to address other local matters.

The activities of bodies of self-organisation of the population established in territories that are currently temporarily occupied have effectively been made impossible. For example, the legislation requires bodies of self-organisation of the population to report on their activities at least once a year at meetings (conferences) of residents at their place of residence. The law also establishes the frequency with which the composition of such a body must be renewed and so on. Compliance with these requirements is impossible for bodies of self-organisation of the population established in territories not controlled by Ukraine, while failure to comply with the requirements of the law constitutes grounds for their termination. A link to the territory of activity is a key feature of a body of self-organisation of the population, so in such cases relocation, that is, a change of registered address, cannot be applied.

Similarly, due to the danger caused by military risks, the need to hold constituent meetings (conferences) of residents at their place of residence and the specific nature of the activities of MA remains a serious challenge.

Recommendations

1. Ensure proper information and expert support for the processes of developing and approving the statutes of territorial communities.
2. Amend the legislation to prohibit the adoption of statutes by heads of MAs, while defining the possibility of establishing temporary rules for the use of public participation instruments.
3. Regulate by law the issue of ensuring the implementation of forms of public participation in addressing matters of local significance by MAs of occupied territories and ensure that MAs of occupied territories enable citizens to use the decision-making participation instruments currently available.
4. Adopt draft law No. 15165 to improve the legal conditions for the activities of bodies of self-organisation of the population.
5. Regulate by law the establishment and activities of bodies of self-organisation of the population in occupied territories.

3131 Press Service of the Verkhovna Rada Secretariat. Improving the Legal Conditions for the Activities of Bodies of Self-Organisation of the Population: the Lead Committee Recommends that the Verkhovna Rada Adopt Draft Law No. 15165 as a Basis. Verkhovna Rada of Ukraine, 2026. ↗

3132 Information provided by Respondent No. 71 during an interview conducted on 25.03.2026.

Oversight Role of Civil Society

State of play

The exercise of civil society's oversight role in Ukraine and its effectiveness are limited by the impact of martial law, insufficient funding for CSOs and the uneven level of openness among public authorities.

One of the basic instruments for CSOs to exercise their oversight role is the Law of Ukraine 'On Citizens' Appeals',[3133] which provides mechanisms for challenging the actions and inaction of individual officials or institutions. The Law also makes it possible to submit proposals for improving the activities of public authorities and to expose shortcomings in their work. In March 2024, Government Draft Law No. 11082[3134] was registered with the aim of improving legislation on appeals.

In August 2024, amendments[3135] to the Law of Ukraine 'On Local Self-Government in Ukraine'[3136] entered into force, introducing an obligation for village, settlement, city, district-in-city, district and regional councils to publish video recordings of their meetings on their own websites. The findings of a study on the first year of implementation of this provision by regional councils, from August 2024 to August 2025, show that 71% of councils held their sessions in person, while the rest worked remotely or in a hybrid format, 57% published recordings and 43% broadcast their meetings live.[3137] As regards the practice of city councils, data for the same period indicate almost 300 sessions of city councils in regional centres and Kyiv. Of these, 57% were held in person, almost 29% were held remotely or in a hybrid format, where some elected representatives worked from the council premises and others participated by internet conference, while the remaining councils used both options.[3138]

An important instrument for involving CSOs in the development and implementation of public policy remains the work of public councils under central and local executive authorities. Their activities are regulated by Government Resolution No. 996.[3139] In 2022, amendments were made to the Resolution,[3140] which defined the specific features of the functioning of public councils for the period of martial law and six months after its termination. The amendments provide that a new composition of a public council must be formed by the executive authority six months after the date of termination or cancellation of martial law, extend the term of office of existing public councils until their

3133 On Citizens' Appeals: Law of Ukraine No. 393/96-VR of 02.10.1996. ↗

3134 On Appeals: Draft Law of Ukraine, registration No. 11082 of 13.03.2024. ↗

3135 On Amendments to the Law of Ukraine 'On Local Self-Government in Ukraine' to Ensure the Transparency of Local Self-Government: Law of Ukraine No. 3590-IX of 22.02.2024. ↗

3136 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997. ↗

3137 A Year under the Cameras: How Regional Councils Show the Work of Sessions and Committees. CHESNO Movement, 2025. ↗

3138 Security or Convenience: How City Councils Abuse the Right to Remote Work and Meeting Recordings. CHESNO Movement, 2025. ↗

3139 On Ensuring Public Participation in the Formation and Implementation of State Policy: Resolution of the Cabinet of Ministers of Ukraine No. 996 of 03.11.2010. ↗

3140 On Amendments to Resolution of the Cabinet of Ministers of Ukraine No. 996 of 3 November 2010: Resolution of the Cabinet of Ministers of Ukraine No. 909 of 16.08.2022. ↗

new composition is approved and establish the possibility, by decision of the executive authority, of restricting members of a public council's access to the premises in which the authority is located, restricting the publication of information on the activities of the public council, with subsequent publication within six months after the date of termination or cancellation of martial law and other measures.

Sectoral councils are also developing actively, including due to the impact of the war. In August 2023, Government Resolution No. 812 approved the Model Regulation on the Council for Internally Displaced Persons.[3141] Councils for internally displaced persons operate as consultative and advisory bodies under the Council of Ministers of the Autonomous Republic of Crimea, Kyiv and Sevastopol city, regional and district state (military) administrations. As of 2024, 813 such councils[3142] were already operating in Ukraine. Despite their limited powers, lack of budgets and large number of tasks, these councils are gradually becoming effective platforms for interaction between IDPs and local authorities. Their activities contribute to the search for effective solutions at community level.[3143]

Even where cooperation between state institutions and CSOs is successful, the closed nature of these institutions and their unwillingness to provide additional data[3144] for work or cooperation with other structural units with which no established contacts exist remain a problem. Therefore, in many cases, the successful exercise of the oversight role of CSOs depends on prior experience of interaction with state institutions.

The Prozorro electronic public procurement system[3145] remains a convenient and effective instrument for monitoring public procurement. Even defence procurement is carried out using the Prozorro instrument, which allows CSOs to analyse the policies and procedures established by the public contracting authority.[3146] The findings of monitoring conducted by CSOs have evolved and now primarily serve as a basis for the development or revision of policies and procedures by public authorities, rather than merely as a way to publicly highlight problems. In addition, at the request of state institutions, CSOs analyse counterparties.[3147] Prozorro makes it possible to track patterns in the behaviour of bidders and signs of collusion between them, which serves as a basis for improving state policies. The analytics developed by think tanks support the work and conclusions of supervisory boards under state institutions. Cooperation with CSOs has led to the introduction of procurement risk indicators for the automated system for analysing closed agreements in Prozorro and the possibility of marking procurement as risky.[3148] Cooperation with CSOs

3141 On the Council for Internally Displaced Persons: Resolution of the Cabinet of Ministers of Ukraine No. 812 of 2023. ↗

3142 Interactive Map of Ukraine with IDP Councils. ZaRady VPO, 2025. ↗

3143 Capacities and Challenges of IDP Councils: Results of the First Nationwide Study. ZaRady VPO, 2025. ↗

3144 Information provided by Respondent No. 72 during an interview conducted on 24.03.2026.

3145 Prozorro Electronic Public Procurement System. ↗

3146 Procurement of Dry Rations for the AFU: Causes of Supply Failures and Market Assessment — StateWatch Analysis. StateWatch, 2026. ↗

3147 Information provided by Respondent No. 72 during an interview conducted on 24.03.2026.

3148 New Risk Indicators in Prozorro: Focus on Changes to Essential Contract Terms. Prozorro, 2026. ↗; New Risk Indicators Introduced in Prozorro. Public Procurement Adviser, 2026. ↗

and the development of solutions for defence procurement have also improved Prozorro's functionality for procurement in other sectors.[3149]

Progress and issues

On 20 January 2026, Law No. 4212-IX[3150] entered into force, with provisions improving CSO access to information on the work of Verkhovna Rada committees. **The practical implementation of the updated legislation on the mandatory publication of video recordings of meetings may become a problem**. According to an analysis of committee work in 2025,[3151] most committees demonstrated that they were not ready to comply with the new law on the mandatory publication of video recordings of meetings. Some committees limited their openness on security grounds, including the Committee on National Security, Defence and Intelligence and the Committee on Law Enforcement. **It is important to avoid the misuse of security risks as grounds for holding committee meetings in closed format**.

The risk that citizens' appeals may become an ineffective instrument arose because, on 14 November 2025, the relevant committee[3152] revised the text of draft law No. 11082[3153] before the second reading. If Draft Law No. 11082 on citizens' appeals is adopted in the version supported by the Committee, the response to citizens' appeals risks being reduced to the formal receipt of a reply from a civil servant, without any obligation to seek a substantive solution to the problem.[3154] Experts continue to emphasise the need to revise Draft Law No. 11082. In particular, the list of entities responsible for considering appeals should be aligned with the provisions of the Constitution of Ukraine, the definition of a 'complaint regarding the consideration of appeals' should be excluded as a separate type of appeal and the obligation to ensure face-to-face personal reception of citizens should be clearly established.[3155]

Some positive steps have been taken to increase youth involvement in the work processes of state institutions. In December 2025, the Government approved the Model Regulation on a Youth Council under a central executive authority.[3156] In January 2026, a strategic session of the Council on Youth Affairs under the President of Ukraine was held in Kyiv.[3157]

3149 Publication on the StateWatch page on the social network Facebook. ↗

3150 On Amendments to Certain Laws of Ukraine to Strengthen Certain Guarantees for the Activities of Media and Journalists and Ensure Citizens' Right of Access to Information: Law of Ukraine No. 4212-IX of 14.01.2025. ↗

3151 Six Verkhovna Rada Committees Report Poorly on Their Work — CHESNO Analysis. CHESNO Movement, 2026. ↗

3152 Committee of the Verkhovna Rada on Human Rights, De-Occupation and Reintegration of Temporarily Occupied Territories of Ukraine, National Minorities and Interethnic Relations, which is the main committee for the consideration of Draft Law No. 11082.

3153 On Appeals: Draft Law of Ukraine, registration No. 11082 of 13.03.2024. ↗

3154 A Roundtable on Draft Law No. 11082 'On Appeals' Was Held. Centre of Policy and Legal Reform, 2026. ↗

3155 Why Draft Law 'On Appeals' No. 11082 Is a Step toward the EU — but Needs Work. Transparency International Ukraine, 2026. ↗

3156 On Approval of the Model Regulation on a Youth Council under a Central Executive Authority: Resolution of the Cabinet of Ministers of Ukraine No. 1627 of 10.12.2025. ↗

3157 The Council on Youth Affairs Defined Its Priorities for 2026. Ministry of Youth and Sports of Ukraine, 2026. ↗

Recommendations

1. Ensure the publication of meetings of Verkhovna Rada committees, except where matters of national security, defence and intelligence are considered, without abusing such exceptions.
2. Revise Draft Law No. 11082 to ensure the proper substantive consideration of citizens' appeals and an effective response by public authorities to the issues raised in them, while enabling applicants to participate in the search for solutions — including by joining working groups and reviewing documents.

Public Consultations

State of play

Despite the adoption of the Law of Ukraine 'On Public Consultations',[3158] its practical implementation has been postponed until the end of martial law, which hinders the systematic introduction of public consultation practices at the state and local levels. Existing consultation mechanisms continue to function, but legislation is often developed and implemented without proper public dialogue with civil society. At the same time, civil society demonstrates its ability to influence the content of legislative initiatives through advocacy and expert participation in the revision of draft laws between the first and second readings.[3159] The issue of ensuring effective and timely public consultations is becoming increasingly relevant in the context of the need to adapt Ukrainian legislation to European standards, particularly in connection with initiatives to introduce an accelerated procedure for considering European integration draft laws.

LSG bodies publish annual plans for public consultations on their official websites.[3160]

Progress and issues

The **Law of Ukraine 'On Public Consultations'**,[3161] signed by the President in October 2024, **remains inoperative**, as it will enter into force only one year after the termination or cancellation of martial law in Ukraine. The Law provides for public consultations by all executive authorities, LSG bodies and others when adopting any administrative decisions but does not apply to MPs. The Law should be brought into force as soon as possible and this is feasible even under martial law, as its provisions already exclude matters related to measures to ensure Ukraine's defence capability and national security from its scope. The participation opportunities that the Law of Ukraine 'On Public Consultations' creates for civil society are highly promising: it regulates the procedure, main stages and forms of public consultations, provides for the creation of an online platform for public consultations and requires reporting on their results. The Law provides that the Government and LSG

3158 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024. ↗

3159 Information provided by Respondent No. 67 during an interview conducted on 23.03.2026.
Information provided by Respondent No. 66 during an interview conducted on 20.03.2026.
Information provided by Respondent No. 71 during an interview conducted on 25.03.2026.

3160 Indicative Plans for Public Consultations in Kyiv City State Administration. Kyiv City Council, 2026. ↗

3161 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024. ↗

bodies should begin work on adopting and updating regulations six months before the Law enters into force, which currently postpones the start of their preparation of the necessary normative legal acts. Moreover, even the six months allocated by the Law will not be sufficient to develop the necessary materials and adopt them in time.[3162] The procedures for developing, approving and adopting normative legal acts, as well as for developing and launching the online platform, are lengthy. This particularly concerns matters that will require expenditure from the State Budget of Ukraine (State Budget), such as the operation of the online platform. After martial law is cancelled, there is a risk that public authorities will shift their focus to organising the electoral process and rebuilding territories, making the remaining tasks less of a priority.

At present, consultations with the public are conducted in accordance with the Procedure for Public Consultations on the Formation and Implementation of State Policy, approved by Resolution of the Cabinet of Ministers of Ukraine No. 996.[3163] An example of such consultations is the holding of electronic public consultations on the draft National Human Rights Strategy for the period until 2035.[3164]

Overall, the law-making process demonstrates a lack of proper public dialogue and consultations. This became evident after the registration of a number of draft laws aimed at the large-scale recodification of the Civil Code of Ukraine. Before their registration, neither a risk assessment nor open communication with stakeholders was conducted. The authors of these draft laws failed to ensure public discussion and consultations and, most importantly, an inclusive dialogue in the process of drafting the texts of the draft laws, which runs counter to the logic of Ukraine's European integration.

On 21 September 2025, a number of draft laws on amendments to the Civil Code of Ukraine were submitted to the Verkhovna Rada, including Nos. 14056[3165] and 14057.[3166] Their declared purpose was to update Books One and Two of the Civil Code in order to adapt private law to the digital age: to regulate abuses in the field of artificial intelligence (AI), improve the regulation of personal and biometric data, introduce the 'right to be forgotten' and move away from Soviet terminology ('personal non-property rights') in favour of the European concept of personality rights. At the same time, despite their complexity and significant socio-economic importance, these draft laws were not subject to public discussion before their registration.

CSOs with expertise in media law analysed these draft laws and identified several risks for the functioning of independent media.[3167] To ensure the inclusive involvement of civil society in revising the draft laws before the first reading, CSO representatives appealed to the Chairman of the Verkhovna Rada of Ukraine, whose office promptly created a

3162 Information provided by Respondent No. 70 during an interview conducted on 21.03.2026.

3163 On Ensuring Public Participation in the Formation and Implementation of State Policy: Resolution of the Cabinet of Ministers of Ukraine No. 996 of 03.11.2010. ↗

3164 Electronic Public Consultations on the Draft Decree of the President of Ukraine 'On Approval of the National Human Rights Strategy for the Period until 2035'. Ministry of Justice of Ukraine, 2026. ↗

3165 On Amendments to the Civil Code of Ukraine in Connection with the Updating (Recodification) of the Provisions of Book One: Draft Law of Ukraine, registration No. 14056 of 21.09.2025. ↗

3166 On Amendments to the Civil Code of Ukraine in Connection with the Updating (Recodification) of the Provisions of Book Two: Draft Law of Ukraine, registration No. 14057 of 21.09.2025. ↗

3167 Recodification of the Civil Code: Betrayal, Victory or 'It Is Not So Clear-Cut'? Centre for Democracy and Rule of Law, 2025. ↗

WhatsApp communication channel with key media experts.[3168] Civil society submitted its comments to the Chairman of the Verkhovna Rada and took part in a number of public consultations. Shortly after these draft laws were registered, several MPs withdrew their signatures from one of them, including Yaroslav Yurchyshyn,[3169] Olena Kondratiuk[3170] and others.[3171]

As regards the impact of the draft laws on civil society, no direct systemic threats to its functioning were identified. At the same time, a number of provisions required substantial revision and clarification with the participation of civil society organisations to prevent restrictions on their rights or lawful activities.

Later, in January 2026, another draft law — No. 14394[3172] 'Civil Code (Private Law Code)' — was submitted to Parliament, prepared with the same lack of public dialogue and consultations. It contains a number of controversial provisions concerning early marriages, family relations, reproductive rights, LGBTQ+ rights and other matters. Once again, some MPs withdrew their signatures and called for additional public consultations before the draft law is considered in Parliament (namely, Olena Kondratiuk).[3173] On 9 April 2026, Draft Law No. 15150 was registered in the Verkhovna Rada,[3174] proposing another version of the Civil Code of Ukraine, and it was supported at first reading on 28 April 2026.[3175] On the same day, Draft Law No. 14056[3176], No. 14057[3177] and No. 14394[3178] were withdrawn from consideration by Parliament. A significant part of the comments previously raised regarding Draft Law No. 14394 remain relevant to Draft Law No. 15150. This draft law has already triggered a wave of public protests.[3179] In addition, more than 80 human rights and civil society organisations appealed to the Chairman of the Verkhovna Rada of Ukraine and the author of the draft law, Ruslan Stefanchuk, requesting a working meeting to discuss the proposals developed for amendments to the draft law.[3180]

3168 I Held a Substantive Meeting with Representatives of Leading Civil Society Organisations and Legal Experts in the Fields of Media, Human Rights and Digital Security to Discuss Proposals to Two Key Draft Laws Registered in Parliament. Ruslan Stefanchuk, Facebook. ↗

3169 Yurchyshyn Withdrew His Signature from Draft Law No. 14057 and Will Organise a Discussion with Media Lawyers. Detector Media. ↗

3170 New Civil Code: A Wave of Criticism over the Introduction of New Family Law Provisions. Dzerkalo Tyzhnia. ↗

3171 Ihor Huz, Roman Lozynskyi, Halyna Vasylchenko, Maksym Khlapuk, Anastasiia Radina.

3172 Civil Code of Ukraine (Private Law Code), registration No. 14394 of 22.01.2026. ↗

3173 New Civil Code: A Wave of Criticism over the Introduction of New Family Law Provisions. Dzerkalo Tyzhnia. ↗

3174 Draft Civil Code of Ukraine: Draft Law of Ukraine, registration No. 15150 of 09.04.2026. ↗

3175 Ibid.

3176 On Amendments to the Civil Code of Ukraine in Connection with the Updating (Recodification) of the Provisions of Book One: Draft Law of Ukraine, registration No. 14056 of 21.09.2025. ↗

3177 On Amendments to the Civil Code of Ukraine in Connection with the Updating (Recodification) of the Provisions of Book Two: Draft Law of Ukraine, registration No. 14057 of 21.09.2025. ↗

3178 Civil Code of Ukraine (Private Law Code): Draft, registration No. 14394 of 22.01.2026. ↗

3179 Good Morals, Possession, the Right to Be Forgotten and More: Why People Are Protesting against the Draft New Civil Code. Gwara Media, 2026 ↗; Scandal around the New Civil Code: What Is Wrong with Draft Law No. 15150? Radio Free Europe/Radio Svoboda, 2026. ↗

3180 More than 80 Organisations Called on Stefanchuk to Review the Draft Civil Code. Institute of Mass Information, 2026. ↗

The prospective model for the procedure for considering European integration draft laws creates risks for taking civil society's position into account. On 17 August 2025, Draft law No. 13653[3181] was registered, aimed at improving procedures for approximating Ukrainian legislation to EU acquis, and introducing an accelerated procedure for considering European integration draft laws. On 1 September 2025, alternative draft law No. 13653-1[3182] was registered, which also provides for the introduction of an accelerated procedure for considering draft laws in the field of legislative approximation.

The draft laws provide that, when preparing draft laws included in the National Programme, the Government must interact with Verkhovna Rada committees and MPs. At the same time, they contain no provisions on the possibility or need to involve representatives of civil society organisations and the expert community in the process of developing such draft laws.

The idea of shortening the deadline for submitting alternative draft laws to seven days also raises justified concerns. Excluding representatives of civil society and the expert community from the mechanisms for preparing and considering European integration draft laws under an accelerated procedure may lead to the adoption of underdeveloped provisions without a proper assessment of the risks of their implementation, especially where the regulation of CSOs or impact on them is concerned.

Recommendations

1. Review the provisions of the Law of Ukraine 'On Public Consultations' concerning its entry into force one year after the end of martial law.
2. Ensure public access to participation in the accelerated procedure for adopting European integration draft laws by revising draft laws Nos. 13653 and 13653-1 before the second reading and enshrining a procedure for developing draft laws in the field of legislative approximation that would provide for joint preparation before registration with the participation of the Government, relevant Verkhovna Rada committees and representatives of civil society.

3181 On Amendments to Certain Legislative Acts of Ukraine to Improve Procedures for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis): Draft Law of Ukraine, registration No. 13653 of 17.08.2025. ↗

3182 On Amendments to Certain Legislative Acts of Ukraine Regarding the Procedure for Preparing, Initiating, Considering and Adopting European Integration Draft Laws: Draft Law of Ukraine No. 13653-1 of 01.09.2025. ↗

Support, Development and Protection of Civil Society Organisations

Persecution of Civic Activists

State of play

On 14 July 2026, the President **extended martial law until 31 October 2026**.[3183] This once again preserved the possibility for the authorities, including local MAs, to restrict citizens' right to peaceful assembly. Nevertheless, rallies and demonstrations continue to take place in most regions of Ukraine.[3184] Peaceful assemblies are most often held in large cities, while actions calling for the release of prisoners of war held by Russia also continue. Actions in support of prisoners of war and missing persons are not blocked even in regions where peaceful assemblies are prohibited.[3185] Among other things, following the resignation of Prime Minister of Ukraine Yuliia Svyrydenko on 14 July[3186] and the start of the Government reshuffle, an action in support of M. Fedorov began, demanding that he be reinstated as Minister of Defence of Ukraine in the new composition of the Government.[3187] As of 31 July 2026, since 16 July activists have been taking part in a peaceful protest against the personnel changes every evening.[3188] On 31 July, a protest march took place in Kyiv, calling on the President to continue dialogue with M. Fedorov.[3189] However, in general, Ukraine has developed an inconsistent practice of imposing restrictions and bans on peaceful assemblies, which does not always depend on a region's proximity to the frontline or the border with the aggressor state[3190] and may differ radically between settlements within the same region. Civic activity has not stopped even under martial

3183 On the Extension of Martial Law in Ukraine: Decree of the President of Ukraine No. 596/2026 of 14.07.2026. ↗

3184 Freedom of Peaceful Assembly: How the State Fulfils Its Obligations in Times of Security Challenges. Centre for Civil Liberties, 2025. ↗; KyivPride gathered approximately 455 participants, with a margin of error of ±15, while the number of law enforcement officers recorded by observers was around 462. By contrast, the March of Tradition gathered around 739 participants, with a margin of error of ±50, while the number of law enforcement representatives there was around 273. ↗

3185 Association of Azovstal Defenders' Families. ↗

3186 On the Resignation of Prime Minister of Ukraine Y. A. Svyrydenko: Resolution of the Verkhovna Rada of Ukraine No. 4935-IX of 14.07.2026. ↗

3187 An Action in Support of Fedorov Continues in Kyiv for a Second Day. Ukrainska Pravda. ↗

3188 Protests — Suspilne News. Suspilne News, 2026. ↗

3189 Participants in an Action in Support of Fedorov Held a Protest March in Kyiv. Suspilne News, 2026. ↗

3190 Freedom of Peaceful Assembly: How the State Fulfils Its Obligations in Times of Security Challenges. Centre for Civil Liberties, 2025. ↗

law, as evidenced by more than 1,000 public events over the past year,[3191] ranging from peaceful assemblies to protest actions. The regulation of such events therefore remains an important issue. At the same time, Ukraine has no law on peaceful assemblies. The absence of such a law is not, in itself, an obstacle to democratic development, but it does not contribute to the stable application of current legislation.

Overall, it can be stated that the Ukrainian authorities do not abuse their powers to restrict freedom of movement and peaceful assembly[3192] and continue to work on introducing liability for violations of the curfew, taking into account the position of the public on a reasonable amount of fines.

Progress and issues

The prohibition of a PA in the event that its officials are convicted of collaboration activities is excessive and unjustified. The Law of Ukraine 'On Public Associations'[3193] provides for the possibility of prohibiting organisations by court decision if their authorised persons are convicted of a criminal offence against the foundations of Ukraine's national security, namely for engaging in collaboration activities. Such wording of the Law essentially creates conditions for applying the relevant prohibition provision to organisations whose governing body members have been found guilty of collaboration activities. However, since this concerns the prohibition of a legal entity, where the PA itself was not involved in such an offence or in any violation of Articles 36 and 37 of the Constitution of Ukraine,[3194] the prohibition and compulsory termination of such an organisation is not a justified measure. No recorded cases of abuse of the relevant provision of the Law were identified during the reporting period and the very possibility for the state to initiate the termination of organisations whose activities are aimed at violating the Constitution of Ukraine, which is also provided for in Article 28 of the Law of Ukraine 'On Public Associations', is necessary. However, with regard to liability for criminal offences committed by 'authorised persons', the Law requires further revision to avoid possible risks.

The legal environment for the activities of CSOs often comes under threat from the adoption of restrictive legislation. In particular, a law on guarantees for the practice of law[3195] has been adopted and is awaiting the President's signature. It introduces administrative liability for publicly associating advocates with their clients. According to concerns raised by civil society organisations and media representatives, this may hinder anti-corruption activities and the protection of human rights.[3196] Draft Law No. 11228-1,[3197]

3191 Ibid.

3192 Restrictions and Guarantees of Citizens' Rights and Freedoms under Martial Law: A Constitutional and Legal Dimension. Bulletin of Lviv Polytechnic National University. Series: Legal Sciences, No. 1 (49), 2026. ↗

3193 On Public Associations: Law of Ukraine No. 4572-VI of 22.03.2012, Article 28. ↗

3194 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Articles 36, 37. ↗

3195 On Amendments to the Code of Ukraine on Administrative Offences, the Criminal Code of Ukraine and the Criminal Procedure Code of Ukraine Regarding Ensuring Compliance with Guarantees for the Practice of Law: Draft Law of Ukraine, registration No. 12320 of 16.12.2024. ↗

3196 Statement of Civil Society Organisations on Adopted Draft Law No. 12320 Regarding Ensuring Compliance with Guarantees for the Practice of Law. Centre for Democracy and Rule of Law, 2025. ↗

3197 On Amendments to the Criminal Code and Criminal Procedure Code of Ukraine and Other Legislative Acts of Ukraine Regarding the Regulation of Issues of Countering Intelligence and Subversive Activities by Special Services of Foreign States: Draft Law of Ukraine, registration No. 11228-1 of 10.05.2024. ↗

which proposes amnesty for crimes committed in the course of 'special assignments', also raises concerns due to the broad definition of such operations and the potential risks of excessive immunity for law enforcement agencies. In wartime conditions, with Parliament unable to be re-elected and the need for swift decision-making, it is important to ensure monitoring of legislative initiatives. Unfortunately, following the closure of United States Agency for International Development (USAID) projects, the CSOs that traditionally monitored these threats have largely discontinued such activities due to a lack of funding.[3198] At present, there are no national or international donor programmes that would close this gap.

The risks of using legislation on lobbying[3199] to exert pressure on civil society remain. The Law of Ukraine 'On Lobbying'[3200] does not define lobbying activities or the term 'commercial interest' with sufficient clarity, while declaring that the Law does not apply to CSO activities if such activities do not concern commercial interests. Accordingly, the lack of clarity around the term leaves room for the potential classification of CSOs as lobbyists. The implementation of the Law of Ukraine 'On Lobbying' and the launch of the Transparency Register[3201] are taking place under close monitoring by civil society. As of 31 July 2026, 202 lobbying entities were registered in the register. To date, no cases have been recorded of pressure being exerted on CSOs to register or to submit information on their presence or absence in this register.[3202]

Recommendations

1. Monitor the implementation of the provisions of the Law of Ukraine 'On Lobbying' in order to prevent their application to the lawful activities of CSOs.
2. Amend the Law of Ukraine 'On Lobbying' to clarify the definitions of terms, in particular 'commercial interest', in line with Council of Europe recommendations, in order to ensure compliance with the principle of legal certainty.

Funding of Civil Society Organisations

State of play

Funding for CSOs in Ukraine remains one of the most vulnerable elements of CSO support policy, despite certain positive changes and initiatives. The financial sustainability of CSOs in Ukraine continues to depend largely on international donor support, while state funding policy remains fragmented. CEBs provide funding only to certain types of PA, namely youth and children's public organisations, public associations of veterans and persons with disabilities and Non-Governmental Organisations (NGO) working in the field

3198 Information provided by Respondent No. 65 during an interview conducted on 17.03.2026.

3199 For more details — see the subsection 'Lobbying'.

3200 On Lobbying: Law of Ukraine No. 3606-IX of 23.02.2024, para. 5 Part 1 Article 1, para. 8 Part 2 Article 3. ↗

3201 Transparency Register. National Agency on Corruption Prevention. ↗

3202 Information provided by Respondent No. 75 during an interview conducted on 23.03.2026.

of national-patriotic education.[3203] CSO experts note the continued negative impact of the termination of USAID funding on CSO activities, since the fragmentation of funding has significantly increased the workload of CSO teams in administering projects.[3204]

Over the past year, both the number of local CSOs and the need to strengthen their institutional capacity have increased significantly.[3205] In addition, the security situation and access to basic resources, such as electricity, heating, communication tools and the Internet, deteriorated in late 2025 and early 2026 due to continuous attacks by the Russian Federation. This also had a negative impact on the activities of organisations, particularly in frontline regions.

In July 2025, the Law of Ukraine 'On Amendments to the Law of Ukraine "On the Basic Principles of Youth Policy" Regarding the Improvement of Mechanisms for Financing the Implementation of Youth Policy'[3206] entered into force, expanding funding opportunities for youth organisations, including access to charitable contributions and international assistance. The Law provides for the possibility for the Ukrainian Youth Fund to attract grant, charitable and sponsorship funding to support youth initiatives. It also provides for the possibility of institutional support for youth and children's public associations to implement youth projects with a view to ensuring their institutional development. In 2026, the state budget allocates more than UAH 45 million, approximately EUR 900,000, for grant support to youth initiatives.[3207]

The Ukrainian Cultural Foundation announced calls for projects in the cultural sphere, to which CSOs may also apply. On 6 March 2026, a call for projects was announced under the Partnership for Development programme,[3208] with a total programme budget of UAH 8 million, approximately EUR 157,000, for 2026.

In May 2026, the Fund for Social Protection of Persons with Disabilities announced a project competition for CSOs providing social services to persons with disabilities for 2026 and, on 23 June 2026, an additional competition was announced.[3209] The Fund's website contains the results of monitoring the implementation of projects funded in 2025.[3210]

A gradual formation of a more favourable environment for CSOs can be observed, in particular through the introduction of equal tax conditions for providers of social services following the adoption of Law No. 4505-IX,[3211] which allows CSOs not to pay value added tax and to operate on an equal footing with state institutions.

3203 Section 3. State Financial Support for CSOs. Map of Legal Reforms for Civil Society in Ukraine. Centre for Democracy and Rule of Law, 2020. ↗

3204 Information provided by Respondent No. 65 during an interview conducted on 17.03.2026.

3205 Information provided by Respondent No. 65 during an interview conducted on 17.03.2026.

3206 On Amendments to the Law of Ukraine 'On the Basic Principles of Youth Policy' Regarding the Improvement of Financial Support Mechanisms for the Implementation of Youth Policy: Law of Ukraine No. 4488-IX of 05.06.2025. ↗

3207 Grant competitions to support youth initiatives have been announced in Ukraine. Ukrinform, 2026. ↗

3208 Grant Programmes. Ukrainian Cultural Foundation, 2026. ↗

3209 Announcement of Project Competitions for CSOs. Fund for Social Protection of Persons with Disabilities, 2026. ↗

3210 Monitoring of Project Implementation. Fund for Social Protection of Persons with Disabilities, 2026. ↗

3211 On Amendments to the Tax Code of Ukraine and Other Laws of Ukraine Regarding Expanding Patients' Access to Medicines Subject to Procurement by the Person Authorised to Carry Out Procurement in the Healthcare Sector through Managed Entry Agreements: Law of Ukraine No. 4505-IX of 18.06.2025. ↗

On 15 July 2026, the Government's work on introducing a decision that would allow CSOs to import vehicles as humanitarian aid for carrying out their own statutory activities related to the provision of humanitarian aid and humanitarian and medical evacuation[3212] reached its logical conclusion — the Resolution 'Certain Issues of Acquiring and Losing the Status of a Verified Humanitarian Organisation' was adopted.[3213] The Ministry of Social Policy had been working for more than three years on this issue in a row in coordination with civil society. Under martial law, this Ministry is involved in the largest number of processes related to improving the legal environment for CSO activities. The process of explaining the updated rules and procedures is currently ongoing, with the Ministry of Social Policy and civil society carrying it out through the Volunteer Councils Forum platform,[3214] which is coordinated by Illia Odintsov, Adviser to the Minister of Social Policy, Family and Unity of Ukraine.

Progress and issues

Unequal access of CSOs to state funding. The state provides funding for project calls and CSO projects in the youth, veteran and cultural sectors, as well as in the field of protection of the rights and support of persons with disabilities. Such project calls are conducted through the Ukrainian Cultural Foundation, the Fund for Social Protection of Persons with Disabilities, the Ukrainian Veterans Foundation[3215] and the Ukrainian Youth Fund. The amount of support provided through competitive project calls remains limited. At the same time, other CSOs operating in other areas are entirely deprived of access to state funding. This situation has a negative impact on their institutional development and operational sustainability.

Limited development of new instruments of state support for CSOs hampers the strengthening of their institutional stability. This concerns, in particular, the lack of progress in introducing a percentage designation mechanism to finance CSOs[3216] and in laying the groundwork for the operation of classic and non-classic forms of endowments after martial law is lifted. A percentage designation mechanism from personal income tax could potentially create sustainable sources of support for organisations, especially at the local level. However, these initiatives remain unimplemented or blocked, including due to fiscal constraints and the position of the MoF.

The practical impossibility of procuring goods and services abroad due to currency restrictions imposed by the National Bank for the period of martial law.[3217] These restrictions affect the ability of CSOs to build their logistical, technical and expert capacity

3212 Materials of coordination meetings at the Office of the President chaired by the Deputy Head of the Office of the President.

3213 Certain Issues of Acquiring and Losing the Status of a Verified Humanitarian Organisation: Resolution of the Cabinet of Ministers of Ukraine No. 954 of 15 July 2026. ↗

3214 Results of the All-Ukrainian Forum of Volunteer Councils: Network of Volunteer Councils and Support for the Regions. Ministry of Social Policy, Family and Unity of Ukraine, 2026 ↗; The First All-Ukrainian Forum of Volunteer Councils with the Participation of the Minister of Social Policy, Family and Unity of Ukraine Has Started in Volyn. Volyn Regional State Administration, 2026. ↗

3215 Varto: Yednannia 2.0. Ukrainian Veterans Foundation, 2025. ↗

3216 On Amendments to the Tax Code of Ukraine Regarding the Introduction of a Percentage Designation Mechanism to Support Non-Profit Organisations: Draft Law of Ukraine, registration No. 7500 of 28.06.2022. ↗

3217 On the Operation of the Banking System during Martial Law: Resolution of the Board of the National Bank of Ukraine No. 18 of 24.02.2022. ↗

for carrying out their statutory activities. In addition, these restrictions have made it impossible for Ukrainian CSOs to act as the main implementers of projects, sub-grantors and managers of project funds where such projects involve consortia with foreign NGOs or universities.[3218] This situation is further complicated by the absence of legislation regulating the virtual assets market[3219] and by the unavailability of Revolut and PayPal[3220] systems for CSOs registered as legal entities in Ukraine. This challenge has an uncertain timeframe, as it is linked to the martial law regime, which is periodically extended due to the ongoing armed aggression of the Russian Federation.

A potential threat lies in the difficulties that may arise once Ukrainian legislation is brought into line with the EU acquis on the regulation of crowdfunding platforms,[3221] particularly in the context of the absence of legislation on virtual assets.[3222] Although Ukraine has officially declared its course towards legalising the virtual assets market by adopting the Law 'On Virtual Assets'[3223] in February 2022, the legislative framework remains uncertain, as the Law has never entered into force. In September 2025, the Verkhovna Rada adopted as a basis at first reading a new draft law, No. 10225-d,[3224] the third registered draft law on this issue, which is intended to regulate the circulation of virtual assets and amend the Tax Code. Its provisions are controversial.[3225] In the course of its further revision, particular attention should be paid to determining the extent to which the Markets in Crypto-Assets Regulation (MiCA) package[3226] needs to be taken into account, so as not to create an overly rigid regulatory framework, but rather to facilitate the transition of virtual asset service providers into the regulated market.[3227]

Crowdfunding as an instrument for raising funds from a broad community is becoming increasingly widespread in Ukraine — from supporting cultural projects and start-ups to collecting donations for defence and humanitarian needs. At the same time, legislative regulation of this area remains fragmented and vague, which complicates its alignment with EU legislation. Ukraine is seeing the development of charitable and social crowdfunding, both through specialised platforms focused on developing civic initiatives,

3218 'CSO Barometer 2025': Civil Society Resilience Holds Its Ground. Hromadskyi Prostir, 16.12.2025. ↗

3219 Expert Opinion of 09.07.2025 on Draft Law of Ukraine No. 10225-d of 24.04.2025 'On Amendments to the Tax Code of Ukraine and Other Legislative Acts of Ukraine Regarding the Regulation of the Circulation of Virtual Assets in Ukraine'. ↗

3220 Why PayPal, Wise, Stripe and Revolut Do Not Operate in Ukraine and What This Means for IT Professionals. DOU, 2025. ↗

3221 Crowdfunding in Ukraine: Current State, Regulatory Challenges and the Prospect of AML Obligations. Centre for Democracy and Rule of Law, 2026. ↗

3222 According to the National Programme for the Adaptation of Ukrainian Legislation to EU Law, by the end of 2026 it is envisaged to 'support and adopt the Law of Ukraine on amendments to certain legislative acts of Ukraine aimed at regulating the virtual assets market in Ukraine, which, in particular, provides for amendments to define the types of virtual assets, the list of services related to the circulation of virtual assets and requirements for virtual asset service providers'. However, there is currently no progress in preparing a draft law that would offer stakeholders in the virtual assets market a balanced architecture. Centre for Democracy and Rule of Law, 2025. ↗

3223 On Virtual Assets: Law of Ukraine No. 2074-IX of 17.02.2022. ↗

3224 On Amendments to the Tax Code of Ukraine and Certain Other Legislative Acts of Ukraine Regarding the Regulation of the Circulation of Virtual Assets in Ukraine: Draft Law of Ukraine, registration No. 10225-d of 24.04.2025. ↗

3225 For the preparation of the relevant legislation and its implementation in Ukraine, Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31.05.2023 on markets in crypto-assets and amending Regulations (EU) No. 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 must be implemented. ↗

3226 MiCA — Markets in Crypto-Assets Regulation. ↗

3227 Draft Law No. 10225-d: What the Third Vision of the Virtual Assets Market in Ukraine Means for the Civil Society Sector. Centre for Democracy and Rule of Law, 2025. ↗

creative projects and small businesses and through instruments offered by banks, such as Monobank Jar ('banka'), or various payment systems.

Ukraine still lacks a clear legislative definition of crowdfunding as an institution, and relevant relations are regulated by civil and commercial law without specific rules for online platforms. In May 2024, the European Union adopted a new package of AML/CFT rules.[3228] In particular, this package expands the range of 'obliged entities', referred to in Ukrainian legislation as entities subject to primary financial monitoring, and covers crowdfunding platforms, which will be required to implement AML/CFT measures, including customer verification and reporting of suspicious transactions, as early as July 2027. Thus, the new package proposes two types of fundraising platforms: a 'crowdfunding service provider' and a 'crowdfunding intermediary'. While the activities of specialised crowdfunding platforms that exclusively serve crowdfunding purposes clearly fall under the first category, the second category is more complex. It remains unclear which entities exactly fall within the definition of 'crowdfunding intermediaries'.[3229] If a particular group posts a fundraising appeal on Facebook, should Facebook be considered a 'crowdfunding intermediary'? Or where an association sends its members a fundraising request via WhatsApp? There is a need for a clear explanation and definition of the range of entities that fall within the category of crowdfunding intermediaries to avoid varied and inconsistent interpretations and legal uncertainty.

It also remains unclear how the implementation of European requirements may affect Ukraine's unique case, where banks themselves offer fundraising products, and whether financial monitoring requirements for users of such products will be strengthened. Ukraine and the EU are publicly discussing the possibility of accelerated EU accession, which will automatically create the need for the faster implementation of European rules into national legislation. In the context of war and active fundraising campaigns, it is important to have transparent and clear regulation that protects donors and counters fraud, while not undermining the ability to respond quickly to urgent needs. If the legislation is not developed in advance and with proper discussion, the response to new obligations may come as a sudden shock to citizens, platforms and institutions, especially amid large-scale charitable fundraising campaigns.

Recommendations

1. Increase the amount of state funding to be distributed through competitive mechanisms, while also ensuring institutional support for CSOs based on competitive procedures, revising the list of CSOs eligible to participate in them and reviewing approaches to the list and amounts of eligible costs within the implementation of CSO projects.
2. Adopt Draft Law No. 7500 on introducing a percentage designation mechanism to support CSOs and develop and adopt the amendments to the Budget Code of Ukraine necessary for the implementation of this mechanism, in line with European practice, as well as conduct a comprehensive review of the system of tax incentives for non-governmental organisations in order to reduce CSOs' dependence on external donor funding.

3228 Anti-Money Laundering: Council Adopts Package of Rules. Council of the European Union and the European Council, 2024. ↗

3229 Unpacking the EU AML/CFT package impacts on the non-profit sector. European Centre for Not-for-Profit Law, 2025. ↗

3. Further revise Draft Law No. 10225-d, taking into account the positions of civil society and business.

State Target Social Programme for the Development of Volunteering

State of play

The development of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030 became one of the important elements of the transition towards the systematic implementation of state policy in the field of volunteering. The development and implementation of the relevant programme are envisaged in the Action Plan for the Implementation of the National Strategy for Promoting Civil Society Development in Ukraine for 2025–2026[3230] and in the FDI Roadmap.[3231]

The EU Enlargement Package 2025 Report[3232] emphasises the need to adopt the programme, as an important stage in the implementation of systematic state policy in the field of volunteering with provision for adequate funding of its measures.

The Concept of the State Target Programme for the Development of Volunteering in Ukraine until 2030 was approved by the Government in July 2025.[3233] In September 2025, a public presentation was held of the approved concept and the first draft elements of the programme,[3234] 'State Targeted Social Programme for the Development of Volunteering until 2030: Engagement and the Role of CSOs', during which CSOs were encouraged to actively participate in preparing the draft.

The draft programme envisages the implementation of tasks and measures aimed at: (1) developing volunteering infrastructure, (2) strengthening the organisational capacity of CSOs that involve volunteers, (3) digitalising coordination and (4) improving the legal environment. The priority measures include: (1) launching a competitive mechanism of state support for organisations working with volunteers, (2) creating an information and analytical platform to coordinate volunteering activities between the state, CSOs and volunteers themselves, (3) disseminating practices of long-term volunteering, agreements and volunteer insurance and (4) preparing methodological materials and training products for organisations and public authorities.

3230 On Approval of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026: Order of the Cabinet of Ministers of Ukraine No. 246 of 21.03.2025. ↗

3231 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, measure 1 of strategic result 5 of section IV.B National Legal, Regulatory and Policy Frameworks for Civil Society Institutions of the Roadmap on the Functioning of Democratic Institutions. ↗

3232 The European Commission Presented the Ukraine Progress Report under the 2025 Enlargement Package — the Best Assessment in Three Years. Communication Team of the Office of the Deputy Prime Minister for European and Euro-Atlantic Integration, 2025. ↗

3233 On Approval of the Concept of the State Target Social Programme for the Development of Volunteering until 2030: Order of the Cabinet of Ministers of Ukraine No. 715 of 15.07.2025. ↗

3234 Presentation of the Concept of the State Target Social Programme for the Development of Volunteering. Ukrinform YouTube Channel, 2026. ↗

The draft programme was to be developed and submitted within six months of the approval of the concept. The process was delayed and the draft programme was submitted to the Government only in March 2026. Thus, the deadlines for the adoption of the programme set out in the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026 were missed.[3235] The draft programme went through public consultations[3236] and coordination with other ministries and agencies. CSOs had the opportunity to submit proposals to the text of the draft programme even before the stage of official public consultations[3237] in November 2025. The draft programme was developed in coordination with CSOs and at the stage of public consultations, which lasted from 9 January to 23 January 2026.[3238] Thus, the Ministry of Social Policy ensured an open process for developing the programme.

On 29 April 2026, the Government approved[3239] the 'State Target Social Programme for the Development of Volunteering in Ukraine until 2030'.[3240]

Progress and issues

Securing adequate funding for the implementation of the Programme may become problematic, as the State Budget for 2026 does not provide for a separate budget programme to finance the volunteering programme. The costs of financing the programme in 2026 are expected to be covered by the Ministry of Social Policy through the Ministry's existing programmes and other sources, as well as through cooperation with CSOs. The absence of a separate budget programme for 2026 and the need to finance the Programme through the redistribution of existing resources or donor assistance limit the potential impact of such initiatives and, in practice, shift a significant share of responsibility for their implementation onto CSOs themselves.

Recommendations

1. Ensure the implementation of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030 and provide funding for the programme's measures.

3235 On Approval of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026: Order of the Cabinet of Ministers of Ukraine No. 246 of 21.03.2025. ↗

3236 Public Discussion of the Draft State Target Social Programme for the Development of Volunteering in Ukraine until 2030. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3237 The Ministry of Social Policy Invites CSOs to Jointly Work on the Draft State Social Programme for the Development of Volunteering until 2030. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3238 Report on the Results of the Public Discussion and Electronic Public Consultations on the Draft Order of the Cabinet of Ministers of Ukraine 'On Approval of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030'. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3239 The Government Approved the State Programme for the Development of Volunteering in Ukraine until 2030. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3240 On Approval of the State Target Social Programme for the Development of Volunteering in Ukraine until 2030: Order of the Cabinet of Ministers of Ukraine No. 396 of 29.04.2026. ↗

National Strategy for Promoting Civil Society Development

State of play

In previous years, the Secretariat of the Cabinet of Ministers of Ukraine (SCMU) ensured inclusive consultations with the public and state authorities on the development of two Action Plans for the Implementation of the National Strategy for Promoting Civil Society Development in Ukraine, for 2023–2024 and 2025–2026.[3241] Although the SCMU assesses the level of implementation of these Action Plans as high,[3242] the implementation of some measures under the current Action Plan has been postponed. Unfortunately, the Action Plan often contains vague wording for some measures,[3243] as a result of which executive authorities tend to avoid responsibility for implementing measures proposed by the public, especially where these measures require the development and adoption of legislative amendments.

During the reporting period, the SCMU continues to make efforts to facilitate the implementation of the provisions of the FDI Roadmap.[3244]

Progress and issues

The Strategy for Promoting Civil Society Development is due to expire in 2026. At the same time, the current state of progress on the next strategic document raises concerns that it may not be drafted and approved in time. In autumn 2025, the SCMU began preparations for developing the next strategic document on civil society development and held one public consultation with CSOs.[3245] The current strategy[3246] remains in force until the end of 2026, and the SCMU published an up-to-date report on its implementation on 21 March 2026.[3247] The new strategic document is expected to lay the groundwork for addressing the financial, legal, security-related and institutional challenges that hinder the lawful activities of CSOs. As of 31 July 2026, no further public

3241 On Approval of the Action Plan until 2024 for the Implementation of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026: Order of the Cabinet of Ministers of Ukraine No. 160 of 14.02.2023. ↗; On Approval of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026: Order of the Cabinet of Ministers of Ukraine No. 246 of 21.03.2025. ↗

3242 Information provided by Respondent No. 67 during an interview conducted on 23.03.2026.

3243 Information provided by Respondent No. 66 during an interview conducted on 20.03.2026.

3244 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. Roadmap on the Functioning of Democratic Institutions. ↗

3245 Meeting of the Community of Practice: Discussing Approaches to Developing the New Civil Society Development Strategy for 2027–2031. ISAR Ednannia. ↗

3246 On the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026: Decree of the President of Ukraine No. 487/2021 of 07.09.2021. ↗

3247 Information on the Status of Implementation of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026, approved by Order of the Cabinet of Ministers No. 246 of 21.03.2025, as of 1 January 2026. Cabinet of Ministers of Ukraine. ↗

consultations had been announced, although the SCMU had collected applications from CSOs to participate in the working group developing the strategy.[3248]

The SCMU is considering the development of a separate monitoring tool to track the implementation of the next strategic document in the field of support for civil society development. This tool may include an e-consultation system.[3249]

Following the Government reshuffle in July 2025, the **SCMU's powers and responsibilities expanded significantly without a corresponding increase in staffing**, which resulted in a decline in the capacity of the relevant units to promptly process proposals and materials submitted by civil society institutions.[3250] This problem should be considered comprehensively in the context of the challenges and progress of public administration reform.

Recommendations

1. In cooperation with CSOs, prepare and approve the National Strategy for Promoting Civil Society Development in Ukraine for the next period. Develop effective mechanisms for monitoring the implementation of Action Plans and introduce an effective implementation monitoring system.

3248 Application Form: Working Group for Preparing the Draft National Strategy for Promoting Civil Society Development in Ukraine for 2027–2032. Secretariat of the Cabinet of Ministers of Ukraine. ↗

3249 Information provided by Respondent No. 67 during an interview conducted on 23.03.2026.

3250 Ibid.

Social and Economic Activities of Civil Society Organisations

State of play

The social and economic activities of CSOs are gaining increasing importance and taking on new forms in the context of the full-scale invasion. The number of public and charitable organisations has grown significantly since the beginning of Russia's full-scale invasion of Ukraine. As of 1 April 2025, the number of COs in Ukraine reached 32,974, while the number of NGOs stood at 106,720. Compared with the situation before the start of the full-scale invasion, the number of COs increased by 57% and the number of NGOs grew by 10%.[3251] The number of people working in public and charitable organisations involved in humanitarian response has increased, as has the amount of humanitarian aid imported and distributed by such organisations among those in need. The areas of CSO activity have also changed. CSOs have become a pillar of support for the state in humanitarian response and in the social sphere.

CSOs are increasingly acting as providers of social services, which often means higher-quality, needs-based services. As of the end of 2023, 525 CSOs were registered in the Register of Social Service Providers and Recipients out of 3,491 social service providers, accounting for 15% of the total.[3252] As of 27 July 2026, the Register already included 4,768 social service providers.[3253]

On 19 March 2026, the Fund for Social Protection of Persons with Disabilities announced a call for the implementation of an experimental project to organise the provision of a comprehensive resilience-building service in 103 territorial communities. CSOs that are social service providers may participate in this call.[3254] Public and charitable organisations are the main service providers involved in establishing resilience centres.[3255]

3251 The number of NGOs in Ukraine has exceeded one hundred thousand during the full-scale war — study. Detector Media, 2025. ↗

3252 Only 8% of CSO social service providers consider social services to be a priority area of their activity — ISAR Ednannia study. ISAR Ednannia. ↗

3253 Data on Social Service Providers. Ministry of Social Policy, Family and Unity of Ukraine. ↗

3254 Announcement of a Call for the Implementation of an Experimental Project on Organising the Provision of a Comprehensive Social Resilience-Building Service in Territorial Communities. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗

3255 In 2025, the Network of Resilience Centres Expanded by 121 New Centres. Ministry of Social Policy, Family and Unity of Ukraine, 2026. ↗ ;Resilience in Action: A Brief Account of the Monitoring Visit by the Locus Resilience Team to Communities. Caritas Ukraine, 2026. ↗

An important opportunity for CSOs, especially in the context of limited funding, is social entrepreneurship. Legislation specifically grants charitable organisations the right to carry out entrepreneurial activities, if this is provided for in its statute, or through the establishment of legal entities, provided that such activity corresponds to the purpose of the public association and contributes to its achievement.[3256] In 2019, the MoF of Ukraine issued a letter confirming that PAs may carry out entrepreneurial activities without losing their non-profit status.[3257]

COs, pursuant to Article 16 of the Law of Ukraine 'On Charitable Activities and Charitable Organisations', have the right to carry out economic activities without the purpose of making a profit, provided that such activities contribute to achieving their statutory goals.[3258] In their clarifications, tax authorities indicate that COs may carry out economic activities without the purpose of making a profit, provided that they serve the organisation's statutory goals.[3259]

Progress and issues

Lack of regulation of mechanisms for procuring social services. CSOs working in the field of social service provision note[3260] that the further development of social services reform requires greater legal certainty. At present, social services are procured within the framework of experimental projects.[3261] To develop the system of social service providers, ensure effective funding planning and improve the quality of such services, the relevant mechanisms need to be enshrined in permanent legislation.

In October 2025, Draft Law No. 14156 'On Amendments to the Law of Ukraine "On Development and State Support for Small and Medium-Sized Enterprises in Ukraine" Regarding the Development of Social Entrepreneurship'[3262] was registered. It provides, among other things, for amendments to the Law of Ukraine 'On Charitable Activities and Charitable Organisations', which define the right of charitable organisations to carry out entrepreneurial activities specifically. Draft Law No. 14156 establishes a basic framework for social entrepreneurship, which may be carried out on the basis of a public or charitable organisation. It also provides for the possibility of supporting social entrepreneurship entities as an instrument for addressing socio-economic problems, including through their involvement in state programmes aimed at resolving issues of employment, social integration and the development of communities and territories. The draft law creates a basis for the possible development of social entrepreneurship as an instrument in Ukraine.

3256 On Public Associations: Law of Ukraine No. 4572-VI of 22.03.2012, Article 23. ↗

3257 Regarding the Possibility for Public Associations to Carry Out Entrepreneurial Activities and the Inclusion of Such Associations in the Register of Non-Profit Institutions and Organisations. Letter of the Ministry of Finance of Ukraine No. 11210-09-5/3214 of 06.02.2019. ↗

3258 On Charitable Activities and Charitable Organisations: Law of Ukraine No. 5073-VI of 05.07.2012, Article 16. ↗

3259 Can a Charitable Organisation Engage in Economic Activities, in Particular Distribute Advertising Materials? Main Department of the STS in Lviv Region, 2021. ↗

3260 State, Achievements and Further Development of the Social Services Sector in Ukraine. Caritas Ukraine, 2025. ↗

3261 Certain Issues of Implementing an Experimental Project on Organising the Provision of a Comprehensive Social Resilience-Building Service in Territorial Communities: Resolution of the Cabinet of Ministers of Ukraine No. 1505 of 19.11.2025. ↗

3262 On Amendments to the Law of Ukraine 'On Development and State Support for Small and Medium-Sized Enterprises in Ukraine' Regarding the Development of Social Entrepreneurship: Draft Law of Ukraine, registration No. 14156 of 27.10.2025. ↗

On 26 March 2026, the Committee of the Verkhovna Rada of Ukraine on Economic Development recommended Draft Law No. 14156 for consideration[3263] by Parliament at first reading.

Public and charitable organisations are not sufficiently aware of the steps that need to be taken to start carrying out entrepreneurial activities.[3264] For organisations that decide to provide services for a fee or sell goods to cover costs within the purpose for which such an organisation was established, the key issue is preserving their non-profit status. However, even where there are legislative grounds and clarifications from tax authorities confirming the possibility of retaining non-profit status while carrying out entrepreneurial activities, the management of organisations fears possible problems with the tax authorities, bookkeeping for such activities, the need to amend founding documents and other related issues.

The need for CSOs to register as VAT payers threatens to complicate their operational activities. Under para. 181.1 Article 181 of the Tax Code of Ukraine,[3265] if the total amount of taxable transactions for the supply of goods or services accrued or paid to a person over the last 12 calendar months exceeds UAH 1 million, approximately EUR 19,500, that person is required to register as a VAT payer. This tax legislation requirement applies to CSOs in the same way as to other taxpayers. The issue is particularly relevant for organisations providing social services. Although social services are exempt[3266] from VAT, the value of such services is taken into account when calculating the statutory threshold. According to clarifications by the tax authorities, transactions exempt from VAT are also included for the purposes of VAT payer registration.[3267] The need to register as a VAT payer entails an obligation to comply with relatively complex reporting requirements, which may significantly complicate the operational activities of CSOs.

Recommendations

1. Adopt at first reading Draft Law No. 14156 'On Amendments to the Law of Ukraine "On Development and State Support for Small and Medium-Sized Enterprises in Ukraine" Regarding the Development of Social Entrepreneurship'. Involve representatives of the expert community and practitioners in the field of social entrepreneurship established by public and charitable organisations in further revising the draft law before its second reading.
2. Ensure proper information and explanatory work by the tax authorities on the possibility for PA to carry out entrepreneurial activities and for charitable organisations to carry out economic activities without the purpose of making a profit.
3. Revise the provisions of tax legislation to regulate the application of thresholds established for registration as VAT payers to non-profit institutions and organisations, in particular Pas and COs.

3263 The Economic Development Committee Supported Draft Laws on Family and Social Entrepreneurship. Holos Ukrainy, 2026. ↗

3264 Information provided by respondent No. 73 during an interview conducted on 27.03.2026.

3265 Tax Code of Ukraine No. 2755-VI of 02.12.2010, para. 181.1 Article 181. ↗

3266 Publication by the Ministry of Social Policy, Family and Unity on the social network Facebook. ↗

3267 Which transactions involving the supply of goods/services are considered taxable transactions for the purposes of VAT payer registration? State Tax Service of Ukraine in Ivano-Frankivsk Region, 2024. ↗

Agency for Legislative Initiatives

European Integration



Legislative Dimension of European Integration

The legislative dimension of Ukraine's European integration covers the development and implementation of a regulatory framework aimed at approximating national legislation to the legal system of the European Union, which includes, but is not limited to, acts of EU legislation adopted within the framework of the European Community, the Common Foreign and Security Policy and cooperation in the field of justice and home affairs (EU acquis). The effectiveness of this process is determined by the coherence of legal mechanisms, their binding nature and their ability to ensure the systematic implementation of commitments within the negotiation process for accession to the European Union (EU).

State of play

The systematic adaptation of Ukrainian legislation to EU law is based on a regulatory framework formed at several levels of legal regulation. The constitutional entrenchment of the state's European choice is of fundamental strategic importance: the Law of Ukraine 'On Amendments to the Constitution of Ukraine (regarding the strategic course of the state towards Ukraine's full membership in the European Union and the North Atlantic Treaty Organization)' introduced provisions into the Preamble to the Constitution of Ukraine, as well as Articles 85, 102 and 116, on the irreversibility of Ukraine's strategic course towards membership in the EU and North Atlantic Treaty Organization (NATO). Accordingly, European integration acquired the status of a constitutionally defined area of activity for state bodies.[3268]

At the level of special legislation, the Law of Ukraine 'On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the EU' of 2004 remained of key importance for a long time. It defined general approaches to the approximation of national legislation to the EU acquis, institutional coordination mechanisms and procedures for assessing the compliance of normative legal acts with EU law.[3269]

Section IX of the Law of Ukraine 'On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union' established a model for reviewing draft laws and other normative legal acts for compliance with the EU acquis. In particular, it provided that: (1) each draft law, after being submitted to the Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament), is sent to the Committee on Ukraine's Integration into the European Union (Committee on EU Integration) to determine whether the draft falls within the areas governed by law; (2) draft laws that fall within such areas are referred to the authorised central executive body (CEB) for the preparation of an expert opinion on their compliance with the acquis of the EU; (3) a special procedure for assessing compliance with EU law applies to draft normative legal acts in the relevant areas. At the same time, according to the Law, normative legal acts that contradict the EU acquis may be adopted only where there is sufficient justification for the need for such a decision and for a clearly defined period specified in the act itself.

3268 On Amendments to the Constitution of Ukraine (regarding the strategic course of the state towards Ukraine's full membership in the European Union and the North Atlantic Treaty Organization): Law of Ukraine No. 2680-VIII of 07.02.2019. ↗

3269 On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union: Law of Ukraine No. 1629-IV of 18.03.2004. ↗

In 2019, an attempt was made to update the approaches to shaping state policy in the field of European integration through Draft Law of Ukraine No. 1206 'On the Principles of State Policy in the Field of European Integration'.[3270] The draft law envisaged the systematic regulation of the relevant processes, in particular: (1) the introduction of mechanisms for reviewing acts for compliance with EU law; (2) stronger monitoring of the implementation of commitments and (3) the creation of a centralised information system. However, the draft law was not adopted and remained under consideration by the committee. According to the opinion of the Main Scientific and Expert Department of the Secretariat of the Verkhovna Rada,[3271] its provisions showed signs of being declarative, lacking sufficient legal certainty and terminological consistency and raised concerns regarding the compliance of certain provisions with the constitutional distribution of powers.

At the same time, the Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada (Roadmap of the European Parliament Mission)[3272] also identified the need to update legislative regulation in the field of implementation of the EU acquis, in particular through the adoption of a new law to replace the 2004 Law of Ukraine,[3273] as well as to ensure the practice of accompanying draft laws with information on their compliance with obligations under the Association Agreement.

After Ukraine was granted candidate status for membership of the EU in 2022, the legislative dimension of European integration was further developed, through Resolution of the Verkhovna Rada No. 2483-IX.[3274] This act defined an updated model for the participation of the Verkhovna Rada in the process of adapting legislation to the EU acquis, including the introduction of mandatory elements of legislative drafting work. These include, in particular, tables of compliance, the official translation of the relevant act of EU legislation and/or other sources EU acquis attached to the respective draft law, the review (opinion) of the Committee on EU Integration on compliance with EU law and the involvement of the sectoral committee (the main committee responsible for preparing the draft law for consideration).

At the same time, regulating these issues specifically through a resolution of the Verkhovna Rada has institutional limitations, since the relevant procedural aspects of the legislative process should, by their nature, be integrated primarily into the Law of Ukraine 'On the Rules of Procedure of the Verkhovna Rada of Ukraine' (Rules of Procedure, Rules of Procedure of the Verkhovna Rada), which defines the framework for the submission, consideration and adoption of draft laws. The use of a separate resolution instead of systematic amendments to the Rules of Procedure results in fragmented regulation, complicates the coherence of parliamentary procedure and creates parallel rules operating alongside the basic legislative act governing parliamentary procedure. In addition, this concerns not

3270 On the Principles of State Policy in the Field of European Integration: Draft Law of Ukraine, registration No. 1206 of 29.08.2019. ↗

3271 On the Principles of State Policy in the Field of European Integration: opinion of the Main Scientific and Expert Department of the Secretariat of the Verkhovna Rada of Ukraine on the draft Law of Ukraine, registration No. 1206 of 29.08.2019. ↗

3272 Report and Roadmap on Internal Reform and Capacity-Building for the Verkhovna Rada of Ukraine: European Parliament Needs Assessment Mission, 2016. ↗

3273 On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union: Law of Ukraine No. 1629-IV of 18.03.2004. ↗

3274 On Certain Measures to Fulfil Ukraine's Commitments in the Field of European Integration: Resolution of the Verkhovna Rada of Ukraine No. 2483-IX of 29.07.2022. ↗

only internal organisational matters of parliamentary activity, but also elements of the nationwide mechanism for fulfilling Ukraine's international legal obligations and adapting legislation to the EU acquis, which require more stable and systematic regulation at the level of law.

At the same time, the current regulatory framework does not contain a sufficiently detailed legislative procedure for identifying draft laws related to the fulfilment of Ukraine's commitments in the field of European integration. Resolution of the Verkhovna Rada No. 2483-IX[3275] empowers the Committee on EU Integration to determine whether draft laws contain provisions related to the adaptation of Ukrainian legislation to the EU acquis and the fulfilment of Ukraine's international legal obligations in the relevant area. However, no exhaustive criteria are established at the level of law for such classification, a unified procedure for initial screening or standardised rules for marking the relevant legislative initiatives. As a result, a significant role is played by institutional practice and the discretion of participants in the legislative process, which may lead to inconsistent approaches.

Further development of the parliamentary dimension of European integration took place in June 2026 with the adoption of Resolution of the Verkhovna Rada No. 4912-IX 'On Parliamentary Support for the Negotiation Process on Ukraine's Accession to the European Union'.[3276] For the first time, this act established at the regulatory level specific mechanisms for interaction between the Verkhovna Rada and the Cabinet of Ministers of Ukraine (Government) within the EU accession negotiations. In particular, the Resolution provides that the Government, jointly with parliamentary committees, is to ensure the coordinated consideration of draft laws aimed at adapting Ukrainian legislation to the EU acquis and fulfilling Ukraine's international legal obligations in the field of European integration. In addition, the Cabinet of Ministers of Ukraine is required to inform the Verkhovna Rada of the results of consultations with EU institutions on draft laws, submit quarterly reports on the implementation of the National Programme for the Adaptation of Ukrainian Legislation to EU Law (NPAA, National Programme) and the progress of the accession negotiations and promptly inform Parliament of decisions by EU institutions and positions of EU Member States relevant to the negotiation process. Thus, Resolution No. 4912-IX introduced a more formalised model of cooperation between Parliament and the Government in the field of European integration and established additional mechanisms for parliamentary support for the negotiation process.

The Verkhovna Rada is currently considering Draft Law of Ukraine No. 8242[3277] on amendments to the Rules of Procedure of the Verkhovna Rada regarding the submission, consideration and adoption of draft laws aimed at adapting Ukrainian legislation to the provisions of EU law (EU acquis), which provides for more detailed procedures for the legislative consideration of European integration draft laws.

Draft Law No. 8242 provides for the regulation, at the level of law, of a special procedure for considering European integration draft laws, in particular: (1) including such draft laws

3275 On Certain Measures to Fulfil Ukraine's Commitments in the Field of European Integration: Resolution of the Verkhovna Rada of Ukraine No. 2483-IX of 29.07.2022. ↗

3276 On Parliamentary Support for the Negotiation Process on Ukraine's Accession to the European Union: Resolution of the Verkhovna Rada of Ukraine No. 4912-IX of 11.06.2026. ↗

3277 On Amendments to the Rules of Procedure of the Verkhovna Rada of Ukraine regarding the Submission, Consideration and Adoption of Draft Laws Aimed at Adapting Ukrainian Legislation to the Acquis of the European Union: Draft Law of Ukraine, registration No. 8242 of 28.11.2022. ↗

on the agenda without an additional vote; (2) making it mandatory to submit expanded accompanying documents;[3278] (3) conducting additional reviews of compliance with the EU acquis both in Parliament and at the level of the Cabinet of Ministers of Ukraine and (4) giving priority to the second-reading procedure when considering them.

In addition, the draft law provides for the possibility of revising the text of draft laws between readings, taking into account comments set out in the opinions of the relevant bodies, namely the Committee on EU Integration, the Government within the review of compliance with the EU acquis, as well as the expert and legal departments of the Secretariat of the Verkhovna Rada (Secretariat; Secretariat of the Verkhovna Rada; Secretariat of Parliament). This is aimed at improving the quality of legislative decisions and eliminating the risk of adopting provisions that are incompatible with EU law. Accordingly, Draft Law No. 8242 is intended to move certain procedures introduced at the level of parliamentary practice and subordinate regulation into the field of legislative regulation, which should ensure a more systematic approach to the consideration of European integration draft laws.

A further stage in the development of this concept was marked by new legislative initiatives: Draft Law No. 13653 'On Amendments to Certain Legislative Acts of Ukraine to Improve Procedures for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis)'[3279] and the alternative Draft Law No. 13653-1 'On Amendments to Certain Legislative Acts of Ukraine regarding the Procedure for Preparing, Initiating, Considering and Adopting European Integration Draft Laws'.[3280] Both drafts propose a comprehensive update not only of the Rules of Procedure of the Verkhovna Rada, but also of the Laws of Ukraine 'On the Cabinet of Ministers of Ukraine' and 'On Committees of the Verkhovna Rada of Ukraine', which indicates a transition from the procedural to the institutional stage of the legal framework for European integration.

At the same time, there are conceptual differences between these drafts. Draft Law No. 13653 focuses on centralising the process through the leading role of the Government, National Programme and the model of an 'adaptation draft law', which, as a rule, originates from the Government. It provides for a more technical and managed procedure, with clear timeframes, special marking of draft laws and the possibility of expedited consideration. By contrast, the alternative Draft Law No. 13653-1 uses the broader category of 'European integration draft law', strengthens the role of the Committee on EU Integration in determining the status of such initiatives and allows for broader participation by subjects of legislative initiative, in particular Members of Parliament of Ukraine.

The budgetary component is of particular importance. The texts of both draft laws expressly provide for the need to include expenditures related to the implementation of the National Programme for the Adaptation of Legislation in the Law of Ukraine 'On the State Budget of Ukraine for 2026' and in subsequent budget cycles. This indicates a shift

3278 This concerns, in particular, an explanatory note substantiating the European integration objective of the draft law, a comparative table, a table of compliance of the provisions of the draft law with acts of EU law (EU Acquis), information on Ukraine's international legal obligations in the relevant field, a financial and economic justification of the consequences of implementing the act, as well as other documents necessary for conducting legal and European integration review.

3279 On Amendments to Certain Legislative Acts of Ukraine to Improve Procedures for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis): Draft Law of Ukraine, registration No. 13653 of 17.08.2025. ↗

3280 On Amendments to Certain Legislative Acts of Ukraine regarding the Procedure for Preparing, Initiating, Considering and Adopting European Integration Draft Laws: Draft Law of Ukraine, registration No. 13653-1 of 01.09.2025. ↗

from a declarative model of European integration to a model in which adaptation to the EU acquis is treated as a permanent state function requiring stable funding for expert reviews, translations, IT solutions, staff training, institutional capacity and implementation monitoring.

The provision, included in both draft laws, on repealing the Law of Ukraine 'On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union' of 2004 marks the end of the previous era of adaptation, which was focused primarily on the neighbourhood policy and the Association Agreement, and the transition to a new model based on the logic of full accession to the EU and the negotiation architecture of membership.

In parliamentary planning practice, a separate instrument has been established for defining legislative priorities in the field of European integration. In accordance with the legislative work plans of the Verkhovna Rada, a special mechanism for marking draft laws has been introduced since 2023, with a mark next to draft laws indicating their European integration relevance,[3281] while since 2024 a separate section has been provided containing a list of issues aimed at adapting Ukrainian legislation to the EU acquis in terms of fulfilling Ukraine's international legal obligations.[3282]

Thus, as of 2026, the legislative process in the field of European integration is characterised both by attempts to regulate special procedures for considering the relevant draft laws and by the existence of legislative planning instruments focused on fulfilling Ukraine's commitments in the process of accession to the EU.

The legislative dimension of European integration is also developing in connection with the fulfilment of Ukraine's international legal obligations. The Constitution establishes that international treaties in force, the binding nature of which has been approved by the Verkhovna Rada, form part of national legislation.[3283]

The Association Agreement between Ukraine, of the one part, and the European Union, the European Atomic Energy Community and their Member States, of the other part, ratified by Law of Ukraine No. 1678-VII of 16 September 2014 (Association Agreement), remains the key instrument for legal approximation, including the Deep and Comprehensive Free Trade Area, which fully entered into force on 1 September 2017.[3284] The implementation of the Agreement was ensured through the action plan approved by Resolution of the Government No. 1106.[3285]

3281 On the Legislative Work Plan of the Verkhovna Rada of Ukraine for 2023: Resolution of the Verkhovna Rada of Ukraine No. 2910-IX of 07.02.2023. ↗

3282 On the Legislative Work Plan of the Verkhovna Rada of Ukraine for 2024: Resolution of the Verkhovna Rada of Ukraine No. 3561-IX of 06.02.2024. ↗

3283 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 1 Article 9. ↗

3284 On Ratification of the Association Agreement between Ukraine, of the one part, and the European Union, the European Atomic Energy Community and their Member States, of the other part: Law of Ukraine No. 1678-VII of 16.09.2014. ↗

3285 On the Implementation of the Association Agreement between Ukraine, of the one part, and the European Union, the European Atomic Energy Community and their Member States, of the other part: Resolution of the Cabinet of Ministers of Ukraine No. 1106 of 25.10.2017. ↗

According to the official report on the implementation of the Association Agreement for 2025, overall progress in fulfilling Ukraine's commitments in 2014–2025 reached 84%.[3286] By institution, implementation stands at: the Government — 81%, the Verkhovna Rada — 74% and other state authorities — 68%.[3287]

As part of preparations for negotiations on accession to the EU, Ukraine introduced a procedure for the initial assessment of the compliance of legislation with the EU acquis ('self-screening'), approved by Resolution of the Government No. 189.[3288] As part of this process, approximately 28,000 acts of EU law were reviewed.[3289]

As of 2025, bilateral screening with the EU had been completed, and the Government had approved roadmaps in key areas that form the basis of the negotiation process.[3290] An additional strategic instrument for ensuring the European integration process is the Roadmap on the Functioning of Democratic Institutions (FDI Roadmap[3291]), which defines a set of measures aimed at strengthening democratic processes, improving the effectiveness of Parliament, developing the electoral process and engagement with civil society. The document covers 31 strategic results and 96 measures grouped into four areas: the general framework of democracy, the electoral process, the functioning of parliaments in a democratic system and the role of civil society. The development and approval of the FDI Roadmap took place as part of fulfilling the requirements of the EU negotiating framework and forms part of Ukraine's preparations for opening negotiations under Cluster 1 'Fundamentals of the Accession Process', which confirms its role as a key strategic document in the field of European integration. At the same time, the FDI Roadmap defines not only the areas of reform, but also the need to ensure proper coordination between state authorities and to align the legislative process with international standards and Ukraine's commitments.

The FDI Roadmap was developed in several stages, including the preparation of a draft version of the document and consultations with stakeholders.[3292] The content of the document demonstrates a comprehensive approach to reforms, including the identification of specific measures in the field of parliamentary activity, such as improving legislative procedures, increasing the transparency and accountability of the Verkhovna Rada and strengthening parliamentary oversight. Measure 1.5 of Subsection III.A 'Transparency and accountability' of the FDI Roadmap provides for the development, adoption and

3286 On the Implementation of the Association Agreement between Ukraine and the European Union in 2025: report of the Cabinet of Ministers of Ukraine, 2026. ↗

3287 This ratio is explained by differences in the methodology for calculating these indicators. Overall progress reflects the aggregate level of fulfilment of the entire body of commitments under the Association Agreement across policy sectors and measures, while the institutional indicators concern only the part of the tasks for which a specific group of bodies was responsible. Thus, these are different analytical cross-sections of the same process: the first characterises the overall state of implementation of the Agreement, while the second reflects the contribution of individual institutional implementers. For this reason, these indicators are not mutually exclusive and are not subject to direct arithmetic comparison.

3288 On Approval of the Procedure for Conducting an Initial Assessment of the State of Implementation of European Union Legal Acts: Resolution of the Cabinet of Ministers of Ukraine No. 189 of 28.02.2023. ↗

3289 A report on the results of the initial assessment of the state of implementation of European Union legal acts (EU acquis) — self-screening — has been published. European Integration Portal, 2023. ↗

3290 Ukraine successfully completes its screening process. European External Action Service, 2025. ↗

3291 Roadmap on the Functioning of Democratic Institutions: Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

3292 Ukraine is preparing three roadmaps as part of EU accession: what these documents provide for and why they are important. Government Portal on European Integration, 2025. ↗

implementation of legislation on a special procedure for the preparation, initiation, consideration and adoption of European integration draft laws. In addition, measure 1.12 of Subsection III.C 'Effectiveness' of the FDI Roadmap identifies the need to introduce comprehensive legislation that should ensure: the procedure for determining Ukraine's priority commitments in the field of European integration, mandatory tables of compliance for draft laws, additional reviews of legislative initiatives and the translation of the relevant acts into one of the languages of the EU.

Sectoral integration is dynamic in nature, in particular the updated text of the Deep and Comprehensive Free Trade Area entered into force on 29 October 2025.[3293]

Progress and issues

Progress in the institutional support of the European integration process was marked by the **introduction, in December 2025, of the 'Pulse of Accession' information system for monitoring the fulfilment of Ukraine's commitments in the field of European integration**, established in accordance with Resolution of the Government No. 1624.[3294] This system is intended to organise reporting, monitoring and assessment of the effectiveness of Ukraine's fulfilment of its commitments in the field of European integration, including in the context of ensuring the negotiation process for accession to the EU, as well as to create a single information database in this area. Pursuant to Resolution No. 1624, state authorities are required to ensure that information is regularly entered into the system, including weekly updates on the fulfilment of commitments.

Progress in the planning system was marked by the **adoption of the National Programme**, approved by Resolution of the Government No. 438.[3295] The National Programme provides for systematic planning of legislative changes by negotiation clusters, the designation of responsible authorities and the establishment of implementation indicators.[3296] An additional step was the adoption, on 11 June 2026, of the Resolution of the Verkhovna Rada of Ukraine 'On Parliamentary Support for the Negotiation Process on Ukraine's Accession to the European Union'. It provides for quarterly reporting by the Cabinet of Ministers of Ukraine to Parliament on the implementation of the NPAA and requires amendments to the Programme and its components to be agreed with an authorised representative of the Verkhovna Rada. This, in turn, may strengthen the link between Government planning for legislative adaptation and parliamentary support for its implementation.

The legally prescribed model of mandatory review of draft laws for compliance with the EU acquis is not supported by a mechanism for its full application in the legislative process. The 2004 Law of Ukraine[3297] establishes the mandatory review of draft laws in areas of EU law. At the same time, in subsequent practice, such review is not applied

3293 Deep and Comprehensive Free Trade Area (DCFTA) between the European Union and Ukraine, updated version effective from 29.10.2025. ↗

3294 Certain Issues of Reporting, Monitoring and Evaluation of Ukraine's Fulfilment of Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

3295 On Approval of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law: Resolution of the Cabinet of Ministers of Ukraine No. 438 of 01.04.2026. ↗

3296 For details, see the subsection 'National Programme for the Adaptation of Ukrainian Legislation to European Union Law'.

3297 On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union: Law of Ukraine No. 1629-IV of 18.03.2004. ↗

as a universal procedure to all draft laws falling within the relevant areas. This indicates the absence of instruments to ensure the full coverage of legislation by this procedure. Ukraine's progress in the accession process directly depends on its ability to ensure coordinated work by all state institutions.[3298] The absence of such coordination creates a risk of reform momentum being lost and trust on the part of EU Member States being weakened.

The absence of a modern framework law in the field of European integration continues to limit the systematic coordination of the adaptation of Ukrainian legislation to EU law. Despite the submission of Draft Laws No. 8242, No. 13653 and No. 13653-1, which are aimed at updating the procedures for considering European integration draft laws and modernising the institutional model for adapting to the EU acquis, a comprehensive legislative mechanism has still not been adopted. As a result, regulation remains fragmented, is based on acts of different legal force and does not ensure a single coherent system for the distribution of powers, planning, monitoring and control of the fulfilment of commitments in the field of European integration.

The current mechanisms for identifying European integration draft laws do not ensure full coverage of the legislative process. At the regulatory level, there is no definition of a European integration draft law, no exhaustive criteria for identifying one and no universal procedure for mandatory preliminary screening of all registered initiatives for their connection with the EU acquis. As a result, the classification of draft laws as falling within the relevant category largely depends on the position of the subject of legislative initiative or on subsequent institutional assessment after registration. Therefore, in practice, draft laws are registered that are clearly relevant to European integration in terms of their substance but are not marked as such through a special procedural status.[3299] One example is Draft Law No. 12384,[3300] which is aimed at reforming the fisheries management system in line with the principles of sustainable use of aquatic bioresources, transparent access to resources and attracting investment into the sector. Its subject matter is directly linked to preparations for meeting the requirements of negotiation Chapter 13 'Fisheries' and the European Commission's recommendations concerning Ukraine. Another example is Draft Law No. 14412[3301] on improving the system for distributing powers between CEB, which concerns the principles of good governance, institutional capacity and administrative reform, namely areas of direct relevance to Cluster 1 'Fundamentals' and the fulfilment of the EU membership criteria.

These examples demonstrate the need to move from a selective or reactive approach to a systematic mechanism for the early identification of all draft laws relevant to the EU acquis.

A related problem is the absence of an integrated system for recording and tracking European integration draft laws throughout the full cycle of legislative adaptation. At present, there is no single digital system that would connect the stages of planning,

3298 The speed of Ukraine's accession to the EU: how to overcome the main challenges. New Europe Center, 2026. ↗

3299 According to calculations made on the basis of information published on the official website of the Verkhovna Rada of Ukraine.

3300 On Stimulating the Economic Development of the Fisheries Sector: Draft Law of Ukraine, registration No. 12384 of 08.01.2025. ↗

3301 On the Principles of Delimitation and Distribution of Powers between Levels of Public Governance: Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗

registration of a draft law, determination of its link to the EU acquis, passage through parliamentary procedures, adoption and subsequent implementation. The 'Pulse of Accession' monitoring information system, established by Resolution of the Government No. 1624,[3302] is primarily focused on recording the fulfilment of commitments by executive authorities, but is not integrated with parliamentary tracking of draft laws and does not contain a full set of tools for the automated marking of legislative initiatives relevant to the EU acquis. As a result, data on European integration progress remain fragmented, while assessing the full legislative cycle, from planning to the entry into force of an act, becomes significantly more difficult.

The absence of differentiated marking of European integration draft laws reduces the accuracy of recording legislative progress. In current practice, draft laws are generally marked based on their broad relevance to European integration, without distinguishing the nature and depth of their connection to the EU acquis. As a result, the same category may include both acts directly implementing EU law and legislative initiatives of indirect or ancillary relevance. This approach makes it more difficult to objectively assess the actual scope of work completed, compare progress across sectors, set legislative planning priorities and prepare analytical reporting on the approximation of Ukrainian legislation to the EU acquis.

Recommendations

1. **Adopt a modern framework law in the field of European integration instead of the fragmented regulatory model**. Update or replace Law No. 1629-IV by defining, at the level of law, a coherent system for the development and implementation of state policy in the field of European integration, procedures for adapting legislation to the EU acquis, the status of key planning instruments, the distribution of powers between state authorities and mechanisms for monitoring the fulfilment of commitments.
2. **Ensure the full application of the mechanism for reviewing draft laws for compliance with the EU acquis**. Improve legislative procedures so that review for compliance with the EU acquis applies to all draft laws concerning the relevant areas of EU law, rather than only to separately identified initiatives. Separately, establish at the level of law the concept of a European integration draft law, the criteria for classifying a draft law as falling within this category and a formalised procedure for determining a draft law as a European integration draft law, with the possibility of initiating such a procedure by the sectoral committee of the Verkhovna Rada, the Government or other authorised actors.
3. **Introduce an automated mechanism for recording and tracking draft laws in the field of European integration**. Create a centralised information subsystem within the 'Pulse of Accession' to identify, classify and monitor draft laws related to the EU acquis, with access provided to all interested authorities.
4. **Provide for a differentiated approach to the classification of draft laws in the field of European integration**. Introduce a classification of draft laws depending on the level of their connection to the EU acquis — direct implementation, partial approximation or systemic changes — which will improve the accuracy of records, analysis and assessment of legislative progress.

3302 Certain Issues of Reporting, Monitoring and Evaluation of the Performance of Ukraine's Fulfilment of Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

Institutions Responsible for European Integration

State of play

The institutional system for ensuring Ukraine's European integration is multi-level and covers the presidential, governmental, interagency, negotiation and parliamentary levels. Ukraine's preparation for accession to the EU covers at least 128 policy areas and requires the involvement of at least 76 state authorities at the central level, which creates increased requirements for coordination and the distribution of powers between institutions.[3303]

At the presidential level, the negotiation track has been institutionalised through the establishment of the Delegation of Ukraine to Participate in Negotiations with the EU on the Conclusion of the Agreement on Ukraine's Accession to the EU. The delegation was established by Decree of the President No. 365/2024;[3304] the decree also provided for the formation of negotiation groups by sections of the negotiating framework and the possibility of involving representatives of the Verkhovna Rada, state bodies, enterprises, institutions, organisations, civil society associations, experts and representatives of the business community in their work.

The central political coordinator of the European integration track within the executive branch is the Vice Prime Minister for European and Euro-Atlantic Integration of Ukraine. Following the reshuffle of the Cabinet of Ministers of Ukraine on 16 July 2026, Vsevolod Chentsov was appointed to this position. The Vice Prime Minister for European and Euro-Atlantic Integration of Ukraine represents Ukraine on key platforms of the negotiation process with EU Member States and EU institutions.[3305]

The key European integration institution within the Government's apparatus is the Government Office for Coordination of European and Euro-Atlantic Integration of the Secretariat of the Cabinet of Ministers of Ukraine (Government Office). Its status and functions are defined by Resolution of the Government No. 759.[3306] The Government Office is an independent structural unit of the Secretariat of the Cabinet of Ministers of Ukraine (SCMU) and is subordinated to the Prime Minister of Ukraine, the Vice Prime Minister for European and Euro-Atlantic Integration and the State Secretary of the Cabinet of Ministers of Ukraine. Its main tasks include: (1) coordinating the adaptation of legislation to the EU acquis; (2) reviewing draft normative legal acts for compliance with commitments in the field of European integration; (3) coordinating the activities of executive authorities within the negotiation process and (4) supporting the work of the Ukraine–EU association bodies.

A separate functional area of responsibility of the Government Office is coordinating the implementation of the Association Agreement and supporting systems for monitoring the

3303 European Integration: Institutional and Human Resources Dimension. ANTS, 2023. ↗

3304 On the Delegation of Ukraine to Participate in Negotiations with the European Union on the Conclusion of the Agreement on Ukraine's Accession to the European Union: Decree of the President of Ukraine No. 365/2024 of 21.06.2024. ↗

3305 Ibid.

3306 On the Government Office for Coordination of European and Euro-Atlantic Integration: Resolution of the Cabinet of Ministers of Ukraine No. 759 of 04.10.2017. ↗

fulfilment of European integration commitments. It is the Government Office that publishes annual reports on the implementation of the Association Agreement and coordinates the preparation of Government plans for implementing the European Commission's recommendations under the Enlargement Package.[3307]

At the level of ministries and CEB, specialised structural units and officials are responsible for coordinating European integration in the relevant sectors of state policy. An important institutional step was the Government's introduction of the positions of deputy ministers for European integration,[3308] who are responsible for ensuring the coherence of sectoral policy with Ukraine's commitments to the EU, coordinating legislative approximation and interaction with other state authorities in the field of European integration. In parallel, as part of the public administration reform, directorates for strategic planning and European integration[3309] were established in several pilot ministries in 2018 as a new model for the internal coordination of reforms and the approximation of legislation to EU standards. The organisational structure subsequently evolved, and these functions are now performed not only by directorates, but also by departments, offices or other independent structural units, depending on the structure of the relevant body. For example, in the Ministry for Recovery, Infrastructure and Transport of Ukraine, the relevant powers are exercised by the Department of International Cooperation and European Integration,[3310] while in the MCSC they are exercised by the Department of European and Euro-Atlantic Integration and International Cooperation.[3311] This multi-level sectoral model makes it possible to integrate the European integration component into the day-to-day activities of ministries, but at the same time requires uniform coordination standards, sufficient human resources and sustainable institutional capacity across all executive authorities.

The parliamentary component of the system is ensured primarily by the Committee on EU Integration. In the current model, this Committee performs the function of parliamentary review of draft laws for compliance with Ukraine's international legal obligations in the field of European integration and with the EU acquis and participates in shaping procedures for legislative support for European integration. The practice of the legislative process confirms its regular involvement in the consideration of a significant number of legislative initiatives, both as the main committee and as a co-executing committee. According to the official web portal of the Verkhovna Rada, as of April 2026 the Committee on EU Integration had 123 documents registered for which it was designated as the main committee and 3,301 draft laws in respect of which it was designated as a co-executor. Separately, based on the results of 2025, the Committee on EU Integration was identified as the leader among parliamentary committees by the share of draft laws that became laws: out of 25 draft laws for which it was the main committee, 15 were adopted, representing an effectiveness

3307 The Government approved the Action Plan for implementing the European Commission's recommendations presented in the EU Enlargement Package 2024. Government Portal on European Integration, 2025. ↗

3308 The position of Deputy Minister for European Integration is being introduced in all ministries, Arseniy Yatsenyuk. Government Portal, 2014. ↗ ; Certain Issues of Ensuring European Integration: Order of the Cabinet of Ministers of Ukraine No. 501 of 21.05.2014 (expired). ↗

3309 On Streamlining the Structure of the Staff of Central Executive Bodies, Their Territorial Subdivisions and Local State Administrations: Resolution of the Cabinet of Ministers of Ukraine No. 179 of 12.03.2005. ↗

3310 Department of International Cooperation and European Integration. Ministry for Recovery, Infrastructure and Transport of Ukraine, 2026. ↗

3311 Structural Units. Team. Ministry of Culture of Ukraine. ↗

rate of 60% — the highest figure among Verkhovna Rada committees.[3312] In addition, the Committee's official communications show the systematic adoption of opinions on the compliance of draft laws with EU law at almost every meeting, confirming its continuous expert function in the day-to-day legislative process.[3313]

An important element in the institutionalisation of the parliamentary dimension of European integration was the introduction of specialised subcommittees within parliamentary committees. In accordance with Resolution of the Verkhovna Rada No. 2483-IX,[3314] each committee of the Verkhovna Rada is required to establish a subcommittee on the adaptation of Ukrainian legislation to the EU acquis and the fulfilment of Ukraine's international legal obligations in the field of European integration.

As of 2026, such subcommittees have been established within all committees of the Verkhovna Rada, which indicates the horizontal institutionalisation of the European integration function in Parliament.[3315] Thus, parliamentary participation in the process of adapting legislation to the EU acquis is carried out not only through the sectoral committee, but also through specialised subcommittees in different sectors of state policy.

Institutional bodies of the Ukraine–EU association, established in accordance with the Association Agreement, play a separate role in the system for ensuring European integration. These include the Association Council, the Association Committee, subcommittees in the relevant sectors of cooperation and the Parliamentary Association Committee. These bodies ensure regular political and technical dialogue between Ukraine and the EU, coordination of the fulfilment of commitments under the Association Agreement and monitoring of progress in adapting legislation to the EU acquis. Coordination of the Ukrainian side's participation in the activities of the association bodies is entrusted to the Government Office, which ensures the preparation of materials for meetings, the coordination of positions of executive authorities and monitoring of the implementation of agreements reached as a result of the work of the relevant bodies. Sectoral subcommittees operate within these institutions, covering key areas of state policy and serving as an important mechanism for Ukraine's sectoral integration into the internal market of the EU.[3316]

The Parliamentary Association Committee is a key instrument of interparliamentary cooperation between the Verkhovna Rada and the European Parliament (EP) and functions as a permanent forum for political dialogue, information exchange and the development of common approaches to the implementation of the Association Agreement.[3317] The PAC has the right to request information from the Association Council on the implementation of the Agreement, receives information on its decisions and recommendations and may also provide its own recommendations to these bodies.

3312 Committee on Ukraine's Integration into the EU leads among VRU committees by the number of draft laws that became laws. Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union, 2026. ↗

3313 Agenda and decisions of meetings of the Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union. Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union. ↗

3314 On Certain Measures to Fulfil Ukraine's Commitments in the Field of European Integration: Resolution of the Verkhovna Rada of Ukraine No. 2483-IX of 29.07.2022. ↗

3315 According to information collected during the monitoring of parliamentary committee websites.

3316 Subcommittees of the Ukraine–EU Association Committee: sectoral cooperation and cooperation agenda. Government Portal on European Integration. ↗

3317 Parliamentary Association Committee. Government Portal on European Integration. ↗

Meetings of the Parliamentary Association Committee are held on a regular basis and ensure that the parliamentary dimension of European integration is aligned with the activities of the executive branch. Representatives of the Government, the expert community and other stakeholders may be involved in the work of the Ukrainian part of the Committee, which contributes to the development of a more comprehensive approach to fulfilling Ukraine's commitments within the framework of European integration.

The role of the Parliamentary Association Committee has increased significantly at the current stage in the context of Ukraine's preparations for accession to the EU, in particular in coordinating inter-committee cooperation between the Verkhovna Rada and the committees of the EP, as well as in shaping the agenda of the negotiation process, including the opening of clusters, the achievement of benchmarks and the preparation of negotiating positions.[3318] The role of the Parliamentary Association Committee is also being strengthened through institutional decisions aimed at supporting the negotiation process for Ukraine's accession to the EU. Within the Committee's work, a decision was taken to establish a specialised subcommittee focused on supporting the negotiation process, reflecting the EP political support for the earliest possible start of negotiations and its involvement in shaping Ukraine's negotiating positions.[3319]

In addition, the activities of the Parliamentary Association Committee involve cooperation not only with parliamentary institutions, but also with representatives of Ukraine's executive branch and the European Commission, which contributes to the development of a coordinated approach to the implementation of European integration policy and the negotiation process.[3320]

Accordingly, the Parliamentary Association Committee performs the function of an institutional bridge between the legislative bodies of Ukraine and the EU, ensuring the parliamentary dimension of the European integration process and its alignment with the negotiation track.

As of 2025–2026, the system of institutions responsible for European integration in Ukraine already has formalised centres of political coordination, a separate Government coordination office, a presidential-governmental negotiation architecture, interagency and sectoral negotiation groups, a parliamentary committee and auxiliary parliamentary expert mechanisms. At the same time, the scale of this system itself confirms that its effectiveness directly depends on the quality of interagency coordination, a clear distribution of powers and the existence of a single accountability framework. Moreover, despite its formalisation and functional breadth, Ukraine's established institutional architecture for European integration is characterised by a high level of complexity and a significant number of actors involved at different levels of decision-making. The combination of the presidential, governmental, interagency, negotiation and parliamentary dimensions requires clearly defined mechanisms for coordination, distribution of responsibility and interaction between institutions.

3318 'Association with the EU is an extremely broad process in which Parliament plays a key role', Vadym Halaichuk, Head of the Ukrainian Delegation to the Parliamentary Association Committee. Verkhovna Rada of Ukraine, 2026. ↗

3319 Parliamentary Association Committee adopts statement in support of Ukraine. Committee of the Verkhovna Rada of Ukraine on Ukraine's Integration into the European Union, 2025. ↗

3320 Rules of Procedure of the EU-Ukraine Parliamentary Association Committee. European Parliament. ↗

The existence of parallel coordination instruments, including negotiation groups, association bodies, parliamentary mechanisms and Government structures, as well as the growing role of the parliamentary dimension in the negotiation process, brings to the fore the issue of the coherence of their activities and the effectiveness of institutional management of the European integration process.

Progress and issues

Progress lies in the fact that Ukraine has already established the basic institutional architecture for managing the European integration process. In 2024–2026: (1) the negotiation track was institutionalised through Ukraine's delegation, the Interagency Working Group on Ensuring the Negotiation Process for Ukraine's Accession to the European Union and the Approximation of Ukrainian Legislation to EU Law (Interagency Working Group) and 36 negotiation groups; (2) the role of the Government Office as a coordination centre was updated; (3) specialised subcommittees on the adaptation of legislation to the EU acquis were established within parliamentary committees; (4) the work of the Parliamentary Association Committee was intensified; (5) the 'Pulse of Accession' monitoring system was introduced and (6) roadmaps under Cluster 1 were approved. This indicates a transition from a fragmented model of implementing the Association Agreement to a more comprehensive model of preparation for accession to the EU.

At the same time, the further effectiveness of this architecture depends not so much on the existence of individual institutions as on the quality of coordination between them, a clear distribution of responsibility, stable information exchange and the ability to ensure the implementation of decisions at all levels — from the Government to Parliament, the regions and sectoral implementers.

An important institutional development during the reporting period was the reshuffle of the Cabinet of Ministers of Ukraine on 17 July 2026, which included the appointment of a new Vice Prime Minister for European and Euro-Atlantic Integration of Ukraine.[3321] Despite the personnel changes, the institutional architecture for coordinating the negotiation process and adapting legislation to EU law maintained continuity, which is an important prerequisite for the consistent fulfilment of Ukraine's European integration commitments.

The complexity of the institutional architecture and the absence of an integrated coordination mechanism create risks of fragmentation in the European integration process.

The institutional system for ensuring Ukraine's European integration includes several interconnected functional blocks: (1) the level of strategic political leadership, including the President and other actors involved in shaping the state's overall course; (2) the governmental and executive level, including the Government, the Government Office, ministries and other CEB; (3) the negotiation level, including Ukraine's Delegation, the Interagency Working Group and negotiation groups; (4) the parliamentary level, including the Verkhovna Rada, sectoral committees and subcommittees; (5) the bilateral institutional level under the Association Agreement, including the Association Council, the Association Committee, the Parliamentary Association Committee and other joint

3321 On the Formation of the Composition of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 17.07.2026. ↗

Ukraine–EU bodies.[3322] At the same time, the absence of a single mechanism to ensure coordinated management between these blocks complicates the synchronisation of the negotiation process, legislative planning and the fulfilment of Ukraine's commitments in the field of European integration.

The absence of a single accountability framework between institutions in the negotiation process limits the effectiveness of managing the fulfilment of commitments.

The existing institutional mechanisms are not connected by an integrated system of reporting, centralised recording of adopted decisions, identification of responsible actors and tracking of progress in each area of the negotiation process. As a result, the timely determination of responsibility for delays or non-implementation of measures becomes more difficult, the transparency of management decisions is reduced and the risks of duplication of functions between individual bodies increase. The absence of an end-to-end accountability system also makes it more difficult to form a single picture of the fulfilment of commitments for the state leadership, Parliament and international partners.

The insufficient institutional capacity of the SCMU as a coordinating centre limits the effectiveness of interagency cooperation.

A significant part of the tasks related to coordinating the positions of state authorities, supporting Government decisions, monitoring the fulfilment of commitments and providing organisational support for the negotiation process passes through the SCMU and the Government Office. At the same time, the complexity and scale of the tasks associated with accession to the European Union require strengthening its capacity as a genuine 'Centre of Government'. This is directly reflected in the Roadmap on Public Administration Reform,[3323] which provides for strengthening the role of the Secretariat of the Government in coordinating the processes of planning, developing and implementing state policy.

The development of the parliamentary system for considering European integration issues is not fully accompanied by unified standards for the work of sectoral subcommittees.

The establishment of subcommittees on European integration within parliamentary committees has contributed to the sectoral coverage of different areas of the EU acquis and to the integration of the European integration dimension into the work of the Verkhovna Rada. At the same time, the absence of unified procedures for their work, agreed approaches to assessing draft laws for compliance with the EU acquis, common methodological standards and proper mechanisms for coordination between committees may lead to inconsistent practice and varying levels of involvement in the process of legislative adaptation.

Multi-level coordination between the central and regional levels of government is not sufficiently effective.

European integration involves cooperation not only between central authorities, but also with regional structures, while the effectiveness of reforms depends on well-established

3322 This classification is used in this report as an analytical model to describe the distribution of functions between institutions, rather than as an officially established normative system.

3323 Roadmap on Public Administration Reform: Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, measures 1 and 3 of strategic result 4, Section 'Policy Development and Coordination'. ↗

dialogue between these levels.[3324] A significant part of the EU acquis is implemented precisely at the subnational level, in particular in the areas of environment, waste management, water policy, energy efficiency, transport mobility, public services, regional development, state aid, control over the use of funds and administrative capacity. For this reason, the quality of implementation of European standards depends not only on decisions adopted in Kyiv, but also on the ability of the regional level to implement new rules in practice in a timely manner.

At the same time, the current institutional architecture of the negotiation process and legislative adaptation remains predominantly central-governmental. The main coordination mechanisms are concentrated at the level of the Government, CEB, negotiation groups and parliamentary structures, while the participation of the regional level is mostly indirect or consultative. The normative legal acts regulating the negotiation process do not contain a sufficiently detailed procedure for the systematic participation of regions in the preparation of positions, implementation planning and assessment of readiness to fulfil commitments.

This creates several practical risks: first, a possible gap between national reform planning and the actual capacity of communities or regions to meet new requirements; second, uneven implementation across regions depending on human, financial and managerial resources and third, loss of time at the stage of practical implementation of decisions already adopted. For this reason, multi-level coordination should be regarded not as a secondary administrative aspect, but as one of the prerequisites for the successful fulfilment of Ukraine's membership criteria for the EU.

The fragmentation of reforms and the absence of an institutionalised mechanism for integrating civil society initiatives into the decision-making process complicate the fulfilment of the EU membership criteria.

International assessments emphasise that effective European integration requires a systematic approach to reforms, involving policy coherence, consistency of changes and the involvement of a wide range of stakeholders. At the same time, Ukraine continues to face the risk of fragmented reforms, where legislative and institutional changes are implemented unevenly and without proper coordination between policy sectors.[3325] A separate aspect of this problem is the absence of a legally established mechanism that would ensure the systematic consideration of initiatives from civil society, the expert community and business associations in the process of shaping state policy in the field of European integration. Despite the actual involvement of such actors in consultation processes, their outcomes are not binding and are not integrated into formalised decision-making procedures of state authorities.

Recommendations

1. **Introduce an integrated system for managing the European integration process.** Develop and enshrine in legislation a single coordination mechanism that would combine the negotiation process, legislative activity, strategic planning and monitoring of the fulfilment of commitments within a single policy cycle. At the strategic level, regular coordination formats should be introduced for interaction

3324 Ukraine strengthens focus on regional readiness for EU membership. European External Action Service, 2025. ↗

3325 Ukraine's EU path: a transformation for European civil society. European Economic and Social Committee, 2026. ↗

between the President, the Government and the Verkhovna Rada on key priorities of the negotiation process, the fulfilment of membership criteria, the reform calendar and legislative priorities. At the operational level, it is advisable to ensure the continuous exchange of information between Government structures, parliamentary committees, negotiation groups and other responsible bodies on the status of fulfilment of commitments, risks of delay and the need for regulatory decisions.

2. **Define a single accountability framework for all institutions involved in European integration**. Introduce a centralised system for reporting and recording decisions, based on 'Pulse of Accession', with a clear definition of responsible bodies and implementation indicators.
3. **Strengthen the institutional capacity of the SCMU as the 'Centre of Government'.** Expand its analytical and coordination functions, ensure reinforcement of its human resources and consolidate its role as the central body for managing the European integration process.
4. **Unify the standards for the work of subcommittees on European integration**. Develop common methodological approaches to the analysis of draft laws, including criteria for compliance with the EU acquis and mechanisms for coordination between subcommittees.
5. **Introduce mechanisms for multi-level coordination between the central and regional levels of government**. Define the procedure for interaction between executive authorities and local self-government bodies in the process of implementing the EU acquis, including regular coordination formats. Ensure the institutionalisation of such interaction by strengthening the role of the Congress of Local and Regional Authorities under the President as a platform for coordinating European integration reforms at the subnational level, as well as by introducing a separate functional component within it dedicated to the implementation of the EU acquis.
6. **Ensure the effective application of the Law of Ukraine 'On Public Consultations' in the field of European integration**. Provide for special procedures for conducting consultations on documents related to accession to the EU, in particular roadmaps, acquis implementation plans, negotiating positions, sectoral reforms and other strategic decisions, taking into account confidentiality requirements, the specialised composition of participants, shortened timeframes and the mandatory publication of the results of consideration of proposals.

National Programme for the Adaptation of Ukrainian Legislation to European Union Law

State of play

The National Programme, approved by Resolution of the Government No. 438,[3326] has become the basic framework document for the new stage of Ukraine's legal approximation to EU standards. Unlike previous mechanisms, which were focused primarily on the implementation of the Association Agreement, the National Programme is directly integrated into the negotiation architecture of accession to the European Union and is structured according to the clusters and chapters of the EU acquis. Its launch is accompanied by the operation of the 'Pulse of Accession'[3327] digital monitoring system, as well as the inclusion of the roadmaps under Cluster 1 'Fundamentals' in the Programme's structure. At the same time, the effectiveness of the National Programme's implementation will depend on the prioritisation of measures, budgetary provision, human resources and translation capacity, as well as the establishment of procedures that ensure the transformation of consultations with stakeholders into formalised management decisions.

The National Programme became a logical continuation of the evolution of Ukraine's system of legal approximation to the EU acquis. While the 2004 Law of Ukraine 'On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union' laid down the basic mechanisms for review and gradual adaptation,[3328] the new programme operates in the context of candidate country status and the official negotiation process for membership.

The development of the National Programme was based on the results of the bilateral screening of Ukrainian and EU legislation, as well as on the indicators, or benchmarks, defined by the European Commission within the negotiating framework.[3329] During the self-screening process, approximately 28,000 acts of EU law were reviewed and the central executive bodies prepared the relevant analytical reports.[3330]

Bilateral screening with the EU was completed on 30 September 2025, which created the basis for moving from assessing legislative compliance to defining specific adaptation measures and further negotiation steps.[3331]

3326 On the Approval of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis): Resolution of the Cabinet of Ministers of Ukraine No. 438 of 01.04.2026. ↗

3327 Certain Issues of Reporting, Monitoring and Evaluation of the Performance of Ukraine's Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

3328 On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union: Law of Ukraine No. 1629-IV of 18.03.2004. ↗

3329 The EU Has Handed Kyiv the Accession Conditions. We Publish the Document Listing the 'Key Reforms' for Ukraine. European Pravda, 2026. ↗

3330 Report on the Results of the Initial Assessment of the State of Implementation of European Union Legal Acts (EU acquis). Government Office for Coordination of European and Euro-Atlantic Integration, 2023. ↗

3331 Ukraine successfully completes its screening process. Directorate-General for Enlargement and Eastern Neighbourhood, European Commission, 2025. ↗

The National Programme is significant in scale: it contains 1,875 tasks aimed at implementing more than 1,600 acts of EU law. This indicates a transition to a systemic model of reform planning covering all negotiation chapters of the EU acquis.[3332]

An integral part of the National Programme consists of the documents forming the basis of Cluster 1 'Fundamentals', namely:

- the Rule of Law Roadmap;
- the Roadmap on Public Administration Reform;
- the Roadmap on the Functioning of Democratic Institutions;
- the Action Plan on the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine.[3333]

An important element of institutional support for the National Programme was the creation of the 'Pulse of Accession' information system for monitoring the fulfilment of Ukraine's commitments in the field of European integration, formalised by Resolution of the Government No. 1624.[3334] The system provides for the designation of responsible persons in CEBs and the regular updating of data in Ukrainian and English. As of 31 March 2026, the public part of the 'Pulse of Accession' information system had not been put into full operation, which limits the external transparency of monitoring the fulfilment of European integration commitments. The system consists of an internal web portal (private part) and a website (public part).[3335] At the initial stage, representatives of ministries and agencies work in the internal segment, while opening information to the public and international partners has been defined as the next stage in the system's development.[3336]

The adoption of the National Programme was accompanied by the repeal of previous Government acts in the field of implementing the Association Agreement, including Resolutions of the Government No. 447[3337] and No. 1106.[3338] This decision marks an institutional transition from the model of implementing the Association Agreement to a model of negotiation-oriented adaptation.

It should also be noted separately that, in 2026, during discussions of the procedures for the European integration track in the Verkhovna Rada, the need to update the existing legislative framework in the field of adapting Ukrainian legislation to EU law was expressly

3332 The Government Approved the National Programme for the Adaptation of Ukrainian Legislation to EU Law. Government Office for Coordination of European and Euro-Atlantic Integration, 2026. ↗

3333 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

3334 Certain Issues of Reporting, Monitoring and Evaluation of the Performance of Ukraine's Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

3335 Ibid, paras. 13, 14.

3336 The Government Approved the Regulation on the 'Pulse of Accession' Information System for Monitoring the Implementation of European Integration Commitments. Government Office for Coordination of European and Euro-Atlantic Integration, 2025. ↗

3337 Issues of Planning, Monitoring and Evaluation of the Performance of the Association Agreement between Ukraine, of the One Part, and the European Union, the European Atomic Energy Community and Their Member States, of the Other Part: Resolution of the Cabinet of Ministers of Ukraine No. 447 of 31.05.2017. ↗

3338 On the Implementation of the Association Agreement between Ukraine, of the One Part, and the European Union, the European Atomic Energy Community and Their Member States, of the Other Part: Resolution of the Cabinet of Ministers of Ukraine No. 1106 of 25.10.2017. ↗

noted. This primarily concerns the modernisation of the 2004 Law of Ukraine 'On the National Programme for the Adaptation of Ukrainian Legislation to the Legislation of the European Union' and related procedures for the legislative support of European integration. A number of legislative initiatives aimed at establishing a more effective regulatory framework for adaptation to the EU acquis have also been registered in Parliament.[3339] Further evidence of the institutionalisation of the parliamentary dimension of European integration was the adoption of Resolution of the Verkhovna Rada No. 4912-IX, which introduced mechanisms for regular reporting to Parliament on the implementation of the National Programme for the Adaptation of Ukrainian Legislation to EU Law and the progress of the negotiations on Ukraine's accession to the European Union.

Overall, as of April 2026, Ukraine had established a new framework mechanism for managing the adaptation of legislation to the EU acquis, combining the results of screening, reform roadmaps, digital monitoring and sectoral planning.

Progress and issues

After 1 October 2025, at least three qualitative shifts can be identified. First, the **completion of bilateral screening closed the preparatory phase and made it possible to move from fragmented approximation to more systematic programming of adaptation**. Second, in December 2025 the **Government preliminarily approved the draft National Programme at the level of the interagency working group[3340] and in April 2026 formally approved it as a Government act**. Third, from December 2025 the **centralised 'Pulse of Accession' monitoring system began operating**, which at least at the regulatory level creates a single digital framework for recording the fulfilment of European integration commitments. Taken together, this means that in 2025–2026 Ukraine moved from a predominantly preparatory and diagnostic mode to a regime of systematic planning, implementation and monitoring of reforms.

An additional positive development is that, from the outset, the Government positioned the National Programme not as a purely technical list of tasks, but as a universal instrument intended to replace previous fragmented documents in the field of European integration, covering not only the formal transposition[3341] of EU acts, but also the institutional changes needed for the practical implementation of Union standards.[3342] Combined with training programmes for Ukrainian public servants,[3343] this indicates a gradual recognition that adaptation to the EU acquis is not only a legislative drafting process, but also a governance process.

3339 The leadership of the Verkhovna Rada of Ukraine discussed the adaptation of Ukraine's legislation to EU law. Press Service of the Secretariat of the Verkhovna Rada of Ukraine, 2026. ↗

3340 The Interagency Working Group Approved the National Programme for the Adaptation of Ukrainian Legislation to EU Law. European Integration Portal, 2025. ↗

3341 The term 'transposition' is used to denote the regulatory process through which the requirements of European Union directives acquire legal force in a state's domestic legal order through the adoption of relevant legislative and secondary legislation. EUR-Lex. Transposition. Glossary of summaries. ↗

3342 The MoJ Launched the Development of the National Programme for the Adaptation of Legislation to EU Law. Cabinet of Ministers of Ukraine, 2025. ↗

3343 Publication by the Centre for Adaptation of the Civil Service to the Standards of the European Union on the social network Facebook, 2025. ↗

Despite the launch of the National Programme, there is still **no sufficiently clear and verifiable methodology for prioritising its measures** in the public domain. Given the existence of 1,875 tasks, the decisive issue is not the list of commitments itself, but the logic for sequencing their implementation: which measures should be addressed first, which acts are critical for opening and advancing negotiation clusters and which decisions depend on translations, institutional readiness or budgetary resources. Publicly available Government communications show the general positioning of the National Programme as a 'systemic plan',[3344] but do not reveal a sufficiently detailed, publicly verifiable prioritisation matrix. This creates a risk that the National Programme will be very extensive, but insufficiently hierarchical.

The absence of a clear budgetary link between the measures of the National Programme, the responsible implementers and sources of funding limits the realism of implementing the planned reforms. Both the roadmaps under Cluster 1 and the resolution on the National Programme are based on the funding formula 'at the expense of and within the limits of' already provided expenditures, as well as funds from international technical assistance and other sources. This structure is typical for Government programmes, but it does not ensure a sufficiently clear link between a specific measure and a defined amount of financial need, the responsible spending unit and the timeframe for covering costs.

This problem is particularly sensitive for horizontal tasks without which systematic progress in the negotiation process is impossible: the translation of acts of the EU acquis, staff training, the creation of digital monitoring systems, analytical support and interagency coordination. Such expenditures often lack political visibility and may give way to more urgent budgetary needs in wartime. As a result, measures formally included in programmes may be implemented unevenly, with delays or through ad hoc external funding, which reduces the predictability of Ukraine's fulfilment of commitments in the field of European integration.

The institutional dependence of the National Programme on human resources and translation capacity. By including in the Roadmap on Public Administration Reform a separate measure on the 'Translation Office' as a Translation Coordination Unit,[3345] the Government itself effectively recognised that the translation of the EU acquis and terminological harmonisation are not secondary issues. However, the mere inclusion of such a measure in the Roadmap does not mean that this bottleneck has already been overcome. On the contrary, it shows that the capacity to translate large volumes of EU acts and ensure the bilingual operation of the monitoring system remains a critical precondition for the implementation of the National Programme.

This was further confirmed by Resolution of the Cabinet of Ministers of Ukraine No. 378[3346] of 25 March 2026, by which the Government revised the original model for creating a separate state institution, the 'Translation Office', and cancelled the previous decision on its establishment as unimplemented. Instead, the functions of translating EU legal acts into Ukrainian, translating acts of Ukrainian legislation into English, as well as updating the

3344 Publication by the Office of the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine on the social network Facebook, 2026. ↗

3345 Strategic Result 6 of the section 'Policy Development and Coordination' of the Roadmap on Public Administration Reform. ↗

3346 On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine and Repeal of Order of the Cabinet of Ministers of Ukraine No. 1222 of 05.12.2024: Resolution of the Cabinet of Ministers of Ukraine No. 378 of 25.03.2026. ↗

glossary of terms of the EU acquis, were assigned to the state institution 'Entrepreneurship and Export Promotion Office'. At the same time, the resolution provided for the creation of a separate translation department, defined specialised positions for translators, philologists and legal advisers in international and European law and established separate remuneration conditions for them.

This approach shows that the state recognises the critical importance of translation infrastructure for European integration. At the same time, however, it demonstrates the institutional instability of the model for ensuring it: instead of a separate specialised institution, the function was integrated into an existing organisation with a different core mandate. This may create risks of dispersed resources, competition between the institution's priorities and delays in building a systematic body of translations, without which the proper implementation of the EU acquis and the preparation of legislative decisions become more difficult.

The limited normative force and inter-institutional reach of the National Programme. The National Programme was approved by a resolution of the Government. This means that it structures the executive branch to a greater extent than the parliamentary cycle of law-making. Although Resolution No. 438 provides for interaction with Verkhovna Rada committees during the development of draft laws, it does not in itself create a full-fledged legislative procedure that would make the National Programme a mandatory framework reference point for parliamentary planning, consideration and prioritisation of draft laws. As a result, a gap remains between the Government's adaptation plan and the autonomous dynamics of Parliament.

Fragmentation of data between the Government monitoring system and the legislative process. 'Pulse of Accession' is intended to function as a single information database in the field of European integration commitments. However, Resolution of the Government No. 1624 is primarily focused on ministries, other CEB and state bodies as the main users and providers of information. At the same time, the legislative process has its own autonomous recording infrastructure, procedures for the passage of draft laws and separate information resources of the Verkhovna Rada, which are not integrated with the Government monitoring system into a single digital cycle.

As a result, a gap may arise between recording a Government measure as completed and the actual state of regulatory support for the relevant reform. For example, a measure may be considered completed after a draft law has been submitted to the Verkhovna Rada or a framework law has been adopted, even though the practical launch of the new rules still requires secondary legislation, application methodologies, digital solutions, budgetary provision, staff training or the creation of new administrative procedures. In the absence of end-to-end tracking, it is difficult to determine promptly at which exact stage a delay has occurred: parliamentary consideration, the preparation of secondary legislation, organisational implementation or the actual application of the rules.

An additional challenge is that the intense pace of the negotiation process and the focus on quickly achieving formal milestones may encourage concentration on quantitative performance indicators rather than full readiness for implementation. Therefore, the problem does not lie in the formal shortcomings of an individual system, but in the absence of an integrated mechanism that would combine Government and Parliament data and the stages of practical implementation into a single picture of reform progress.

Recommendations

1. **Approve a methodology for prioritising the measures of the National Programme**. Define criteria for selecting measures, including negotiation criticality, budgetary impact, dependence on other reforms, human resources readiness and the need for translations, and publish a short version of the priorities annually.
2. **Integrate the National Programme into medium-term budget planning**. For key horizontal measures, such as translations of the EU acquis, training and digital monitoring systems, provide for budget programmes with a designated responsible spending unit and basic KPIs.
3. **Introduce mandatory verification of translation and regulatory readiness for priority draft laws under the National Programme**. For draft laws classified as priorities, in accordance with the methodology for determining priority draft laws, provide for a preliminary assessment of the availability of an official or working translation of the relevant acts of the EU acquis, as well as a basic analysis of the need for further secondary legislation for the practical implementation of the future law. Such assessment should be carried out by the lead developer of the draft law under the coordination of the Secretariat of the Government / Government Office. Attention should be paid to ensuring the timely translation of EU acts that determine the content and scope of Ukraine's future commitments within the negotiation process.
4. **Synchronise the National Programme with the Legislative Work Plan of the Verkhovna Rada and the calendar of the negotiation process**. Ensure a continuous process of aligning the measures of the National Programme with the parliamentary legislative cycle, negotiation clusters, benchmarks and deadlines for fulfilling commitments to the EU, in order to avoid a gap between Government planning, the legislative process and negotiation dynamics.
5. **Enshrine in law the status and binding nature of the National Programme**. Define in law the place of the National Programme for the Adaptation of Legislation within the system of strategic planning documents, its binding nature for executive authorities and its link to the activities of the Verkhovna Rada, including requirements for regular reporting on the state of implementation.
6. **Conduct an annual independent audit of the implementation of the National Programme**. Ensure regular external assessment of progress in implementing the National Programme with the participation of representatives of civil society, sectoral experts, the business community and international partners, with the preparation of a public report and recommendations for adjusting priorities.

Work of Negotiation Groups, Coordination and Implementation of Reform Roadmaps

In 2025, Ukraine prepared negotiating positions for all six clusters of the negotiating framework, indicating significant technical progress. At the same time, the system remains complex, multi-level and requires further institutional stabilisation. The main challenges

remain the absence of a single accountability framework, insufficient public transparency in the work of negotiation structures, risks of duplication between the 'association' and 'accession' tracks and the need to formalise interaction with Parliament, the regions and civil society.

State of play

Ukraine's negotiation process for accession to the EU was formally launched by Decree of the President No. 365/2024,[3347] which established Ukraine's Delegation to participate in negotiations with the European Union on the conclusion of the Agreement on Ukraine's Accession to the EU. The document also provides for the approval of the delegation's directives and the possibility of involving representatives of state authorities, Members of Parliament of Ukraine, experts, civil society and the business community in the work of the negotiation mechanism.

The operational structure of the negotiation process was detailed by Resolution of the Cabinet of Ministers of Ukraine No. 987,[3348] which established the Interagency Working Group, and also approved the composition of 36 negotiation groups for individual areas of the EU acquis and the Regulation on the Interagency Working Group. The Government Office, which is an independent structural unit of the SCMU, provides organisational and information support for the activities of the Interagency Working Group and the negotiation groups.[3349] Meetings of the Interagency Working Group must be held at least once every three months.

The system of 36 negotiation groups covers 33 negotiation chapters of the EU acquis and three additional areas of the negotiating framework.[3350] This model corresponds to the logic of the cluster-based negotiation process and ensures the sectoral specialisation of the state apparatus.

The functional purpose of the negotiation groups is to: (1) ensure the preparation of negotiating positions by negotiation chapter; (2) develop measures to implement EU recommendations and (3) provide analytical support to Ukraine's Delegation. This indicates that the negotiation groups perform not only a consultative or expert function but also serve as a working mechanism for shaping the negotiating position and supporting the implementation of EU recommendations.[3351]

In May 2025, the Interagency Working Group approved the draft transformation roadmaps. Subsequently, by Order No. 475,[3352] the Government approved the Rule of Law Roadmap, the Roadmap on Public Administration Reform, the FDI Roadmap, the Action Plan on the

3347 On the Delegation of Ukraine to Participate in Negotiations with the European Union on the Conclusion of the Agreement on Ukraine's Accession to the EU: Decree of the President of Ukraine No. 365/2024 of 21.06.2024. ↗

3348 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 987 of 27.08.2024. ↗

3349 Para. 16 of the Regulation on the Interagency Working Group on Ensuring the Negotiation Process on Ukraine's Accession to the European Union and Approximation of Ukrainian Legislation to European Union Law, approved by Resolution of the Cabinet of Ministers of Ukraine No. 987 of 27.08.2024. ↗

3350 Negotiations glossary. Government Office for Coordination of European and Euro-Atlantic Integration. ↗

3351 Ibid.

3352 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025. ↗

Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine, as well as Ukraine's negotiating position under Cluster 1 'Fundamentals of the EU Accession Process', classified as 'for official use'. The same act established that the implementation of the roadmaps and the action plan is to be financed within the limits of the state and local budgets, funds from international technical assistance and other sources not prohibited by law, and that responsible authorities must submit quarterly information to the Government on the state of their implementation.

The official report on the implementation of the Association Agreement for 2025[3353] confirms that, during 2025, Ukraine's negotiation mechanism moved towards the systematic approval of negotiating positions by clusters of the EU negotiating framework. The next stage was the meeting of the Interagency Working Group on 27 May 2025, following which the draft negotiating positions of Ukraine under Cluster 2 'Internal Market' and Cluster 6 'External Relations' were approved. They were subsequently approved by Orders of the Government No. 534[3354] and No. 533[3355] respectively. This demonstrated the ability of the negotiation architecture to work simultaneously with different areas of the EU acquis in terms of content: from the free movement of goods, services, capital and competition to the common commercial policy, external security and the state's international positioning.

Thus, already in the first half of 2025, the institutional system of the negotiation process demonstrated a transition from the stage of organisational launch to the actual development and Government approval of Ukraine's official negotiating documents, which became a key indicator of its functional capacity.

Progress and issues

After 1 October 2025, several positive developments can be observed in the operation of the negotiation and coordination architecture. First, already in October and December 2025, the **Interagency Working Group approved Ukraine's negotiating positions on three clusters**, indicating a shift from the organisational set-up of the structure to its practical use in the negotiation process.

On 1 October 2025, the Government approved the updated composition of the Interagency Working Group and updated the composition of the working (negotiating) groups responsible for preparing Ukraine's negotiating positions on individual chapters of the EU acquis.[3356] These changes were partly due to the reorganisation and renaming of ministries, as well as personnel changes in the Government and other CEB, which required the composition of the negotiating groups to be updated. The very fact of this update indicates that the Government treated the negotiating groups not as a static structure, but as a flexible mechanism adapting to the new phase of the negotiation process following

3353 Report on the Implementation of the Association Agreement between Ukraine and the European Union for 2025. Government Office for Coordination of European and Euro-Atlantic Integration, 2026. ↗

3354 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 2 'Internal Market': Order of the Cabinet of Ministers of Ukraine No. 534 of 30.05.2025. ↗

3355 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 6 'External Relations': Order of the Cabinet of Ministers of Ukraine No. 533 of 30.05.2025. ↗

3356 Publication by the Office of the Deputy Prime Minister for European and Euro-Atlantic Integration on the social network Facebook, 2025. ↗

the completion of screening and the transition to the preparation of official negotiating positions.

On 13 October 2025, the Interagency Working Group endorsed the draft negotiating position of Ukraine on Cluster 3, 'Competitiveness and Inclusive Growth'. The Office of the Deputy Prime Minister for European and Euro-Atlantic Integration[3357] separately emphasised that the negotiating position fully takes into account the European Commission's screening report, and that Ukraine recognises the EU acquis within this cluster and is ready to ensure its full implementation by the time of accession to the EU. At the same time, the document also included requests for certain transitional periods, indicating Ukraine's gradual shift towards the classic negotiation logic of candidate countries, where substantiated national negotiating derogations or time-bound adaptation mechanisms are developed alongside the commitment to implementation.

On 11 December 2025, the Interagency Working Group approved the negotiating positions on Cluster 4, 'Green Agenda and Sustainable Connectivity'[3358] and Cluster 5, 'Resources, Agriculture and Cohesion Policy'.[3359]

On 10 December 2025, the Government formalised the 'Pulse of Accession'[3360] as a single information system for reporting, monitoring and evaluating the performance of Ukraine's commitments in the field of European integration.

In February 2026, the **composition of the delegation was updated**,[3361] while Government communication had already previously described the negotiation mechanism as an element of the new European integration architecture, alongside the overall progress in implementing the Association Agreement.[3362] This indicates an attempt by the Government to bring the negotiation and monitoring components together within a single logic of movement towards membership.

The procedural uncertainty of public reporting by the negotiation structures complicates the external assessment of progress.

Resolution No. 987[3363] defines the Interagency Working Group as a consultative and advisory body and sets out its main organisational parameters, while the official Government portal regularly reports on individual meetings and the approval of draft negotiating positions.[3364]

3357 Publication by the Office of the Deputy Prime Minister for European and Euro-Atlantic Integration on the social network Facebook, 2025. ↗

3358 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 4 'Green Agenda and Sustainable Connectivity': Order of the Cabinet of Ministers of Ukraine No. 1460 of 17.12.2025. ↗

3359 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 5 'Resources, Agriculture and Cohesion Policy': Order of the Cabinet of Ministers of Ukraine No. 1459 of 17.12.2025. ↗

3360 Certain Issues of Reporting, Monitoring and Evaluation of the Performance of Ukraine's Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

3361 On Amendments to Decree of the President of Ukraine No. 365/2024 of 21.06.2024: Decree of the President of Ukraine No. 157/2026 of 24.02.2026. ↗

3362 The Government Updated the Negotiation Architecture to Ensure Ukraine's Accession to the EU. Government Office for Coordination of European and Euro-Atlantic Integration, 2025. ↗

3363 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 987 of 27.08.2024. ↗

3364 Institutional Mechanism of European Integration. Government Office for Coordination of European and Euro-Atlantic Integration. ↗

At the same time, publicly available acts and materials do not establish a standardised obligation to publish minutes, brief meeting summaries, standard progress metrics or a single public reporting structure for each group. This means that external monitoring of the negotiation process depends primarily on fragmented communication rather than on a predictable public reporting procedure.

The structural tension between the confidentiality of negotiating directives and the requirement for meaningful consultations creates a risk of uneven stakeholder engagement practices.

Decree of the President No. 365/2024[3365] establishes two different institutional logics at the same time: on the one hand, the delegation's directives are defined as a document 'for official use', which limits their public availability. On the other hand, the Government is required to ensure that negotiating positions are developed with the involvement of representatives of civil society and the business community. A similar approach can also be seen in Government decisions on the formation of the negotiation architecture, in particular Resolution of the Government No. 987,[3366] which provides for the possibility of representatives of business associations, civil society organisations, all-Ukrainian associations of employers' organisations and research institutions participating in the work of negotiating groups, subject to their consent. At the same time, the relevant regulatory acts and their annexes do not contain clear criteria for selecting such representatives, procedures for their involvement, the status of their participation or requirements for the transparency of this process. Open sources also contain no formalised approach to defining the boundary between the confidential part of the negotiation process and those elements that may be subject to structured consultations without risking disclosure of the state's negotiating position. Combined with the practice of preparing roadmaps in 2025, which was officially presented as involving a broad range of stakeholders,[3367] this points to a regulatory gap: the consultation mechanism is declared but not procedurally detailed. As a result, space is created for different, uneven and less predictable practices of interaction with stakeholders, which may affect both the quality of preparation of negotiating positions and the level of trust in the European integration process.

Uneven institutional capacity across individual sectors may affect the pace of progress in the negotiations.

Ukraine's negotiation architecture covers virtually the entire spectrum of public policy: from energy, transport, digitalisation and competition to education, culture, the environment, fisheries and cohesion policy. At the same time, the complexity of the EU acquis, the varying levels of regulatory maturity across sectors, uneven staffing capacity and access to specialised expertise create a risk of asymmetric readiness across individual areas. In practical terms, this may mean that some negotiating groups are able to prepare negotiating positions, implementation plans and legislative amendments more quickly, while other sectors will need significantly more time to reach a comparable level of

3365 On the Delegation of Ukraine to Participate in Negotiations with the European Union on the Conclusion of the Agreement on Ukraine's Accession to the European Union: Decree of the President of Ukraine No. 365/2024 of 21.06.2024. ↗

3366 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 987 of 27.08.2024. ↗

3367 Ukraine Is Preparing Three Roadmaps as Part of EU Accession: What These Documents Provide For and Why They Matter. European Integration Portal, 2025. ↗

readiness. In the absence of a system for the early identification of such imbalances and targeted support, this creates a risk of an uneven pace in the negotiation process across clusters and chapters.

Recommendations

1. **Introduce a unified standard for public reporting by negotiating groups**. It is recommended to establish minimum requirements for the regular publication of the results of the work of negotiation structures: brief meeting summaries, the status of preparation of negotiating positions, progress in implementing roadmaps, key risks and next steps. This would strengthen the transparency of the process and make it possible to conduct an external assessment of progress.
2. **Define the boundaries between open and official information in the negotiation process**. Internal rules should be developed to distinguish between information that remains restricted for official use and information that may be used for public communication or consultations. This would help avoid a situation in which the confidentiality of negotiating directives effectively blocks any meaningful discussion with business, experts and civil society.
3. **Introduce internal monitoring of the capacity of negotiating groups**. The readiness of negotiating groups should be assessed periodically against the following parameters: staffing capacity, availability of sectoral expertise, the pace of preparation of negotiating positions, the state of legislative approximation and risks of delays under individual chapters of the EU acquis. Based on the results of such an assessment, the need for additional expert, methodological or staffing support should be identified.

Public Support for European Integration

State of play

Public support for Ukraine's accession to the EU in 2022–2026 remains consistently high and is one of the country's strongest domestic resources for advancing towards membership. Data from leading sociological studies in 2023–2026 show a stable position among the majority of citizens in favour of EU accession. At the same time, a high level of support does not always mean an equal level of understanding of the substance of reforms, the timeframe for integration and the cost of sectoral changes. Alongside this, risks remain of information manipulation, uneven regional engagement and insufficiently structured participation of civil society in supporting reforms. The next stage of European integration policy requires not only maintaining public support as such but also transforming it into sustained public readiness for the practical changes necessary for EU membership.

An important element of state policy on public support for European integration was the approval by the Government of the Communication Strategy on Ukraine's European Integration for the Period until 2026.[3368] The document defined a comprehensive model of state communication on: (1) the benefits of Ukraine's membership of the EU, (2) raising

3368 On Approval of the Communication Strategy on European Integration of Ukraine for the Period until 2026: Order of the Cabinet of Ministers of Ukraine No. 1155 of 09.12.2022. ↗

citizens' awareness of the substance of European integration reforms, (3) building trust in the course towards membership, (4) countering disinformation and manipulative narratives and (5) involving young people, business, regions, the media and civil society in shaping a pro-European agenda.

A separate emphasis was placed on segmented communication with different target audiences, in particular young people, veterans, internally displaced persons, representatives of local self-government, the education sector and the business sector. Institutionally, the Strategy oriented the state system not only towards conducting information campaigns, but also towards building a sustainable model of interagency coordination, in which the key role is played by the Government, the Government Office, ministries and other authorities within their respective powers.

In 2024–2025, amendments[3369] were made to the Strategy and action plans for its implementation[3370] were updated, which indicates the adaptation of state communication policy to the new phase of the negotiation process on Ukraine's accession to the EU, new security challenges and the growing public demand for specific answers regarding the pace, conditions and consequences of future membership.

After 2022, support for EU membership took on the character of a broad public consensus. A public opinion survey[3371] conducted in 2023 showed that 92% of citizens supported Ukraine's accession to the EU. This is one of the highest figures recorded throughout the observation period and is evidence of society's consolidation around the European choice.

A survey conducted in February 2024[3372] showed 77% support for the European direction of development compared with the alternative of participation in a customs union with Russia, Belarus and Kazakhstan. At the same time, the study recorded differing expectations regarding the timeframe for accession: some respondents expected accession in the short term, while others considered the process to be significantly longer.

In July 2025, a new study confirmed the stability of support for EU accession at 75%.[3373] Even after the transition from the symbolic stage of obtaining candidate status to the more complex negotiation phase, public support remains high.

At the beginning of 2026, support for Ukraine's accession to the EU[3374] was recorded at 83%. It can therefore be observed that European integration retains a high level of legitimacy in Ukrainian society.

3369 On Amendments to Order of the Cabinet of Ministers of Ukraine No. 1155 of 09.12.2022: Order of the Cabinet of Ministers of Ukraine No. 322 of 13.04.2024. ↗

3370 Certain Issues of Implementation of the Communication Strategy on European Integration of Ukraine for the Period until 2026: Order of the Cabinet of Ministers of Ukraine No. 622 of 25.06.2025. ↗

3371 Dynamics of Readiness for Concessions in War, Trust in Politicians, Attitudes Toward Democracy, and Desire for Ukraine to Join the EU and NATO: Results of a Survey Conducted on 26 May – 5 June 2023. Kyiv International Institute of Sociology, 2023. ↗

3372 Absolute Majority of Ukrainians Believe in Victory over Russia, Support Membership in the EU and NATO. Rating Group Ukraine, 2024. ↗

3373 National Survey of Ukraine (International Republican Institute, July 2025). Rating Group Ukraine, 2025. ↗

3374 Ukrainians' Support for Accession to the EU and NATO Increased over the Year to 83% and 71% Respectively — Razumkov Centre/Ilko Kucheriv Democratic Initiatives Foundation. Interfax-Ukraine, 2026. ↗

The external context is also generally favourable for advancing Ukraine's European integration agenda. According to Eurobarometer survey data published in 2025, 56% of citizens of EU Member States support further enlargement of the Union, which indicates that the enlargement policy retains political legitimacy at the level of public opinion.[3375] According to a survey conducted in spring 2026, 76% of EU citizens support continued assistance to Ukraine until a just and lasting peace is achieved, 57% approve of granting Ukraine candidate country status for EU membership and 56% support EU funding for the purchase and supply of military equipment for Ukraine. At the same time, 76% of respondents believe that Russia's full-scale aggression against Ukraine poses a threat to the security of the EU itself.[3376]

Particularly indicative is the fact that Ukraine remains among the most supported candidate countries for accession among the EU population, as confirmed both by analytical materials of the European Commission and by studies covered in European media.[3377] This means that, despite broader discussions about 'enlargement fatigue', public support for Ukraine's integration not only persists, but is also relatively stable in most Member States.

At the same time, support for EU enlargement is not uniform: cautious or sceptical attitudes[3378] remain in a number of Member States, linked to domestic political factors, economic expectations and security concerns.

Taken together, Ukraine's domestic sociological data, which demonstrate a consistently high level of support for EU membership, and the positive dynamics of public opinion in the Member States of the EU create a favourable 'double window of opportunity' for the negotiation process. On the one hand, this provides domestic political legitimacy for the course towards membership. On the other hand, it creates the necessary external support for decision-making at EU level. Thus, as of 2025–2026, public support for Ukraine's European integration has both internal resilience and a sufficient level of external political support, which is an important factor in the successful advancement of accession negotiations.

Progress and issues

High support for membership is not always the same as readiness for complex reforms. Sustained support for accession to the EU is a strategic asset for Ukraine and an important source of political legitimacy for the European integration course. At the same time, support for the fact of membership itself does not automatically mean readiness for synergy between the authorities and society in equally supporting all reforms linked to alignment with the EU acquis. In its assessments, the European Commission regularly emphasises that progress towards membership depends primarily on results in the rule of law, the fight against corruption, institutional independence, the functioning of the market

3375 56% of Citizens Support EU Enlargement, New Eurobarometer Poll Shows. Euronews, 2025. ↗

3376 Most Europeans support continued aid to Ukraine — Eurobarometer / the Government Office for Coordination of European and Euro-Atlantic Integration. 2026. ↗

3377 New Eurobarometer Survey on EU Enlargement: Ukraine the Most Favoured for Accession. EU Neighbours East, 2025. ↗

3378 For example, according to a special Eurobarometer survey conducted in 2025, the lowest levels of support for further EU enlargement were recorded in France (43%), Czechia (43%) and Austria (45%), while the highest levels were observed in Sweden (79%), Denmark (75%) and Lithuania (74%). New Eurobarometer Survey on EU Enlargement: Ukraine the Most Favoured for Accession. EU Neighbours East, 2025. ↗

economy and administrative capacity, that is, on reforms that are often highly politically and socially sensitive.[3379]

The practice of recent years also shows that certain areas of reform may provoke public debate or political resistance amid general support for EU accession. In several cases, such issues became the subject of both domestic political debate and monitoring by the institutions of the European Union.[3380]

Accordingly, the public consensus on EU accession needs to be continuously reinforced through a high-quality explanation of the substance of reforms, their necessity and their long-term benefits for citizens. Without this, support for the overall course may coexist with resistance to individual sectoral changes, particularly in areas such as competition, environmental standards, state aid, the judiciary, agricultural policy or the labour market.[3381]

Insufficient public awareness of the mechanics of the accession process. Although support for membership remains high, the level of understanding of how the EU accession process actually works is much less uniform. Negotiation clusters, implementation of the EU acquis, the role of the National Programme for the Adaptation of Legislation and the logic of opening and closing negotiating chapters remain technical and complex categories for a significant share of citizens. This is why the European Commission and Government institutions separately emphasise the need to explain that accession is not a one-off political decision, but a multi-level process of legislative and institutional change. Available sociological data also indicate a gap between general support and the level of awareness: 86% of citizens consider themselves informed to some extent about Ukraine's accession to the EU, yet only 25% assessed their level of knowledge as high or very high, while the majority reported only a general understanding of the process.[3382] This points to significant demand for a deeper and practically oriented explanation of how European integration will affect the economy, citizens' rights, state institutions and everyday standards of living.

Absence of a state communication strategy on European integration for the period after 2026.

The Communication Strategy on Ukraine's European Integration for the Period until 2026 played an important role at the stage of obtaining candidate status, consolidating public support and providing a basic explanation of the benefits of membership of the EU. At the same time, Ukraine's transition to the stage of accession negotiations, the preparation

3379 Ukraine Report 2025. European Commission, 2025. ↗

3380 Urban planning reform (Draft Law No. 5655) also became an example of a conflict between the official rhetoric of modernisation and criticism from civil society and professional associations. A number of Ukrainian NGOs, architects, representatives of local self-government and anti-corruption organisations appealed to EU institutions and the European Parliament, emphasising that the proposed model creates risks of concentrating control in favour of large developers, weakening the role of communities and contradicting the principles of transparent and accountable post-war recovery supported by the European Union. The European Parliament Called on Zelenskyy Not to Sign Urban Planning Law No. 5655, Opposed by the Architectural Community. ZMINA, 2023 ↗; Draft Law No. 5655: Discussion with the Public. Association of Ukrainian Cities, 2023. ↗; Discussions on adapting the public procurement system to EU standards are also accompanied by active involvement of civil society and criticism of certain decisions in the area of transparency and oversight of recovery. Not a Bad Cop, but a Partner: How Civil Society Helps the State with EU Integration of Public Procurement. Transparency International Ukraine, 2025. ↗

3381 Ukraine Committed to EU Accession, Should Do More on Rule of Law, Commission Draft Says. Reuters, 2025. ↗

3382 How Ukrainians Perceive Reconstruction, Corruption and European Integration – A Public Opinion Poll. Transparency International Ukraine, 2025. ↗

of negotiating positions, implementation of the EU acquis and fulfilment of roadmaps creates new communication needs that go beyond the initial information model. The need to explain the substance of negotiation clusters, sectoral reforms, the regional dimension of preparation for membership, possible transitional periods, the cost of reforms and realistic accession timeframes is becoming increasingly important. In the absence of an updated strategic document, there is a risk that state communication policy will not fully correspond to the new challenges of the negotiation stage.

Sociological data are insufficiently integrated into the decision-making system in the field of European integration. In Ukraine, sociological studies are regularly conducted on support for accession to the EU, the level of trust in the European course, citizens' expectations and perceptions of reforms. At the same time, such data are mostly used as an indicator of public sentiment or as an element of public communication, rather than as a fully fledged public governance tool. In practice, there are no signs of the systematic inclusion of sociological monitoring results in the development of communication campaigns, the identification of priority topics for explanation, audience segmentation, the detection of regional imbalances or the adjustment of specific policy areas. As a result, the state risks responding to public demand with delay or using universal communication approaches where targeted solutions for different population groups are needed.

The risk of disinformation and manipulative narratives regarding European integration remains.

The high level of support for Ukraine's accession to the EU does not eliminate the risks of a distorted perception of the integration process within the country. Simplified or manipulative perceptions may spread in public discourse, suggesting either that EU membership is a quick political decision that does not require complex reforms or, conversely, that European integration will allegedly lead to a loss of sovereignty, the erosion of national identity,[3383] excessive external control or economic losses for certain social groups. An additional risk lies in inflated public expectations regarding the timeframe for accession: if the negotiation process is delayed, this may turn into disappointment and declining trust in reforms.[3384] In the absence of systematic state communication, rapid debunking of false information and a clear explanation of the substance of changes, the domestic information space remains vulnerable to manipulation, which directly affects the sustainability of public support for Ukraine's European course.

Such claims are used particularly actively in pro-Russian and Eurosceptic environments. For example, in 2025, a case was recorded involving the claim that the EU was allegedly 'falling apart because Brussels demands full subordination of states and deprives them of sovereignty'.[3385] Political campaigns in individual Member States have also demonstrated the use of anti-Brussels rhetoric.

Ahead of the elections in Hungary, international media noted the long-standing practice of 'Brussels-bashing', whereby the EU was portrayed as an external enemy imposing decisions on the state.[3386] At the same time, narratives also circulated in the media

3383 Best Friends: Magical Thinking, Obscurantism and Propaganda. NV, 2025. ↗

3384 Why Four EU Heavyweights Oppose Ukraine's Accelerated Accession — Politico. TEXTY.org.ua, 2026. ↗

3385 The EU Is Disintegrating as Brussels Demands Complete Subordination. EUvsDisinfo, 2025. ↗

3386 Most Hungarians Want Better Relations with EU after Years of Orbán Brussels-Bashing, Poll Finds. The Guardian, 2026. ↗

environment about alleged 'EU fatigue with Ukraine' or the impossibility of its accession due to internal contradictions within the EU. Analytical materials on the blocking of the negotiation process warned that delays in decision-making could be used to create the perception that 'Brussels is leaving Ukraine behind', potentially undermining motivation for reforms.[3387] Taken together, this indicates that even amid high support for membership, public trust in the integration process requires constant protection through strategic communication, fact-checking and explanation of the substance of reforms.

Recommendations

1. Move from general pro-European communication to communication on specific reforms. Public policy in the field of European integration should systematically explain not only the strategic goal of EU membership, but also the substance of specific reforms, their stages, timeframes, costs and practical benefits for citizens and business. Particular attention should be paid to sensitive areas: the rule of law, anti-corruption policy, competition, state aid, environmental standards, agricultural policy and the labour market.
2. Develop and approve the Communication Strategy on Ukraine's European Integration for 2027–2030, tailored to the needs of the EU accession negotiations, implementation of the EU acquis, the regional dimension of preparations for membership and the shaping of realistic public expectations.
3. Integrate sociological monitoring into the system for managing European integration policy. Regular sociological data, including the level of support, level of knowledge, fears, expectations and regional differences, should be used not only to identify trends, but also as a basis for adjusting state communication and reform priorities.
4. Strengthen counteraction to disinformation regarding European integration in Ukraine's domestic information space. State communication on European integration should be institutionally linked with mechanisms for strategic communications, fact-checking and information security, focused primarily on Ukrainian society. At the systemic level, it would be advisable to rapidly debunk manipulative narratives about 'Brussels diktat', 'loss of sovereignty', the 'economic disadvantage of accession', 'threats to traditional values' or the 'lack of prospects for Ukraine's membership', using clear evidence-based arguments and tailored messages for different social and regional audiences. In addition, it would be advisable to support the external communication dimension through diplomatic channels, international media and Ukraine's public diplomacy.

3387 'Plan B' for Ukraine's EU Accession. How Brussels Is Preparing to Help Kyiv despite Hungary's Veto. European Pravda, 2025. ↗

Agency
for Legislative
Initiatives

Governance



Changes in the Composition of the Government of Ukraine

State of play

Composition of the Government of Ukraine

Yuliia Svyrydenko replaced Denys Shmyhal as Prime Minister of Ukraine[3388] on 17 July 2025, after he had served in office for more than five years, since March 2020.[3389]

On the same day, Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament) approved the new composition of the Cabinet of Ministers of Ukraine (Government).[3390] Despite the change in leadership, most members of the previous Government either remained in office or took up new positions. Denys Shmyhal continued to serve in Yuliia Svyrydenko's Government, taking up the position of Minister of Defence of Ukraine and subsequently that of First Deputy Prime Minister of Ukraine — Minister of Energy of Ukraine.[3391]

The composition of Yuliia Svyrydenko's Government included the First Deputy Prime Minister of Ukraine — Minister of Energy of Ukraine, the Deputy Prime Minister for Restoration of Ukraine — Minister for Development of Communities and Territories of Ukraine, the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine, the Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine, 10 ministers and two acting Ministers.

On 14 July 2026, Prime Minister of Ukraine Yuliia Svyrydenko presented a report on the key results of the Cabinet of Ministers of Ukraine's work over the preceding year,[3392] after which the Verkhovna Rada accepted her resignation.[3393] Yuliia Svyrydenko's Government remained in office for almost exactly one year. The resignation of the Prime Minister automatically resulted in the resignation of the entire Cabinet of Ministers of Ukraine.[3394]

On 16 July 2026, the Verkhovna Rada appointed Serhii Koretskyi Prime Minister of Ukraine.[3395] On the same day, the Verkhovna Rada formed the new Government, comprising the First Deputy Prime Minister of Ukraine — Minister of Energy of Ukraine, the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine, the

3388 On the Appointment of Y. Svyrydenko as Prime Minister of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4549-IX of 17.07.2025. ↗

3389 On the Appointment of D. Shmyhal as Prime Minister of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 515-IX of 04.03.2020. ↗

3390 On the Formation of the Composition of the Cabinet of Ministers of Ukraine and Dismissal of Members of the Cabinet of Ministers of Ukraine that Has Resigned: Resolution of the Verkhovna Rada of Ukraine No. 4550-IX of 17.07.2025. ↗

3391 On the Appointment of D.Shmyhal as Minister of Defence of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4552-IX of 17.07.2025. ↗

3392 Yuliia Svyrydenko Presented the Results of the Government's Work over the Year. Government Portal. 2026. ↗

3393 On the Resignation of Prime Minister of Ukraine Y. Svyrydenko: Resolution of the Verkhovna Rada of Ukraine No. 4935-IX of 14.07.2026. ↗

3394 Constitution of Ukraine No. 254k/96-VR of 28.06.1996, Part 3 Article 115. ↗

3395 On the Appointment of S. Koretskyi as Prime Minister of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4941-IX of 16.07.2026. ↗

Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine and 13 ministers.[3396]

Serhii Koretskyi's Government was formed amid a political crisis, against the backdrop of peaceful protests in Kyiv and the regions over President of Ukraine Volodymyr Zelenskyy's decision not to resubmit Mykhailo Fedorov's candidacy for the position of Minister of Defence of Ukraine.[3397]

At the time the new Government was appointed, President of Ukraine Volodymyr Zelenskyy did not submit nominations to the Verkhovna Rada for the positions of Minister of Defence of Ukraine and Minister of Foreign Affairs of Ukraine. At the same time, on 16 July 2026, Volodymyr Zelenskyy instructed Yevhen Khmara to temporarily perform the duties of Minister of Defence of Ukraine[3398] and Andrii Sybiha to temporarily perform the duties of Minister of Foreign Affairs of Ukraine.[3399] On 17 July 2026, the Cabinet of Ministers of Ukraine, with the agreement of the President of Ukraine, appointed Yevhen Khmara acting Minister of Defence of Ukraine and Andrii Sybiha acting Minister of Foreign Affairs of Ukraine.[3400]

Changes in the system of central executive bodies

Yuliia Svyrydenko's Government continued the practice of previous governments of reformatting the system of central executive bodies (CEBs). Yuliia Svyrydenko herself described the reformed composition of the Government as one of the smallest in the entire history of Ukraine's independence and as evidence that the Ukrainian authorities had set a course towards reducing the size of the state apparatus.[3401]

In particular, the number of ministries in Svyrydenko's Government decreased from 19 to 15.[3402] Accordingly, powers were redistributed and changes were made to the scheme for the Government's direction and coordination of the activities of central executive bodies through the relevant ministers (the scheme of direction and coordination).[3403] Following the decision to reorganise the Ministry of National Unity of Ukraine (Ministry of National Unity) and merge it into the Ministry of Social Policy under the new name, the Ministry of Social Policy, Family and Unity of Ukraine (Ministry of Social Policy), in July 2025,[3404] further changes affected six more ministries:

3396 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026. ↗

3397 Amid the 'Cardboard Protests': Rada Appoints New Government, but without Defence Minister — How MPs Voted. CHESNO. 2026. ↗

3398 We Have Just Discussed Our Long-Range Operations against Russia with Yevhen Khmara. President of Ukraine Volodymyr Zelenskyy. Facebook. 2026. ↗

3399 Meeting with Prime Minister Serhii Koretskyi. President of Ukraine Volodymyr Zelenskyy. Facebook. 2026. ↗

3400 Government Appointed Acting Ministers of Defence and Foreign Affairs. Government Portal. 2026. ↗

3401 We are getting to work': Svyrydenko describes the new Government as one of the smallest in Ukraine's history and outlines its first tasks. Suspilne. 2025. ↗

3402 On Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 442 of 10.09.2014 (as amended). Scheme for the direction and coordination of the activities of central executive bodies by the Cabinet of Ministers of Ukraine through the relevant members of the Cabinet of Ministers of Ukraine. ↗

3403 Ibid.

3404 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 904 of 21.07.2025. ↗

- the Ministry of Economy, renamed the Ministry of Economy, Environment and Agriculture of Ukraine (Ministry of Economy), became the legal successor to the Ministry of Agrarian Policy and Food of Ukraine (Ministry of Agrarian Policy) and the Ministry of Environmental Protection and Natural Resources of Ukraine (Ministry of Environmental Protection) following their liquidation[3405] (November 2025);
- the functions, rights, obligations and assets of the Ministry for Strategic Industries of Ukraine (Ministry for Strategic Industries) were transferred to the Ministry of Defence of Ukraine (MoD), also following the liquidation of the former (November 2025);[3406]
- in October 2025, the Ministry of Culture and Strategic Communications of Ukraine was renamed the Ministry of Culture of Ukraine (Ministry of Culture),[3407] while in November 2025 powers were redistributed between the Ministry of Culture and the State Committee for Television and Radio Broadcasting of Ukraine (Derzhkomteleradio),[3408] as well as the Ukrainian Institute of National Memory (UINM).[3409]

The function of directing and coordinating Derzhkomteleradio and the UINM was transferred from the Ministry of Culture directly to the Prime Minister of Ukraine.[3410]

The Ministry of Culture retained powers to ensure the formation and implementation of state policy in the media, information and publishing sectors.[3411] According to the publicly available explanations, the idea behind the redistribution of powers between the Ministry of Culture and Derzhkomteleradio was to transfer all operational activities related to strategic communications, the telethon, foreign broadcasting and similar matters to Derzhkomteleradio, which already had similar functions, while leaving information policy matters to the Ministry of Culture, especially in the context of European integration and the development of the media space after the war.[3412]

Serhii Koretskyi's Government was no exception and continued the practice of reformatting the CEB system. The number of ministries increased from 15 to 17. At the same time, another change in the structure and powers of ministries once again took place without proper public justification or clear calculations of institutional efficiency:

3405 Certain Issues of the Ministry of Economy, Environment and Agriculture: Resolution of the Cabinet of Ministers of Ukraine No. 903 of 21.07.2025. ↗

3406 Certain Issues of the Activities of the Ministry of Defence: Resolution of the Cabinet of Ministers of Ukraine No. 905 of 21.07.2025. ↗

3407 On Renaming the Ministry of Culture and Strategic Communications of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1396 of 29.10.2025. ↗

3408 Certain Issues of the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1509 of 19.11.2025. ↗

3409 On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine Regarding Certain Issues of the Activities of the Ukrainian Institute of National Memory: Resolution of the Cabinet of Ministers of Ukraine No. 1643 of 12.12.2025. ↗

3410 Ibid.

3411 Certain Issues of the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1509 of 19.11.2025. ↗

3412 Who will become Minister of Culture and Deputy Prime Minister for Humanitarian Policy: what was decided in the Rada. RBC-Ukraine. 2025. ↗

- the Ministry of Economy, Environment and Agriculture of Ukraine was renamed the Ministry of Economy and Environment of Ukraine (Ministry of Economy). The decision to liquidate the Ministry of Agrarian Policy and Food of Ukraine was reversed;[3413]
- the Ministry for Development of Communities and Territories of Ukraine (Ministry for Development) was renamed the Ministry for Recovery, Infrastructure and Transport of Ukraine. The Ministry for Communities, Territories and Internally Displaced Persons of Ukraine was established and assumed from the Ministry of Social Policy the powers to formulate and implement state policy on internally displaced persons.[3414]

Rotation of members of the Government

The formation of Yuliia Svyrydenko's Government was, in effect, a minor personnel reshuffle combined with a long-discussed reduction in the number of ministries. Its main feature was the absence of new political figures: it was formed primarily from ministers of the previous Government or their deputies. Some members of the Government changed ministerial portfolios, while others were promoted. In July 2025, after a long tenure as Prime Minister, Denys Shmyhal headed the MoD, former Minister of Energy of Ukraine Herman Halushchenko headed the Ministry of Justice of Ukraine (MoJ), and former Minister of Environmental Protection and Natural Resources of Ukraine Svitlana Hrynchuk replaced him as Minister of Energy of Ukraine (Ministry of Energy). Tetiana Berezhna moved from the position of Deputy Minister of Economy to the position of Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine, while Mykhailo Fedorov was appointed First Deputy Prime Minister of Ukraine — Minister of Digital Transformation of Ukraine.

Most ministers, 10 out of 15, retained their positions unchanged from the formation of Yuliia Svyrydenko's Government on 17 July 2025 until the Government's resignation. This group includes Matvii Bidnyi, Ministry of Youth and Sports of Ukraine (Ministry of Youth and Sports), Oleksii Sobolev, Ministry of Economy, Ihor Klymenko, Ministry of Internal Affairs of Ukraine (MoIA), Andrii Sybiha, Ministry of Foreign Affairs of Ukraine (MFA), Oleksii Kuleba, Ministry for Development of Communities and Territories of Ukraine (Ministry for Development), Oksen Lisovyi, Ministry of Education and Science of Ukraine (MoES), Viktor Liashko, Ministry of Health of Ukraine (MoH), Serhii Marchenko, Ministry of Finance of Ukraine (MoF), Denys Uliutin, Ministry of Social Policy and Nataliia Kalmykova, Ministry of Veterans Affairs of Ukraine (Ministry of Veterans Affairs).[3415] Tetiana Berezhna, Ministry of Culture, also belongs to the stable leadership group; following a relatively brief period as acting Minister,[3416] she held the position of Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine since October 2025.[3417]

3413 During the Verkhovna Rada's consideration of the appointment of Serhii Koretskyi as Prime Minister of Ukraine, the possible establishment of the Ministry of Environmental Protection and Natural Resources of Ukraine was also discussed. Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 16.07.2026. Verkhovna Rada of Ukraine. 2026. ↗

3414 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 963 of 17.07.2026. ↗

3415 On the Formation of the Composition of the Cabinet of Ministers of Ukraine and Dismissal of Members of the Cabinet of Ministers of Ukraine that Has Resigned: Resolution of the Verkhovna Rada of Ukraine No. 4550-IX of 17.07.2025. ↗

3416 On Temporarily Assigning the Duties of Minister of Culture and Strategic Communications to T. Berezhna: Order of the Cabinet of Ministers of Ukraine No. 785 of 28.07.2025. ↗

3417 On the Appointment of Tetiana Berezhna as Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4645-IX of 21.10.2025. ↗

In autumn 2025, changes took place in key ministries:

- **dismissals**: Svitlana Hrynchuk, Ministry of Energy,[3418] and Herman Halushchenko, MoJ,[3419] were dismissed in November 2025.

Against the backdrop of a corruption scandal in the energy sector in November 2025 (Operation 'Midas')[3420] the Government suspended H. Halushchenko from performing the duties of Minister of Justice of Ukraine at an extraordinary meeting.[3421] On 14 November, the President of Ukraine removed H. Halushchenko and S. Hrynchuk from the National Security and Defence Council of Ukraine (NSDC)[3422] and, on 19 November, the Verkhovna Rada dismissed two ministers at once during its plenary meeting — H. Halushchenko[3423] and S. Hrynchuk,[3424] after Hrynchuk herself submitted a resignation letter. The opposition and part of the pro-presidential political force 'Servant of the People' demanded the resignation of the entire Government. However, Parliament limited itself to urgent measures in response to the corruption scandal — the dismissal of two ministers.[3425] This was an understandable step given the risks of a complete reset of the Government after only several months of its operation, which could have adversely affected the stability of the public administration system amid the full-scale war.

- **horizontal rotation**: the dismissals of the Ministers of Justice and Energy led to a reshuffle of ministers who had been working in the Government since 2020: Mykhailo Fedorov moved from the position of First Deputy Prime Minister of Ukraine — Minister of Digital Transformation of Ukraine to the position of Minister of Defence of Ukraine,[3426] while Denys Shmyhal moved from the position of Minister of Defence of Ukraine to the position of First Deputy Prime Minister of Ukraine — Minister of Energy of Ukraine[3427] (January 2026).

The appointment of D. Shmyhal as Minister of Energy of Ukraine was justified by his managerial and professional experience, as well as his personal contribution during his

3418 On the Dismissal of S. Hrynchuk from the Position of Minister of Energy of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4693-IX of 19.11.2025. ↗

3419 On the Dismissal of H. Halushchenko from the Position of Minister of Justice of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4692-IX of 19.11.2025. ↗

3420 Operation 'Midas': high-level criminal organisation operating in the energy sector exposed. National Anti-Corruption Bureau of Ukraine. 2025. ↗; Mindich, Halushchenko and corruption at Energoatom: key facts about the NABU's Operation 'Midas'. RBC-Ukraine. 2025. ↗

3421 Issue of the Ministry of Justice: Order of the Cabinet of Ministers of Ukraine No. 1219 of 12.11.2025. ↗

3422 On Changes in the Composition of the National Security and Defence Council of Ukraine: Decree of the President of Ukraine No. 845 of 14.11.2025. ↗

3423 On the Dismissal of H. Halushchenko from the Position of Minister of Justice of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4692-IX of 19.11.2025. ↗

3424 On the Dismissal of S. Hrynchuk from the Position of Minister of Energy of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4693-IX of 19.11.2025. ↗

3425 On the second attempt: how the Rada dismissed Halushchenko and Hrynchuk. DW. 2025. ↗; Corruption scandal at Energoatom as a stress test for the authorities. DW. 2025. ↗

3426 On the Resignation of M. Fedorov, First Deputy Prime Minister of Ukraine — Minister of Digital Transformation of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4753-IX of 13.01.2026. ↗; On the Appointment of M. Fedorov as Minister of Defence of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4756-IX of 14.01.2026. ↗

3427 On the Resignation of D. Shmyhal, Minister of Defence of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4752-IX of 13.01.2026. ↗; On the Appointment of D. Shmyhal as First Deputy Prime Minister of Ukraine — Minister of Energy of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4759-IX of 14.01.2026. ↗

premiership to the resilience of the energy system during attacks. At the same time, according to media reports, other candidates declined the position.[3428]

The appointment of M. Fedorov, who since the beginning of the full-scale invasion had focused not only on digitalisation but also on the development of defence technologies, indicated a shift in the focus of the MoD towards technological warfare — the development of unmanned systems, digitalisation and stronger cooperation with the private sector.[3429]

By the end of Yuliia Svyrydenko's Government's term, two ministries remained without ministers and were headed by acting ministers: Liudmyla Suhak, MoJ,[3430] and Oleksandr Borniakov, Ministry of Digital Transformation of Ukraine (Ministry of Digital Transformation).[3431]

The formation of Serhii Koretskyi's Government demonstrated a reliance on the internal personnel pool of the state apparatus, in particular:

- the core of the new executive — six heads of ministries — was formed through the reappointment of ministers from Yuliia Svyrydenko's Government. This group included Denys Shmyhal (First Deputy Prime Minister of Ukraine — Minister of Energy of Ukraine), Tetiana Berezhna (Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine), Matvii Bidnyi (Ministry of Youth and Sports), Viktor Liashko (MoH), Serhii Marchenko (MoF) and Denys Uliutin (Ministry of Social Policy);
- experienced professionals from the diplomatic service, ministerial structures and CEBs were promoted to higher-level positions: Vsevolod Chentsov moved from the position of Representative of Ukraine to the European Union and the European Atomic Energy Community to that of Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine; Oksana Ferchuk moved from the position of Deputy Minister of Defence of Ukraine for Digital Development, Digital Transformation and Digitalisation to that of Minister of Digital Transformation of Ukraine;[3432] Taras Vysotskyi moved from the position of Deputy Minister of Economy, Environment and Agriculture of Ukraine[3433] to that of Minister of Agrarian Policy and Food of Ukraine; Ivan Vyhivskyi moved from the position of Head of the National Police of Ukraine[3434] to that of Minister of Internal Affairs of Ukraine; and Andrii Butenko moved from the

3428 To equalise the pressure. What hopes the authorities place on Denys Shmyhal at the Ministry of Energy and why. Suspilne News. 2026. ↗

3429 Shift of focus towards technological warfare: the media explained what Fedorov's appointment indicates. UNIAN. 2026. ↗

3430 On Temporarily Assigning the Duties of Minister of Justice of Ukraine to L.P. Suhak: Order of the Cabinet of Ministers of Ukraine No. 1268 of 19.11.2025. ↗

3431 On Temporarily Assigning the Duties of Minister of Digital Transformation of Ukraine to O.S. Borniakov: Order of the Cabinet of Ministers of Ukraine No. 16 of 14.01.2026. ↗ ; On Temporarily Assigning the Duties of Minister of Digital Transformation of Ukraine to O.S. Borniakov: Order of the Cabinet of Ministers of Ukraine No. 458 of 15.05.2026. ↗

3432 On the Dismissal of O. Ferchuk from the Position of Deputy Minister of Defence of Ukraine for Digital Development, Digital Transformation and Digitalisation: Order of the Cabinet of Ministers of Ukraine No. 711-r of 16.07.2026. ↗

3433 On the Dismissal of T. Vysotskyi from the Position of Deputy Minister of Economy, Environment and Agriculture of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 710-r of 16.07.2026. ↗

3434 On the Dismissal of I. Vyhivskyi from the Position of Head of the National Police of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 712-r of 16.07.2026. ↗

position of Head of the National Agency for Higher Education Quality Assurance[3435] to that of Minister of Education and Science of Ukraine;

- Members of Parliament Denys Maslov[3436] and Vitalii Bezghin[3437] relinquished their parliamentary mandates and were appointed Minister of Justice of Ukraine and Minister for Communities, Territories and Internally Displaced Persons of Ukraine, respectively;
- heads of regional state administrations Vitalii Kim, Head of the Mykolaiv Regional State Administration,[3438] and Mykola Kalashnyk, Head of the Kyiv Regional State Administration,[3439] were appointed Minister of Veterans Affairs of Ukraine and Minister for Recovery, Infrastructure and Transport of Ukraine, respectively.[3440]

The renewal of the Cabinet of Ministers of Ukraine left unresolved the question of appointing the leadership of the Ministry of Defence of Ukraine and the Ministry of Foreign Affairs of Ukraine, whose ministers are appointed by the Verkhovna Rada upon nomination by the President of Ukraine. As no such nominations had been submitted by the President to Parliament, the Government was compelled to use the only mechanism available in these circumstances to ensure continuity in the management of the ministries — temporarily assigning ministerial duties to deputy ministers.

In particular, the Cabinet of Ministers of Ukraine first appointed Yevhen Khmara Deputy Minister of Defence of Ukraine[3441] and, on the same day, temporarily assigned him the duties of Minister of Defence of Ukraine.[3442] As of 31 July 2026, it remained unclear how Yevhen Khmara could be appointed Minister of Defence of Ukraine, as he was serving in the military, whereas the law requires this position to be held by a civilian.[3443] Accordingly, the staffing arrangements concerning this Ministry appear to be temporary. During Yuliia Svyrydenko's Government's term, the MoD had two different ministers and, following the formation of the new Government, found itself in a state of uncertainty.

Under a similar procedure, the Government first appointed Andrii Sybiha — whose candidacy was not in question — First Deputy Minister of Foreign Affairs of Ukraine[3444]

3435 On the Dismissal of A. Butenko from the Position of Head of the National Agency for Higher Education Quality Assurance: Order of the Cabinet of Ministers of Ukraine No. 713-r of 16.07.2026. ↗

3436 On the Early Termination of the Powers of D. Maslov, Member of Parliament of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4943-IX of 16.07.2026. ↗

3437 On the Early Termination of the Powers of V. Bezghin, Member of Parliament of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4944-IX of 16.07.2026. ↗

3438 On the Dismissal of V. Kim from the Position of Head of the Mykolaiv Regional State Administration: Decree of the President of Ukraine No. 614/2026 of 16.07.2026. ↗

3439 On the Dismissal of M. Kalashnyk from the Position of Head of the Kyiv Regional State Administration: Decree of the President of Ukraine No. 613/2026 of 16.07.2026. ↗

3440 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026. ↗

3441 On the Appointment of Y. Khmara as Deputy Minister of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 722-r of 17.07.2026. ↗

3442 On Temporarily Assigning the Duties of Minister of Defence of Ukraine to Y. Khmara: Order of the Cabinet of Ministers of Ukraine No. 723-r of 17.07.2026. ↗

3443 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018, Part 7 Article 15. ↗

3444 On the Appointment of A. Sybiha as First Deputy Minister of Foreign Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 720-r of 17.07.2026. ↗

and, on the same day, temporarily assigned him the duties of Minister of Foreign Affairs of Ukraine.[3445]

This arrangement ensured continuity in the management of the ministries whose ministerial appointments fall within the competence of the President of Ukraine, without completing the full appointment procedure provided for by the Constitution of Ukraine. At the same time, the fact that the appointment of the heads of two strategic ministries remained unresolved after the renewal of the Cabinet of Ministers indicates insufficient preparation of the staffing decisions accompanying the change of Government.

Rotation of state secretaries

In Yuliia Svyrydenko's Government, state secretaries retained their positions in the ministries where political leadership remained unchanged following the 2025 change of Government: Oleksii Perevezentsev, Ministry of Youth and Sports,[3446] Inna Yashchuk, MoIA,[3447] Oleksandr Karasevych, MFA,[3448] Serhii Biletskyi, Ministry for Development,[3449] Maksym Yarmystyi, MoES,[3450] Oleksandr Bukhanevych, MoJ[3451] and Olena Andriiets, MoH.[3452]

State secretaries resigned in the ministries where political leadership changed: Vitalii Petruk, Ministry of Economy,[3453] Ivan Sopiha, MoD,[3454] Serhii Suiarko, Ministry of Energy[3455] and Oleh Kurochenko, Ministry of Culture.[3456]

3445 On Temporarily Assigning the Duties of Minister of Foreign Affairs of Ukraine to A. Sybiha: Order of the Cabinet of Ministers of Ukraine No. 721-r of 17.07.2026. ↗

3446 On the Appointment of O. Perevezentsev as State Secretary of the Ministry of Youth and Sports of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 399 of 30.04.2021. ↗

3447 On the Appointment of I. Yashchuk as State Secretary of the Ministry of Internal Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 140 of 14.02.2023. ↗

3448 On the Appointment of O. Karasevych as State Secretary of the Ministry of Foreign Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1180 of 29.11.2024. ↗

3449 On the Appointment of S. Biletskyi as State Secretary of the Ministry for Development of Communities and Territories of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 926 of 01.10.2024. ↗

3450 On the Appointment of M. Yarmystyi as State Secretary of the Ministry of Education and Science of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 293 of 07.04.2023. ↗

3451 On the Appointment of O. Bukhanevych as State Secretary of the Ministry of Justice of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1151 of 22.11.2024. ↗

3452 On the Appointment of O. Andriiets as State Secretary of the Ministry of Health of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 514 of 30.05.2025. ↗

3453 On the Appointment of V. Petruk as State Secretary of the Ministry of Economy of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 224 of 17.03.2023 ↗; On the Dismissal of V. Petruk from the Position of State Secretary of the Ministry of Economy, Environment and Agriculture of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1414 of 10.12.2025. ↗

3454 On the Appointment of I. Sopiha as State Secretary of the Ministry of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 344 of 15.04.2025 ↗; On the Dismissal of I. Sopiha from the Position of State Secretary of the Ministry of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 975 of 15.09.2025. ↗

3455 On the Appointment of S. Suiarko as State Secretary of the Ministry of Energy of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 362 of 18.04.2025 ↗; On the Dismissal of S. Suiarko from the Position of State Secretary of the Ministry of Energy of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 31 of 19.01.2026. ↗

3456 On the Appointment of O. Kurochenko as State Secretary of the Ministry of Culture and Strategic Communications of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 962 of 08.10.2024 ↗; On the Dismissal of O. Kurochenko from the Position of State Secretary of the Ministry of Culture and Strategic Communications of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1294 of 22.11.2025. ↗

Despite the ministers remaining unchanged, dismissals of state secretaries were recorded in three ministries: Ivan Bochko, MoF,[3457] Vita Shapovalova, Ministry of Veterans Affairs[3458] and Nataliia Neniuchenko, Ministry of Social Policy.[3459]

New state secretaries were appointed to the vacant positions in six ministries: Andrii Pyvovarov, Ministry of Economy,[3460] Volodymyr Levchuk, Ministry of Culture,[3461] Maksym Malashkin, MoD,[3462] Lesia Ivanyshchuk, MoF,[3463] Yurii Butenko, Ministry of Veterans Affairs[3464] and Ihor Vishtak, Ministry of Social Policy.[3465] From January 2026, Dmytro Ruhaiev served as acting State Secretary of the Ministry of Digital Transformation,[3466] while on 18 March 2026 Oleksandr Kompaniiets was appointed State Secretary of the Ministry of Digital Transformation.[3467]

The ministerial rotation in January 2026 caused a synchronous movement of state secretaries: Maksym Malashkin,[3468] after being dismissed from the MoD, headed the administrative office of the Ministry of Energy on the same day. Ivan Turchak[3469] similarly moved from the Ministry of Digital Transformation to the MoD. In effect, the ministers took 'their' state secretaries with them.

3457 On the Appointment of I. Bochko as State Secretary of the Ministry of Finance of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 796 of 28.07.2025 ↗; On the Dismissal of I. Bochko from the Position of State Secretary of the Ministry of Finance of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 328 of 10.04.2026. ↗

3458 On the Appointment of V. Shapovalova as State Secretary of the Ministry of Veterans Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 467 of 30.05.2024 ↗; On the Dismissal of V. Shapovalova from the Position of State Secretary of the Ministry of Veterans Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 979 of 15.09.2025. ↗

3459 On the Appointment of N. Neniuchenko as State Secretary of the Ministry of Social Policy of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 662 of 29.07.2022 ↗; On the Dismissal of N. Neniuchenko from the Position of State Secretary of the Ministry of Social Policy of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 960 of 10.09.2025. ↗

3460 On the Appointment of A. Pyvovarov as State Secretary of the Ministry of Economy, Environment and Agriculture of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1416 of 10.12.2025. ↗

3461 On the Appointment of V. Levchuk as State Secretary of the Ministry of Culture of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1295 of 22.11.2025. ↗

3462 On the Appointment of M. Malashkin as State Secretary of the Ministry of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 977 of 15.09.2025. ↗

3463 On Temporarily Assigning the Duties of State Secretary of the Ministry of Finance of Ukraine to L. Ivanyshchuk: Order of the Cabinet of Ministers of Ukraine No. 329 of 10.04.2026 ↗; On the Appointment of L. Ivanyshchuk as State Secretary of the Ministry of Finance of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 345 of 20.04.2026. ↗

3464 On the Appointment of Y. Butenko as State Secretary of the Ministry of Veterans Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1298 of 26.11.2025. ↗

3465 On the Appointment of I. Vishtak as State Secretary of the Ministry of Social Policy, Family and Unity of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 1029 of 25.09.2025. ↗

3466 On Temporarily Assigning the Duties of State Secretary of the Ministry of Digital Transformation of Ukraine to D. Ruhaiev: Order of the Cabinet of Ministers of Ukraine No. 39 of 19.01.2026. ↗

3467 On the Appointment of O. Kompaniiets as State Secretary of the Ministry of Digital Transformation of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 235-r of 18.03.2026. ↗

3468 On the Dismissal of M. Malashkin from the Position of State Secretary of the Ministry of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 33 of 19.01.2026 ↗; On the Appointment of M. Malashkin as State Secretary of the Ministry of Energy of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 37 of 19.01.2026. ↗

3469 On the Dismissal of I. Turchak from the Position of State Secretary of the Ministry of Digital Transformation of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 34 of 19.01.2026 ↗; On the Appointment of I. Turchak as State Secretary of the Ministry of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 38 of 19.01.2026. ↗

Civil service corps

From the reformatting of the CEB system in July 2025 to 30 June 2026, the authorised staffing level in the ministries and the Secretariat of the Cabinet of Ministers of Ukraine (SCMU) decreased and became closer to the actual number of staff. At the same time, the number of vacancies increased, although only slightly. As of 30 June 2026, the number of all categories of staff in the ministries and the SCMU was as follows:

- authorised staffing level — 19,900 (-307 positions);
- actual number of staff — 16,600 (-413 positions);
- vacancies — 3,300 (+106 positions, or 17% of the authorised staffing level compared with 15% before the change of Government).[3470]

The Ministry of Economy and the Ministry of Social Policy reacted most noticeably to the changes in the CEB system under Svyrydenko's Government, where the increase in the authorised staffing level was accompanied by an increase in the number of vacancies.

In the Ministry of Economy, which before the change of Government had been staffed at 93%, the authorised staffing level increased by more than 500 positions due to the transfer of positions from the liquidated ministries, from 858 to 1,365. At the same time, the number of vacancies increased more than fourfold — from 59 to 270, or from 7% in June 2025 to 20% in June 2026. By comparison, before its liquidation, the Ministry of Agrarian Policy was staffed at 77%, with 23% of positions vacant, while the Ministry of Environmental Protection was staffed at 89%, with 11% of positions vacant.[3471]

In the Ministry of Social Policy, which before the merger of the Ministry of National Unity into it had been staffed at 81%, the authorised staffing level increased by 127 positions, from 325 to 452 staff positions. At the same time, the number of vacancies doubled — from 63 to 126, from 19% in June 2025 to 27% in June 2026. Before its reorganisation, the Ministry of National Unity had been staffed at 70%, with 30% of positions vacant.[3472]

The Ministry of Culture demonstrates a different dynamic: after the reduction of its functions in January 2026, with the authorised staffing level unchanged at 317 staff positions, the number of vacancies decreased, from 14% in June 2025 to 12% in June 2026.[3473]

As regards the MoD, to which the functions of the Ministry for Strategic Industries were transferred, up-to-date data on staffing levels and vacancies remain restricted during martial law. Before the change of Government, the Ministry for Strategic Industries was staffed at 79%, with 172 out of 217 positions filled and vacancies accounting for 21% of the authorised staffing level.[3474]

3470 Number of employees of all categories in state bodies. Ministries and SCMU. Comparison of data as of June 2025 and June 2026. Ministry of Finance of Ukraine. ↗

3471 Ibid, June 2025 and June 2026.

3472 Ibid, June 2025 and June 2026.

3473 Ibid, June 2025 and June 2026.

3474 Ibid, June 2025.

For most other ministries, the situation has not changed significantly: as of 30 June 2026, the overall vacancy rate in the CEB system was 17%, compared with 15% in June 2025.[3475]

Recruitment to civil service positions also remained unchanged — as of 31 July 2026, the provision of the Law of Ukraine 'On the Legal Regime of Martial Law' suspending competitive selection for the duration of martial law and for a further six months after its termination or cancellation remained in force.[3476]

Progress and issues

The Governments of Yuliia Svyrydenko and Serhii Koretskyi continued the practice of unjustified reformatting of the CEB system, which indicates the absence of a coherent strategic vision of its architecture and distribution of powers. The creation, reorganisation and liquidation of ministries and other central executive bodies is a constitutional power of the Cabinet of Ministers.[3477] At the same time, as has become established practice, there are no public justifications for such decisions. For example, the continued existence of the Ministry of National Unity had been in question[3478] even before the formation of the new composition of the Government, in particular due to the notice of suspicion served on the person heading it,[3479] as well as the Ministry's relatively low effectiveness. At the same time, it was this Ministry that was chosen for reorganisation, whereas the Ministry of Agrarian Policy and the Ministry of Environmental Protection were liquidated without any public explanation of the reasons.

The reasons for dividing functions between the Ministry of Culture and Derzhkomteleradio were explained not by the Government, but only incidentally by Members of Parliament of Ukraine (MPs) in media interviews.[3480] This nevertheless showed that the issue had been considered in advance before the appointment of Tetiana Berezhna as Deputy Prime Minister for Humanitarian Policy — Minister of Culture. At the same time, the transfer of the functions of directing and coordinating Derzhkomteleradio and the UINM from the Ministry of Culture to the Prime Minister was not raised in the public domain at all.

In November 2025, the integrated property complexes of the State Enterprise 'Multimedia Platform for Foreign Broadcasting of Ukraine', the Ukrainian National News Agency 'Ukrinform' and the State Institution 'Center for Strategic Communications and Information Security' were transferred from the management of the Ministry of Culture to Derzhkomteleradio.[3481] However, only three months later, the management functions in respect of the State Enterprise 'Multimedia Platform for Foreign Broadcasting of Ukraine' were transferred directly to the Cabinet of Ministers of Ukraine.[3482] Thus, the original

3475 Ibid, June 2025 and June 2026.

3476 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 10. ↗

3477 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, para. 9[1] Article 116. ↗

3478 Ukraine's Ministry of National Unity may be scrapped – sources. Ukrainska Pravda. 2025. ↗

3479 Corruption in Ministry for Development: deputy PM suspected. National Anti-Corruption Bureau. 2025. ↗

3480 Who will become Minister of Culture and Deputy Prime Minister for Humanitarian Policy: what was decided in the Rada. RBC-Ukraine. 2025. ↗

3481 Certain Issues of the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1509 of 19.11.2025. ↗

3482 Certain Issues Concerning the State Enterprise 'Multimedia Platform for Foreign Broadcasting of Ukraine': Order of the Cabinet of Ministers of Ukraine No. 169-r of 19.02.2026. ↗

model for distributing powers in the field of foreign broadcasting was revised shortly after its introduction. This, in turn, demonstrates inconsistency in decision-making and places an additional burden on the SCMU by assigning it state property management functions.

The transformation of the CEB system once again affected the Ministry of Economy and the Ministry of Agrarian Policy. The first decision to merge these ministries was adopted in 2019. At the end of 2020, the Government restored the Ministry of Agrarian Policy and, from 2021, it again operated as a separate central executive body. In July 2025, a decision was once again taken to liquidate the Ministry of Agrarian Policy and transfer its functions back to the Ministry of Economy. However, only one year later, the new Government decided to restore the Ministry of Agrarian Policy as a separate ministry. Prime Minister Serhii Koretskyi emphasised that the Ministry of Agrarian Policy should be a self-sufficient and significant component of the Government and noted that there was complete clarity regarding the candidate to head it — Taras Vysotskyi.[3483]

Notably, the agricultural policy area retained institutional continuity: in 2019–2021 and again in 2025, Taras Vysotskyi served as a deputy economy minister responsible for agricultural policy.[3484] During the restoration of the Ministry of Agrarian Policy, he served as First Deputy Minister[3485] and, from May to September 2024, as acting Minister.[3486] Accordingly, restoring the Ministry did not require building a management team 'from scratch', but relied on the existing personnel capacity.

Serhii Koretskyi also stated that restoring the Ministry of Agrarian Policy was only the first stage in dividing the Ministry of Economy, which, in his view, had become overloaded with functions. The next step may be to restore the Ministry of Environmental Protection and Natural Resources of Ukraine, given that environmental protection is an important area of European integration. At the same time, he explained that the relevant decision had not yet been submitted for consideration because additional time was required to define the future ministry's specific tasks and identify a candidate to head it.[3487]

In effect, the situation repeated itself. Despite the previous experience of operating an enlarged Ministry of Economy in 2019–2020, one year after the ministries were merged again, the new Government concluded that an excessive concentration of functions within a single body required the restoration of the Ministry of Agrarian Policy as a separate ministry and, potentially, the Ministry of Environmental Protection as well.

The Ministry for Communities and Territories Development was also split into two ministries in the new Government. The Ministry for Recovery, Infrastructure and Transport and the Ministry for Communities, Territories and Internally Displaced Persons will now operate separately. Previously, in 2022, the Ministry for Development of Communities

3483 Koretskyi Confirms Restoration of the Ministry of Agrarian Policy and Names Candidate for Minister. NV Business. 2026. ↗

3484 On the Appointment of T. Vysotskyi as Deputy Minister for Development of Economy, Trade and Agriculture of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 745-r of 06.09.2019. ↗

3485 On the Appointment of T. Vysotskyi as First Deputy Minister of Agrarian Policy and Food of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 506-r of 26.05.2021. ↗

3486 On Temporarily Assigning the Duties of Minister of Agrarian Policy and Food of Ukraine to T. Vysotskyi: Order of the Cabinet of Ministers of Ukraine No. 425-r of 14.05.2024. ↗

3487 Koretskyi Confirms Restoration of the Ministry of Agrarian Policy and Names Candidate for Minister. NV Business. 2026. ↗

and Territories had been reorganised and merged with the Ministry of Infrastructure under the new name of the Ministry for Communities, Territories and Infrastructure.[3488]

The separation of functions is now expected to strengthen decentralisation efforts and ensure a more targeted approach to local infrastructure recovery, while improving governance in strategically important sectors, including housing, transport and municipal services.[3489]

The cyclical nature of these institutional decisions demonstrates insufficient consistency in state policy on the organisation of the CEB system, causing institutional turbulence for the second time within a single year.

The issue of the architecture of the public administration system is also not submitted for public discussion. Moreover, the Laws of Ukraine 'On Law-Making Activity'[3490] and 'On Public Consultations'[3491] do not apply to decisions on the creation or liquidation of state bodies. As a result, such decisions are not accompanied by impact assessment or consultations with stakeholders.[3492]

At the same time, reformatting the CEB system has a direct impact on citizens and business. On the one hand, it may create uncertainty and unpredictability in public policy, which may undermine trust in the Government's institutional capacity. On the other hand, provided that future decisions are justified in advance and properly communicated, through consultations and expert discussions, such changes may be positively perceived by the public and the business community, becoming an expected step aimed at improving the efficiency of public administration.

A change of minister almost inevitably leads to a change of state secretaries, which demonstrates the political dependence of this position.

During Yuliia Svyrydenko's Government's term, state secretaries changed in more than 50% of ministries, twice in the MoD.[3493] None of the state secretaries who left their positions due to the change of Government had exercised their powers for the full five-year term provided for by law.[3494] The formal grounds for the dismissal of state secretaries were resignation at their own request, agreement of the parties or transfer to another position. At the same time, the short tenure of state secretaries and their replacement after the appointment of a new minister, or even more often than that, remains an established practice of the Ukrainian public administration model, which makes it impossible for

3488 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1343 of 02.12.2022. ↗

3489 Ministry for Development Explains Changes in Leadership and Structure. Ekonomichna Pravda. 2026. ↗

3490 On Law-Making Activity: Law of Ukraine No. 3354-IX of 24.08.2023, para. 5 Article 1. ↗

3491 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024, para. 3 Article 2. ↗

3492 Organisational Architecture of the Cabinet of Ministers of Ukraine and Central Executive Bodies. Agency for Legislative Initiatives. 2025. ↗

3493 According to calculations based on information published on the website of the Verkhovna Rada of Ukraine as of 20 April 2026.

3494 On Central Executive Bodies: Law of Ukraine No. 3166-VI of 17.03.2011, Article 10. ↗

state secretaries to perform their key function — ensuring the stability and continuity of ministries' work.[3495]

As of 31 July 2026, Serhii Koretskyi's Government had made no changes to ministry state secretaries. However, the short period for which it had been in office does not provide a sufficient basis for comparison with the staffing practices of previous governments.

Instability in the CEB system and changes in political leadership complicate the work of individual ministries and the system as a whole. Frequent changes in the CEB system and the redistribution of competences destabilise their work and force staff to constantly adapt to new conditions. In addition, such processes draw bodies into lengthy organisational and legal procedures related to the reorganisation or liquidation of bodies and increase the burden on the state budget, in particular due to the release, as a result of the reorganisation or liquidation of ministries, of some employees who are made redundant or refuse to work in the updated structure.

The merger of the Ministry of Economy and the Ministry of Agrarian Policy in July 2025 and their separation in July 2026 provide a particularly illustrative example. During this period, the procedure for liquidating the Ministry of Agrarian Policy was initiated and its powers were transferred to the Ministry of Economy, requiring changes to the Ministry of Economy's structure and staffing table. Employees of the Ministry of Agrarian Policy were dismissed as a result of the Ministry's liquidation, with some subsequently employed by the Ministry of Economy. The procedure for terminating the Ministry of Agrarian Policy, initiated in July 2025,[3496] was never completed. Therefore, the decision to restore it as a separate ministry did not require the establishment of a new CEB. Nevertheless, for the second time within a year, organisational and staffing procedures became necessary, this time in connection with restoring the Ministry's activities.

The example of the Ministry for Development of Communities and Territories of Ukraine[3497] demonstrates that ministry reorganisation processes can last for years and extend well beyond the term of a single Government. In particular, the decision to reorganise it and merge it with the Ministry of Infrastructure of Ukraine was adopted in December 2022[3498] and the process remains ongoing.[3499]

Thus, the reorganisation and liquidation of ministries trigger lengthy organisational and legal processes. Where the CEB system is frequently changed, a significant share of managerial, human and financial resources is devoted to reorganisation procedures, diverting institutions from the performance of their core tasks and functions in the

3495 Politically Neutral Civil Service: Human Capital of the Reform or a Vulnerable Link in the Public Administration System? Agency for Legislative Initiatives. 2025, p. 10. ↗

3496 Certain Issues of the Ministry of Economy, Environment and Agriculture: Resolution of the Cabinet of Ministers of Ukraine No. 903 of 21.07.2025. ↗

3497 To ensure completion of the reorganisation of the Ministry for Development of Communities and Territories of Ukraine, in September 2024 the Ministry was renamed the Ministry of Regional Development, Construction and Housing and Communal Services of Ukraine. Certain Issues Concerning Measures to Complete the Reorganisation of the Ministry for Development of Communities and Territories of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1027 of 06.09.2024. ↗

3498 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1343 of 02.12.2022. ↗

3499 The Ministry of Regional Development, Construction and Housing and Communal Services of Ukraine has been undergoing termination as a legal entity since 04.01.2023. Information from the Unified State Register as of 30.07.2026. Clarity Project. ↗

relevant areas of state policy. Reformatting the CEB system and reducing their maximum staffing levels approximately to the level of actual staffing generally does not reduce staff shortages. On the contrary, it may encourage staff outflow and deepen institutional instability.

One of Prime Minister Serhii Koretskyi's first statements concerned the need to optimise the state apparatus and improve the efficiency of management processes.[3500] At the same time, his reference to the possible restoration of the Ministry of Environmental Protection as a separate ministry[3501] indicates that the transformation of the CEB system is continuing. This means that organisational and staffing changes within ministries are also likely to continue. Prime Minister Serhii Koretskyi instructed that proposals for a rapid review of all ministries be prepared by 27 July 2026 to assess the current state of affairs, including the implementation of budget programmes, resilience plans and other areas. Where necessary, the State Audit Service of Ukraine[3502] may be involved in this process, which may indicate an intention to carry out a comprehensive assessment of executive bodies before further management decisions are taken, with particular attention to compliance with budgetary discipline. As of 31 July 2026, the results of the rapid review had not been made public, as they required further analysis and evaluation before management decisions could be prepared.

At the same time, there is no evidence of a systematic practice whereby ministries, following a change in the composition of the Government or a minister, or the reorganisation or liquidation of a body, prepare consolidated information reports on the state of affairs in the relevant policy area and the activities of the institution.[3503] Preparing such documents — transition books — would facilitate a proper handover and provide the new leadership with a comprehensive understanding of the current state of policies, implementation of strategic objectives, reforms already launched, existing risks and unresolved issues. The absence of such a practice is linked both to the speed with which political staffing decisions are adopted and implemented, which does not always leave sufficient time for a proper handover, and to the absence of established procedures and an institutional culture of ensuring continuity in governance when political leadership changes.

In turn, the public should receive a clear and properly substantiated explanation of the reasons for a Government reset and its expected results, particularly where such changes occur repeatedly within a single calendar year.

3500 Serhii Koretskyi Discussed the Need to Streamline the State Apparatus and Improve Management Efficiency. Government Portal. 2026. ↗

3501 Koretskyi Confirms Restoration of the Ministry of Agrarian Policy and Names Candidate for Minister. NV Business. 2026. ↗

3502 Serhii Koretskyi Instructed that Proposals Be Prepared for a Rapid Review of Ministries. Government Portal. 2026. ↗

3503 In 2019, Volodymyr Groysman's Government launched an initiative to prepare transition books for the handover to Oleksii Honcharuk's Government in order to ensure continuity of projects and decisions extending over time and allow the new Government to take over its responsibilities quickly. However, the initiative did not develop into an established Government practice and was not institutionalised at the regulatory level. Groysman: Transition Books Enable Continuity of Reforms and Government Action. Ukrinform. 2019 ↗; Transition Books Enable Continuity of Reforms and Government Action — Volodymyr Groysman. UAONLINE. 2019. ↗

Recommendations

1. Introduce the practice of reformatting the CEB system only on the basis of a prior functional review and public justification of the proposed changes, with an independent expert discussion of their alternatives and risks. The requirement to prepare and update transition books in the event of a change of minister or a change in the composition of the Cabinet of Ministers of Ukraine should be established in legislation, with ministry state secretaries made responsible for their preparation and for familiarising the new political leadership with their contents.
2. Eliminate the factors behind the excessive dependence of the senior civil service corps on political figures, by making coordinated amendments to the Laws of Ukraine 'On Civil Service' and 'On Central Executive Bodies' regarding:
   - restoring the powers of the Commission on Senior Civil Service to determine the winners of competitions for category 'A' positions;
   - strengthening legal guarantees for the role of state secretaries in ensuring the stability and continuity of ministries' work, regardless of changes in political leadership.

Government Priorities

State of play

Government programme documents

Government programme documents describe the ways, methods and resources required to address identified public policy problems and achieve the development goals set in the relevant area or areas through the implementation of planned, interrelated tasks and measures.[3504]

Government programme documents include the Programme of Activities of the Cabinet of Ministers (the Government Programme), strategies for the development of relevant sectors, strategies that serve as the basis for preparing proposals on public investment, state targeted programmes and other programme documents, the requirements for the development and implementation of which are determined by laws of Ukraine or decrees of the President of Ukraine.[3505]

The Government Programme is developed on the basis of the agreed political positions and programme tasks of the coalition of parliamentary factions in the Verkhovna Rada, as well as proposals from members of the Government, and defines the guidelines for the Government's activities for the duration of its term of office.[3506]

3504 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, para. 2 § 56. ↗

3505 Ibid.

3506 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Part 1 Article 11 ↗; On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, para. 1 § 5. ↗

Yuliia Svyrydenko's Government presented the draft Government Programme to MPs, international partners and representatives of think tanks on 18 August 2025, one month after the formation of the Government, after which it opened a call for proposals to finalise the document with the involvement of experts, civil society organisations (CSOs), businesses and citizens.[3507] The Government Programme was approved[3508] by the Government on 10 September 2025 and registered[3509] in the Verkhovna Rada on 23 September 2025, effectively in breach of the statutory deadline. Parliament adopted neither of the required decisions — approval of the Government Programme or its return for revision — within the deadline set by the Rules of Procedure of the Verkhovna Rada.[3510] Therefore, the Government Programme was deemed not to have been approved, and Yuliia Svyrydenko's Government could not submit a new Government Programme to the Verkhovna Rada for one year.[3511]

Yuliia Svyrydenko's Government Programme had an unusually short planning horizon and covered the period from the end of 2025 to 2026. In terms of structure, the document consists of 12 priorities,[3512] 16 programme goals, 138 operational goals and 687 achievement criteria, 466 for 2025 and 221 for 2026.[3513]

On 18 July 2026, Serhii Koretskyi instructed the ministries to submit proposals for the Government Programme and the Government Priority Action Plan (GPAP) within seven days. The documents were expected to be finalised and submitted for consideration by the Government by 5 August 2026.[3514]

As of mid-2025, according to the Ministry of Economy, 333 **strategic documents of various types** had been adopted at national level, excluding activity plans of public authorities. Of these, 32, or 9.6% of documents, were programmes, including two national and 13 state targeted programmes, 102, or 30.6%, were strategies,[3515] 98, or 29.5%, were plans, 79, or 23.7%, were concepts, including 14 concepts of state targeted programmes, and 22, or 6.6%, were other programme documents.[3516]

3507 The Government approved the Action Programme and submitted it to Parliament for consideration. Uriadovyi Kurier, newspaper of the Cabinet of Ministers of Ukraine. 2025 ↗; Programme of Activities of the Cabinet of Ministers of Ukraine. 2025. ↗ As part of the preparation of the draft Government Programme, the Government received 683 proposals from CSOs, business associations, experts and active citizens.

3508 On Approval of the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1173 of 10.09.2025. ↗

3509 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14069 of 23.09.2025. ↗

3510 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Rules of Procedure of the Verkhovna Rada of Ukraine, Part 3 Article 227. ↗

3511 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Rules of Procedure of the Verkhovna Rada of Ukraine, Parts 6, 8, 9 Article 227. ↗

3512 Government priorities: 1) national security and defence, 2) integration into the EU, 3) fight against corruption, 4) well-being, 5) support for war veterans, 6) macrofinance and reforms, 7) business, 8) education and science, 9) healthcare and sport, 10) reconstruction, 11) culture, 12) winter stability and security.

3513 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14069 of 23.09.2025. ↗

3514 Serhii Koretskyi: Ministries Will Submit Proposals for the Government Programme and Priority Action Plan within One Week. Government Portal. 2026.

3515 The 102 strategies define more than 600 goals, including more than 350 strategic goals.

3516 On Approval of the Concept of the National Strategic Planning System: Order of the Cabinet of Ministers of Ukraine No. 853 of 13.08.2025. ↗

Government planning documents

Planning the activities of the Government is intended to ensure coherent and consistent actions by ministries and other CEBs, in particular on the implementation of Government programme documents.[3517] The Government Programme should define programme goals, while subsequent planning should specify these goals in the Government Medium-Term Action Plan, the Government Priority Action Plan for the year and the activity plans of ministries and other CEBs. Government planning actors include the Cabinet of Ministers, ministries and other CEBs.[3518]

Documents on planning the activities of the Government include:

- the Government Medium-Term Action Plan (GMAP) is developed for a three-year period. The provisions of the GMAP contain information on: 1) the main problems; 2) the list of programme goals; 3) the results of work in the previous period; 4) the essence of the approach proposed for implementation in the medium term; 5) tasks and measures; 6) possible risks to the implementation of the selected approach; 7) the required resources; 8) expected results; 9) target indicators. The provisions of the GMAP must be aligned with the provisions of the Budget Declaration in terms of financial support for its implementation in the relevant budget periods;[3519]
- the GPAP is developed for a period of up to one year. The GPAP sets out: 1) tasks and measures (steps); 2) implementation deadlines; 3) implementing bodies; 4) expected results. The GPAP is prepared based on the Government Programme, other programme documents of the Government and the GMAP, taking into account tasks established by laws of Ukraine, decrees of the President of Ukraine and Ukraine's international legal obligations.[3520]

On 10 September 2025, the GPAP for 2025 was approved.[3521] The plan was effectively designed for four months and included 129 operational goals and 414 tasks broken down by ministry, measures to implement the task, the implementation deadline, those responsible for implementation and expected results.

The GPAP for 2026[3522] was approved on 30 March 2026. It provides for 12 strategic goals and 129 operational goals. Within the operational goals, it defines expected results, key

3517 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, para. 1 § 5[1].

3518 Ibid, para. 8 § 5[1].

3519 Ibid, para. 4 § 5[1]. The only GMAP was approved by Volodymyr Groysman's Government in 2017. On Approval of the Government Medium-Term Priority Action Plan until 2020 and the Government Priority Action Plan for 2017: Order of the Cabinet of Ministers of Ukraine No. 275 of 03.04.2017.

3520 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, para. 6 § 5[1].

3521 The previous GPAP for 2025, approved by Denys Shmyhal's Government, ceased to be valid. On Approval of the Government Priority Action Plan for 2025: Order of the Cabinet of Ministers of Ukraine No. 1003 of 10.09.2025.

3522 On Approval of the Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026. ; The Government Priority Action Plan is approved within one month from the date of official publication of the Law on the State Budget of Ukraine for the relevant year. By decision of the Prime Minister, other deadlines for approving the Government Priority Action Plan may be established. The Law of Ukraine 'On the State Budget of Ukraine for 2026' was adopted on 3 December 2025. On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, para. 7 § 5[1]. ; On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025.

indicators, tasks, 419 in total, measures, implementation deadlines, those responsible for implementation and implementation indicators.

Ministers determine the priorities of their ministries' work and approve ministry work plans,[3523] which provide for measures to fulfil tasks and achieve target indicators defined, in particular, in programme documents and documents on planning the activities of the Cabinet of Ministers and the Verkhovna Rada, decrees of the President of Ukraine and decisions of the NSDC.[3524]

In June 2026, the Medium-Term Plan of the State's Priority Public Investments for 2027–2029 was approved, with a total volume of UAH 270.9 billion. The document covers 18 priority sectors, 44 subsectors and 67 main areas of public investment.[3525] The Plan also identifies five cross-cutting public investment priorities: energy efficiency, digitalisation, climate change response, gender equality and barrier-free accessibility. Approval of the Plan is a mandatory prerequisite for forming the Unified Project Portfolio of Public Investments of the State.[3526]

Together with the GPAP for 2026, a list of draft laws aimed at implementing its operational goals was approved. The list comprised 95 draft laws already registered with the Verkhovna Rada, which the ministries were required to support.

Overall, Yuliia Svyrydenko's Government submitted 240 draft laws to the Verkhovna Rada, some of which were resubmitted following the resignation of Denys Shmyhal's Government. Of these, Parliament adopted 30 laws. At the same time, following the resignation of Yuliia Svyrydenko's Government, 188 Government draft laws that the Verkhovna Rada had not considered at first reading were returned to their lead drafters for possible resubmission to the Cabinet of Ministers of Ukraine after the newly formed Government assumed office.[3527]

The impact of international obligations on Government priorities

International obligations are a separate source for shaping Government priorities.

Yuliia Svyrydenko's Government Programme identified integration into the European Union (EU) as one of the 12 Government priorities. It provided for the completion of national procedures to open negotiations on Ukraine's accession to the EU across all six clusters. Progress under the EU Enlargement Package was to be an important result. Priority areas included market liberalisation with the EU, implementation of the National Programme for the Adaptation of Ukrainian Legislation to EU Law (EU acquis) as a

3523 On Central Executive Bodies: Law of Ukraine No. 3166-VI of 17.03.2011, para. 2 Part 2 Article 8. ↗

3524 On Approval of Tasks and Key Indicators of Performance, Efficiency and Quality of Official Activities of Civil Servants Holding the Positions of State Secretaries of Ministries for 2026: Order of the Cabinet of Ministers of Ukraine No. 1483 of 24.12.2025. ↗

3525 On Approval of the Medium-Term Plan of the State's Priority Public Investments for 2027–2029: Order of the Cabinet of Ministers of Ukraine No. 608-r of 07.06.2026. ↗

3526 Government Approved the Medium-Term Plan of Priority Public Investments for 2027–2029. Ministry of Economy, Environment and Agriculture of Ukraine. 2026. ↗

3527 During Yuliia Svyrydenko's Government's term (17.07.2025–14.07.2026), 240 Government-initiated draft acts were registered in Parliament, of which: 28 were signed; 1 was being prepared for signature; 1 was submitted to the President for signature; 5 were withdrawn from consideration; 2 were heard and withdrawn from consideration; 5 were rejected and withdrawn from consideration; 2 were awaiting second reading; and 8 were being prepared for second reading. According to calculations based on information published on the Verkhovna Rada of Ukraine website as of 31 July 2026. ↗

comprehensive plan for implementing all EU acts and the development of a negotiating position on critical economic issues.[3528] Separate attention was paid to deregulation in the process of integration into the EU — the development of a negotiating position that would enable the implementation of deregulation initiatives.[3529]

In the GPAP for 2026, the European integration block covers 12 operational goals, including harmonisation of legislation with EU law, screening of the compliance of Ukrainian legislation with EU law, the opening of negotiation clusters and implementation of sectoral tasks on adapting regulation to EU standards, including bringing regional policy closer to EU cohesion policy and adapting the transport sector, energy, accounting, audit and regulation in the area of anti-money laundering to EU standards.[3530]

Budgetary support for Government priorities

Budgetary support for Government priorities is provided through an integrated multi-level system that combines strategic forecasting and operational implementation. The key elements of this architecture are:

- the Budget Declaration, which defines the principles of budget policy and State Budget of Ukraine (State Budget) indicators for the medium term;[3531]
- the medium-term plan of the state's priority public investments, which is developed based on proposals from ministries in accordance with the goals and tasks of strategic planning documents within the indicative aggregate ceiling for public investment for the medium term;[3532]
- the Law of Ukraine on the State Budget of Ukraine for the relevant year, which approves the State Budget and contains provisions to ensure its implementation during the budget period,[3533] transforming strategic guidelines into specific annual legal obligations;
- budget programmes of chief spending units, which are formed taking into account activity plans for the medium term, forecast and programme documents of economic and social development and constitute a set of measures aimed at achieving a single goal, tasks and expected result.[3534]

Current budgetary support for Government priorities is provided through the Budget Declaration for 2026–2028,[3535] the Law of Ukraine 'On the State Budget of Ukraine for

3528 On 5 June 2026, Ukraine and the EU officially opened negotiations under Cluster 1 'Fundamentals of the Accession Process'. Ukraine also formally accepted the benchmarks set by the EU for further progress in the negotiations. EU-UA: Government Portal on European Integration. ↗

3529 On Approval of the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1173 of 10.09.2025. ↗

3530 On Approval of the Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026. ↗

3531 Budget Code of Ukraine No. 2456-VI of 08.07.2010, Part 1 Article 33. ↗

3532 Ibid, Article 33[1].

3533 Ibid, para. 24 Part 1 Article 2.

3534 Ibid, para. 4 Part 1 Article 2, Article 20.

3535 On Approval of the Budget Declaration for 2026–2028: Resolution of the Cabinet of Ministers of Ukraine No. 774 of 27.06.2025. ↗

2026'[3536] and the Medium-Term Plan of the State's Priority Public Investments for 2026–2028.[3537] In June 2026, the Government approved the Budget Declaration for 2027–2029, which defines the principles of the state's budget policy for the next three years, is aimed at ensuring gradual fiscal consolidation and lays the foundations for macroeconomic stability and Ukraine's sustainable recovery.[3538]

Security and defence remain the largest budget priority. Following the entry into force of amendments to the Law of Ukraine 'On the State Budget of Ukraine for 2026',[3539] related to raising EUR 45 billion in 2026 under the Ukraine Support Loan instrument, the total resources allocated to the security and defence sector increased by UAH 1.56 trillion, to UAH 4.367 trillion. Most of the additional funding was allocated to three areas: the procurement of weapons and military equipment, remuneration of military personnel and the establishment of a security and defence sector reserve. While the original version of the Law on the State Budget for 2026 allocated UAH 2.8071 trillion to the security and defence sector, equivalent to 27.2% of projected GDP,[3540] following the amendments its resources increased to UAH 4.367 trillion, or approximately 43.2% of expected nominal GDP.[3541]

Serhii Koretskyi's Government has already begun preparing the draft State Budget for 2027, with the intention of submitting it to the Verkhovna Rada within the statutory deadline — by 15 September 2026. The stated priorities for the 2027 State Budget are strengthening defence capabilities, ensuring financial resilience and pursuing a well-designed social policy.[3542]

Monitoring implementation and reporting

The implementation of Government priorities is monitored through several parallel mechanisms: Government planning, the budget process, international financial instruments, public investment and regulatory policy. Monitoring of the implementation of the GMAP and the GPAP is carried out by the SCMU together with ministries and other CEBs designated as the implementing bodies for the relevant measures.[3543]

3536 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, Articles 1–4. ↗

3537 On Approval of the Medium-Term Plan of the State's Priority Public Investments for 2026–2028: Order of the Cabinet of Ministers of Ukraine No. 671 of 02.07.2025. ↗

3538 On Approval of the Budget Declaration for 2027–2029: Resolution of the Cabinet of Ministers of Ukraine No. 793 of 17.06.2026 ↗; Budget Declaration for 2027–2029: A Course towards Stability and Recovery. Ministry of Finance of Ukraine. 2026. ↗

3539 On Amendments to the Law of Ukraine 'On the State Budget of Ukraine for 2026' regarding Financial Support for the Security and Defence Sector: Law of Ukraine No. 4908-IX of 10.06.2026. ↗

3540 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025 ↗; Verkhovna Rada Adopted the State Budget of Ukraine for 2026. Ministry of Finance of Ukraine. 2025. ↗

3541 On Amendments to the Law of Ukraine 'On the State Budget of Ukraine for 2026' regarding Financial Support for the Security and Defence Sector: Law of Ukraine No. 4908-IX of 10.06.2026 ↗; Amendments to the 2026 State Budget: Parliament Adopted the Draft Law as a Whole. Ministry of Finance of Ukraine. 2026. ↗

3542 Government Began Preparing the Draft State Budget for 2027. Government Portal. 2026. ↗

3543 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, § 5^{1}, para. 9. ↗

For the GPAP for 2026, information must be submitted monthly. Ministries, other CEBs and responsible bodies submit information to the SCMU on the achievement of expected results and key indicators.[3544]

Reports on the progress and results of the implementation of strategies and other programme documents are submitted to the Government at least every 12 months from the date of their approval, unless otherwise specified by the document itself.[3545] Such reports are published on the official websites of the bodies that prepare them.

Each year, no later than 15 April, the Government submits to Parliament a report on the progress and results of the implementation of the Government Programme for the previous year.[3546] The draft report is prepared based on materials from ministries and other CEBs. The SCMU summarises the materials, submits the draft to the Prime Minister of Ukraine for consideration at a Government meeting, after which the Government approves the report and submits it to Parliament.[3547]

Annual consideration of the Government's report on the implementation of the Government Programme approved by Parliament is also provided for. Following its consideration, the Verkhovna Rada must adopt a resolution.[3548]

For interagency tracking of commitments under international financial support programmes, in 2024 the Cabinet of Ministers regulated the monitoring of the Reform Matrix.[3549] The Reform Matrix includes, in particular, recommendations of the European Commission within the EU accession process,[3550] conditions of the International Monetary Fund (IMF) programme,[3551] the Ukraine Plan[3552] and conditions of World Bank programmes.[3553] Information on the fulfilment of these commitments is displayed on the interactive Reform Matrix website in dashboard format.[3554]

The efficiency of budget programmes is assessed at all stages of the budget process on the basis of monitoring data, analysis of performance indicators of budget programmes and other information contained in budget requests, estimates, budget programme

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3544 On Approval of the Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026, para. 2, paragraph 4. ↗

3545 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, § 58, § 59. ↗

3546 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Part 6 Article 11. ↗

3547 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, § 131. ↗

3548 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 228. ↗

3549 Certain Issues of Monitoring the Implementation of the Reform Matrix: Resolution of the Cabinet of Ministers of Ukraine No. 634 of 04.06.2024 ↗. The Reform Matrix is a Government analytical tool that consolidates Ukraine's commitments under international financial support programmes and information on their implementation status.

3550 On Approval of the Action Plan for the Implementation of the Recommendations of the European Commission Presented in the Ukraine Progress Report within the 2024 European Union Enlargement Package: Order of the Cabinet of Ministers of Ukraine No. 300 of 28.03.2025. ↗

3551 IMF Executive Board Approves US$8.1 Billion under an Extended Fund Facility (EFF) Arrangement for Ukraine. International Monetary Fund. 2026. ↗

3552 On Approval of the Ukraine Plan: Order of the Cabinet of Ministers of Ukraine No. 244 of 18.03.2024. ↗

3553 World Bank's New $1.5 Billion Loan to Ukraine Will Provide Relief to Households, Mitigate Impacts of Russia's Invasion. World Bank. 2023 ↗; Program-for-Results Financing (PforR). World Bank. ↗

3554 Reform Matrix. ↗

passports, reports on the execution of estimates and reports on the implementation of budget programme passports.[3555] The results of such assessment serve as the basis for decisions on amendments to budget allocations for the current budget period, the preparation of proposals for the draft budget for the planned budget period and the Budget Declaration, including on suspending the implementation of relevant budget programmes.[3556]

The Government submits the annual report on the implementation of the Law on the State Budget of Ukraine to the Verkhovna Rada, the President of Ukraine and the Accounting Chamber no later than 1 April of the year following the reporting year.[3557] The MoF publicly presents this report, while chief spending units publicly present information on the implementation of budget programmes for the reporting budget period.[3558]

In May 2026, the MoF presented the Government-approved annual report on the implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2025'. In July 2026, the report was considered at a meeting of the Verkhovna Rada Committee on Budget.[3559]

Monitoring of the implementation of the medium-term plan of the State's priority public investments is conducted annually.[3560] Ministries submit monitoring reports to the Ministry of Economy, which prepares a consolidated report on their basis and submits it for consideration by the Strategic Investment Council.[3561] The monitoring results are taken into account when developing the plan for the next period.[3562] Under the regulatory framework, this process should be carried out using the Unified Information System for Public Investment Project Management, but until the procedure for its functioning is regulated, DREAM serves in practice as the digital basis for the relevant procedures.[3563] As of July 2026, the Unified Project Portfolio for 2026 comprised 142 investment projects and 65 programmes with a total value of UAH 5.89 trillion (EUR 115.36 billion).[3564] DREAM is also used for project preparation and assessment, portfolio formation, implementation monitoring and impact assessment.[3565]

3555 Budget Code of Ukraine: Code of Ukraine No. 2456-VI of 08.07.2010, Part 6 Article 20. ↗

3556 Ibid.

3557 Ibid, part 1 Article 61.

3558 Ibid, part 5 Article 28.

3559 On the Report on the Implementation of the Law of Ukraine 'On the State Budget of Ukraine for 2025': Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15408 of 14.07.2026. ↗

3560 On Approval of the Procedure for Developing and Monitoring the Implementation of the Medium-Term Plan of the State's Priority Public Investments: Resolution of the Cabinet of Ministers of Ukraine No. 294 of 28.02.2025, para. 23 of the Procedure. ↗

3561 Ibid, paras. 24–25.

3562 Ibid, para. 27.

3563 Unified Digital Integrated Information and Analytical System for Managing the Reconstruction Process of Real Estate, Construction, and Infrastructure Objects. Ibid, para. 26, para. 2 of the Resolution.

3564 DREAM Analytics — Unified Project Portfolio of the State. 31.07.2026. ↗

3565 Public Investment Management (PIM) Reform in 2025: New Standards of Efficiency and Transparency. Ministry of Economy, Environment and Agriculture of Ukraine. 2026. ↗

Monitoring of the implementation of European integration-related commitments is carried out through the digital system 'Pulse of Accession'.[3566] The information system consists of two components: an internal web portal (the private component) and a website (the public component). Responsible bodies update information in the internal web portal weekly whenever the status of implementation of the relevant commitments changes. The public component of the system has not yet been launched. Verification of the compliance of draft acts with EU law is integrated into the Government's rule-making procedure.[3567]

A separate procedure for management, monitoring and control has been introduced for the implementation of the Ukraine Plan under the EU financial support programme for Ukraine for 2024–2027 (Ukraine Facility).[3568] The Ministry of Economy has been designated as the national coordinator and ensures overall coordination of the implementation of the Ukraine Plan and interaction with the European Commission.[3569] A copy of the report submitted to the European Commission, together with the attached materials, is sent to the MoF and the State Audit Service of Ukraine for audit procedures within their competence.[3570] Responsible bodies, in turn, submit to the coordinator information on the status of implementation of the measures of the Ukraine Plan and documents required to confirm the achieved result.[3571]

During the assessment of the implementation of the Ukraine Plan for the seventh tranche of EU financial assistance under the Ukraine Facility, the European Commission's updated methodology for applying the partial payment mechanism made it possible, for the first time, to take into account steps completed ahead of the established deadlines.[3572]

Progress and issues

The absence of a Government Programme approved by the Verkhovna Rada disrupts the constitutional mechanism of interaction between the legislative and executive branches, depriving this interaction of a clear strategic basis. It is the Government Programme, which is formed on the basis of the agreed political positions of the coalition of parliamentary factions, programme tasks and proposals from members of the

3566 Certain Issues of Reporting, Monitoring and Evaluating the Effectiveness of Implementation of Ukraine's Commitments in the Field of European Integration: Resolution of the Cabinet of Ministers of Ukraine No. 1624 of 10.12.2025. ↗

3567 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, § 33, para. 5¹. ↗

3568 Certain Issues of the Implementation of the Ukraine Facility Instrument: Resolution of the Cabinet of Ministers of Ukraine No. 1318 of 15.11.2024. Procedure for Managing, Monitoring and Controlling the Implementation of the Ukraine Plan. ↗

3569 Ibid, para. 2. Procedure for Managing, Monitoring and Controlling the Implementation of the Ukraine Plan: Resolution of the Cabinet of Ministers of Ukraine No. 1318 of 15.11.2024, paras. 2-5 ↗; The Ministry of Economy launched a dashboard to monitor the implementation of the Ukraine Plan for the Ukraine Facility. Ministry of Economy, Environment and Agriculture of Ukraine. 2024. ↗

3570 Procedure for Managing, Monitoring and Controlling the Implementation of the Ukraine Plan: Resolution of the Cabinet of Ministers of Ukraine No. 1318 of 15.11.2024, para. 2, 6, 7. ↗

3571 Ibid, paras. 8, 9.

3572 Ukraine Receives Seventh Tranche from the EU under the Ukraine Facility. Ministry of Economy and Environment of Ukraine. 2026. ↗

Government, that defines the strategy of the Government's activities — its goals, criteria and timelines for achieving them, as well as the tasks required for their implementation.[3573]

The Government Programme is the basis for planning the Government's activities and ensuring coherent and consistent action by ministries and other CEBs on the implementation of programme goals[3574] and the formation of public policy in the relevant areas.

The Government Programme is taken into account when forming the Verkhovna Rada's legislative work plan.[3575] If the Government Programme is not approved by Parliament, the Government effectively determines the priorities of its activities on its own, while their political approval by Parliament is shifted to the stage of forming the Verkhovna Rada's legislative work plan for the relevant year and considering Government legislative initiatives.

Under such conditions, Parliament loses the opportunity to exercise systematic oversight over the Government it has formed because, having voted for its composition, the Verkhovna Rada did not approve the goals of the Government's activities.

As a result, the Government operates without officially approved benchmarks against which the efficiency of its activities can be systematically assessed. At the same time, the Government loses its one-year immunity from consideration by the Verkhovna Rada of the issue of Government's responsibility, although the priorities of its activities have still not been approved by Parliament.

As a result of this imbalance in relations between state authorities, the Government proved vulnerable to political decisions and ceased exercising its powers after one year in office, without a clear public explanation of the reasons for the decision or the speed with which it was implemented. On 14 July 2026, the Verkhovna Rada supported Prime Minister Yuliia Svyrydenko's resignation by 258 votes,[3576] automatically resulting in the resignation of the entire Cabinet of Ministers of Ukraine. The Government published a presentation outlining its achievements over its year in office.[3577] Information on what had not been achieved during this short period was shared publicly only by Mykhailo Fedorov when leaving the position of Minister of Defence of Ukraine.[3578]

The GPAP for 2026 was approved late, reducing its significance as an annual planning instrument. The GPAP must be approved within one month from the date of official publication of the Law on the State Budget for the relevant year.[3579] The Law of Ukraine 'On the State Budget of Ukraine for 2026' was officially published on 12 December 2025,

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3573 On the Cabinet of Ministers of Ukraine: Law of Ukraine No. 794-VII of 27.02.2014, Article 11 ↗; Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, § 5. ↗

3574 Ibid, § 5[1].

3575 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 19[1]. ↗

3576 On the Resignation of Prime Minister of Ukraine Y. Svyrydenko: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15407 of 14.07.2026 (roll-call vote). ↗

3577 Government Achievements over the Year. ↗

3578 Fedorov Announces Resignation as Defence Minister and Lists What His Team Did and Did Not Achieve. Ukrainian News. 2026. ↗

3579 Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, § 5-1, para. 7. ↗

so the deadline for approval of the GPAP expired on 12 January 2026.[3580] Instead, the GPAP for 2026 was approved only on 30 March 2026.[3581]

Ministries were tasked with bringing their own work plans into line with the GPAP for 2026 within two weeks,[3582] as well as submitting information to the SCMU every month on the achievement of expected results and key indicators for the implementation of the GPAP goals.[3583] Thus, the first regular reporting deadline, 5 April, fell before the deadline for bringing departmental plans into line with the GPAP itself, approximately by 13 April 2026.

The GPAP provides for a number of measures with an implementation deadline in March 2026.[3584] Under such conditions, these measures could not fully serve as advance planning benchmarks for the responsible implementing bodies.

The incomplete system of strategic planning fragments Government priorities, financial and investment resources and reduces the predictability of reforms. Government priorities are not integrated into a coherent hierarchy of strategic documents in which long-term goals, sectoral strategies, budget planning and responsibility for results would be logically connected.[3585] A mandatory hierarchy of documents, their mutual alignment and a systematic link with the budget and public investment have not been ensured, creating conditions for duplication of goals, dispersion of resources and the adoption of documents with unrealistic or undefined amounts of funding. These shortcomings deepen the gap between Government priorities and resource planning.[3586] In the area of public finance, this is manifested in a fragmented distribution of powers over strategic planning, a weak link between strategic and budget planning and insufficient integration of the programme-target method with other elements of strategic management.[3587]

In August 2025, the Government approved the Concept of the National Strategic Planning System in order to develop an approach to building a system for defining and achieving Ukraine's long-term development goals, all elements of which are mutually aligned, take into account the security environment and the state's resource capacity and are aimed at achieving long-term benchmarks supported by society.[3588]

3580 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025. ↗

3581 On Approval of the Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026. ↗

3582 Ibid, para. 2 subpara. 3.

3583 Ibid, para. 2 subpara. 4.

3584 In the areas of medical evacuation, anti-corruption legislation, the functioning of transit centres and temporary accommodation facilities, the supply of natural gas to heat energy producers, post-investment evaluation of large-scale public investment projects and the preparation of strategies that serve as the basis for preparing proposals on public investment, etc. Government Priority Action Plan for 2026: annex to Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026. ↗

3585 On Approval of the Concept of the National Strategic Planning System: Order of the Cabinet of Ministers of Ukraine No. 853 of 13.08.2025, paras. 1–2, section 'Description of the problem requiring resolution'. ↗

3586 Ibid.

3587 Public Finance Management Reform Strategy for 2026–2030, approved by Order of the Cabinet of Ministers of Ukraine No. 217 of 25.02.2026, pp. 49–54. ↗

3588 On Approval of the Concept of the National Strategic Planning System: Order of the Cabinet of Ministers of Ukraine No. 853 of 13.08.2025. ↗

The Ministry of Economy began work on developing the Draft Law of Ukraine 'On State Strategic Planning' and established a working group.[3589] Until the entry into force of the law that will regulate the development of the national strategic planning system and the approval of the Strategy for the Development of Ukraine, the Ukraine Plan,[3590] approved as part of the implementation of the Ukraine Facility instrument for 2024–2027, has been defined as the top-level document in the strategic planning system. The Ukraine Plan contains priority areas of reform and investment in line with the defined model of socio-economic development.[3591] In June 2026, the Government also adopted amendments to the Ukraine Plan aimed at strengthening the link between the Plan, Ukraine's European integration commitments and the EU's negotiating benchmarks. The amendments will enter into force once approved by the Council of the EU.[3592]

At the beginning of 2026, the Government approved:

- the Procedure for developing, monitoring and evaluating the results of implementation of strategies that serve as the basis for preparing proposals on public investment[3593] and corresponding amendments to the Rules of Procedure of the Cabinet of Ministers of Ukraine;[3594]
- the Action Plan to ensure unified approaches to developing, monitoring and evaluating the results of implementation of sectoral strategies that serve as the basis for preparing proposals on public investment.[3595]

These measures are aimed at improving the quality and coherence of strategic and programme documents, the level of their implementation and ensuring compliance with the Public Administration Reform Roadmap,[3596] the programme of cooperation with the

3589 As of Q1 2026, three meetings of the working group had been held, during which: a study of the legislation of selected European countries in the field of strategic planning was presented, the structure of the future draft law and the scope of the relevant components of state strategic planning systems were discussed and a scheme of the system of strategic planning documents was proposed. This scheme was agreed with the MoF.
Status of implementation of the Action Plan for the implementation of the Roadmap for Public Investment Management Reform for 2024–2028 (as of 01.04.2026). Ministry of Finance of Ukraine. 2026. ↗

3590 On Approval of the Ukraine Plan: Order of the Cabinet of Ministers of Ukraine No. 244 of 18.03.2024. ↗

3591 On Approval of the Concept of the National Strategic Planning System: Order of the Cabinet of Ministers of Ukraine No. 853 of 13.08.2025. ↗

3592 On Amendments to the Ukraine Plan: Order of the Cabinet of Ministers of Ukraine No. 567-r of 10.06.2026 ↗; Amendments to the Ukraine Plan. Ministry of Economy, Environment and Agriculture of Ukraine. 16.06.2026. ↗

3593 On Approval of the Procedure for Developing, Monitoring and Evaluating the Results of Implementation of Strategies that Serve as the Basis for Preparing Proposals on Public Investment: Resolution of the Cabinet of Ministers of Ukraine No. 361 of 25.03.2026. ↗

3594 On Amendments to the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 362 of 25.03.2026. ↗

3595 On Approval of the Action Plan to Ensure Unified Approaches to Developing, Monitoring and Evaluating the Results of Implementation of Sectoral Strategies that Serve as the Basis for Preparing Proposals on Public Investment: Order of the Cabinet of Ministers of Ukraine No. 360 of 22.04.2026 ↗; The Procedure was developed with expert support from the Recovery for All (RFA) project, funded by the Government of Canada and implemented by Alinea International in cooperation with the Ministry of Economy. The RFA project supports the strengthening of the strategic planning system in Ukraine to ensure better coherence, transparency and orientation of public policy and investment decisions towards long-term recovery and development, including cooperation with the NACS and ministries. Publication by Recovery for All on the social network Facebook. 2026. ↗

3596 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, measures 1, 2 of strategic result 2 of the section 'Policy Development and Coordination' of the Public Administration Reform Roadmap. ↗

IMF and the Roadmap for Public Investment Management Reform for 2024–2028[3597] and the updated Ukraine Plan.

Government priorities do not always have sufficient financial and economic justification, which complicates their proper consideration in budget planning and execution. In 2025, only 2,309 out of 4,932 draft acts that could potentially affect budget indicators and were considered at the level of Government committees, the Government, Verkhovna Rada committees or plenary sittings of the Verkhovna Rada contained financial and economic calculations, that is 46.8%.[3598] The Government recognised that the formal approach of drafters of normative legal acts to such calculations and the insufficient quality of budget planning by chief spending units lead to a significant number of decisions on the redistribution of expenditures during the budget year.[3599] In June 2026, the MoF approved methodological recommendations for chief spending units on calculating baseline expenditure, fiscal space and the cost of new policies in the course of medium-term budget planning and spending reviews.[3600]

When considering the draft State Budget for 2026, the Accounting Chamber identified a gap between medium-term and annual budget benchmarks,[3601] which were based on different scenarios of forecast macroeconomic indicators of Ukraine's economic and social development for 2026–2028.[3602] In particular, the draft State Budget of Ukraine for 2026 was prepared under a more pessimistic scenario, which envisaged a longer course of hostilities and deeper negative consequences for the economy and society, whereas the Budget Declaration for 2026–2028, which should serve as the basis for preparing the draft State Budget,[3603] was based on a more optimistic scenario. Therefore, the Accounting Chamber assessed certain indicators of the draft state budget, determined under martial law, as insufficiently substantiated and insufficiently realistic.[3604] Subsequent analysis of State Budget execution in Q1 2026 revealed deviations between actual and planned indicators. When the State Budget was approved, real GDP was expected to grow by 2.4%. Instead, real GDP contracted by 0.5% in the first quarter. In addition, external borrowing and grants amounted to UAH 244.2 billion, which was UAH 326 billion, or 57.2%, below the target for January–March. The economy contracted for the first time following a period of growth that had continued since the second quarter of 2023.[3605]

3597 On Approval of the Action Plan for the Implementation of the Roadmap for Public Investment Management Reform for 2024–2028: Order of the Cabinet of Ministers of Ukraine No. 588 of 18.06.2024. ↗

3598 Public Finance Management Reform Strategy for 2026–2030: Order of the Cabinet of Ministers of Ukraine No. 217 of 25.02.2026, p. 16. ↗

3599 Ibid, p. 4.

3600 On Approval of Methodological Recommendations on the Application by Chief State Budget Spending Units of Methodological Approaches to Calculating Baseline Expenditure, Fiscal Space and the Cost of New Policies: Order of the Ministry of Finance of Ukraine No. 311 of 12.06.2026, paras. 1–2, Section I paras. 1–2. ↗

3601 Conclusions based on the examination of the draft Law of Ukraine 'On the State Budget of Ukraine for 2026': Decision of the Accounting Chamber No. 23-1 of 26.09.2025, p. 4. ↗

3602 On Approval of the Forecast of Economic and Social Development of Ukraine for 2026–2028: Resolution of the Cabinet of Ministers of Ukraine No. 946 of 06.08.2025. ↗

3603 Budget Code of Ukraine: No. 2456-VI of 08.07.2010, Part 1 Article 33. ↗

3604 Conclusions based on the examination of the draft Law of Ukraine 'On the State Budget of Ukraine for 2026': Decision of the Accounting Chamber No. 23-1 of 26.09.2025, p. 4. ↗

3605 Opinion on the Results of the Analysis of the Implementation of the Law on the State Budget of Ukraine for 2026 in the First Quarter: Decision of the Accounting Chamber No. 18-3 of 09.06.2026, pp. 3, 6. ↗

The evaluation of budget expenditure efficiency also remained incomplete: in 2025, 17 chief spending units were to conduct spending reviews in 31 areas, but as of 31 December 2025, reports had been submitted by 9 chief spending units in 15 areas.[3606] In 2026, 14 chief spending units are to conduct State Budget spending reviews in 22 areas.[3607]

The framework and predominantly political nature of the GPAP, without clear performance indicators, creates a risk of non-fulfilment of international obligations. Unlike international obligations, which provide for the achievement of specific measurable results, the GPAP is mainly based on a framework-based logic that defines general areas of public policy and interim measures, while international programmes, in particular the Ukraine Facility and the IMF programme, are focused on final legal, institutional or financial results. This creates a discrepancy between the GPAP and international obligations in the level of specificity: the GPAP sets out actions by executive bodies, while international obligations require the achievement of a defined result.

The GPAP for 2026 correlates most closely with the measures of the Ukraine Plan under the Ukraine Facility in the part that corresponds to the format of Government planning and can be implemented within the powers of executive bodies.[3608] In these cases, there is a clear link between the measure, the implementing body and the expected result, the achievement of which is ensured through Government planning instruments and acts of executive bodies.

The relationship between the GPAP and Ukraine's obligations under the IMF programme is different. The GPAP outlines general areas of public policy, while the IMF programme provides for clearly defined and measurable results to be achieved: adoption of a specific draft law, approval of a strategy, appointment of an official, preparation of an analytical document or introduction of a new management procedure. As a result, the Government may report progress in reforms, while certain international obligations may remain unfulfilled. This is confirmed by the results of the first review of the IMF programme in June 2026. Although all quantitative performance criteria and indicative targets had been met by the end of March, two structural benchmarks set for Q1 were implemented with delays and one remained unimplemented. To continue implementing the programme, the parties agreed on an updated reform timetable, corrective measures and additional policy commitments.[3609]

3606 State budget spending reviews in 2025: reports submitted by 9 out of 17 spending units. Ministry of Finance of Ukraine. 2026. ↗

3607 On Conducting State Budget Spending Reviews in Certain Areas in 2026: Order of the Cabinet of Ministers of Ukraine No. 463-r of 20.05.2026. ↗

3608 This concerns, in particular, the approval of strategic documents, adoption of acts of the Cabinet of Ministers of Ukraine, introduction of digital services, decisions in the field of state property management and achievement of defined indicators for which a responsible implementing body has been assigned. That is why the GPAP for 2026 relatively fully reflects measures on the development of HRMIS, the use of the Diia portal for recruitment to civil service vacancies, updating the strategic framework for reforming the state-owned banking sector, strengthening corporate governance in the state sector of the economy, including through the establishment of supervisory boards and corporatisation of certain enterprises, as well as measures to support the agricultural sector through the State Agrarian Register and develop circular economy policy. Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026. ↗

3609 IMF Staff Reaches Staff Level Agreement on the First Review of the Extended Fund Facility Arrangement and Concludes Discussions of the 2026 Article IV Consultation with Ukraine / International Monetary Fund. 2026 ↗ ; Ukraine and the IMF Reached Staff-Level Agreement on the First Review of the Extended Fund Facility (EFF) Arrangement. Ministry of Finance of Ukraine. 2026. ↗

Government priorities are closest to IMF commitments in areas within the responsibility of the MoF: tax policy, public finance management, customs reform, digitalisation of financial data and policy on state-owned banks.[3610] At the same time, the GPAP does not always record the specific results provided for by the IMF programme. In many cases, there is only a thematic overlap, which in itself does not indicate full incorporation of the relevant obligations.

The biggest gaps concern personnel and institutional decisions. In particular, the IMF programme for 2026 provides for clear structural benchmarks, such as the appointment of a permanent Head of the State Customs Service of Ukraine (SCS), updating approaches to selecting members of supervisory boards of state-owned banks and introducing regulation under which problem banks transferred into state ownership should not be recapitalised from the state budget.[3611] In the GPAP, these issues are mentioned only as general areas: optimisation of customs policy,[3612] reduction of the state's share in the banking sector[3613] and improvement of the corporate governance system.[3614] This means that the GPAP reflects the general direction of reform, but does not always cover the specific decisions to which the IMF programme links fulfilment of the relevant commitment. This can be seen, in particular, in the energy sector.[3615]

As a result, the GPAP does not always make it possible to identify delays in the fulfilment of international obligations in a timely manner. The document records general areas and interim actions but does not always reflect the specific results on which the assessment of reforms by international partners and the further receipt of financial support depend. This creates a risk that formal progress on Government priorities will not mean full fulfilment of international obligations and will complicate oversight of reforms.

Recommendations

1. The Government should prepare the Government Programme on the basis of an analysis of the previous Government's achievement of planned results, fulfilment of international commitments and current public policy challenges, providing for

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3610 In particular, with regard to amendments to the Tax Code of Ukraine, the introduction of rules to counter tax avoidance, improvement of transfer pricing, digitalisation of public finance management and the creation of centralised information solutions. Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026, pp. 166, 173, 190. ↗ ; IMF Country Report No. 26/58. Ukraine: Request for an Extended Arrangement under the Extended Fund Facility and Cancellation of the Current Arrangement—Press Release, Staff Report, Staff Supplement, and Statement by the Alternate Executive Director for Ukraine. International Monetary Fund. 2026, pp. 54, 141. ↗

3611 IMF Country Report No. 26/58. Ukraine: Request for an Extended Arrangement under the Extended Fund Facility and Cancellation of the Current Arrangement—Press Release, Staff Report, Staff Supplement, and Statement by the Alternate Executive Director for Ukraine. International Monetary Fund. 2026. ↗

3612 Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026, pp. 10, 164. ↗

3613 Ibid, p. 168.

3614 Ibid, pp. 177–178.

3615 The GPAP contains important priorities on energy resilience, preparation for the heating season, protection of vulnerable categories of consumers and harmonisation of legislation in the energy sector with EU legislation. However, the IMF requirements are more specific: to prepare a technical analysis of hidden budgetary costs in the electricity, gas and heat supply sectors, as well as scenarios for gradually bringing tariffs to an economically justified level.
Government Priority Action Plan for 2026: Order of the Cabinet of Ministers of Ukraine No. 306 of 30.03.2026, pp. 126–129, 302–305. ↗ ; IMF Country Report No. 26/58. Ukraine: Request for an Extended Arrangement under the Extended Fund Facility and Cancellation of the Current Arrangement—Press Release, Staff Report, Staff Supplement, and Statement by the Alternate Executive Director for Ukraine. International Monetary Fund. 2026, pp. 141–142. ↗

a medium-term planning horizon. The Verkhovna Rada should ensure its timely processing and consideration as a basis for parliamentary assessment of the Cabinet of Ministers of Ukraine's performance and for ensuring the stability of its work, avoiding a repetition of the practice of a Government operating without an approved Programme.

2. Ensure timely approval of the GPAP by synchronising the timelines for its adoption, the alignment of ministry and other CEB plans with it and the submission of implementation reports.
3. Complete the formation of the state strategic planning system by defining the hierarchy of strategic documents, the procedure for their alignment with budget and investment planning and mechanisms for monitoring, evaluation and review.
4. Ensure proper financial and economic justification of Government decisions that affect budget indicators and the full application of medium-term budget planning instruments, including spending reviews.
5. Include in the GPAP all international obligations whose implementation falls within the competence of the Government, ministries and other CEBs, defining specific measurable implementation results that correspond to the indicators for fulfilling international obligations, as well as the procedure for monitoring implementation or the method of verification.

Agency for Legislative Initiatives

Multi-Level Governance



Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine

By Resolution of the Cabinet of Ministers of Ukraine (Government) No. 333 of 1 April 2014, the Concept of Reforming Local Self-Government and the Territorial Organisation of Power in Ukraine[3616] (the Concept) was approved. The rationale for the relevance of the Concept was the inefficiency of the public administration system; the fragmentation of territorial communities, which rendered them incapable of providing public services to the population; the fact that around 50% of territorial communities had budgets subsidised by more than 70%;[3617] and significant disparities in the administrative-territorial structure. The main problems addressed by the Concept included: deterioration in the quality and accessibility of public services; the worn-out condition of heating, sewerage and water supply networks, as well as the housing stock; a complex demographic situation; the misalignment of local policies with public demand; underdevelopment of forms of direct democracy; staffing policy; unclear distribution of powers; incomplete coverage of local self-government across the territory; and other related issues.

The purpose of the Concept was to define the directions, mechanisms and timelines for the establishment of effective local self-government and the territorial organisation of power. The Concept outlines the problems, as well as the ways and means of addressing them, and sets out the principles of reform. The objectives of the Concept are structured along the following areas:

- ensuring the accessibility and quality of public services;
- achieving an optimal distribution of powers between local self-government bodies (LSG bodies) and executive authorities;
- defining a well-founded territorial basis for the activities of LSG bodies and executive authorities in order to ensure the accessibility and proper quality of public services provided by such bodies;
- creating adequate material, financial and organisational conditions to ensure the exercise by LSG bodies of their own and delegated powers.[3618]

State of play

Legislative support for the reform began with the adoption of the Laws of Ukraine 'On Cooperation of Territorial Communities',[3619] 'On Voluntary Amalgamation of Territorial

3616 On the Approval of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

3617 According to calculations based on the information provided in the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine.

3618 On Approval of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

3619 On Cooperation of Territorial Communities: Law of Ukraine No. 1508-VII of 17.06.2014. ↗

Communities',[3620] as well as amendments to the Budget Code of Ukraine[3621] and the Tax Code of Ukraine[3622] regarding financial decentralisation. However, to date, amendments to the Constitution of Ukraine concerning decentralisation — which were intended to precede the above legislative initiatives — have not been adopted. Between 2014 and 2021, a total of five proposals for amendments to the Constitution of Ukraine concerning decentralisation were put forward:

- President of Ukraine (President) Petro Poroshenko initiated Draft Law No. 2217a[3623] and its revised version No. 2217a.[3624] Both draft laws were withdrawn.
- President Volodymyr Zelenskyi initiated Draft Law No. 2598[3625] and its revised version No. 2598.[3626] Both draft laws were withdrawn.
- In addition, following inclusive extra-parliamentary public consultations, a New Concept of the Draft Law 'On Amendments to the Constitution of Ukraine (Regarding Decentralisation of Power)' (of 30 November 2021)[3627] was developed, but it was not registered as a draft law.

Since 2014, the Government has approved a number of action plans for the implementation of the Concept of Reforming Local Self-Government and the Territorial Organisation of Power in Ukraine, as well as resolutions adopted in implementation of the Concept.[3628]

3620 On Voluntary Amalgamation of Territorial Communities: Law of Ukraine No. 157-VIII of 05.02.2015. ↗

3621 On Amendments to the Budget Code of Ukraine Regarding the Reform of Interbudgetary Relations: Law of Ukraine No. 79-VIII of 28.12.2014. ↗

3622 On Amendments to the Tax Code of Ukraine and Certain Legislative Acts of Ukraine Regarding Tax Reform: Law of Ukraine No. 71-VIII of 28.12.2014. ↗

3623 On Amendments to the Constitution of Ukraine (Regarding Decentralisation of Power): Draft Law of Ukraine, registration No. 2217a of 01.07.2015. ↗

3624 Ibid.

3625 On Amendments to the Constitution of Ukraine (Regarding Decentralisation of Power): Draft Law of Ukraine, registration No. 2598 of 13.12.2019. ↗

3626 Ibid.

3627 Amendments to the Constitution of Ukraine Regarding Decentralisation of Power: Final Report Based on Inclusive Extra-Parliamentary Public Consultations 'Amendments to the Constitution of Ukraine Regarding Decentralisation through Consensus'. Draft Text of Amendments to the Constitution of Ukraine Regarding Decentralisation of Power of 29.11.2021. ↗

3628 On Approval of the Action Plan for the Implementation of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 591 of 18.06.2014. ↗; On Amendments to the Action Plan for the Implementation of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 349 of 08.04.2015. ↗; Certain Issues of the Implementation of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 688 of 22.09.2016. ↗; On Approval of the Action Plan for 2017 Aimed at Intensifying the Reform of Local Self-Government and State Support for the Voluntary Amalgamation of Territorial Communities: Order of the Cabinet of Ministers of Ukraine No. 682 of 13.09.2017. ↗; On Approval of the Action Plan for the Implementation of the New Stage of the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2019–2021: Order of the Cabinet of Ministers of Ukraine No. 77 of 23.01.2019. ↗; On Amendments to Paragraph 6 of the Action Plan for the Implementation of the New Stage of the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2019–2021: Order of the Cabinet of Ministers of Ukraine No. 443 of 19.06.2019. ↗; On Amendments to the Action Plan for the Implementation of the New Stage of the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2019–2021: Order of the Cabinet of Ministers of Ukraine No. 96 of 05.02.2020. ↗; On Amendments to the Action Plan for the Implementation of the New Stage of the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2019–2021: Order of the Cabinet of Ministers of Ukraine No. 621 of 09.06.2021. ↗; On Approval of the Action Plan for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2024–2027: Order of the Cabinet of Ministers of Ukraine No. 270 of 26.03.2024. ↗

In 2020, a permanent Working Group on the Implementation of the Decentralisation Reform in Ukraine was established,[3629] operating under the Committee of the Verkhovna Rada on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning.

On 16 December 2021, the Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament) established a Working Group to prepare comprehensive legislative proposals for amendments to the Constitution of Ukraine concerning decentralisation;[3630] however, no information on its activities in 2025 is available from open sources.

The Concept was to be implemented in two stages (Stage I: 2014; Stage II: 2015–2017).

The first preparatory stage (2014) envisaged: (1) the creation of a legislative framework for reform (including amendments to the Constitution of Ukraine, legislative regulation of issues of direct democracy, implementation of the right of territorial communities to voluntary amalgamation and cooperation, regulation of a new system of administrative-territorial structure, and definition of the powers and resource provision of LSG bodies); (2) modelling of administrative-territorial units and the development of draft normative legal acts necessary to complete the formation of the new system of administrative-territorial structure; (3) ensuring a coordination mechanism for the implementation of the reform; (4) information and awareness-raising activities.

At the second stage (2015–2017) of the implementation of the Concept, it was envisaged to: (1) unify and standardise public services; (2) carry out institutional reorganisation of LSG bodies and local executive authorities on a new territorial basis; (3) conduct local elections taking into account the reformed system of LSG bodies; (4) improve the system of spatial planning of communities; (5) address the issue of providing newly established communities with spatial planning schemes and general plans.[3631]

The Concept became the driving force of the reform: it enabled the formation of a modern administrative-territorial structure and launched a new system of territorial organisation of power. A particularly significant achievement was the introduction of budgetary decentralisation: the budgets of all territorial communities established direct relations with the State Budget of Ukraine (State Budget) and became predictable for development planning through taxes assigned to local budgets, as well as transparent calculations of state grants and subventions. In addition, the foundations for the resource provision of local self-government were established; public services became more accessible and of higher quality; sectoral infrastructure is being optimised; the principles of participatory democracy are being strengthened; and territorial communities have been granted a broad range of powers and resources.

On 11 February 2021, the European Parliament (EP) adopted a Report on the implementation by Ukraine of the EU–Ukraine Association Agreement, in which, inter alia, the reform of

3629 On the Establishment of a Permanent Working Group on the Implementation of the Decentralisation Reform in Ukraine: Decision of the Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning of 03.06.2020, Minutes No. 29. ↗

3630 A Working Group on Amendments to the Constitution of Ukraine Concerning Decentralisation Established in Parliament. Press Service of the Verkhovna Rada of Ukraine, 2021. ↗

3631 On the Approval of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

local self-government and the territorial organisation of power was identified as the most successful reform.[3632]

The first objective of the Concept, concerning ensuring the accessibility and quality of public services, can be considered achieved. However, the tasks under this block are not one-off and their further implementation largely depends on adequate resource provision, the development of the infrastructure of Administrative Service Centres (ASCs), harmonisation of the activities of different branches of power, alignment of sectoral tasks with the capacity to deliver administrative services through ASCs, as well as proper legislative support in this area.[3633] The assessment of the quality of administrative service provision has improved significantly: in 2023, 33.5% of respondents rated it as good or very good (compared to 18.5% in 2019).[3634] As of 31 July 2026, the ASC network comprised 5,798 units (+82 compared to the previous quarter), including 5,480 (+75) operational ASCs, their territorial subdivisions, remote workplaces and mobile ASCs. A total of 318 (+7) ASC network units remain temporarily closed.[3635]

The objective of the Concept related to defining a sound territorial basis for the activities of LSG bodies and executive authorities can be considered formally achieved. For this purpose, the Methodology for the Formation of Capable Territorial Communities[3636] was approved, which defines the procedure for developing prospective plans for the formation of community territories of the Autonomous Republic of Crimea (AR Crimea) and regions, as well as the conditions for establishing capable territorial communities. Subsequently, Methodological Recommendations on the Criteria for the Formation of Administrative-Territorial Units at the Subregional (District) Level were developed.[3637] In addition, Methodological Recommendations on the Assessment of the Capacity of Territorial Communities were prepared.[3638]

In 2020, the Government approved prospective plans for the formation of community territories in 24 regions and adopted 24 resolutions on determining administrative centres and approving the territories of communities of the regions.[3639] As a result, 1,470 territorial

3632 European Parliament Resolution of 11 February 2021 on the Implementation of the EU Association Agreement with Ukraine (2019/2202(INI)). ↗

3633 With the adoption of the Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine on Optimisation of the Network and Functioning of Administrative Service Centres and Improvement of Access to Administrative Services Provided in Electronic Form' No. 943-IX of 03.11.2020, ASCs are to be mandatorily established in all territorial communities of Ukraine.

3634 Dynamics of Public Assessment of the Quality of Administrative Service Provision in Ukraine. A face-to-face survey conducted by the Ilko Kucheriv Democratic Initiatives Foundation in cooperation with the Centre for Political Sociology. ↗

3635 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power: as of 01.07.2026. Ministry for Development of Communities and Territories of Ukraine. ↗

3636 On Approval of the Methodology for the Formation of Capable Territorial Communities: Resolution of the Cabinet of Ministers of Ukraine No. 214 of 08.04.2015. ↗

3637 Methodological Recommendations on the Criteria for the Formation of Administrative-Territorial Units at the Subregional (District) Level. ↗ In their development, the provisions of Regulation (EC) No 1059/2003 of the European Parliament and of the Council of 26 May 2003 on the establishment of a common classification of territorial units for statistics (NUTS), as amended by Regulations (EU) No 1319/2013 and No 868/2014, were taken into account.

3638 Methodological Recommendations on the Assessment of the Capacity of Territorial Communities. ↗

3639 The Government Determined Administrative Centres and Approved the Territories of Territorial Communities of All Regions. Governmental Portal, 2020. ↗

communities were established, and the 2020 local elections were held on a new territorial basis.[3640]

In order to develop the legal framework of the administrative-territorial structure, in July 2023 the Law of Ukraine 'On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine'[3641] was adopted, which defines the procedure for the formation, liquidation, establishment and alteration of the boundaries of administrative-territorial units, their naming and renaming, as well as the resolution of other issues related to the administrative-territorial structure of Ukraine.

The greatest achievement of the Concept's objective to create appropriate material, financial and organisational conditions was budgetary decentralisation.[3642] Amendments to the Tax Code and the Budget Code enabled local self-government, as of 1 January 2015, to receive increased financial resources to strengthen economic capacity. All territorial communities entered into direct inter-budgetary relations with the State Budget, and for the performance of delegated state powers they received relevant transfers (including grants, educational and medical subventions, and subventions for the development of community infrastructure, etc.).

The full-scale Russian military aggression has created the following challenges for the further implementation of the Concept's objectives:

- the establishment of military administrations (MA) at all subregional and regional levels, in parts of territorial communities, and the temporary suspension of the powers of a significant number of LSG bodies have led to heterogeneity in the organisation of governance systems at the local level, depending on the status of the territory, security factors and the capacity to exercise the right to local self-government;
- the lack of modern experience of democratic functioning under martial law slows down adaptability to emerging challenges;
- resource losses are substantial and undermine not only planning and development, but also the capacity of LSG bodies to perform assigned powers;
- noticeable budgetary centralisation and instability of tax legislation, which negatively affect the revenue side of local budgets;
- local budget expenditures have been redirected towards addressing urgent priorities, including defence measures, restoration of damaged municipal property, support

3640 However, the 2020 local elections were not held in certain territories: those occupied by Russia in 2014–2015 (the Autonomous Republic of Crimea, the city of Sevastopol, certain districts of Donetsk and Luhansk regions; elections to the Donetsk and Luhansk regional councils were not conducted), as well as in territories where elections could not be held for security reasons in accordance with Resolution of the Central Election Commission No. 161 of 08.08.2020. Accordingly, since 2015, the exercise of local government powers in these territories has been entrusted to military-civil administrations, pursuant to Article 1 of the Law of Ukraine 'On Military-Civil Administrations'. At that time, a total of 20 military-civil administrations had been established by Decrees of the President: the Luhansk and Donetsk regional MCAs, and 18 military-civil administrations of settlements (10 in Donetsk region and 8 in Luhansk region). Thus, in the 2020 local elections, members to 1,577 local councils were elected.

3641 On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine: Law of Ukraine No. 3285-IX of 08.07.2023. ↗

3642 Decentralisation in Ukraine: Achievements and Tasks for 2021–2024. Presentation / Ministry for Development of Communities and Territories of Ukraine. ↗

for the military, protection of the rights of internally displaced persons, support for veterans and assistance to those affected by Russian military aggression;

- a particularly acute issue affecting the functioning of local self-government is the shortage of personnel due to killings, captivity, migration, mobilisation and restrictions on citizens' rights, which prompt elected officials and local self-government employees to terminate their service in LSG bodies;
- a further challenge for Ukraine is preparation for European integration under the legal regime of martial law, given the complexity of planning processes, the shortage of qualified personnel and the need to ensure that legislation takes into account the specific features of martial law while simultaneously complying with the requirements of the European integration agenda.

The Concept remains in constant focus and is subject to systematic monitoring by public authorities, civil society, academia and international technical assistance projects.[3643]

Progress and issues

Despite the recognition of the reform of local self-government and the territorial organisation of power in Ukraine as successful,[3644] it remains incomplete: a number of **tasks set out in the Concept and its implementation plan have not been fulfilled** due to a range of internal and external factors:

- internal: incomplete legislative framework; inertia of local authorities at the initial stage of the reform regarding the voluntary amalgamation of territorial communities; and certain decisions on the implementation of the reform that were politically motivated;
- external: the full-scale Russian aggression against Ukraine.

A notable step forward is the approval, by Resolution of the Cabinet of Ministers of Ukraine No. 1748, of the specific features of reforming local self-government and the territorial organisation of power under martial law and in preparation for Ukraine's accession to the EU.[3645] The document incorporates amendments to the Concept prepared by the Ministry for Development of Communities and Territories of Ukraine (Ministry for Development), based on the analysis of the Centre of Expertise for Multilevel Governance operating within the Secretariat of the Congress of Local and Regional Authorities of the Council of Europe.

3643 Opinion on the 'Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine'. Centre of Expertise for Multilevel Governance, operating within the Secretariat of the Congress of Local and Regional Authorities of the Council of Europe. 2024. ↗ ; Monitoring of the Decentralisation Process. ↗ ; Assessment of the Implementation of the Objectives of the Concept for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine. Institute of Tax Reforms, 2018. ↗; Decentralisation of Power: Agenda for the Medium-Term Perspective: Analytical Report. National Institute for Strategic Studies, 2019. ↗; Study on the Results of the Evaluation of the Effectiveness of the Application of Certain Legislative Acts on Decentralisation of Power in Ukraine, 2020. ↗; Local Self-Government Reform: Conclusions and Forecasts. Ukrainian Bar Association, 2021. ↗

3644 European Parliament Resolution of 11 February 2021 on the Implementation of the EU Association Agreement with Ukraine (2019/2202(INI)). ↗

3645 Certain Issues of the Reform of Local Self-Government and the Territorial Organisation of Power under Martial Law and Preparation for Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025. ↗

These amendments were grounded in the need to update the Concept's objectives in light of the challenges primarily related to the full-scale Russian aggression against Ukraine, as well as the relevance of preparing for Ukraine's accession to the European Union. The document focuses on the objectives of the Concept that remain incomplete or unimplemented.[3646] The Resolution No. 1748 also instructed the Ministry for Development, within three months, a draft action plan for the implementation of the specific features approved by the Resolution. As of 31 July 2026, such an action plan has not been adopted.

Persistent challenges include the **insufficient cost-recovery level of administrative services and the absence of clear legislative regulation of administrative fees**. For most administrative services, the fees remain either insufficiently compensatory or unjustified.[3647] On 5 June 2025, the Parliament adopted, at first reading, the Draft Law 'On Administrative Fee', intended to address this issue.[3648] The failure to adopt this draft law perpetuates the problem of inadequate regulation of administrative fees, which in turn limits proper revenue generation for local budgets.

An important factor in enhancing the professionalism of service in LSG bodies was the adoption of the Law of Ukraine 'On Service in Local Self-Government Bodies' (Law No. 3077-IX),[3649] the entry into force of which has been postponed, thereby stalling the reform of the public service.[3650]

The Concept's objective of achieving an optimal distribution of powers between LSG bodies and executive authorities remains unfulfilled. There is duplication of powers both between executive authorities and LSG bodies and among LSG bodies at different levels, while the transfer of powers is carried out inconsistently and without sufficient conceptual justification.[3651] In 2024, a Concept for the Distribution and Delineation of Powers[3652] was presented, and only on 29 January 2026 did the Government approve the Draft Law 'On the Principles of Delineation and Distribution of Powers between Levels of

3646 The objectives of the reform have been defined considering new challenges (grouped by areas):
- formation of an updated territorial basis of public governance;
- strengthening institutional capacity and ensuring proper coordination between LSG bodies and executive authorities;
- increasing the influence of residents on local and regional policy;
- delineation and distribution of powers and creation of conditions for adequate resource provision of local self-government;
- ensuring effective delivery of public services and management of material and financial resources;
- ensuring legality;
- ensuring European integration;
- ensuring a systematic and consistent policy of reconstruction and recovery of territories.

3647 For example, the fee for registration of place of residence is UAH 13.60, the state duty for marriage registration is UAH 0.85, while business and land registration are free of charge. The fees for administrative services are non-transparent, and in some cases unreasonably high (for example, passport services at the State Enterprise 'Document' cost UAH 400, while the pilot project 'Marriage in a Day' costs from UAH 6,000 to UAH 13,000, of which only UAH 0.85 of state duty is transferred to the local budget). On Administrative Fee: Explanatory Note to the Draft Law of Ukraine, registration No. 4380 of 16.11.2020. ↗

3648 On Administrative Fee: Explanatory Note to the Draft Law of Ukraine, registration No. 4380 of 16.11.2020. ↗

3649 On Service in Local Self-Government Bodies: Law of Ukraine No. 3077-IX of 02.05.2023. ↗

3650 For more details, see subsection 'Service in Local Self-Government Bodies'.

3651 Concept of the Distribution and Delineation of Powers. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning. ↗

3652 Experts Presented the Concept of the Distribution and Delineation of Powers between Local Self-Government and Executive Authorities. Decentralisation, 2023. ↗

Public Governance'.[3653] On 7 April 2026, the Verkhovna Rada adopted the draft law at first reading; as of 31 July 2026, it was being prepared for the second reading.[3654]

With regard to the formation of a new administrative-territorial structure, while the objectives have generally been achieved, the existing system remains imperfect:

- a number of territorial communities remain non-viable;[3655]
- not all districts newly established in 2020 comply with the European NUTS classification, according to which they should have a population of at least 150,000;
- in particular: Kosiv and Verkhovyna districts (Ivano-Frankivsk region), Rakhiv district (Zakarpattia region), Koriukivka and Novhorod-Siverskyi districts (Chernihiv region), and Vyzhnytsia district (Chernivtsi region);[3656]
- the consequences of Russian military aggression include the destruction and complete devastation of a number of settlements, which will evidently constitute a substantial basis for decisions on the 'reconfiguration' of certain territorial communities, the consolidation of border territorial communities, and the relocation of administrative centres of communities bordering Russia further away from the border.

This is the result of several factors. First, the formation of territorial communities at the initial stage of the reform was carried out on a voluntary basis; therefore, compliance with the requirements of the Methodology for the Formation of Capable Territorial Communities was secondary, which led to the establishment of a number of non-viable territorial communities. Second, a number of communities were formed outside the prospective plans. Finally, the Methodology for the Formation of Capable Territorial Communities[3657] proved to be imperfect and does not correlate with the Methodological Recommendations on the Assessment of the Capacity of Territorial Communities.[3658]

A positive development is the adoption of the Law of Ukraine 'On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine',[3659] which defines the procedure for the formation, liquidation, establishment and alteration of the boundaries of administrative-territorial units, their naming and renaming, as well as the resolution of other issues related to the administrative-territorial structure of Ukraine.

However, this **Law presents a problem of legal uncertainty**: (1) the term 'administrative-territorial structure' is widely used in the current legislation, yet it lacks a definition; (2)

3653 On the Principles of Delineation and Distribution of Powers between Levels of Public Governance: Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗

3654 For more details, see subsection 'Distribution and Delineation of Powers between Executive Authorities and Local Self-Government Bodies; between Local Self-Government Bodies at Different Levels'.

3655 Formation of Capable Territorial Communities in Ukraine: Advantages, Risks, Threats: Socio-Geographical Study. Y. Oliinyk, P. Ostapenko. Ukrainian Geographical Journal, 2016, No. 4. ↗

3656 Kosiv and Verkhovyna Districts in Ivano-Frankivsk Region Fail to Meet Standards: Implications and Potential Consequences. Suspilne, Ivano-Frankivsk. Suspilne, 2024. ↗

3657 On Approval of the Methodology for the Formation of Capable Territorial Communities: Resolution of the Cabinet of Ministers of Ukraine No. 214 of 08.04.2015. ↗

3658 Analysis of Methodologies for Assessing the Capacity of Territorial Communities: Conclusions and Proposals. Decentralisation, 2023. ↗

3659 On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine: Law of Ukraine No. 3285-IX of 08.07.2023. ↗

territorial communities are not mentioned within the system of administrative-territorial structure, and accordingly, the procedure for their formation, establishment, alteration of boundaries and renaming is not defined;[3660] (3) the benchmarks (population size and the nature of development (compact or individual residential development) are limited, with only one indicator established — population size; (4) it is not defined what constitutes a change in the administrative-territorial structure, and there are no established grounds, conditions or legal consequences of such changes; (5) the consequences for LSG bodies and their officials in the event of changes to the administrative-territorial structure are not defined; (6) there is no legal regulation of the procedure for changing the administrative-territorial structure of regions.

Legal uncertainty in matters of administrative-territorial structure persists, as national legislation has not yet been harmonised in accordance with the Law of Ukraine 'On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine'.[3661] To address this issue, in February 2026 the specialised Committee of the Verkhovna Rada recommended that the Parliament adopt draft law No. 14318[3662] at first reading. However, on 16 July 2026, the initiator withdrew the draft law in connection with the Government's resignation.

A positive development is the strengthening of the institution of starostas: as of early July 2026, 7,307 starostas (-1 compared with the first quarter of 2026) were serving in 7,737 starosta districts (+1).[3663]

Legislative regulation of certain forms of direct democracy at the local level remains insufficient (in the context of the Concept's objective to develop participatory democracy). For example, (1) consultations on participatory budgeting at the local self-government level are a widespread practice in Ukraine; however, they still lack legislative formalisation and are regulated by individual acts of LSG bodies; (2) there is no legislative framework for local referendums.

The rejection of Draft Law No. 6319[3664] perpetuates existing problems, in particular the complex procedures for establishing bodies of self-organisation of the population and constitutes non-implementation of the Action Plan for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2024–2027.[3665] The draft law was intended to comprehensively update outdated legislation on bodies of

3660 This issue is partially regulated by Article 186 of the Land Code of Ukraine and paragraph 7^1 of Section V 'Final and Transitional Provisions' of the Law of Ukraine 'On Local Self-Government in Ukraine'. Land Code of Ukraine: Law of Ukraine No. 2768-III of 25.10.2001. ↗

3661 On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine: Law of Ukraine No. 3285-IX of 08.07.2023. ↗

3662 On Amendments to Certain Legislative Acts in Connection with the Adoption of the Law of Ukraine 'On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine': Draft Law of Ukraine, registration No. 14318 of 18.12.2025. ↗

3663 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 01.01.2026. Ministry for Development of Communities and Territories of Ukraine. ↗

3664 On Amendments to the Law of Ukraine 'On Bodies of Self-Organisation of the Population' on Improving the Procedure for the Establishment, Operation and Termination of Bodies of Self-Organisation of the Population: Draft Law of Ukraine, registration No. 6319 of 18.11.2021. ↗

3665 Action Plan for the Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine for 2024–2027: Order of the Cabinet of Ministers of Ukraine No. 270 of 26.03.2024, para. 2, Part 7. ↗; The Verkhovna Rada Did Not Support the Update of the Law on Bodies of Self-Organisation of the Population: What Communities Have Lost. Decentralisation, 2026. ↗

self-organisation of the population, which no longer corresponds to the realities of the administrative-territorial reform and the challenges of wartime. Draft Law No. 15165[3666] 'On Amendments to Certain Laws of Ukraine on Improving the Legal Conditions for the Activities of Bodies of Self-Organisation of the Population' is currently under consideration by Parliament. It is a revised version of rejected Draft Law No. 6319 containing technical amendments.[3667]

Since the onset of the full-scale Russian aggression, following the introduction of martial law, all types of elections, referendums, strikes, mass gatherings and assemblies have been prohibited.[3668] There is no prohibition on other forms of direct democracy. Such restrictions partially narrow the scope of democratic functioning at the local level, complicating the implementation of certain institutions of local self-government and the fulfilment of the Concept's objectives.

Recommendations

1. Amend the Constitution of Ukraine with regard to decentralisation after the termination or lifting of martial law.
2. Ensure proper legislative support for the implementation of the Concept's objectives through the adoption of laws of Ukraine, in particular: 'On the Principles of Delineation and Distribution of Powers between Levels of Public Governance', 'On the Principles of Administrative-Territorial Structure', 'On Local Referendum', 'On Administrative Fee', 'On Amendments to Certain Laws of Ukraine on Improving the Legal Conditions for the Activities of Bodies of Self-Organisation of the Population', 'On Amendments to the Law of Ukraine "On Bodies of Self-Organisation of the Population" on Improving the Procedure for the Establishment, Operation and Termination of Bodies of Self-Organisation of the Population', 'On Amendments to Certain Legislative Acts in Connection with the Adoption of the Law of Ukraine "On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine"', etc.
3. Define the delineation and distribution of powers between levels of public governance as a strategic and priority area for the implementation of the Concept.
4. Conduct a review of the criteria for the capacity of territorial communities and update the approaches and methodologies for assessing such capacity.
5. In the post-war period, improve the administrative-territorial structure considering the realities on the ground and regional strategies, based on clear and transparent criteria.
6. Approve an action plan for the implementation of the specific features of the reform of local self-government and the territorial organisation of power under martial law and in preparation for Ukraine's accession to the European Union (pursuant to paragraph 3 of Resolution of the Government No. 1748).

3666 On Amendments to Certain Laws of Ukraine on Improving the Legal Conditions for the Activities of Bodies of Self-Organisation of the Population: Draft Law of Ukraine, registration No. 15165 of 10.04.2026. ↗

3667 Transcript of the meeting of the Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning of 11 May 2026. Committee of the Verkhovna Rada of Ukraine on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning. ↗

3668 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 1 Article 19. ↗

State Regional Development Strategy

The State Regional Development Strategy for 2021–2027 (the Strategy), approved by the Resolution of the Cabinet of Ministers of Ukraine No. 695,[3669] is a strategic planning document within the system of regional policy. The Strategy defines the strategic objectives of state regional policy for the period up to 2027: (1) building a cohesive state in the social, humanitarian, economic, environmental, security and spatial dimensions; (2) increasing the competitiveness of regions; (3) developing effective multi-level governance.

State of play

Several amendments have been introduced to the Strategy:

- on 13 August 2024, the Strategy was revised;[3670]
- on 12 December 2025, the regional development priorities for the period up to 2027 were updated; a division of territories into two types based on security criteria was introduced, with specific priorities defined for each type of territory;[3671]
- on 7 March 2025[3672] and 31 December 2025,[3673] technical amendments were introduced.

On 25 September 2025, the Action Plan for 2025–2027 for the implementation of the Strategy[3674] (the Action Plan) was approved. The implementation of the Action Plan is to be carried out, inter alia, at the expense of local budgets. LSG bodies are recommended to ensure its implementation within their competences. More than 95% of the tasks assigned to LSG bodies are of a recommendatory nature and are implemented subject to their consent.[3675]

The Ministry for Development published on its website monitoring reports on the implementation of the State Regional Development Strategy and on the implementation of its Action Plan in 2025.[3676]

The sources of financing of state regional policy include, inter alia, funds from the State Fund for Regional Development (SFRD).[3677] From the beginning of the full-scale Russian aggression in 2022 up to and including 2024, no funds were allocated from the

3669 State Regional Development Strategy for 2021–2027: Resolution of the Cabinet of Ministers of Ukraine No. 695 of 05.08.2020.

3670 Amendments to the State Regional Development Strategy for 2021–2027: Resolution of the Cabinet of Ministers of Ukraine No. 940 of 13.08.2024.

3671 On Amendments to the State Regional Development Strategy for 2021–2027: Resolution of the Cabinet of Ministers of Ukraine No. 1686 of 12.12.2025.

3672 On Amendments to the State Regional Development Strategy for 2021–2027: Resolution of the Cabinet of Ministers of Ukraine No. 272 of 07.03.2025.

3673 On Amendments to the State Regional Development Strategy for 2021–2027: Resolution of the Cabinet of Ministers of Ukraine No. 1796 of 31.12.2025.

3674 On Approval of the Action Plan for 2025–2027 for the Implementation of the State Regional Development Strategy for 2021–2027: Order of the Cabinet of Ministers of Ukraine No. 1047 of 25.09.2025.

3675 According to calculations based on the information provided in the Action Plan.

3676 Regional Development Monitoring. Ministry for Restoration, Infrastructure and Transport of Ukraine.

3677 On the Principles of State Regional Policy: Law of Ukraine No. 156-VIII of 05.02.2015, para. 1, Part 1 Article 21.

Fund. Consequently, several projects envisaged to be financed from the SFRD remain unfinished.[3678]

The Procedure for the Use of SFRD Funds in 2025[3679] defined the mechanism for the use of funds allocated in the state budget under the budget programme 'State Fund for Regional Development'.

In total, UAH 1 billion allocated in the 2025 State Budget for the SFRD was to be directed towards 48 public investment projects in 16 regions (17 civil protection facilities in public buildings (shelters), 10 healthcare facility projects, 10 general secondary education institution projects, 6 preschool education institution projects, 3 water supply/wastewater projects and 2 administrative building projects). The total volume of the SFRD was distributed based on a territorial approach: 50% for projects in frontline regions, 30% for central regions and 20% for western regions of Ukraine. Accordingly, following the project selection, the largest volumes of funding[3680] were to be allocated to Kharkiv, Kherson, Kyiv and Lviv regions.[3681]

The total number of territorial communities covered by the strategic planning process (1,343) increased by 24 compared to the first quarter of 2024 (1,319).[3682]

To ensure the effective implementation of state regional policy,[3683] Regional Development Agencies (RDAs) may be established. As of the end of 2025, 21 RDAs were operational.[3684]

The 2025 monitoring report on the implementation of the State Regional Development Strategy for 2021–2027 recorded **positive dynamics for three indicators** under Strategic Objective 'III. Building Effective Multi-Level Governance':

- the share of territorial communities with approved strategic planning documents for state regional policy increased from 43% to 74%. The highest values were recorded in Vinnytsia (100%), Poltava (97%), Chernivtsi (94%) and Ivano-Frankivsk (92%) regions;
- the share of RDA funding from local budgets decreased from 45.8% to 32.6% (with the share of funding from other sources correspondingly increasing to 67.4%), indicating diversification of funding sources and increased financial capacity of RDAs.

3678 Monitoring Report on the Implementation of the State Regional Development Strategy in 2024: Ministry for Restoration, Infrastructure and Transport of Ukraine. ↗

3679 Procedure for the Use of State Fund for Regional Development Funds in 2025: Resolution of the Cabinet of Ministers of Ukraine No. 971 of 13.08.2025. ↗

3680 The Selection of Projects to Be Financed from the State Fund for Regional Development Completed. Ministry for Restoration, Infrastructure and Transport of Ukraine. ↗

3681 UAH 1 Billion from the SFRD Allocated to 48 Priority Investment Projects in 16 Regions. Ministry for Restoration, Infrastructure and Transport of Ukraine. ↗

3682 Monitoring of the Development and Approval of Strategic Documents in Territorial Communities. Ministry for Restoration, Infrastructure and Transport of Ukraine. ↗

3683 On the Principles of State Regional Policy: Law of Ukraine No. 156-VIII of 05.02.2015, Part 1 Article 19. ↗

3684 Report on the Results of the Activities of Regional Development Agencies / Ministry for Restoration, Infrastructure and Transport of Ukraine. 2025. p. 3. ↗

At the same time, the number of territorial communities with active territorial community cooperation agreements showed a negative trend: it decreased by 115 to 181. The lowest values were recorded in Kirovohrad, Luhansk, Lviv, Poltava and Khmelnytskyi regions.[3685]

Progress and issues

A positive development was the resumption of SFRD financing in 2025. However, the list of investment projects selected for implementation in 2025 was approved only at the end of October 2025.[3686] Priority was given to projects with a high degree of readiness (completed procurement procedures and signed works contracts), which were expected to be completed by the end of 2025. At the same time, the limited timeframe at the end of the budget year created risks for the timely absorption of funds.

Until the change in the composition of the Government and the system of central executive bodies (CEB) in July 2026, the **Ministry for Development was working on a concept for reforming the SFRD**, which constitutes progress. This is driven by:

- the need to integrate into the SFRD the key principles of EU cohesion policy — programming, partnership, territorial orientation and performance — as well as the need to systematically transition to European rules for investment management. In the medium term, the Fund should be transformed into a fully-fledged instrument for the implementation of state regional policy, capable of ensuring the management and effective allocation of EU structural and investment funds in line with EU standards;[3687]
- the chronic problems of the SFRD, including delayed financing,[3688] underfunding, discretionary allocation of funds and the erosion of a strategic approach through subventions for socio-economic development, which have replaced transparent competitive selection with political arrangements;[3689]
- the reform of public investment management. Amendments to the Budget Code of Ukraine provide for the modernisation of the SFRD from 2026.[3690] The SFRD will finance not individual projects, but medium-term programmes of priority investments of regions and communities, developed based on their development strategies. Financing from the SFRD will cover only a certain percentage of the total cost of such medium-term public investment plans.[3691]

3685 Monitoring Report on the Implementation of the State Regional Development Strategy for 2025 / Ministry for Restoration, Infrastructure and Transport of Ukraine. 7 p. ↗

3686 On Approval of the List of Public Investment Projects to Be Implemented in 2025 at the Expense of the State Fund for Regional Development: Order of the Cabinet of Ministers of Ukraine No. 1145 of 22.10.2025. ↗

3687 The State Fund for Regional Development Will Be Reformed in Line with EU Standards. Ministry for Restoration, Infrastructure and Transport of Ukraine, 2026. ↗

3688 On the Approval of the List of Public Investment Projects That May Be Implemented in 2025 Using Funds from the State Regional Development Fund: Order of the Cabinet of Ministers of Ukraine No. 1145 of 22.10.2025. ↗

3689 Regional Development in Ukraine: From Legislative Theory to Practice: Analysis of Legal Regulation, Planning System and Causes of Reform Stagnation. A. Tkachuk. ↗

3690 On Amendments to the Budget Code of Ukraine Regarding the Updating and Improvement of Certain Provisions: Law of Ukraine No. 4225-IX of 16.01.2025. ↗

3691 The State Fund for Regional Development Will Be Reformed in Line with EU Standards. Ministry for Restoration, Infrastructure and Transport of Ukraine, 2026. ↗

The newly established Ministry for Communities, Territories and Internally Displaced Persons of Ukraine is expected to continue implementing this reform.

Problems in the implementation of investment projects include: (1) consistently low quality of applications, (2) difficulties in project appraisal by members of regional selection committees, (3) isolated cases of influence on the results of competitive selection, (4) lack of consultations with residents when determining the thematic focus of development projects and (5) an insufficient number of projects contributing to local economic development.[3692]

Another problem is the **'planning gap'** (the absence of state programmes linking strategies with projects), which complicates the use of planning documents. At the national level, regional development programmes have not been adopted; as a result, strategies remain declarative, while projects are implemented in an ad hoc manner.[3693]

Progress has been made in that, in November 2025, the Government defined a list of functional types of territories and the requirements for indicators used to classify areas into different functional types:[3694]

- recovery areas;
- areas with specific development conditions (areas with a low level of socio-economic development; areas with natural constraints to development; areas affected by man-made disasters; just transition areas; protected areas; rural areas);
- areas of regional growth poles, including, where applicable, urban agglomerations;
- areas of sustainable development.

Progress in developing effective multi-level governance can be observed in the initial steps towards the **classification of areas by functional type**. In February 2026, the Ministry for Development held the first meeting of the Commission on the assessment and classification of areas by functional type. It was proposed to classify 123 territorial communities as recovery areas.[3695] In March 2026, at a subsequent meeting, 885 communities were classified as areas with specific development conditions (208 communities — areas with a low level of socio-economic development; mountainous areas; 101 — forested areas; 199 — steppe areas; 60 — protected areas; 232 — rural areas).[3696] Targeted support programmes will be developed by the state for each functional type.[3697]

3692 Key Problems in the Use of SFRD Funds: A Regional Perspective. Study 'Analysis of the Effectiveness of State Support for Regional Development Projects'. ↗

3693 Regional Development in Ukraine: From Legislative Theory to Practice: Analysis of Legal Regulation, Planning System and Causes of Reform Stagnation. A. Tkachuk. ↗

3694 On Defining the List of Functional Types of Territories and the Requirements for Indicators for Classifying Territories into Different Functional Types: Resolution of the Cabinet of Ministers of Ukraine No. 1493 of 19.11.2025. ↗

3695 Ukraine Introduces a Territorial Approach: Classification of Communities by Types of Territories Launched. Ministry for Restoration, Infrastructure and Transport of Ukraine, 2026. ↗

3696 The Ministry for Development Continues Work on Classifying Communities by Functional Types of Territories. Ministry for Restoration, Infrastructure and Transport of Ukraine, 2026. ↗

3697 Ukraine Introduces a Territorial Approach: Classification of Communities by Types of Areas Launched. Ministry for Restoration, Infrastructure and Transport of Ukraine, 2026. ↗

The work initiated by the Ministry for Development is expected to be continued by the newly established Ministry for Communities, Territories and Internally Displaced Persons of Ukraine.

Recommendations

1. Reform the SFRD to align the system of regional development financing with EU standards and the public investment management reform.
2. Strengthen training for representatives of LSG bodies in the preparation and management of investment projects.
3. Adopt state programmes for the implementation of the State Regional Development Strategy.

Functioning of Local Self-Government Bodies

'Local self-government in Ukraine is a state-guaranteed right and the real capacity of a territorial community — residents of a village or a voluntary association of residents of several villages into a rural community, a settlement or a city — to resolve issues of local significance independently or under the responsibility of LSG bodies and officials, within the limits of the Constitution and laws.'[3698] The principles of local self-government and its powers are defined by the European Charter of Local Self-Government, enshrined in Chapter XI of the Constitution of Ukraine and regulated by specialised legislation. The Law of Ukraine 'On Local Self-Government in Ukraine' establishes the system and guarantees of local self-government, the principles of its organisation and functioning, as well as the legal status and liability of LSG bodies and officials. Restrictions on the rights of territorial communities to local self-government may be imposed only under martial law or a state of emergency.[3699]

In view of the extension of martial law in Ukraine,[3700] the activities of LSG bodies and officials are carried out in accordance with the provisions of the Law of Ukraine 'On the Legal Regime of Martial Law'.

State of play

As a result of the reform of local self-government and the territorial organisation of power in Ukraine, following the optimisation of the administrative-territorial structure in 2020, local elections were held on a new territorial basis and under new electoral rules:

- elections of members of village, settlement and city councils (territorial communities with up to 10,000 voters) — under the majoritarian system of relative majority;

3698 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, Part 1 Article 2. ↗

3699 Ibid, Article 21.

3700 On Approval of the Decree of the President of Ukraine 'On the Extension of Martial Law in Ukraine': Law of Ukraine No. 4928-IX of 14.07.2026. ↗

- elections of members of regional, district and district-in-city councils, as well as members of city, village and settlement councils (territorial communities with 10,000 or more voters) — under the proportional representation system with open electoral lists of local organisations of political parties;
- elections of village, settlement and city mayors (in cities with up to 75,000 voters) — under the majoritarian electoral system of relative majority;
- elections of mayors of cities with 75,000 or more voters — under the majoritarian electoral system of absolute majority.[3701]

Local elections in October 2020 were not held in the territories occupied by the Russian Federation in 2014–2015 (the AR Crimea, the city of Sevastopol and certain areas of Donetsk and Luhansk regions), and the Donetsk and Luhansk regional councils were not elected. In addition, pursuant to Resolution of the Central Election Commission No. 161,[3702] elections were not held in certain territorial communities for security reasons.

The election of representative bodies in the 2020 local elections based on the new administrative-territorial structure constitutes a clear achievement of the reform of local self-government and the territorial organisation of power and corresponded to one of the key objectives of the Reform Concept — the establishment of an effective territorial system of LSG bodies.[3703]

Overall, elections were held to 1,577 local councils, with a total of 43,122 mandates: 25,852 under the proportional system and 17,270 under the majoritarian system.[3704] Of the 1,421 vacant positions of village, settlement and city heads,[3705] 1,364 were filled.[3706]

The exercise of local authority in territories where democratic elections and the right to local self-government could not be ensured since 2015 was entrusted to civil-military administrations.[3707] Following the introduction of martial law on 24 February 2022, the President established MA on the basis of civil-military administrations, including: in 2022

3701 Electoral Code of Ukraine No. 396-IX of 19.12.2019, Parts 1–4 Article 192.

3702 On the Impossibility of Holding the First Elections of Deputies of Certain Village, Settlement and City Councils of Donetsk and Luhansk Regions and the Relevant Village, Settlement and City Heads on 25 October 2020: Resolution of the Central Election Commission No. 161 of 08.08.2020.

3703 On the Approval of the Concept of Reform of Local Self-Government and Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014.

3704 Report of the Central Election Commission for 2020: Results of the 2020 Local Elections, pp. 18–20.

3705 Ibid.

3706 AIS 'Local Elections': Central Election Commission.

3707 'Temporary state bodies in villages, settlements, cities, districts and regions operating within the Anti-Terrorist Centre under the Security Service of Ukraine [...] or within the Joint Operational Headquarters of the Armed Forces of Ukraine [...] and designated to ensure the operation of the Constitution and laws of Ukraine, ensure security and the normal functioning of the population, public order, participation in countering acts of armed aggression, sabotage and terrorist acts, prevention of a humanitarian catastrophe in the area of repelling the armed aggression of the Russian Federation, including the conduct of an anti-terrorist operation.' On Military-Civil Administrations: Law of Ukraine No. 141-VIII of 03.02.2015, Part 1 Article 1.

— 5 in Luhansk[3708] and 7 in Donetsk regions;[3709] in 2023 — 3 in Luhansk region;[3710] and in 2025[3711] — 4 in Donetsk region.[3712]

Since the start of the full-scale invasion, regional and district MA have been established.[3713] Subsequently, a number of MA were also created in specific settlements (as of 31 July 2026 217 military administrations of settlements (MAS) including the Kyiv City Military Administration, had been established).[3714]

As of February 2026, 388 communities in 10 regions were located in areas of heightened security risk: 165 in areas of possible hostilities, 53 in areas of active hostilities, 26 partially occupied and 144 fully occupied.[3715] These data are dynamic, while the List of Territories in Which Hostilities Are (Were) Conducted or Which Are Temporarily Occupied by the Russian Federation is approved by an Order of the Ministry for Development.[3716]

Following the outbreak of the invasion in February 2022, LSG bodies were engaged in establishing voluntary formations of territorial communities,[3717] organising information security, ensuring the uninterrupted functioning of municipal services, carrying out humanitarian missions and operating under conditions of staff shortages, physical danger, and a significant decline in local budget revenues. At present, LSG bodies continue to support the frontline on a regular basis, both through budgetary resources and volunteer efforts. Other priorities include ensuring the physical safety of residents, supporting internally displaced persons, reallocating budget expenditures, maintaining budget revenues, meeting rear-area needs and providing assistance to the Armed Forces. All of this takes place in the context of population displacement, energy shortages, and, in many communities in the east and centre of the country, extensive infrastructure damage.

3708 On the Establishment of Military Administrations of Settlements in Donetsk Region: Decree of the President of Ukraine No. 406/2022 of 11.06.2022 ↗; On the Establishment of Military Administrations of Settlements in Luhansk Region: Decree of the President of Ukraine No. 665/2022 of 23.09.2022. ↗

3709 On the Establishment of Military Administrations of Settlements in Donetsk Region: Decree of the President of Ukraine No. 188/2022 of 30.03.2022. ↗

3710 On the Establishment of Military Administrations of Settlements in Luhansk Region: Decree of the President of Ukraine No. 181/2023 of 24.03.2023. ↗

3711 In 2025, four military administrations in Donetsk region were established on the basis of military-civil administrations that had been operating since 2021. This transformation occurred with a significant delay and raised concerns among experts regarding the consistency of institutional policy and the timeliness of management decisions under martial law. Features of the Organisation of the Public Administration System in the Territories of Donetsk and Luhansk Regions: Analytical Note, p. 7 ↗; since 2022, these territorial communities have been occupied by the Russian Federation in accordance with the List of Territories Where Hostilities Are (Were) Conducted or Temporarily Occupied by the Russian Federation, approved by Order of the Ministry for Development of Communities and Territories of Ukraine No. 376 of 28.02.2025. ↗

3712 On the Establishment of Military Administrations of Settlements in Donetsk Region: Decree of the President of Ukraine No. 240/2025 of 16.04.2025. ↗

3713 On the Establishment of Military Administrations: Decree of the President of Ukraine No. 68/2022 of 24.02.2022. ↗

3714 According to calculations based on information available in the document search system on the official website of the President of Ukraine. ↗

3715 Military Administrations and Communal Institutions in TOT: the Ministry for Development of Communities and Territories of Ukraine Develops New Solutions for Their Functioning. Ministry for Development of Communities and Territories of Ukraine, 2026. ↗

3716 List of Territories in Which Hostilities Are (Were) Conducted or Which Are Temporarily Occupied by the Russian Federation: Order of the Ministry for Development of Communities and Territories of Ukraine No. 376 of 28.02.2025 (as amended). ↗

3717 On the Foundations of National Resistance: Law of Ukraine No. 1702-IX of 16.07.2021. ↗

Where a military administration of a settlement (or settlements) is established, the Verkhovna Rada, upon submission by the President, may decide that, for the duration of martial law and for 30 days following its termination or lifting, the Head of the military administration of a settlement shall, in addition to the powers assigned to them, exercise the powers of the village, settlement or city council, its executive committee and the respective village, settlement or city head.[3718] At the same time, as of early July 2026, 26 Heads of military administrations of settlements, including the Head of the Kyiv City Military Administration, had not been vested with such powers.[3719]

A specific feature of the functioning of local self-government under martial law is that LSG bodies may be involved by the military command in the implementation of martial law measures. In addition, a village, settlement or city head of a territorial community where no hostilities are taking place and where no decision has been taken to establish a military administration of a settlement is granted additional powers, which are exercised individually, subject to the obligation to promptly inform the Head of the relevant regional military administration.[3720] The powers of LSG bodies under martial law may also be expanded by secondary legislation; for example, they may be assigned tasks relating to: (1) addressing the consequences of hostilities;[3721] (2) providing educational services, accommodation and meals for general secondary education students among internally displaced persons (IDP);[3722] and (3) implementing mobilisation procedures and supporting the functioning of administrative service centres,[3723] among others.[3724]

The current state of functioning of local self-government may be characterised as follows: at the regional and subregional levels, LSG bodies operate in parallel with MA;[3725] at the basic level, the situation varies significantly depending on the course of hostilities, occupation or de-occupation, shelling, and other factors. LSG bodies in territorial communities where active hostilities have not taken place or are not ongoing operate largely under normal conditions.

3718 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 2 Article 10. ↗

3719 On the Exercise by Heads of Military Administrations of Settlements of the Powers Provided for by Part Two of Article 10 of the Law of Ukraine 'On the Legal Regime of Martial Law': Resolution of the Verkhovna Rada of Ukraine. ↗

3720 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Parts 4, 5 Article 9. ↗

3721 On Amendments to the Procedure for Conducting Inspections of Commissioned Construction Objects: Resolution of the Cabinet of Ministers of Ukraine No. 423 of 05.04.2022, Part 2. ↗

3722 On Certain Issues of the Organisation of General Secondary Education and the Educational Process under Martial Law in Ukraine: Order of the Ministry of Education and Science of Ukraine No. 274 of 28.03.2022. ↗

3723 On Issues of Conscription of Citizens for Military Service during Mobilisation for a Special Period: Resolution of the Cabinet of Ministers of Ukraine No. 560 of 16.05.2024, Part 1. ↗

3724 AUC Calls on the Government Not to Burden Community Budgets with Payments for the Free Accommodation of Internally Displaced Persons ↗; Government Decisions Must Be Substantiated ↗; for more details, see subsection 'Division and Delineation of Powers Between the Executive Branch and Local Self-Government Bodies; Between Local Self-Government Bodies of Different Levels'; however, the delegation of powers to local self-government bodies is accompanied by challenges in ensuring adequate resources.

3725 In accordance with points 1 and 3 Part 3 Article 10 of the Law of Ukraine 'On the Legal Regime of Martial Law', in the event of the establishment of a regional and/or district military administration for the period of martial law and for 30 days after its termination or cancellation, in cases of temporary occupation or encirclement of the administrative centre of a region, or where the Verkhovna Rada adopts a relevant decision upon submission by the President of Ukraine, the powers of the respective regional and/or district councils are exercised by the corresponding regional and district MA; the respective district and regional councils do not exercise their powers in cases of temporary occupation or encirclement of the administrative centre of a region or upon the adoption of the relevant decision by the Verkhovna Rada upon submission by the President of Ukraine.

At present, different governance models coexist at the level of territorial communities, namely:

1) where no MAS has been established and LSG bodies exercise their full range of powers;
2) where a MAS has been established and has been assigned certain powers of LSG bodies, while the latter continue to function;
3) where a MAS has been established and its Head exercises the powers of the village, settlement or city head, as well as those of LSG bodies, which temporarily do not exercise their powers (both in territories under the control of Ukraine's public authorities and in temporarily occupied territories);
4) where no MA has been established and LSG bodies do not exercise their powers (temporarily occupied territories).

In response to the urgent need to adapt public administration to the challenges of martial law, the Verkhovna Rada has adopted several important decisions in support of local self-government. Among these, Law No. 2259-IX[3726] is particularly significant, as it, inter alia: (1) regulates the specific features of the exercise of powers by LSG bodies under martial law; (2) defines the grounds for the termination of the powers of local councils; (3) clarifies the powers of MA and their Heads; and (4) simplifies procedures for personnel decisions within LSG bodies. Law No. 2381-IX[3727] permits officials of LSG bodies to engage in secondary employment, receive financial assistance,[3728] and relaxes asset declaration requirements for the duration of martial law.

Progress and issues

The change in the electoral system during the 2020 local elections has emerged as a significant problem, leading to **excessive 'partisation'[3729] of local councils**. This has substantially hindered the development of territorial communities, as it makes LSG bodies dependent on political dynamics, while the interests of communities become secondary for elected representatives. This does not correspond to the public demand for participation, openness and transparency in local governance, nor to the expectation of electing genuine community leaders (504 deputies received fewer than 10 votes, including 68 who received no votes and 17 who received only one vote[3730]).

This 'partisation' of local councils is the result of several factors:

1) A decrease in the number of local council members elected through self-nomination compared to the regular local elections of 2015, when the proportion of self-nominated candidates was significantly higher (15.92% in 2020 compared to

3726 On Amendments to Certain Laws of Ukraine Concerning the Functioning of the Civil Service and Local Self-Government During the Period of Martial Law: Law of Ukraine No. 2259-IX of 12.05.2022. ↗

3727 On Amendments to the Law of Ukraine 'On the Prevention of Corruption' Regarding the Specifics of Applying Anti-Corruption Legislation Under Martial Law: Law of Ukraine No. 2381-IX of 08.07.2022. ↗

3728 Financial assistance provided for by the legislation of a foreign state and paid from the funds of that foreign state or an international organisation.

3729 In this context, 'partisation' refers to the excessive influence of political parties on the formation and activities of representative local self-government bodies.

3730 2020 Elections: The least influential deputies are those who received fewer than 10 votes. CHESNO, 2020. ↗

66.95% in 2015). This is due to the removal of the right to self-nomination under the current proportional electoral system with open lists.[3731]

2) A substantial proportion of local councils were elected under the proportional representation system with open lists: 25,852 list-based council members out of a total of 43,122 mandates.[3732]

3) The recall of local council members, in accordance with the Law of Ukraine 'On the Status of Local Councils Members', is carried out under a procedure in which the political party organisations that nominated them play a decisive role.[3733]

A further issue concerns the role of the district level of local self-government: as a result of decentralisation, this level has been weakened due to the transfer of resources to the basic level. In addition, the minimisation of the powers of district councils has raised questions about the necessity of maintaining the subregional level of local self-government (a decision which is possible only following the relevant amendments to the Constitution of Ukraine).

Another challenge to the proper functioning of LSG bodies is the **shortage of personnel and the growing demand for qualified staff**.[3734] To address this issue, the procedure for filling vacant positions in public authorities under martial law has been simplified[3735] (with the aim of preventing a loss of institutional capacity); however, this measure has not fully resolved the problem.[3736]

The reduction in the number of local council members creates a risk of local councils being unable to adopt decisions. As of 31 July 2026, 9,919 local council members had either had their powers terminated early or had not assumed office, accounting for 23.8% of all mandates obtained in the 2020 local elections, while 37 (2.7%) village, settlement and city heads had either terminated or not assumed their powers.[3737] Under the Electoral Code of Ukraine, the procedure for filling vacant mandates without holding elections may be applied only in cases of early termination of the powers of a list-based council members (the next candidate in the relevant territorial or single electoral list of the party organisation is recognised as elected). However, in the case of early termination of the powers of majoritarian council members, a vacant mandate may be filled only through elections. At the same time, under martial law, elections of the President, as well as elections to the Verkhovna Rada, the Verkhovna Rada of the AR Crimea and LSG bodies, are prohibited.[3738] As a result, in the event of early termination of the powers of council

3731 Local elections on October 25, 2020. ODIHR Limited Election Observation Mission. Final report. ↗ ; The Status of Local Council Members: Realities, Challenges, and Solutions. Agency for Legislative Initiatives. P. 49. ↗

3732 Local elections on October 25, 2020. ODIHR Limited Election Observation Mission. Final report. ↗ ; The Status of Local Council Members: Realities, Challenges, and Solutions. Agency for Legislative Initiatives. P. 49. ↗

3733 On the Status of Local Council Members: Law of Ukraine No. 93-IV of 11.07.2002, Article. 37–48. ↗ ; Local elections on October 25, 2020. ODIHR Limited Election Observation Mission. Final report. ↗

3734 For more detail, see the subsection 'Service in Local Self-Government Bodies'.

3735 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part. 5, 6, 8 Article. 10. ↗

3736 Local Self-Government: How to Retain Staff During Wartime — An Analysis of Draft Law No. 10284 ↗ ; Solovyov, E. (2025). The State of Staffing in Local Self-Government Bodies During Wartime in Ukraine. Successes and Achievements in Science No. 8(18). P. 779. ↗

3737 CEC's 'Local Elections' Information and Analytical System: Results of the 2020 Local Elections. ↗

3738 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part. 1 Article. 19. ↗

members in territorial communities with up to 10,000 voters, there is a potential risk of a reduction in the composition of councils, the absence of a quorum at plenary sessions and meetings of standing committees and, consequently, the inability of councils to function effectively.

The capacity of local councils has also been adversely affected by Resolution of the Cabinet of Ministers of Ukraine No. 69,[3739] which introduced a ban on crossing the state border for all local council members, irrespective of their military status, including women, persons with disabilities and pensioners. This measure has contributed to a trend of early termination of mandates upon personal request (accounting for 10% of all cases of early termination[3740]). The Sixth Administrative Court of Appeal declared this resolution unlawful;[3741] overturned the judgment of the Sixth Administrative Court of Appeal and allowed the cassation appeal of the Cabinet of Ministers of Ukraine.[3742] Acknowledging the issue, the Government, by Resolution No. 1054,[3743] clarified that the restriction on crossing the state border *'does not apply to female local council members, except those who are officials of LSG bodies'*. This amendment has only partially addressed the problem and has created a situation of artificial discrimination: (1) male council members remain subject to the travel restriction, meaning that even those granted deferment are unable to travel abroad; and (2) female council members who are officials of LSG bodies also remain subject to the restriction. On 23 April 2026, the High Council of Justice adopted a public appeal to the Cabinet of Ministers of Ukraine concerning, inter alia, the regulation of state-border crossing by women public servants who are not liable for military service.[3744] By Resolution No. 587,[3745] the Government ultimately lifted the restriction on crossing the state border for women public officials, except those holding key senior positions.

To ensure the decision-making capacity of local councils under martial law, Draft Law No. 14405[3746] was submitted to the Parliament in January 2026. It proposes that, when adopting decisions, local councils calculate votes based not on the basis of the council's total composition, as currently required, but based on the number of council members whose mandates have not been terminated. It also seeks to prevent the termination of mandates of local council members serving in the Armed Forces.

Local self-government bodies have been granted powers to support the security and defence sector. The legal mechanism for providing financial and material support to the state security and defence sector from territorial community budgets is regulated by Law

3739 On Amendments to the Rules for the Crossing of the State Border by Citizens of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 69 of 27.01.2023. ↗

3740 The Status of Local Council Members: Realities, Challenges, and Solutions. Agency for Legislative Initiatives. P. 36. ↗

3741 Ruling of the Sixth Administrative Court of Appeal of 03.11.2025 in Case No. 320/20473/24. ↗

3742 Judgment of the Cassation Administrative Court within the Supreme Court of 03.07.2026 in Case No. 320/20473/24 (proceedings No. K/990/45290/25). ↗

3743 Certain Issues Concerning the Crossing of the State Border by Ukrainian Citizens: Resolution of the Cabinet of Ministers of Ukraine No. 1054 of 28.08.2025. ↗

3744 On the Public Appeal to the Cabinet of Ministers of Ukraine Concerning the Regulation of State-Border Crossing by Women Public Servants Who Are Not Liable for Military Service and Women Judges: Decision of the High Council of Justice No. 761/0/15-26 of 23.04.2026. ↗

3745 Certain Issues of Crossing the State Border by Citizens of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 587 of 06.05.2026. ↗

3746 On Ensuring the Functioning Capacity of Local Councils under Martial Law: Draft Law of Ukraine No. 14405 of 27.01.2026. ↗

No. 3812-IX,[3747] which entered into force on 30 May 2026 and authorised communities to provide lawful support to the Defence Forces of Ukraine from local budgets.

Representatives of LSG bodies in temporarily occupied territories remain primary targets of the occupying forces: there have been numerous cases of abductions of local council members, village, settlement and city heads, and other public officials, as well as killings, enforced disappearances and instances of coercion to collaborate with the occupation authorities through physical violence and torture.[3748]

Measures introduced under martial law have also led to **legal uncertainty regarding the status of council members and the absence of clear grounds for the resumption of the activities of LSG bodies** whose powers have been suspended. The Law of Ukraine 'On the Legal Regime of Martial Law' provides for the suspension of the activities of LSG bodies with the possibility of their subsequent resumption.[3749] Such suspension implies that the council continues to exist, but its powers are temporarily halted. However, the Law does not specify whether the powers of individual council members are likewise restricted, for example in relation to their work within electoral constituencies.[3750] While such temporary limitations are a necessary measure under martial law, they nonetheless constitute a restriction of local self-government rights.

A further concern is the application of different models of public governance and the legal **uncertainty surrounding the grounds for the establishment of MAS at the level of settlements, as well as the suspension of the activities of LSG bodies**. This may give rise to a dangerous trend of ad hoc ('manual') governance, the centralisation of powers, a rollback of decentralisation reforms,[3751] the marginalisation of local council members and the erosion of the right of territorial communities to self-government.

A politically sensitive issue remains the **implications for the status of local council members of court decisions banning 19 political parties** associated with pro-Russian ideology, whose activities were deemed a threat to national security and defence in the context of Russia's full-scale invasion. In the 2020 local elections, 4,188 council members — approximately 10% of all elected representatives — were elected from parties that have

3747 On Amendments to Certain Laws of Ukraine on Expanding the Powers of Local Self-Government Bodies to Support Ukraine's Security and Defence Sector: Law of Ukraine No. 3812-IX of 18.06.2024. ↗

3748 Annual Report of the Ukrainian Parliament Commissioner for Human Rights on the State of Observance and Protection of Human and Civil Rights and Freedoms in Ukraine in 2024, p. 52 ↗; Regarding the Abduction of Representatives of Local Self-Government Bodies: Open Letter of the Board of the All-Ukrainian Association of Local Self-Government Bodies 'Association of Amalgamated Territorial Communities' ↗; The Occupiers Abducted 132 Representatives of Local Self-Government Bodies and Public Authorities of Ukraine. ZMINA, 2023 ↗; Black Register of Cases of Executions, Torture and Ill-Treatment of the Civilian Population in the Temporarily Occupied Territories of Ukraine (24.02.2022–31.08.2023), p. 177. ↗

3749 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 10. ↗

3750 Part 1 Article 10 of the Law of Ukraine 'On the Status of Local Council Members' establishes the key obligations of a local council members within their electoral constituency, including: (1) maintaining contact with voters; (2) informing voters about the work of the local council and its bodies, the implementation of economic and social development plans and programmes, other local programmes, the local budget and council decisions and voters' mandates; (3) participating in public hearings on matters concerning their constituency, in the implementation of council decisions and voters' mandates and in public events organised by LSG bodies within the community or constituency; (4) studying public opinion and the needs of the territorial community, informing the council and its bodies thereof and directly participating in addressing such needs; (5) receiving voters, considering proposals, applications and complaints of members of the territorial community and taking measures to ensure their prompt resolution. ↗

3751 Military Administrations: Creeping Centralisation or a Necessary Instrument during War? CHESNO Movement, 2023. ↗

since been banned.[3752] The prohibition of a party's activities prevents the replacement of a council member elected from that party in the event of early termination of their mandate, which may pose a risk to quorum in certain local councils.

At the same time, a positive development is the adoption by the Verkhovna Rada on 8 October 2025 of Resolution No. 4621-IX,[3753] which provides that the current **LSG bodies (councils and heads) remain fully empowered until the opening of the first session of newly elected councils** following the next elections held after the lifting of martial law. This measure is intended to ensure the continuity of local governance in the context of armed aggression and the direct prohibition of elections under martial law.

At present, the continued functioning of local councils alongside the establishment of MA has led to a **situation of 'dual authority'**. The distribution of powers between MA and district and regional councils is not sufficiently clearly defined by the Law of Ukraine 'On the Legal Regime of Martial Law'. This results in overlapping competences and hinders coordinated action. Judicial practice already contains examples of disputes concerning the delineation of powers between local councils and MA (for instance, between the Chernivtsi Regional Council and the Chernivtsi Regional Military Administration,[3754] as well as between the Chernihiv Regional Council and the Chernihiv Regional Military Administration), in particular with regard to the management of communal property and the appointment of its managers.[3755]

In some cases, conflicts between MA and LSG bodies have entered the public domain (for example, between the Kyiv City Mayor and the Head of the Kyiv City Military Administration[3756]).

Recommendations

1. In revising electoral legislation, consider the experience of the 2020 local elections and introduce measures to reduce the impact of 'partisation' on the formation of representative LSG bodies in future local elections.
2. Define the role of the district level of local self-government and the powers of district councils and address the issue of their resource provision.
3. Take measures to preserve the capacity of local councils by adopting Draft Law No. 14405 and lifting the blanket ban on crossing the state border for all local council members introduced by Resolution of the Government No. 69 of 27 January 2023.
4. Amend the Law of Ukraine 'On the Legal Regime of Martial Law' to clearly delineate and distribute powers between LSG bodies and MA to avoid overlapping competences.

3752 The Impact of the Termination of Political Parties' Activities on the Capacity of Local Governance under Martial Law. OPORA, 2026. ↗

3753 On the Continuity of the Functioning of Representative Bodies of Local Self-Government (Village, Settlement, City, District-in-City, District and Regional Councils, Village, Settlement and City Heads) in Ukraine under Conditions of Armed Aggression of the Russian Federation: Resolution of the Verkhovna Rada of Ukraine No. 4621-IX of 08.10.2025. ↗

3754 Decision of the Chernivtsi District Administrative Court of 09.12.2022 in case No. 600/2428/22-a ↗; Ruling of the Seventh Administrative Court of Appeal of 14.03.2023 in case No. 600/2428/22-a. ↗

3755 Ruling of the Sixth Administrative Court of Appeal of 23.05.2023 in case No. 620/7714/22. ↗

3756 'No Overreach': Head of the Kyiv City Military Administration Tkachenko on His Powers and the Conflict with Klychko. Suspilne, 2025. ↗

Oversight of Legality in the Activities of Local Self-Government Bodies; Transparency and Accountability

In 2015, as a result of the reform, the prosecution service lost its general supervisory function over the legality of decisions of LSG bodies.[3757] While the Constitution of Ukraine provides that decisions of LSG bodies may be suspended on the grounds of their non-compliance with the Constitution and laws of Ukraine, with a simultaneous appeal to a court,[3758] the procedures and subjects authorised to initiate such action were not defined.

Oversight of the legality of decisions of LSG bodies is particularly important in the context of decentralisation: it ensures the lawfulness of actions and maintains a balance between the autonomy of communities and state control mechanisms for compliance with legal requirements.

The Concept of Reforming Local Self-Government and the Territorial Organisation of Power in Ukraine[3759] provided for the introduction of control and supervisory measures intended to ensure the transparency and accountability of local self-government. Among the expected outcomes of the implementation of the Concept was facilitating a change in the status of local state administrations from bodies of general competence to control and supervisory bodies within the system of executive power, with the function of coordinating the activities of territorial bodies of central executive authorities in the respective territory.[3760]

Transparency and accountability of LSG bodies were explicitly established as core principles of local self-government reform in the Concept. This is particularly relevant in the absence of a mechanism for state oversight of decisions adopted by LSG bodies. It should be noted that the European Charter of Local Self-Government provides that such supervision (1) may be exercised only according to procedures and in cases provided for by the constitution or by law, (2) shall ensure compliance only with the law and constitutional principles and (3) shall be exercised in such a way as to ensure that the measures taken by the controlling authority are proportionate to the importance of the interests which it is intended to protect.[3761]

State of play

To regulate the issue of legislative provision for state oversight of the legality of decisions of LSG bodies, all proposals for amendments to the Constitution of Ukraine concerning

3757 On the Public Prosecutor's Office: Law of Ukraine No. 1697-VII of 14.01.2014. ↗

3758 Constitution of Ukraine of 28.06.1996, Article 144. ↗

3759 On Approval of the Concept of Reforming Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

3760 Ibid.

3761 European Charter of Local Self-Government, ratified by the Law of Ukraine No. 452/97-VR of 15.07.1997, Article 8. ↗

decentralisation (in 2015 and 2019) envisaged the establishment of the institution of prefects.[3762]

The proposed amendments to the Constitution of Ukraine offered three different approaches to the organisation of executive power at the regional and subregional levels: (1) executive power is exercised by prefects; (2) executive power is exercised by territorial bodies of central executive authorities, while prefects act as representatives of the state; (3) executive power is exercised jointly by prefects and territorial bodies of central executive authorities. It was proposed to grant the President (upon submission by the Government) the power to appoint and dismiss prefects. At the same time, prefects were to have the status of civil servants. With regard to the accountability and subordination of prefects, the following approaches were envisaged: (1) in the exercise of their powers, prefects are responsible to the President and accountable and subordinate to the Government; (2) in the exercise of their powers, prefects are accountable and subordinate to both the President and the Government. The key powers of prefects were to include oversight of compliance by LSG bodies with the Constitution and laws of Ukraine, coordination of the activities of territorial bodies of central executive authorities and oversight of their compliance with the Constitution and laws of Ukraine. A contentious issue was the proposal to grant prefects the power to suspend decisions of LSG bodies that do not comply with the Constitution of Ukraine and pose a threat to state sovereignty, territorial integrity or national security. At the same time, it was envisaged that acts of prefects themselves could be repealed by the President or the Government.

However, work on the draft amendments to the Constitution of Ukraine concerning decentralisation has currently been suspended, as the Constitution of Ukraine cannot be amended under conditions of martial law or a state of emergency.[3763]

The lack of political consensus on constitutional amendments even prior to the start of Russia's full-scale military aggression and the introduction of martial law led to the search for alternative ways to ensure legislative regulation of state oversight of the legality of decisions of LSG bodies.

Accordingly, in March 2021, the Parliament adopted Draft Law No. 4298[3764] at first reading. The draft law provided for the transformation of local state administrations into 'prefecture-type' bodies, which would coordinate territorial bodies of executive authorities and be vested with powers to exercise proportionate oversight of the legality of decisions of LSG bodies.

However, the nationwide association of LSG bodies, the 'Association of Ukrainian Cities', opposed these changes, expressing concerns about the risk of undermining the achievements of the decentralisation reform.[3765]

3762 On Amendments to the Constitution of Ukraine (Regarding Decentralisation of Power): Draft Law of Ukraine, registration No. 2217a of 01.07.2015. ↗; On Amendments to the Constitution of Ukraine (Regarding Decentralisation of Power): Draft Law of Ukraine, registration No. 2598 of 13.12.2019. ↗; Amendments to the Constitution of Ukraine Concerning Decentralisation of Power. Final Report Following Inclusive Extra-Parliamentary Public Consultations 'Amendments to the Constitution of Ukraine in the Part of Decentralisation through Consensus'. Draft text of amendments to the Constitution of Ukraine concerning decentralisation of power of 29.11.2021. ↗

3763 Constitution of Ukraine of 28.06.1996, Article 157. ↗

3764 On Amendments to the Law of Ukraine 'On Local State Administrations' and Certain Other Legislative Acts of Ukraine Regarding Reform of the Territorial Organisation of Executive Power in Ukraine: Draft Law No. 4298 of 30.10.2020. ↗

3765 Draft Law No. 4298 Ignores the Council of Europe Opinion. Association of Ukrainian Cities. ↗

In turn, the Centre of Expertise for Good Governance of the Council of Europe issued its opinions on the draft law (in November 2020[3766] and February 2024[3767]), emphasising the need to balance supervisory functions so that they do not evolve into political pressure.

In April 2025, a new Draft Law No. 13150[3768] and two alternative draft laws were introduced.[3769] In May 2025, the Parliament adopted Draft Law No. 13150 at first reading. However, during the preparation of the draft law for the second reading, the nationwide association of LSG bodies, the 'Association of Ukrainian Cities', again opposed it, disputing the need for introducing a Unified State Register of Acts of Local Self-Government and for oversight of the legality of all powers — both delegated and own — while stating that Draft Law No. 13150 had been transformed into a dangerous one by the second reading stage.[3770] Consequently, on 4 September 2025, the Verkhovna Rada did not support this draft law. This resulted in the failure to fulfil the relevant indicator of the Ukraine Facility Plan related to the introduction of a system of oversight over the legality of decisions of LSG bodies.[3771]

In September 2025, a new Draft Law No. 14048[3772] was registered. The purpose of this draft law was to *establish an effective system for ensuring the legality of acts of LSG bodies in Ukraine, to create a personnel reserve for the positions of heads of district state administrations and to define requirements for candidates seeking inclusion in this reserve*.[3773] In November 2025, it was adopted in its entirety as the Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies'.[3774]

Progress and issues

The main challenge in the legislative framework for oversight of the legality of decisions of LSG bodies remains the **absence of amendments to the Constitution of Ukraine**

3766 Opinion on the Draft Law 'On Amendments to the Law of Ukraine "On Local State Administrations" and Certain Other Legislative Acts of Ukraine Regarding Reform of the Territorial Organisation of Executive Power in Ukraine' (No. 4298) of 27.11.2020, CEGG/LEX(2020)5. Centre of Expertise for Good Governance, Directorate General of Democracy – II. ↗

3767 Opinion on the Draft Law 'On Amendments to the Law of Ukraine "On Local State Administrations" and Certain Other Legislative Acts of Ukraine Regarding Reform of the Territorial Organisation of Executive Power in Ukraine' (No. 4298), CEGG/LEX(2024)1 of 21.02.2024. Centre of Expertise for Good Governance operating within the Secretariat of the Congress of Local and Regional Authorities of the Council of Europe. ↗

3768 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality in the Activities of Local Self-Government Bodies and Officials: Draft Law of Ukraine, registration No. 13150 of 03.04.2025. ↗

3769 On Amendments to Certain Laws of Ukraine Regarding Ensuring the Legality of Acts of Local Self-Government Bodies and Coordination of the Activities of Territorial Bodies of Central Executive Authorities: Draft Law of Ukraine, registration No. 13150-1 of 14.04.2025. ↗; On Amendments to the Law of Ukraine 'On Local State Administrations' and Certain Other Legislative Acts of Ukraine Regarding Ensuring Legality in the Activities of Local Self-Government Bodies and Officials: Draft Law of Ukraine, registration No. 13150-2 of 22.04.2025. ↗

3770 Draft Law No. 13150 Has Been Turned into a Dangerous One by the Second Reading Stage. Association of Ukrainian Cities, 2025. ↗

3771 Delayed Adoption of the Law Cost Ukraine Half a Billion Euros. CHESNO Movement, 2025. ↗

3772 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies: Draft Law of Ukraine, registration No. 14048 of 18.09.2025. ↗

3773 Ibid.

3774 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies: Law of Ukraine No. 4677-IX of 18.09.2025. ↗

concerning decentralisation, which prevents the establishment of the institution of prefects as a fully-fledged mechanism for legality oversight.

Progress has been made with the **adoption** of the Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies', which forms part of the euro-integration commitments under the Ukraine Facility.[3775] The Law is intended to ensure proportionate legality oversight by defining the subjects responsible for such oversight:

- over regional councils — a central executive authority designated by the Government,
- over district councils — regional state administrations (RSA),
- over the basic level of local self-government, within one year from the entry into force of the Law — RSA and subsequently district state administrations.

The subject responsible for legality oversight has two options for ensuring compliance with the law: (1) prevention of violations of legality (through methodological, informational and advisory assistance to LSG bodies); (2) state oversight of acts (issuing a requirement to eliminate a violation of the law); and applying to a court with a claim to declare an act (or its individual provisions) unlawful (illegal) and to have it repealed (declared invalid). The only exception where the oversight authority may independently suspend a decision of a LSG body is where there is a threat to the territorial integrity of Ukraine.

However, this Law provides that state oversight applies only to acts of LSG bodies adopted in the exercise of powers delegated by the state and only with regard to their compliance with the law.

Thus, **state oversight over acts of LSG bodies adopted in the exercise of their own powers currently remains outside the scope of regulation**. Evidently, the incompleteness of oversight over the legality of decisions of local councils remains an unresolved issue. This may lead to a lack of control over decision-making in the exercise of their own powers.

Another issue with this Law is the **postponement of its entry into force**: the Law enters into force on the day following its publication and is to be put into effect twelve months after the termination or lifting of martial law in Ukraine.[3776]

Thus, a mechanism for state oversight of the legality of decisions of LSG bodies is currently absent, and its legislative framework does not fully meet expectations regarding state oversight in terms of ensuring legality across all decisions of local self-government bodies.

As regards the transparency and accountability of the activities of LSG bodies, despite progress in legislative regulation (adoption of the Laws of Ukraine 'On Amendments to Certain Laws of Ukraine on People's Power at the Level of Local Self-Government',[3777]

3775 Vitalii Bezghin: One Year after the End of Martial Law, the State Will Supervise the Legality of Acts of Local Self-Government Bodies. Golos of Ukraine. ↗

3776 On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies: Law of Ukraine No. 4677-IX of 18.09.2025, Part 1 Section II. ↗

3777 On Amendments to Certain Laws of Ukraine on People's Power at the Level of Local Self-Government: Law of Ukraine No. 3703-IX of 09.05.2024. ↗

'On Public Consultations',[3778] 'On Amendments to the Law of Ukraine "On Local Self-Government in Ukraine" Regarding Ensuring Transparency of Local Self-Government'[3779]), a number of issues remain.

First, **the practice of postponing the entry into force of legislation prevents the practical implementation of the developed mechanisms for ensuring transparency in the activities of public authorities**. For instance, the Law of Ukraine 'On Public Consultations' enters into force twelve months after the termination or lifting of martial law in Ukraine.

Secondly, **improvements in the legislative framework on participatory democracy do not take into account practical implementation under conditions of martial law**. This primarily concerns the Law of Ukraine 'On Amendments to Certain Laws of Ukraine on People's Power at the Level of Local Self-Government': forms of direct democracy that involve mass gatherings are difficult to implement given the importance of complying with security requirements.

Thirdly, **certain provisions lead to duplication of regulation**. For example, the Law of Ukraine 'On Amendments to Certain Laws of Ukraine on People's Power at the Level of Local Self-Government' amended, inter alia, Article 19 of the Law of Ukraine 'On Local Self-Government in Ukraine', including by providing that the Statute of a territorial community should regulate the procedure for the village, settlement or city head, council members and starostas to inform and report to the territorial community. At the same time, Article 54[1] of the Law of Ukraine 'On Local Self-Government in Ukraine' establishes that the procedure for reporting by a starosta is determined by the Regulation on the Starosta.[3780] Thus, the issue of reporting by starostas is now regulated simultaneously by two legal acts.

Fourthly, **certain innovations aimed at addressing wartime challenges may create difficulties in the post-war period**. In particular, the Law of Ukraine 'On Amendments to Certain Laws of Ukraine on People's Power at the Level of Local Self-Government' has effectively given a 'green light' to recognising internally displaced persons as members of territorial communities at their actual place of residence/stay based on an IDP registration certificate. However, this provision may create challenges in determining their voting rights in local elections: (1) an IDP certificate is a document confirming temporary residence, whereas belonging to a territorial community implies permanence of residence; (2) the address data provided when issuing an IDP certificate is not verified and is based on the applicant's statements; (3) a question arises as to in which community's voter list an IDP should be included — at the place of registration or at the actual place of residence; (4) there is currently no mechanism for the automatic change of an IDP's electoral address, which may result in a situation where a person appears simultaneously on two voter lists — at the place of registration and at the address indicated in the IDP certificate; (5) by granting voting rights to IDPs in new communities, the legislator has laid the groundwork for changes in the electoral landscape in many communities where IDPs are present in significant numbers.

3778 On Public Consultations: Law of Ukraine No. 3841-IX of 20.06.2024. ↗

3779 On Amendments to the Law of Ukraine 'On Local Self-Government in Ukraine' Regarding Ensuring Transparency of Local Self-Government: Law of Ukraine No. 3590-IX of 22.02.2024. ↗

3780 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, Part 6 Article 54[1]. ↗

Fifthly, **the absence of adequate sanctioning safeguards calls into question the proper enforcement of the established requirements on transparency and accountability**.[3781]

Ensuring transparency of local self-government[3782] remains inadequate, primarily due to the following factors: insufficient local rule-making, limited technical capacity, the consequences of Russia's full-scale aggression, lack of resources, the dependence of compliance with the Law of Ukraine 'On Amendments to the Law of Ukraine "On Local Self-Government in Ukraine" Regarding Ensuring Transparency of Local Self-Government' on the discretion of implementers, insufficient understanding of the imperative and obligations related to transparency, and weak sanctioning policy.[3783] For example, only around half of starostas report to the local council and the community (although the reporting trend among starostas is positive).[3784]

Recommendations

1. Following the termination or lifting of martial law, amend the Constitution of Ukraine concerning decentralisation in order to establish the institution of prefects in Ukraine as a fully-fledged mechanism for oversight of the legality of decisions of local self-government bodies.
2. Amend the Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies' in order to introduce state oversight, including over acts of LSG bodies adopted in the exercise of their own powers.
3. Amend the Laws of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies' and 'On Public Consultations' to remove the postponement of their entry into force and implementation.
4. Introduce systematic monitoring of the transparency of the activities of local self-government bodies.

3781 In this regard, it should be noted that, according to the findings of the TI Ukraine study 'Openness and Interaction with the Public: How Cities Are Passing the European Transparency Test?' (2025), the following conclusion was drawn: 'viewing openness through the lens of European benchmarks has highlighted the problem of formalistic approaches by local self-government bodies to the publication of information'. ↗

3782 Study on the Practice of Application and Assessment of the Effectiveness of the Implementation of Legislation on Ensuring Transparency of Local Self-Government. ↗

3783 Ibid.

3784 Study 'Accountability and Oversight of Starostas'. ↗

Division and Delineation of Powers Between the Executive Branch and Local Self-Government Bodies; Between Local Self-Government Bodies of Different Levels

One of the key objectives of the Concept of Reform of Local Self-Government and the Territorial Organisation of Power (the Concept) is to achieve an optimal distribution of powers between LSG bodies and executive authorities.[3785] This entails the division and allocation of powers in accordance with the principle of subsidiarity, with a clear delineation of functions, rights and responsibilities across different levels of public governance, without duplication of competences, while ensuring a balance between the interests of the state and local self-government. The aim is to enable the most effective decision-making and to bring public services closer to citizens.

In line with the Concept, such a distribution is intended to ensure the accessibility and quality of public services. The Concept defines the core competences of LSG bodies, which must be supported by adequate human, financial and infrastructure resources.

The Concept also outlines a list of services to be provided at the basic level by structural units of territorial bodies of central executive authorities and broadly defines the competences of LSG bodies at district and regional levels. In addition, it sets out the conditions for an optimal distribution of powers, including participation, a sufficient tax base, the establishment at each administrative-territorial level of representative LSG bodies with their own executive structures and effective state oversight of compliance by LSG bodies with the Constitution and laws of Ukraine.[3786]

State of play

One of Ukraine's commitments in European integration is to complete the process of distribution of powers between LSG bodies and executive authorities at different levels. This is envisaged by Indicator 9.3 of the Ukraine Plan,[3787] as well as the Action Plan for the implementation of the recommendations of the European Commission set out in the 2024 EU Enlargement Package Progress Report on Ukraine;[3788] the Government Priority Action Plan for 2025;[3789] and the Roadmap on Public Administration Reform.[3790]

3785 On Approval of the Concept for Reforming Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

3786 Ibid.

3787 On Approval of the Ukraine Plan: Order of the Cabinet of Ministers of Ukraine No. 244 of 18.03.2024. Steps of the Plan for the Ukraine Facility 2024–2027, p. 18. ↗

3788 On Approval of the Action Plan for the Implementation of the Recommendations of the European Commission Presented in the Report on Ukraine's Progress under the European Union Enlargement Package 2024: Order of the Cabinet of Ministers of Ukraine No. 300 of 28.03.2025. Plan, pp. 1–2. ↗

3789 On Approval of the Government Priority Action Plan for 2025: Order of the Cabinet of Ministers of Ukraine No. 1003 of 10.09.2025. Plan, p. 73. ↗

3790 Roadmap for Public Administration Reform : Order of the Cabinet of Ministers of Ukraine No. 475 of 14.05.2025, p. 12. ↗

As part of the decentralisation process, a range of powers has been devolved to local authorities in line with the principle of subsidiarity.[3791]

Dialogue and efforts to identify optimal solutions for the delineation[3792] and distribution[3793] of powers are ongoing:

- in 2024, the Concept of Distribution and Delineation of Powers was presented;[3794]
- in June 2025, at the initiative of the Ministry for Development, a working group on the delineation of powers between LSG bodies and executive authorities was established;
- on 12 June 2025, a meeting in the 'Strasbourg format' was held in Kyiv, during which the legislative framework for the delineation of powers between executive authorities and LSG bodies was discussed;[3795]
- Resolution of the Government No. 1748 emphasises that the process of delineation of competences between state authorities and LSG bodies, as well as the distribution of powers between local self-government and executive authorities at different levels, remains incomplete.[3796]

Progress and issues

The distribution and delineation of powers among public administration bodies remain only partially regulated by law:

- there is duplication of competences, the assignment of functions to LSG bodies that are not inherent to them, as well as a practice of delegating powers without adequate resource provision;[3797]

3791 Opinion on the 'Concept for Reforming Local Self-Government and the Territorial Organisation of Power in Ukraine', 03.12.2024, CEMG/PAD(2024)6. ↗

3792 Delineation is the process of defining the powers of public governance bodies across different levels and types': Draft Law of Ukraine 'On the Principles of Delineation and Distribution of Powers between Levels of Public Governance' (registration No. 14412 of 30.01.2026). ↗

3793 Distribution is the process of defining powers and specific functions within a single level and type of public governance body': Draft Law of Ukraine 'On the Principles of Delineation and Distribution of Powers between Levels of Public Governance' (registration No. 14412 of 30.01.2026). ↗

3794 Concept of Distribution and Delineation of Powers. ↗

3795 Division of Powers between the State and Local Self-Government Bodies Discussed in Kyiv. Ministry for Development of Communities and Territories of Ukraine, 2025. ↗

3796 Certain Issues of Reforming Local Self-Government and the Territorial Organisation of Power under Martial Law and Preparation for Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025. ↗

3797 AUC Calls on the Government Not to Burden Community Budgets with Payments for the Free Accommodation of IDPs. Association of Ukrainian Cities, 2022. ↗; Division of Powers between State Authorities and Local Authorities as a Step towards Stronger Multilevel Governance in Ukraine. Council of Europe Office in Ukraine, 2024. ↗; Government Decisions Must Be Well-Reasoned. Association of Ukrainian Cities, 2026. ↗

- certain 'sectoral' competences of LSG bodies remain undefined (for example, there is no clear legal regulation of their powers in the management of land,[3798] water[3799] and forest resources[3800]);
- under martial law, an additional need has emerged to delineate powers between MA and LSG bodies (for example, in drafting and approving local budgets, introducing amendments, ensuring budget execution, as well as in the housing and utilities sector).

The role of the subregional level of local self-government remains subject to debate:

- the competences of district councils are currently overly limited;
- district councils face a significant resource deficit;
- district (and regional) councils lack their own executive bodies;
- district councils are effectively excluded from influencing regional policy due to insufficient powers and resources.[3801]

The conditions set out in the Concept **for ensuring an optimal distribution of powers have not been fully met**. Key outstanding issues include:

- the absence of effective state oversight over compliance by LSG bodies with the Constitution and laws of Ukraine;
- instability of tax legislation (for example, an increased tax burden on small businesses and the reallocation of personal income tax from the monetary allowances and other payments of service members, police officers and other security and defence sector personnel from local budgets to the state budget[3802]);
- limited public participation in decision-making processes and oversight of their implementation (these limitations are largely driven by the conditions of martial law, for example, the postponement of the entry into force of the Law of Ukraine 'On Public Consultations').

3798 Competence of Local Self-Government Bodies in the Regulation of Land Relations and the Concept and Essence of Legal Regulation of Land Relations Exercised by Local Self-Government Bodies. ↗

3799 Water bodies are state-owned resources that have not been transferred to territorial communities and are administered by the State Agency of Water Resources of Ukraine, which coordinates activities in the water management sector and ensures the functioning of irrigation systems and protection against the harmful effects of water.

3800 Forest fund lands have not been transferred to territorial communities and are administered by the State Agency of Forest Resources of Ukraine — a central executive body whose activities are directed and coordinated by the Cabinet of Ministers of Ukraine through the Minister of Economy, Environment and Agriculture and which implements state policy in the field of forestry and hunting.

3801 What Is the Reform of the Subregional Level of the Administrative-Territorial System in Ukraine? ↗; Why District Councils Are Unnecessary: Answers for Authorised Representatives. ↗; 'Do They Beg or Earn?': What District Councils in Cherkasy Region Do after Decentralisation. Suspilne, 2024. ↗

3802 On Amendments to Section VI of the Budget Code of Ukraine regarding Ensuring State Defence Capability and the Development of the Defence-Industrial Complex of Ukraine: Law of Ukraine No. 3428-IX of 08.11.2023. ↗

Progress in the distribution and delineation of powers includes the adoption of Resolution of the Government No. 1748.[3803] The adoption of this Resolution introduced the following improvements:

- **the principles of delineation of powers have been proposed** in line with the European Charter of Local Self-Government, European standards and recommendations of the Council of Europe. These include: (1) subsidiarity, (2) avoidance of duplication, (3) recognition of the freedom to exercise powers, limited exclusively by law and (4) ensuring the autonomy of local self-government;
- it has been declared that the **distribution and delineation of powers** should take place between LSG bodies at different levels, between local self-government and the executive authorities and between representative and executive bodies of local self-government;
- a conceptual **approach to resource provision** has been defined;[3804]
- the concept of **organisational framework** for the distribution and delineation of powers has been defined;[3805]
- among the reform objectives, it is also proposed to ensure that LSG bodies have the right to freely resolve any matter not excluded from their competence and not assigned to any other public authority.

Progress is also reflected in the submission, in January 2026, of the **Government Draft Law 'On the Principles of Delineation and Distribution of Powers between Levels of Public Governance' (No. 14412)**[3806] to the Parliament. The draft law defines: (1) the legal framework for the delineation and distribution of powers; (2) the principles of delineation of powers, as well as the levels and bodies of public governance for the purposes of this Law; (3) the classification of powers of public governance bodies; (4) the criteria for distinguishing between own and delegated powers of local self-government, as well as between powers at different levels of local self-government; (5) the conditions for delegating state powers to local self-government; (6) the specificities of the exercise of

3803 Certain Issues of Reforming Local Self-Government and the Territorial Organisation of Power under Martial Law and Preparation for Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025. ↗

3804 (1) Resource provision for the own powers of local self-government should be ensured through revenues from local taxes and fees, by enabling local councils to set respective rates and exemptions, as well as through targeted transfers from the state budget and other sources not prohibited by law.
(2) Resource provision for delegated powers should be ensured through the assignment of a share of national taxes and fees, as well as through transfers from the state budget, the total volume of which corresponds to the scope of delegated powers, including through equalisation formulas. — adapted from Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025 'Certain Issues of Reforming Local Self-Government and the Territorial Organisation of Power under Martial Law and Preparation for Ukraine's Accession to the European Union'. ↗

3805 These principles include: (1) self-government oversight over the targeted use of respective resources; (2) development of forms of inter-municipal cooperation; (3) establishment of own executive bodies of councils at the subregional and regional levels; (4) strengthening the competences of regional councils in the field of regional development; (5) improvement of the mechanism for compensating expenses incurred by LSG bodies as a result of decisions of state authorities; (6) regulation of remuneration mechanisms for local council members for their work in the respective council. — adapted from Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025 'Certain Issues of Reforming Local Self-Government and the Territorial Organisation of Power under Martial Law and Preparation for Ukraine's Accession to the European Union'. ↗

3806 On the Principles of Delineation and Distribution of Powers between Levels of Public Governance: Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗

state and local self-government powers under martial law or a state of emergency; (7) resource provision for the exercise of powers by public governance bodies; (8) the limits of the autonomy of LSG bodies in decision-making; and (9) the liability of LSG bodies for the exercise of their powers.[3807]

Draft Law No. 14412 also raises a number of contentious issues. It envisages that LSG bodies will exercise optional powers[3808] on a contractual basis. However, powers of executive authorities may be conferred on LSG bodies only by law.[3809] The draft law requires further refinement, in particular to: (1) define the conditions and criteria for the delineation and distribution of powers; (2) clarify key terms; (3) improve the criteria for the delineation of powers and the mechanisms for aligning powers with their financial underpinning; (4) further elaborate the mechanisms for the exercise of state and local self-government powers, including under martial law or emergency situations; (5) introduce effective mechanisms for coordination and consultation between different levels of public governance. There is also a need to align the provisions of the draft law with other applicable legislation and to avoid duplication of delegated powers.[3810]

On 7 April 2026, the Verkhovna Rada adopted Draft Law No. 14412 at first reading, and it is currently pending second reading. At the same time, even the adoption of Draft Law No. 14412 will not resolve the issue of regulating the distribution and delineation of powers. The draft law is of a framework nature and merely establishes general 'rules'. Accordingly, even its full adoption will not address the issue in substance. The actual distribution and delineation of powers will evidently take place at a later stage, following the development and adoption of specific law(s) governing the allocation and delineation of powers between levels of public governance.

Recommendations

1. Adopt the Law of Ukraine 'On the Principles of Delineation and Distribution of Powers between Levels of Public Governance', subject to further refinement (in particular, with regard to: (1) general approaches to defining the conditions and criteria for the delineation and distribution of powers; (2) clarification of key terms; (3) improvement of the criteria for delineating powers and of the mechanisms for aligning powers with their financial underpinning; (4) further detailing of the mechanisms for the exercise of state and local self-government powers, including under martial law or emergency situations; (5) introduction of coordination and consultation mechanisms between different levels of public governance; as well as (6) alignment of the provisions of the draft law with other applicable legislation, including the introduction of the necessary corresponding amendments to the laws of Ukraine and refinement of its other provisions).

3807 On the Principles of Delineation and Distribution of Powers between Levels of Public Governance: Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗

3808 Optional powers are powers of executive authorities defined by law that may be transferred to executive bodies of councils at the initiative and in accordance with decisions of village, settlement and city councils, in the manner prescribed by this Law, without altering their state legal nature. This definition is proposed by Draft Law No. 14412.

3809 Constitution of Ukraine, Part 3 Article 143. ↗

3810 On the Principles of Delineation and Distribution of Powers between Levels of Public Governance: Opinion of the Lead Committee on the Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗; Twelve Key Issues to Be Addressed in the Delineation of Powers. Association of Ukrainian Cities, 2026. ↗; On the Principles of Delineation and Distribution of Powers between Levels of Public Governance: Opinion of the Main Committee on the Draft Law of Ukraine, registration No. 14412 of 30.01.2026. ↗

2. Implement the tasks relating to the delineation and distribution of powers and the creation of conditions for adequate resource provision for local self-government, as set out in Resolution of the Government No. 1748.

Ministry for Communities, Territories and Internally Displaced Persons of Ukraine

State of play

Between 2024 and 2026, responsibility for state regional policy, the development of local self-government, the territorial organisation of power and the administrative-territorial structure was transferred between different ministries under different compositions of the Government. Since its establishment in 2005, these ministries had different names and scopes of activities — from overseeing the construction and architectural sector, housing and utilities, regional development and decentralisation reform, to its currently reorganised multi-sector central executive body. In 2022 pursuant to Resolution of the Cabinet of Ministers of Ukraine No. 1343, the Ministry for Development of Communities and Territories was reorganised through its merger with the Ministry of Infrastructure,[3811] forming the Ministry for Development of Communities, Territories and Infrastructure of Ukraine. In September 2024, the Ministry was renamed the Ministry for Development of Communities and Territories of Ukraine (Ministry for Development),[3812] without changes to its mandate or areas of competence.

The activities of ministries are governed by the Law of Ukraine 'On Central Executive Bodies'[3813] and by the regulations governing each ministry, which define its competence within the system of CEBs.

Under the Regulation on the Ministry for Development,[3814] its main tasks included shaping and implementing state policy in the areas of regional policy, development of local self-government, territorial organisation of power and the administrative-territorial structure.[3815] During the Ministry for Development's final year of operation, its priority tasks included: *(1) stimulating regional development, (2) ensuring energy efficiency, (3) restoring territories affected by Russia's armed aggression, (4) developing local self-government and spatial planning and (5) coordinating transport safety and regulating the construction sector through the introduction of new standards and building regulations.*

Other priorities included support for IDPs, evacuation and prisoners of war, regional development, infrastructure and logistics, recovery, energy security, temporarily

3811 Certain Issues of Optimisation of the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1343 of 02.12.2022. ↗

3812 On Renaming the Ministry of Culture and Information Policy of Ukraine and the Ministry for Development of Communities, Territories and Infrastructure of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1028 of 06.09.2024. ↗

3813 On Central Executive Bodies: Law of Ukraine No. 3166-VI of 17.03.2011. ↗

3814 Regulation on the Ministry for Development of Communities and Territories of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 460 of 30.06.2015 (as amended by Resolution No. 1400 of 17.12.2022). ↗

3815 Ibid.

occupied territories, housing compensation, municipal housing, barrier-free policy and digitalisation.[3816]

From September 2024 to July 2026, the Ministry for Development has been headed by Oleksii Kuleba — Deputy Prime Minister for Restoration of Ukraine — Minister for Development of Communities and Territories of Ukraine.[3817] The status of Deputy Prime Minister provides broader powers and supports reforms in local self-government and the territorial organisation of power. At the same time, it may lead to an increased managerial workload and a risk of fragmentation of attention across multiple policy areas. Between 2005 and July 2026, the ministries responsible for regional policy had 14 heads, of whom six served during the term of the Verkhovna Rada of the IX convocation (Aliona Babak, Denys Shmyhal, Oleksii Chernyshov, Vasyl Lozynskyi (acting), Oleksandr Kubrakov, Oleksii Kuleba). The longest-serving head of the Ministry was Hennadii Zubko (five years), during the active phase of decentralisation reform. Two former heads of the Ministry later became Prime Ministers (Volodymyr Groysman, Denys Shmyhal).

The structure of the Ministry corresponded to its areas of activity. One of the 11 Deputy Ministers (Oleksii Riabykin[3818]) had responsibility for the Strategic Planning Unit, the Department for Temporarily Occupied Territories and Humanitarian Issues, the Department of Regional Policy and Reintegration of Territories, the Department for the Implementation of Regional Development Programmes and the Department of Multi-Level Governance.[3819] This part of the Ministry's structure was responsible, inter alia, for regional development, local self-government and the territorial organisation of power.

The authorised staffing level of the Ministry before its reorganisation was 526 positions.[3820] On the day after the change in the composition of the Government, 17 July 2026, Resolution of the Cabinet of Ministers of Ukraine No. 963[3821] established the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, which is expected to concentrate responsibility for the development of communities and territories, while the Ministry for Development is to continue operating under a new name and with a different functional focus — the Ministry for Restoration, Infrastructure and Transport of Ukraine.[3822] The final distribution of powers between the two ministries is still to be determined by separate Government decisions. Under Resolution No. 963, draft regulations on the respective ministries and proposals for amendments to legislation arising from the Resolution were to be prepared and submitted to the Government within two weeks.[3823] As of 31 July 2026, the regulations on the respective ministries had not been approved.

3816 Ministry for Restoration, Infrastructure and Transport of Ukraine. ↗

3817 On the Appointment of O.V. Kuleba as Deputy Prime Minister for Restoration of Ukraine — Minister for Development of Communities and Territories of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 3961-IX of 05.09.2024. ↗

3818 On the Appointment of O.V. Riabykin as Deputy Minister for Development of Communities and Territories of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 939 of 04.10.2024. ↗

3819 Ibid.

3820 Certain Issues of Approval of the Maximum Number of Staff of the Apparatus and Territorial Bodies of Central Executive Bodies and Other State Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 85 of 05.04.2014. ↗

3821 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 963 of 17.07.2026. ↗

3822 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 963 of 17.07.2026. ↗

3823 Certain Issues of Optimising the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 963 of 17.07.2026. ↗

On 16 July 2026, Vitalii Bezghin[3824] was appointed Minister for Communities, Territories and Internally Displaced Persons of Ukraine. He identified six strategic areas for the Ministry's work: (1) cohesive territorial development with a transition to EU cohesion policy, (2) ensuring rights and long-term solutions for internally displaced persons, (3) further developing multi-level governance capable of ensuring high-quality provision of basic services to citizens, (4) creating a high-quality and safe living environment, including in line with barrier-free principles, (5) developing international partnerships to support territorial development and (6) strengthening engagement with Ukrainians abroad and creating incentives for their return to Ukraine.[3825]

Progress and issues

Among the key achievements of the Ministry for Development in multi-level governance in 2025 is the preparation — following regional consultations — of amendments to the Concept of Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine,[3826] which were reflected in Resolution of the Government No. 1748.[3827] As a result, the objectives of the reform have been updated and modernised in light of the challenges primarily associated with the full-scale Russian aggression against Ukraine and the preparation for Ukraine's accession to the European Union.

Further progress includes the updating of the State Regional Development Strategy for 2021–2027 and the approval of the Action Plan for 2025–2027 for its implementation.[3828] The Strategy sets out three strategic objectives: building a cohesive state, enhancing the competitiveness of regions and strengthening effective governance. Its key tasks include stimulating territorial development, reintegration of de-occupied territories and ensuring the provision of high-quality public services in the fields of education, healthcare, culture and social protection. Emphasis is placed on regional economic development. The Plan covers a three-year period and includes 101 measures with clearly defined performance indicators, implementation timelines and sources of funding.[3829]

At present, 22 regional strategies have been updated, while 95% of communities are finalising the development of their own development strategies in line with the national framework.[3830]

3824 On the Formation of the Cabinet of Ministers of Ukraine and the Dismissal of Members of the Resigned Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4942-IX of 16.07.2026. ↗

3825 Vitalii Bezghin Outlines Strategic Priorities for the New Ministry for Communities, Territories and Internally Displaced Persons. Decentralisation, 2026. ↗

3826 On Approval of the Concept of Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

3827 Certain Issues of Reform of Local Self-Government and the Territorial Organisation of Power Under Martial Law and Preparation for Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025. ↗

3828 On Approval of the Action Plan for 2025–2027 for the Implementation of the State Regional Development Strategy for 2021–2027: Order of the Cabinet of Ministers of Ukraine No. 1047 of 25.09.2025. ↗

3829 Action Plan for 2025–2027 for the Implementation of the State Regional Development Strategy for 2021–2027 Approved. Ministry for Development of Communities and Territories of Ukraine, 2025. ↗

3830 Good Multi-Level Governance, Regional Policy, PIM Reform and Development of the DREAM Ecosystem. Ministry for Development of Communities and Territories of Ukraine, 2025. ↗

In 2025, funding of the SFRD was restored, which remains an important instrument of regional policy.[3831]

In January 2026, the procedure for the development, approval, monitoring and evaluation of regional development strategies and their implementation plans was updated (including alignment of regional strategic planning with public investment management and adaptation of strategic planning to different types of territories).[3832]

An important area of the Ministry's work was support for territorial communities in recovery planning. In autumn 2025, procedures for carrying out rapid repairs of critical infrastructure were simplified.[3833]

In December 2025, the Ministry for Development presented an updated model for assessing the capacity of territorial communities based on 24 criteria across the following areas: (1) 'human potential' — total population, including children and demographic trends; (2) 'humanitarian and economic potential' — economic activity, employment, regional construction dynamics, etc.; (3) 'institutional capacity' — access to administrative services, international assistance and cooperation; and (4) 'financial capacity' — revenues, expenditures, level of subsidisation, tax structure and transfers.[3834]

In 2025, the Ministry for Development also developed methodological recommendations to assist LSG bodies in drafting the Statutes of territorial communities.[3835]

In July 2026, the Ministry for Development held the first meeting of the Working Group on developing the draft Concept of Transitional Justice, at which four thematic subgroups were established: compensation for damage and restoration of violated rights, holding perpetrators accountable and preventing impunity, the right to truth and memorialisation and guarantees of non-recurrence.[3836]

Because one of the main **problems in the Ministry for Development's work was its overload with a wide range of areas of responsibility**, attention to the development of multi-level governance was diluted, negatively affecting this area. The establishment of a separate Ministry for Communities, Territories and Internally Displaced Persons of Ukraine is therefore a positive development and may mark a new stage: a shift from the crisis-driven concentration of functions towards strengthening a distinct state policy on communities, territories and multi-level governance.[3837]

3831 Certain Issues of the State Fund for Regional Development: Resolution of the Cabinet of Ministers of Ukraine No. 971 of 13.08.2025. ↗ For details, see the subsection 'State Regional Development Strategy'.

3832 On Amendments to the Resolution of the Cabinet of Ministers of Ukraine of 4 August 2023 No. 816: Resolution of the Cabinet of Ministers of Ukraine No. 81 of 28.01.2026. ↗

3833 The Government Simplified Procedures for Carrying Out Rapid Repairs of Critical Infrastructure. Government Portal, 2025. ↗

3834 Updated Approaches to Assessing the Capacity of Territorial Communities. Presentation by the Ministry for Development of Communities and Territories of Ukraine. ↗

3835 Statute of a Territorial Community: Methodological Recommendations. ↗

3836 The Ministry for Development Begins Preparing the Concept of Transitional Justice: Interagency Working Group Established. Ministry for Development of Communities and Territories of Ukraine, 2026. ↗

3837 Government Establishes the Ministry for Communities, Territories and Internally Displaced Persons. Decentralisation Portal. ↗

At the same time, issue is the **low institutional capacity for policymaking**, caused by frequent changes in leadership and teams, which undermines the stability of the Ministry's work and the consistent implementation of reforms.

A further problem was the **limited transparency of the Ministry's work**: many reports required consolidation, as they are complex and difficult to access and understand. Specifically, this applies to financial and economic indicators. Certain monitoring data are inconsistent (for example, the number of cooperation agreements differs between the Decentralisation Monitoring[3838] and the official register of cooperation agreements[3839]).

Recommendations

1. Approve the Regulation on the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine.
2. Ensure all necessary organisational and legal arrangements for the operation of the newly established Ministry for Communities, Territories and Internally Displaced Persons of Ukraine.

Military Administrations

MA are special temporary state bodies which, in accordance with the Law of Ukraine 'On the Legal Regime of Martial Law',[3840] jointly with military command, introduce and implement measures related to the legal regime of martial law, defence, civil protection, public safety and order, protection of critical infrastructure, as well as the safeguarding of the rights, freedoms and lawful interests of citizens.[3841]

State of play

The establishment of MA is discretionary, and their territorial organisation corresponds to the administrative-territorial structure (region, district, territorial community), forming a hierarchically organised system. MA have a dual purpose — ensuring defence and civil protection measures, as well as public administration. Accordingly, the direction, coordination and oversight of regional MA are exercised both by the Government and the General Staff of the Armed Forces of Ukraine (AFU).[3842]

The status of MA reflects their temporary nature: first, they are established only during martial law; second, they operate no longer than 30 days after the termination or lifting of martial law.[3843]

MA are established by the President upon submission by RSA or military command.

3838 Monitoring of the Decentralisation Process. Decentralisation. ↗

3839 Register of Territorial Community Cooperation Agreements. Diia / Ministry for Development of Communities and Territories of Ukraine. ↗

3840 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Article 4. ↗

3841 Ibid, Part 1 Article 4.

3842 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 7 Article 4. ↗

3843 Ibid, Part 8 Article 4.

The financing of the activities of MA is provided from two sources:

1. Activities related to the exercise of the powers of LSG bodies are financed from the respective local budgets.
2. Activities related to the exercise of other functions are financed from the State Budget of Ukraine.[3844]

The preconditions for the establishment of MA at the subregional and regional levels include:

- the failure to convene a session of the respective district or regional council within the time limits established by the Law of Ukraine 'On Local Self-Government in Ukraine';
- the termination of the powers of regional or district councils in accordance with the law;
- the need to ensure leadership in the areas of defence, public safety and order.

In such cases, heads of district and RSA acquire the status of heads of the respective MAs,[3845] while positions of civil servants may be filled by service members of military formations, as well as by rank-and-file and commanding personnel of law enforcement bodies and the civil protection service.[3846]

With regard to MAS, the Law does not establish specific criteria for their creation.[3847] However, it provides that they are formed from service members of military formations, rank-and-file and commanding personnel of law enforcement bodies and the civil protection service, as well as employees who have concluded employment contracts with regional MA (where established) or with the General Staff of the AFU (where no regional military administration has been established in the respective region).[3848] The Head of an MA is appointed and dismissed by the President upon submission by the General Staff of the AFU or the respective regional state administration. The Head of a MAS may be the respective village, settlement or city mayor.[3849]

3844 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 6 Article 4. ↗

3845 Ibid, Part 4 Article 4.

3846 Ibid, Part 5 Article 4.

3847 The Law establishes only two conditions for the creation of MAs: (1) They are established within the territories of territorial communities in which village, settlement, or city councils and/or their executive bodies, and/or village, settlement, or city mayors do not exercise the powers assigned to them by the Constitution and laws of Ukraine, as well as in other cases provided for by this Law. (2) In the event of established facts of violations by a village, settlement, or city mayor of the respective territorial community in the exercise of powers provided for in Parts 4 and 5 Article 10 of the Constitution or laws of Ukraine, the Head of the regional MA, upon approval by the General Staff of the Armed Forces of Ukraine, submits to the President of Ukraine a proposal on the establishment of a military administration of a settlement (or settlements).

3848 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 3 Article 4. ↗

3849 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 3 Article 4. ↗

On 24 February 2022, by Presidential Decree No. 68/2022,[3850] regional and district MA were established. The same Decree also established the Kyiv City Military Administration. Separate decrees transformed military-civil administrations into MA.[3851]

As of 31 July 2026, 217 military administrations of settlements, including the Kyiv City Military Administration, had been established (+2 compared with the second quarter of 2026).[3852] The largest numbers of MAS were in Kherson (49), Zaporizhzhia (49), Donetsk (46), Kharkiv (27) and Luhansk (26) regions. Significantly fewer were established in Dnipropetrovsk (7), Mykolaiv (4) and Sumy (2) regions. There was one MAS each in Zhytomyr, Kyiv, Odesa, Rivne, Khmelnytskyi and Chernihiv regions.[3853]

MAs exercise the powers of the respective local state administrations and local self-government bodies, subject to the specificities established by the Law of Ukraine 'On the Legal Regime of Martial Law'.[3854] This includes the coordination and direction of the activities of bodies and units within the system of the National Police, the Security Service of Ukraine, territorial recruitment and social support centres, LSG bodies, as well as enterprises, institutions, organisations and healthcare facilities, and the introduction and implementation of measures under the legal regime of martial law.[3855] The Law provides for a broad and exhaustive list of powers of MAs at the regional and subregional levels, as well as of MAS. It further clarifies that MAS exercise delegated powers of executive authorities conferred on LSG bodies by the laws of Ukraine. In addition, the Law stipulates that the Verkhovna Rada has discretionary powers (upon submission by the President) to grant additional powers to the Head of a MAS (for the duration of martial law and for 30 days following its termination or lifting), including:

- the exercise of the powers of the respective local council, its executive committee and the village, settlement or city mayor;
- the authority to approve a temporary structure of the executive bodies of the respective council (for employees whose positions are not included in the temporary staffing tables, downtime is declared or they are transferred to an equivalent or lower position).[3856]

The staff of the council and its executive committee, other executive bodies, as well as municipal enterprises, institutions and organisations of the respective territorial community are subordinated to the Head of the MAS.[3857]

3850 On the Establishment of Military Administrations: Decree of the President of Ukraine No. 68/2022 of 24.02.2022. ↗

3851 No decision was adopted to establish military administrations of settlements on the basis of certain military-civil administrations of Donetsk region (Volnovakha City, Myrne Settlement, Olhynka Settlement, Sartana Settlement) a decision to establish MAS on their basis was adopted only in 2025.

3852 According to calculations based on information available in the document search system on the official website of the President of Ukraine. ↗

3853 Ibid.

3854 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Articles 4, 9, 10. ↗

3855 Ibid.

3856 Ibid, para. 1 Part 2 Article 10.

3857 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Articles 4, 9, 10. ↗

At present, only 26 Heads of MA have not been granted additional powers by Parliament.[3858]

Thus, at the subregional and regional levels, MAs have been established across the board. Regional (where established) and district councils continue to operate in interaction with the respective MAs, which are vested with certain powers of local self-government bodies. At the level of territorial communities, different models of public governance and interaction with LSG bodies coexist.[3859]

Progress and issues

The prompt establishment of regional and district MAs under martial law enabled the rapid reconfiguration of the public governance system, ensuring its continuity and the country's defence capability.

However, a key issue is the **absence of legislatively defined criteria for the establishment of MAS**, particularly in territories remote from the frontline. For example, the expediency of establishing MAS in rear territorial communities such as Varash, Chernihiv, Odesa and Netishyn remains contested. The establishment of certain MAS has been accompanied by political confrontation. Following the court-ordered suspension of the Mayor of Chernihiv, despite a functioning city council and the appointment of the council secretary as acting mayor, the Chernihiv City MA was established in 2023. Similarly, following the revocation of the citizenship of the Mayor of Odesa, and again despite a functioning city council and the appointment of the council secretary as acting mayor, the Odesa City MA was established in 2025. Such developments create risks of centralisation of powers and a narrowing of the right to local self-government.[3860]

In October 2024, the European Commission noted that, in light of the increasing number of MAS, Ukraine should legislatively clarify the criteria for their establishment, emphasising that *'the termination of local self-government should be a measure of last resort, with preference given to alternative security measures where the situation allows, particularly in territories remote from the frontline'*.[3861] To date, these recommendations have not been implemented, thereby perpetuating the problem of unjustified establishment of MAS.

Another issue concerns the **financing of MAS from the respective local budgets:** where they exercise the powers of LSG bodies,[3862] this creates an additional burden on the local budget. Where LSG bodies are fully operational within a given community, the allocation of additional funds to a parallel 'administrative' apparatus appears unjustified. As a result, this leads to an increase in local budget expenditures.

3858 On the Exercise by Heads of Military Administrations of Settlements of the Powers Provided for in Part 2 Article 10 of the Law of Ukraine 'On the Legal Regime of Martial Law': Resolution of the Verkhovna Rada of Ukraine. ↗

3859 At the level of territorial communities, different models of public administration exist, namely: (1) no military administration of a settlement is established, and LSG bodies exercise all their powers; (2) a military administration of a settlement is established, certain powers of LSG bodies are transferred to it, while LSG bodies continue to function; (3) a military administration of a settlement is established, and its Head exercises the powers of the village, settlement or city mayor and of LSG bodies, which temporarily do not exercise their powers (both in territories under the control of the public authorities of Ukraine and in temporarily occupied territories); (4) no military administration is established, and LSG bodies do not exercise their powers (temporarily occupied territory).

3860 Military Administrations as a Threat to Local Self-Government? Deutsche Welle, 2025. ↗

3861 Ukraine 2024 Report. Communication on EU Enlargement Policy, p. 24. ↗

3862 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 6 Article 4. ↗

No criteria have been established for parliamentary decisions on the transfer of powers of LSG bodies to Heads of MAS (or, conversely, for the restoration of LSG bodies where threats to security and public order in a region have been eliminated). First, these are discretionary powers of Parliament; second, such decisions may be adopted upon a corresponding initiative of the President.[3863] This creates a risk of inconsistent application of this mechanism. This creates risks of subjectivity in determining the expediency of such decisions and may, in turn, contribute to a trend towards centralisation of powers. In addition, the procedure for transferring authority from MAs to civilian administrations and LSG bodies in the post-war period is not defined by law.

A further issue is the **legal uncertainty regarding accountability, reporting and oversight of MAS when they are vested with the powers of LSG bodies**. Under the current legislation, Heads of MAS are appointed by the President; however, their accountability and oversight vis-à-vis the territorial community are not legally defined. This situation poses a clear risk to the transparency of MAS activities, particularly in the exercise of LSG bodies.

Another issue concerns the **uncertainty surrounding the status of MAS staff**: the current legislation does not clarify whether these positions fall within the civil service or local self-government service. This gives rise to several issues, including the calculation of length of service and the inability to grant salary supplements based on rank or years of service.[3864] Such legal uncertainty restricts the labour rights of MAS staff.

The regulation of the powers of Heads of MA in personnel matters is also insufficient. There is no clear and exhaustive list of such powers, which are only referred to indirectly. For example, the law does not clearly establish the authority of the Head of an MA to terminate early the powers of, or dismiss, officials of LSG bodies or other staff of the respective local self-government body, including the staff of village, settlement or city councils and their executive committees.[3865] This leads to competence conflicts in the appointment and dismissal of staff.

In addition, **the combination of the office of village, settlement or city mayor with that of Head of a MAS presents a further issue**: in such cases, the Law does not require the early termination of the mayor's mandate, effectively resulting in a breach of the statutory prohibition on holding multiple public offices.[3866]

Legislative initiatives aimed at addressing these challenges include Draft Laws No. 8056,[3867] No. 14063 and its alternatives No. 14063-1 and No. 14063-2,[3868] as well as all

3863 Ibid, Parts 2, 4 Article 10.

3864 On Amendments to Article 4 of the Law of Ukraine 'On the Legal Regime of Martial Law' Regarding the Determination of the Status of Employees of Military Administrations of Settlements: Explanatory Note to the Draft Law of Ukraine, registration No. 14319 of 18.12.2025. ↗

3865 Draft Law No. 14063 on regulation of labour relations and public service under martial law registered. Decentralization, 2025. ↗

3866 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, Part 4 Article 12. ↗ ; On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Part 1 Article 25. ↗

3867 On Amendments to Certain Laws of Ukraine Regarding the Improvement of the Powers of Local Self-Government Bodies and Their Officials During Martial Law: Draft Law of Ukraine, registration No. 8056 of 19.09.2022. ↗

3868 On Amendments to Certain Legislative Acts of Ukraine Regarding Termination of Civil Service, Service in Local Self-Government Bodies, Dismissal of Employees and Other Peculiarities of Labour Relations During Martial Law: Draft Law of Ukraine, registration No. 14063 of 22.09.2025. ↗

currently under consideration by the Verkhovna Rada. Delays in their adoption perpetuate existing challenges in the human resources policy of MAs.

Another issue affecting the functioning of MAs is inadequate professional staffing. Although the establishment of MAs has largely involved the 'reconfiguration' of existing state administration structures at the regional and subregional levels, and staff of LSG bodies have been engaged at the community level, there have in some cases been frequent changes in the Heads of MAs. This undermines institutional memory and the stability of the bodies' operations. For example, since 24 February 2022, there have been seven changes of Heads of the Kyiv Regional MA; five rotations have taken place in the Dnipropetrovsk and Poltava Regional MAs; four changes have occurred in the Luhansk, Sumy, Ternopil and Kherson Regional MAs; and three changes in the Volyn, Donetsk, Zaporizhzhia, Odesa, Rivne and Chernivtsi Regional MAs.[3869]

The main problem in the functioning of MAs is the duplication of powers with LSG bodies. Examples of such duplication include the drafting and approval of local budgets, amendments thereto, ensuring their execution, as well as responsibilities in the housing and utilities sector. The simultaneous operation of two centres of decision-making leads to conflicts of competence and the shifting of responsibility between institutions. Judicial practice contains numerous examples of competence disputes between local councils and MA. These disputes most commonly concern the management of municipal property (for example, litigation between the Chernivtsi Regional Council and the Chernivtsi Regional MA regarding the exercise of powers over municipal assets and the appointment of their managers;[3870] and between the Chernihiv Regional Council and the Chernihiv Regional MA concerning the termination of a municipal enterprise[3871]). Another area of competence disputes relates to budgetary powers (for example, the Varash City MA of Rivne Region filed a claim against the executive committee of the Varash City Council regarding the allocation of funds from the reserve fund of the territorial community budget[3872]). There are also court disputes concerning the subordination of executive bodies of councils and the transfer of powers, including the management of resources (for example, the Varash City Council challenged an order of the Head of the MA concerning the subordination of the education department;[3873] and the Kherson District Council challenged the subordination of its executive apparatus to the Head of the Kherson District MA[3874]).

The situation regarding the organisation of public administration in the capital remains complex. The executive body of the Kyiv City Council is the Kyiv City State Administration (KCSA), which simultaneously performs the functions of state executive authority, constituting a specific feature of the exercise of executive power in the city of Kyiv.[3875] Since 24 February 2022, the KCSA has acquired the status of a military administration[3876] and

3869 Regional Military Administration. Wikipedia. ↗

3870 Decision of the Chernivtsi District Administrative Court of 09.12.2022 in case No. 600/2428/22-a ↗; Ruling of the Seventh Administrative Court of Appeal of 14.03.2023 in case No. 600/2428/22-a. ↗

3871 Ruling of the Sixth Administrative Court of Appeal of 23.05.2023 in case No. 620/7714/22. ↗

3872 Ruling of the Rivne District Administrative Court of 24.11.2025 in case No. 460/15431/25. ↗

3873 Ruling of the Rivne District Administrative Court of 05.09.2024 in case No. 460/10137/24. ↗

3874 Decision of the Odesa District Administrative Court of 03.03.2025 in case No. 420/19894/24. ↗

3875 On the Capital of Ukraine — Hero City Kyiv: Law of Ukraine No. 401-XIV of 15.01.1999, Part 1 Article 10^{1}. ↗

3876 On the Establishment of Military Administrations: Decree of the President of Ukraine No. 68/2022 of 24.02.2022. ↗

currently operates in parallel with LSG bodies. In practice, this gives rise to a competence dispute.[3877] In March 2025, the Kyiv City Council attempted to regain control over the executive body (the KCSA) by adopting a decision stipulating that *'under martial law, the exercise of the powers of the executive body of the Kyiv City Council, as granted under the Law of Ukraine "On Local Self-Government in Ukraine", other legislative acts and decisions of the Kyiv City Council as a local self-government body, shall be carried out through the issuance of orders of the executive body of the Kyiv City Council (the Kyiv City State Administration) signed by the Kyiv City Mayor'*.[3878] In April 2025, the effect of this decision was suspended by a court.[3879]

The ongoing political confrontation between the Kyiv MA, the Kyiv City Mayor and the Kyiv City Council undermines the stability of public administration in the city, the efficiency of public authorities, and the effective implementation of measures under the legal regime of martial law, defence, civil protection, public safety and order, the protection of critical infrastructure and the safeguarding of the rights, freedoms and legitimate interests of citizens. Such dysfunctional interaction has resulted in insufficient progress in equipping protective infrastructure in the city and a slow response to the consequences of destruction, particularly with regard to Kyiv's energy system following large-scale attacks by the aggressor. Ultimately, on 16 July 2026, Tymur Tkachenko was dismissed by Presidential Decree from the position of Head of the Kyiv City Military Administration.[3880] As of 31 July 2026, a new Head of the Kyiv City Military Administration had not been appointed.

Recommendations

1. Amend the Law of Ukraine 'On the Legal Regime of Martial Law' to:
   - establish criteria for the creation of MAs;
   - delineate the powers of MAs and LSG bodies;
   - regulate the status of employees of MA;
   - establish an exhaustive list of grounds for restricting the right to local self-government, limited exclusively to security and defence needs;
   - enhance the transparency and accountability of MAs.
2. Establish, at the legislative level, procedures for the transfer of authority from MA to civilian administrations and LSG bodies in the post-war period.
3. Regulate the organisation of public administration in the city of Kyiv under martial law.

3877 Two Usurpers, One Capital: Why Kyiv Lacks Legitimate Authority. Dzerkalo Tyzhnia, 2025. ↗

3878 On Amendments and Additions to Certain Decisions of the Kyiv City Council: Decision of the Kyiv City Council No. 08/231-222PR of 10.03.2025, Part 2. ↗

3879 The Head of the Kyiv City Military Administration, Tymur Tkachenko, stated that he had challenged in court the decision of the Kyiv City Council to expand the powers of the Head of the Kyiv City State Administration. Suspilne, 2025. ↗

3880 On the Dismissal of T. Tkachenko from the Position of Head of the Kyiv City Military Administration: Decree of the President of Ukraine No. 615/2026 of 16.07.2026. ↗

Local Resources

Local resources include movable and immovable property, local budget funds, other financial resources, land and natural resources owned by territorial communities, as well as assets held in their joint ownership and managed by district and regional councils.[3881]

State of play

One of the objectives of the Concept of Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine[3882] is to create adequate material, financial and organisational conditions, as well as to build the human resource capacity necessary for LSG bodies to exercise their own and delegated powers. The task of ensuring effective management of the material and financial resources of territorial communities[3883] is also reflected in Resolution of the Government No. 1748.[3884]

In 2015, fiscal decentralisation[3885] enabled local self-government to move to direct interbudgetary relations with the state budget. To perform powers delegated by the state, they were provided with corresponding transfers (grants, educational and healthcare subventions, subventions for community infrastructure development, etc.). Amalgamated communities acquired powers and resources comparable to those of cities of regional significance, including the allocation of 60% of personal income tax (PIT) revenues to local budgets for their own competences, as well as revenues from the following taxes: (1) the single tax on the profits of municipally owned enterprises and financial institutions and (2) property tax (real estate, land and transport). Prior to the onset of Russia's full-scale aggression, local budget revenues had increased 4.4 times by 2021. By that time, approximately 23,750 assets held in joint ownership had been transferred to territorial communities from the district level. Territorial communities also received 2,306.44 thousand hectares of agricultural land from state ownership into municipal ownership.[3886]

3881 On State Aid to Undertakings: Law of Ukraine No. 1555-VII of 01.07.2014. ↗

3882 On Approval of the Concept of Reform of Local Self-Government and the Territorial Organisation of Power in Ukraine: Order of the Cabinet of Ministers of Ukraine No. 333 of 01.04.2014. ↗

3883 The following is planned in this area:
› strengthening the financial capacity of LSG bodies to ensure the exercise of their own and delegated powers;
› clearly defining the powers of LSG bodies and providing them with adequate financial resources for their exercise;
› transferring certain powers (functions) to LSG bodies for the administration of local taxes and fees, with the scope of such powers to be determined only after consultations with the relevant local self-government bodies;
› providing for the possibility of cooperation between territorial communities on the administration of local taxes and fees;
› aligning the procedure for crediting personal income tax with European Union practice;
› improving the system of transfers from the state budget to local budgets to ensure their completeness and regularity and to take into account population density and structure;
› ensuring predictability and balance of budgetary and tax policy in the medium term and synchronising medium-term budgeting with strategic planning, taking into account the specific features of functional types of territories, as well as transitioning to medium-term budgeting of local budgets, particularly development budgets;
› effective use of financial instruments for regional development;
› simplifying and improving procedures for attracting credit resources by LSG bodies for investment development, including approval of borrowing and provision of local guarantees, while strengthening internal and external financial control mechanisms to prevent insolvency risks.

3884 Certain Issues of Reforming Local Self-Government and the Territorial Organisation of Power under Martial Law and Preparing for Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025. ↗

3885 With amendments to the Tax and Budget Codes.

3886 Decentralisation in Ukraine: Reform of Local Self-Government and the Territorial Organisation of Power. Achievements and Tasks for 2021–2024. Ministry for Development of Communities and Territories of Ukraine. ↗

The share of own-source revenues of local budgets (general fund excluding transfers) in GDP increased from 5.1% to 7.7% over the period 2015–2022 but has shown a declining trend since 2023 (5.8% in 2025). The share of local budget expenditures in GDP decreased from 14.1% in 2015 to 8.7% in 2025.[3887]

The share of local budget revenues (excluding transfers) in the consolidated budget of Ukraine increased from 18.5% to 24.4% over the period 2015–2022, but has declined since 2023 (14.6% in 2025).[3888] The share of local budget expenditures in the consolidated budget decreased from 41.2% in 2015 to 12.9% in 2025.[3889]

In 2025, revenues to the general fund of local budgets (excluding interbudgetary transfers) amounted to UAH 514,041.3 million (+14.0% year-on-year), although no revenue growth was recorded in the consolidated budgets of Donetsk (-27.3%) and Luhansk (-8.2%) regions. The composition of revenues was as follows:

- personal income tax — UAH 300,330.6 million (+16.6%);
- single tax — UAH 76,371.9 million (+10.6%);
- land fee — UAH 45,345.7 million (+15.3%);
- immovable property tax — UAH 12,736.5 million (+19.3%);
- excise tax — UAH 37,058.5 million (+33.1%);
- corporate profit tax from private sector enterprises — UAH 20,404.1 million (–24.8%).

The execution of the approved annual revenue targets for the general fund in 2025 reached 101.8%, including:

- personal income tax — 103.2%;
- single tax — 101.5%;
- land fee — 91.0%;
- immovable property tax — 104.7%;
- excise tax — 108.0%;
- corporate profit tax from private sector enterprises — 92.0%.[3890]

The share of transfers from the state budget in local budget revenues decreased from 59.1% in 2015 to 26.1% in 2025.[3891]

In January–May 2026, general-fund local budget revenue per capita increased by 16%, from UAH 6,023.2 in the same period of 2025 to UAH 6,989.8. The lowest indices

3887 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 01.07.2026. Ministry for Development of Communities and Territories of Ukraine, 2026. ↗

3888 Ibid.

3889 Ibid.

3890 Briefing note on the execution of general fund revenues of local budgets for 2025, excluding territories outside Ukraine's control before 24.02.2022 (operational data). ↗

3891 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 01.01.2026: Ministry for Development of Communities and Territories of Ukraine. ↗

were recorded in Donetsk (83.2%) and Zaporizhzhia (103.1%) regions, the city of Kyiv (110.2%), Luhansk (110.2%), Dnipropetrovsk (111.1%), Odesa (114.1%) and Kherson (118.5%) regions.[3892]

In January–May 2026, own-source revenues accounted for an average of 69.9% of total local budget revenues. The lowest shares were recorded in Luhansk (10.3%), Donetsk (27%) and Kherson (33%) regions.[3893]

In 2025, the Government ensured the interbudgetary transfers to local budgets in the amount of UAH 203,507.9 million (96.1% of the planned and allocated appropriations), including 100.0% for: (1) the basic grant; (2) the additional grant for the exercise of powers by LSG bodies in de-occupied, temporarily occupied and other territories of Ukraine affected by the full-scale Russian armed aggression; and (3) the educational subvention. In 2025, a reverse grant amounting to UAH 15,195.4 million (100.0% of the planned amount for the period) was transferred to the state budget. In addition, UAH 7,604.2 million of unused subvention balances were returned to the state budget.[3894]

In January–May 2026, local budget expenditure per capita increased by 19.5%, from UAH 8,269.1 in the same period of 2025 to UAH 9,883.8. The highest indices were recorded in Vinnytsia (129.8%), Rivne (128%) and Khmelnytskyi (127.9%) regions.[3895]

In January–May 2026, expenditure on maintaining LSG bodies amounted to UAH 28,652 million, or 9.1% of general-fund expenditure. The share of expenditure on maintaining LSG bodies was highest in Donetsk (14.8%), Kherson (14.7%) and Luhansk (13.7%) regions.[3896]

Among local budget expenditures by function (general and special funds), expenditure on education recorded the largest increase in January–May 2026, rising from UAH 117.2 billion in 2025 to UAH 148.1 billion in 2026.[3897]

The full-scale Russian military aggression has had a negative impact on the resource base of territorial communities:

- loss of territory (approximately 19% of Ukraine's territory within its 1991 borders is temporarily occupied; around 139,000 sq. km of Ukrainian territory is considered mined or contaminated with explosive ordnance[3898]);
- large-scale destruction of infrastructure, municipal assets, the energy system and production capacities (USD 195 billion in direct losses to infrastructure and buildings as of the end of 2025, including housing — USD 61.1 billion, transport infrastructure

3892 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 01.01.2026: Ministry for Development of Communities and Territories of Ukraine. ↗

3893 Ibid.

3894 Briefing note on the execution of general fund revenues of local budgets for 2025, excluding territories outside Ukraine's control before 24.02.2022 (operational data). ↗

3895 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 1 July 2026. Presentation / Ministry for Development of Communities and Territories of Ukraine. 2026. ↗

3896 Ibid.

3897 Ibid.

3898 According to DeepStateMap analysts, as of April 2026 approximately 116,700 sq. km of Ukraine's territory (around 19.3%) was under temporary occupation. Vash Visnyk, 2026. ↗

— USD 40.3 billion, energy — USD 24.8 billion, industry and trade — USD 19.2 billion[3899]);

- reallocation of local budget expenditures to address priority needs, including defence measures, restoration of damaged municipal property, support for the military, protection of the rights of internally displaced persons, support for veterans and assistance to those affected by Russian military aggression;
- a decline in economic activity which, combined with increased fiscal centralisation and instability of tax legislation, has reduced local budget revenues;
- shortages of human resources.

Legislative changes are also significant for the state of local resources. Amendments to the Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine on Land Use Planning'[3900] postponed the approval of comprehensive spatial development plans of territorial communities until 1 January 2028.[3901] For frontline communities, these deadlines are deferred for three years following the end of martial law. The postponement of the requirement to approve comprehensive spatial development plans allows local councils to prepare them in a more thorough and high-quality manner.

As of 31 July 2026, 1,178 communities (88%) had connected to the electronic accounts of the Urban Planning Cadastre at the State Level and were actively using the system. Information on the development of 1,213 new urban-planning documentation projects had begun to be entered, including:

- 88 comprehensive spatial development plans for community territories,
- 11 general plans of settlements,
- 1,013 detailed plans of territories.

Of these projects, 49 planning documents had been approved and entered into force.[3902]

Law No. 4360-IX, adopted in April 2025, abolished the right of tenants of state or municipal property to purchase such property without competition.[3903] Privatisation is now conducted through auctions, which is expected to enhance transparency, ensure justified and appropriate privatisation revenues and reduce corruption risks.

Since August 2025, **usufruct of municipal property**[3904] has been introduced as a new real right, allowing the use of another's property and the receipt of income (fruits) from

3899 Ukraine Fifth Rapid Damage and Needs Assessment RDNA5 February 2022 – December 2025, p. 19. ↗

3900 On Amendments to Certain Legislative Acts of Ukraine on Land Use Planning: Law of Ukraine No. 711-IX of 17.06.2020. ↗

3901 On Amendments to Certain Legislative Acts of Ukraine on the Use of Land Plots for the Development of Digital Infrastructure: Law of Ukraine No. 4321-IX of 25.03.2025. ↗

3902 The Urban Planning Cadastre has introduced a functionality for uploading spatial planning schemes of oblasts. Geoportal of the Urban Planning Cadastre at the State Level, 2026. ↗

3903 On Amendments to Certain Laws of Ukraine on the Specifics of Privatisation of State and Municipal Property Leased Out: Law of Ukraine No. 4360-IX of 16.04.2025. ↗

3904 On the Specifics of Regulation of the Activities of Legal Entities of Certain Organisational and Legal Forms during the Transitional Period and Associations of Legal Entities: Law of Ukraine No. 4196-IX of 09.01.2025. ↗

it without acquiring ownership. For communities, this creates opportunities to monetise assets without additional investment.

Progress and issues

The share of communities with a high level of capacity increased from 31% (412 communities) in 2021 to 34% (452 communities) in 2025. The middle segment (optimal + satisfactory capacity) showed a downward trend, from approximately 40% to approximately 38% (538 communities in 2021, 506 in 2023, 526 in 2024 and 511 in 2025). At the same time, the share of problematic communities (low + critical capacity) remained consistently high at around 27–28% (381 communities in 2021, 330 in 2023, 349 in 2024 and 368 in 2025).[3905]

A notable development in 2026 has been the **retention of 64% of PIT revenues in local budgets**,[3906] as PIT remains the primary source of local budget revenues. In 2025, the share of PIT in the structure of local budget revenues amounted to 57.2% nationwide, 56.2% within community budgets and 74.6% within regional budgets.[3907] This ensures budget stability and predictability, as well as enabling a return to a more strategic approach to planning.

However, fiscal risks for local budgets persist:

1. At present, LSG bodies lack a legislative basis for tax administration. Granting them such powers would enhance control over local budget revenues, strengthen efforts to address tax non-compliance and ultimately increase revenue capacity, reducing dependence on state funding. Draft Law No. 11067,[3908] aimed at strengthening the financial capacity of communities through changes to the property tax administration system, would reduce state expenditure on administering this tax, which amounts to at least UAH 500–700 million annually.[3909]
2. The debate on the place of PIT payment remains unresolved: whether it should be paid at the taxpayer's place of registration (Draft Laws No. 4369[3910] and No. 4115[3911]) or at the location of the employer's subdivisions (Draft Laws

3905 Dynamics of the Financial Capacity of Territorial Communities in 2021–2025: Trends, Structural Changes and Areas of State Policy. Decentralisation, 2025. ↗

3906 On the State Budget of Ukraine for 2026: Law of Ukraine No. 4695-IX of 03.12.2025, p. 52 ↗; Under the 2026 Budget, Local Budgets Will Receive 64% of Personal Income Tax to Prepare for the Heating Season. Ukrinform, 2025. ↗

3907 Monitoring of the Reform of Local Self-Government and Territorial Organisation of Power as of 01.01.2026. Presentation / Ministry for Development of Communities and Territories of Ukraine, 2026. ↗

3908 On Amendments to the Tax Code of Ukraine and Other Legislative Acts to Improve Property Tax Administration: Draft Law of Ukraine, registration No. 11067 of 08.03.2024. ↗

3909 On Amendments to the Tax Code of Ukraine and Other Legislative Acts to Improve Property Tax Administration: Explanatory Note to Draft Law of Ukraine, registration No. 11067 of 08.03.2024. ↗

3910 On Amendments to the Tax Code of Ukraine Regarding the Procedure for Crediting Personal Income Tax in Connection with the Completion of the Decentralisation Reform: Draft Law of Ukraine, registration No. 4369 of 12.11.2020. ↗

3911 On Amendments to the Tax Code of Ukraine to Stimulate Community Development: Draft Law of Ukraine, registration No. 4115 of 17.09.2020. ↗

No. 4238,[3912] No. 4239[3913] and No. 4062[3914]). The current model (payment at the place of employer registration) creates unequal conditions for communities, as the place of registration and the location of operational units (production facilities) often do not coincide. As a result, PIT is not received by the community where the taxpayer is based, even though that community incurs related costs (for example, for transport infrastructure) without corresponding revenue.

3. The withdrawal of the so-called 'military PIT' (the redirection of personal income tax from the salaries of security sector personnel from local budgets to the state budget[3915]). This issue remains unresolved and results in significant revenue losses for communities (approximately UAH 90 billion in potential income[3916]).

4. Unpredictability and underperformance of planned revenues (including due to increasing arrears of municipal enterprises), which are consequences of Russian aggression and the imposition of martial law.

A key challenge remains the **dependence of local budgets on external sources of revenue**, including: (1) state transfers; (2) international assistance;[3917] (3) international reconstruction programmes; and (4) public investment instruments.

Some progress has been made in the area of investment. **Within the framework of the Public Investment Management (PIM) reform, communities have been actively involved**: as of January 2026, 840 medium-term priority investment plans of communities and 23 plans of regional MA had been entered into the DREAM system. A total of 672 communities and 22 regional MA have already moved to the stage of expert assessment and the development of their own Unified Project Portfolios.[3918] This creates conditions for the systematic attraction of investment and more stable revenue streams for local budgets.

The formula for horizontal equalisation of the tax capacity of local budgets entrenches existing inter-municipal financial disparities. Its calculation base (demographic data) is outdated and, under conditions of martial law, highly volatile. In addition, the equalisation formula does not account for the expenditure needs of territorial communities.[3919] The

3912 On Amendments to the Tax Code of Ukraine to Ensure the Payment of Personal Income Tax to the Relevant Local Budgets at the Actual Location of a Separate Subdivision of a Legal Entity: Draft Law of Ukraine, registration No. 4238 of 20.10.2020. ↗

3913 On Amendments to Certain Legislative Acts of Ukraine to Facilitate the Payment of Personal Income Tax to the Relevant Local Budgets at the Actual Location of a Separate Subdivision of a Legal Entity: Draft Law of Ukraine, registration No. 4239 of 20.10.2020. ↗

3914 On Amendments to Articles 14 and 168 of the Tax Code of Ukraine Regarding the Crediting of Personal Income Tax at the Location of Production Subdivisions: Draft Law of Ukraine, registration No. 4062 of 07.09.2020. ↗

3915 On Amendments to Section VI of the Budget Code of Ukraine to Ensure Support for the State's Defence Capability and the Development of Ukraine's Defence Industry: Law of Ukraine No. 3428-IX of 18.11.2023. ↗

3916 The Association of Ukrainian Cities Has Formulated Key Proposals to the 2025 Budget Draft Laws Regarding Local Budgets. Drohobych City Council, 2024. ↗

3917 In 2025, due to the suspension of USAID programmes (DOBRE, HOVERLA and SOERA), several projects were not implemented.

3918 Public Investment Reform in 2025: New Standards of Efficiency and Transparency. Government Portal, 2026. ↗

3919 What Is Wrong with the System of Horizontal Budget Equalisation and How Can It Be Changed? CHESNO. ↗

reverse grant mechanism,[3920] which withdraws funds where tax capacity exceeds 50% (index > 1.1), reduces development resources for more capable communities and does not incentivise revenue growth. At present, there are no legislative initiatives aimed at addressing this issue.

A positive development has been the increase in revenues from land management, the largest own-source asset of communities: over the first 11 months of 2025, local budgets received UAH 41.1 billion in land-related payments, representing a 15.3% increase compared to the previous year.[3921]

Territorial communities incur losses due to the inability to use forest land, as such land has not been transferred to them and remains under the management of the State Agency of Forest Resources of Ukraine.[3922] The total area of forest land in Ukraine is 10.4 million hectares, of which 9.6 million hectares are covered by forest vegetation, with the country's forest cover standing at 15.9%.[3923] In 2025, enterprises in the sector generated UAH 6.94 billion in net profit. The State Enterprise 'Forests of Ukraine' accounted for 99.5% of the total net profit of the sector.[3924] Of the total revenues, UAH 11.781 billion (82%) was transferred to the state budget and UAH 2.597 billion (18%) to local budgets.[3925]

Weak management of municipal property remains a significant issue, manifested in the following aspects: (1) incomplete inventories of municipal assets, which hinder effective management and create opportunities for abuse; (2) insufficient disclosure by LSG bodies on their official websites, in open data formats, of information on municipal assets of territorial communities as well as assets held in joint ownership and managed by district and regional councils;[3926] (3) inefficient management of municipal enterprises, their loss-making performance and lack of transparency. **The mandatory corporatisation and transformation of municipal enterprises** into joint-stock companies and limited liability companies[3927] may result in the loss of a revenue source for territorial community budgets, which, prior to the full-scale invasion, amounted to over UAH 1.3 billion.[3928]

3920 Reverse grant is funds withdrawn from local budgets (territorial communities) to the State Budget of Ukraine for the purpose of horizontal equalisation of the tax capacity of territories. It represents the reverse of a grant: wealthier communities transfer part of their revenues to help balance less affluent regions, forming part of the fiscal equalisation mechanism.

3921 Land fee revenues increased by 15%: local budgets received UAH 41.4 billion. State Tax Service of Ukraine, 2025. ↗

3922 CEB implementing state policy in the field of forestry and hunting, whose activities are directed and coordinated by the Cabinet of Ministers of Ukraine through the Minister of Economy, Environment and Agriculture.

3923 Public Report of the Head of the State Forest Resources Agency of Ukraine for 2025, p. 3. ↗

3924 Ibid, p. 62.

3925 Ibid, p. 63.

3926 The study 'Practice of Application and Assessment of the Effectiveness of the Implementation of Legislation on Ensuring Transparency of Local Self-Government (Law of Ukraine 'On Amendments to the Law of Ukraine "On Local Self-Government in Ukraine" on Ensuring Transparency of Local Self-Government' No. 3590-IX of 22.02.2024) indicates that only 22.3% of citizens and 38.6% of representatives of local self-government bodies reported that information in the form of open data on objects of property rights (joint ownership of territorial communities) is published on the websites of village, settlement and city councils. The figures are somewhat higher for regional and district councils (51.3%). The regularity of publication of such information on official websites of local self-government bodies was assessed differently: 28.7% of citizens versus 56.7% of local self-government representatives consider such data to be updated regularly. At the subregional/regional level, the indicators are higher — 88.9%. ↗

3927 On the Specifics of Regulating the Activities of Legal Entities of Certain Organisational and Legal Forms During the Transitional Period and Associations of Legal Entities: Law of Ukraine No. 4196-IX of 09.01.2025. ↗

3928 Threat of Loss of Revenue Sources for Communities. Association of Ukrainian Cities. ↗

Recommendations

1. Ensure fiscal stability for local councils: establish a legislative framework enabling LSG bodies to administer local taxes; determine the place of tax payment.
2. Improve the formula for horizontal equalisation of the tax capacity of local budgets.
3. Transfer forest land to territorial communities.
4. LSG bodies conduct continuous inventories of municipal property and ensure transparency of related information.

Service in Local Self-Government Bodies

Service in LSG bodies is the professional, permanent activity of citizens of Ukraine who hold positions in LSG bodies, aimed at enabling a territorial community to exercise its right to local self-government and certain powers of executive authorities delegated by law.[3929]

State of play

At present, service in LSG bodies is governed by a specific Law of Ukraine of 2001 (the Law).[3930] However, in 2023, a new version of the Law of Ukraine 'On Service in Local Self-Government Bodies'[3931] was adopted, which enters into force six months after its publication, but not earlier than six months after the termination or lifting of martial law in Ukraine.[3932] Accordingly, the 2001 Law will cease to be in force. The Council of Europe's Centre of Expertise for Good Governance considers that the *draft law lays the foundations for service in LSG bodies and aligns with European principles*.[3933] In connection with its adoption, the National Agency of Ukraine on Civil Service (NACS)[3934] has developed several recommendations for its implementation (in particular, regarding patronage service,[3935] taking the oath,[3936] performance appraisal of service activities[3937] and internal service regulations of LSG bodies).[3938]

3929 On Service in Local Self-Government Bodies: Law of Ukraine No. 2493-III of 07.06.2001.

3930 Ibid.

3931 On Service in Local Self-Government Bodies: Law of Ukraine No. 3077-IX of 02.05.2023.

3932 Ibid, para. 1 of the Final and Transitional Provisions.

3933 Opinion on the Draft Law of Ukraine 'On Service in Local Self-Government Bodies' (No. 6504), Strasbourg, 05.08.2022, CEGG/LEX(2022)1, p. 19.

3934 NACS — National Agency of Ukraine on Civil Service. The NACS provides advisory and methodological support for service in local self-government bodies.

3935 Methodological Recommendations on the Formation of Patronage Service and the Specifics of Patronage Service in Local Self-Government Bodies: Order of the National Agency of Ukraine on Civil Service No. 106-25 of 07.08.2025.

3936 Methodological Recommendations on the Procedure for Taking the Oath by Elected Officials and Local Self-Government Servants of a Territorial Community by Persons Entering Service in a Local Self-Government Body for the First Time or Appointed to a Position in a Local Self-Government Body Representing Another Territorial Community (Territorial Communities): Order of the National Agency of Ukraine on Civil Service No. 90-25 of 07.07.2025.

3937 Methodological Recommendations on the Evaluation of the Results of Official Performance of Local Self-Government Servants: Order of the National Agency of Ukraine on Civil Service No. 80-25 of 24.06.2025.

3938 Methodological Recommendations on the Development and Approval of Internal Service Regulations of a Local Self-Government Body: Order of the National Agency of Ukraine on Civil Service No. 143-25 of 24.10.2025.

Following the full-scale Russian invasion of Ukraine, public administration has undergone a transformation, including service in LSG bodies. LSG bodies have been reoriented towards ensuring the resilience of territorial communities (including the provision of civil protection for the population; humanitarian missions, work with IDPs and ensuring the functioning of critical infrastructure in extraordinary situations), as well as cooperation with military authorities.

With the establishment of MAS, a hybrid model of governance has emerged at the local level. As a result, some officials of LSG bodies have become employees of MAS, while some city, settlement or village heads have assumed the positions of Heads of MAS. In addition, the number of officials in LSG bodies has decreased due to mobilisation and population displacement (with staff shortages particularly acute in frontline communities). Officials often operate under conditions of heightened risk, energy shortages, frequently in remote working arrangements and perform the functions of crisis managers.

Changes have also occurred in the organisation of service in local self-government bodies: the procedure for entry into public service has been simplified (without competitive selection procedures, without submission of asset declarations[3939] and without a document confirming proficiency in the state language[3940]).[3941] Where the powers of a village, settlement or city council, its executive committee and the respective head are transferred to the Head of a MAS, the apparatus, executive committee and other executive bodies of the respective council become subordinated to that Head. The Head of a MAS is authorised to approve the temporary structure of the executive bodies of the relevant council.[3942]

Village, settlement and city heads of territorial communities where hostilities are not taking place and where no decision has been taken to establish a MAS have been granted additional powers. The exercise of some of these powers must be reported to the Head of the regional military administration: (1) clearance of municipally owned land plots from unlawfully installed temporary structures; (2) inspection of buildings and structures damaged as a result of hostilities; (3) demolition of buildings and structures which, following inspection, are deemed accident-prone and pose a threat to human life. Powers that do not require notification of the regional military administration include:

- transfer of funds from the relevant local budget for the needs of the Armed Forces of Ukraine and/or to ensure the implementation of measures under the legal regime of martial law;
- establishment of institutions providing free primary legal aid, appointment and dismissal of the heads of such institutions and engagement of natural or legal persons of private law to provide free primary legal aid;
- response to natural disasters, epidemics and epizootics;

3939 Persons authorised to perform the functions of local self-government as provided for by the Law of Ukraine 'On Prevention of Corruption'.

3940 In accordance with the Law of Ukraine 'On Ensuring the Functioning of the Ukrainian Language as the State Language'.

3941 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Parts 5, 6, 8 Article 10. ↗

3942 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Part 2 Article 10. ↗

- management of hazardous waste.[3943]

For employees whose positions are not included in the temporary structures or staffing schedules (approved by the Head of a MAS[3944] or by the village, settlement or city head[3945]), downtime is declared or they are transferred to an equivalent or lower position. By Resolution of the Government No. 221,[3946] heads of LSG bodies have been recommended[3947] to independently determine the remuneration for employees during periods of downtime.

Since July 2022, officials of local self-government bodies[3948] have been allowed to engage in secondary employment,[3949] provided they are on unpaid leave or in a period of downtime.

Adaptation to the challenges of wartime has also taken place, including in labour legislation applicable to employees of local self-government bodies: in March 2022, the Law of Ukraine 'On the Organisation of Labour Relations under Martial Law' entered into force.[3950]

In addition, Law No. 4887-IX has been adopted, establishing additional remuneration for officials LSG bodies for increased workload related to the implementation of projects (programmes) financed through budget support, assistance and grants from the EU, foreign governments, international organisations and donor institutions, in the amount provided for by the budget of the respective project (programme).[3951]

The NACS is responsible for the professional development of public servants. Positive developments include the functioning of the Knowledge Management Portal,[3952] the Higher School of Public Administration and regional training centres (in March 2026 alone, 17,597 public servants — including 5,654 officials of LSG bodies — completed training at the Higher School of Public Administration and regional training centres). Training in postgraduate education institutions was delivered through 268 short-term and 62 professional (certificate) advanced training programmes.[3953]

3943 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Parts 4, 5 Article 9. ↗

3944 Ibid, Part 2 Article 10.

3945 Ibid, Part 9 Article 9.

3946 Certain Issues of Remuneration of Employees of State Bodies, Local Self-Government Bodies, Enterprises, Institutions and Organisations Financed or Subsidised from the Budget under Martial Law: Resolution of the Cabinet of Ministers of Ukraine No. 221 of 07.03.2022. ↗

3947 Under martial law, within the limits of the wage fund provided for in the estimate, but not lower than two-thirds of the tariff rate established for the employee's tariff grade (basic salary).

3948 Except for officials whose positions fall within categories I–III, provided that employment contracts, civil law contracts for the provision of services or business transactions are concluded with private legal entities or individual entrepreneurs in respect of whom such officials of local self-government bodies have not exercised control, supervisory functions or prepared or adopted relevant decisions concerning their activities within the past year.

3949 On Amendments to the Law of Ukraine 'On Prevention of Corruption' regarding the Specifics of the Application of Anti-Corruption Legislation under Martial Law: Law of Ukraine No. 2381-IX of 08.07.2022, part 28 Section I. ↗

3950 On the Organisation of Labour Relations under Martial Law: Law of Ukraine No. 2136-IX of 15.03.2022. ↗

3951 On Amendments to Certain Laws of Ukraine on Encouraging the Participation of Local Self-Government Bodies in the Implementation of International Technical Assistance Programmes and Projects and International Territorial Cooperation: Law of Ukraine No. 4887-IX of 27.05.2026. ↗

3952 Knowledge Management Portal. ↗

3953 During March, more than 17,000 public servants completed training under advanced training programmes. Knowledge Management Portal, 2026. ↗

Progress and issues

The main challenge in implementing the reform of service in LSG bodies is the postponement of the entry into force of the Law of Ukraine 'On Service in Local Self-Government Bodies' of 2023. Its positive novelties include:

- clear differentiation between the status of local self-government servants and elected officials of local self-government;
- enshrining the principle of political impartiality of local self-government servants, while preserving their constitutional right to stand for election and the guarantees provided by electoral legislation;
- streamlining open competitions for positions in local self-government service;
- publication of vacancy announcements and competition results via the Unified Public Service Vacancies Portal;
- introduction of annual performance appraisal of local self-government servants;
- defining the framework for professional development of local self-government servants;
- establishing mechanisms for career advancement of local self-government servants;
- improving the personnel reserve of local self-government servants;
- introducing a framework for basic salaries of local self-government servants;
- establishing disciplinary and material liability of local self-government servants.[3954]

The postponement of the entry into force of this Law until after the termination or lifting of martial law in Ukraine appears unjustified. Such delay prevents the development of an effective service in local self-government bodies, the proper regulation of remuneration, the harmonisation of legislation with the civil service framework and the professionalisation of the service. Key issues in the regulation of service in local self-government bodies, the resolution of which is currently effectively 'frozen', include: (1) the issue of political neutrality of officials of local self-government bodies;[3955] (2) insufficient autonomy of local self-government bodies, within the limits of the law, to determine their own internal administrative structures in line with local needs and the requirements of effective governance; (3) recruitment to local self-government service does not ensure the selection of highly qualified personnel, taking into account personal qualities and competencies; (4) the low attractiveness of service in local self-government bodies; (5) the status of local self-government servants requires modernisation; (6) insufficient incentives for career progression; (7) an outdated remuneration model and ineffective

3954 Implementation of the Law of Ukraine No. 3077-IX of 02.05.2023 'On Service in Local Self-Government Bodies': Explanations by the National Agency of Ukraine on Civil Service. ↗

3955 This issue remains one of the most debated. The Law of Ukraine 'On Service in Local Self-Government Bodies' does not enshrine the principle of political neutrality (non-partisanship) of service in local self-government bodies. Following the electoral reform and the 'partisation' of local self-government, this issue has become particularly acute.

anti-corruption safeguards; (8) inconsistency between the legislation on service in LSG bodies and the provisions of the Law of Ukraine 'On Civil Service'.[3956]

A key obstacle to the professionalisation of service in LSG bodies is *the absence of a unified scientific and methodological centre for the training and professional development of public servants. In the context of staff shortages, this hampers efforts to address issues of institutional capacity and constrains the development of the public service and human capital as one of the key drivers of an innovative and knowledge-based economy in a modern democratic society. The potential of regional training centres is not sufficiently utilised to build and strengthen the human resources capacity of public administration bodies at all levels*.[3957]

The issue of dismissal of employees of LSG bodies from temporarily occupied territories remains insufficiently regulated. This is reflected in the practical impossibility of carrying out dismissal procedures, the limited grounds for early termination of the powers of elected officials and the inability to effectively protect labour rights[3958] upon dismissal. Difficulties in dismissing employees in temporarily occupied territories result in the ineffective retention of officials who do not, in practice, perform their duties. The situation is further complicated by the lack of clarity regarding the reasons for an employee's presence in temporarily occupied territory — whether voluntary, due to captivity or due to the inability to reach territory under Ukraine's control. Dismissal under such uncertainty may lead to subsequent judicial challenges.[3959]

Another issue is the **lack of transparency in recruitment to public service**. While the absence of competitive procedures facilitates prompt staffing decisions — which is important under martial law — it also creates risks of subjectivity and limits equal access to service in local self-government bodies. This issue could be addressed by Draft Law No. 13478-1[3960] (adopted by Parliament at first reading on 29 April 2026), which aims to reinstate competitive selection procedures, including for service in LSG bodies.

The shortage of personnel in the system of local self-government is, inter alia, driven by low remuneration. At present, the remuneration of officials of LSG bodies is determined by the respective local self-government body, based on the remuneration conditions

3956 On Service in Local Self-Government Bodies: Explanatory Note to the Draft Law of Ukraine, registration No. 6504 of 31.12.2021. ↗

3957 Some Issues of Reforming Local Self-Government and the Territorial Organisation of Power under Martial Law and in Preparation for Ukraine's Accession to the European Union: Resolution of the Cabinet of Ministers of Ukraine No. 1748 of 12.12.2025. ↗

3958 The protection of labour rights is complicated by the fact that officials located in temporarily occupied territories do not have access to justice.

3959 Decision of the Uzhhorod Interdistrict Court of 22.11.2024 in case No. 308/14649/23 ↗; Decision of the Poltava District Administrative Court of 25.10.2022 in case No. 440/5949/22 ↗; Decision of the Odesa District Administrative Court of 30.01.2023 in case No. 420/16201/22 ↗; Decision of the Kharkiv District Administrative Court of 23.05.2023 in case No. 520/5160/23 ↗; Decision of the Donetsk District Administrative Court of 03.08.2023 in case No. 340/2230/23 ↗; Decision of the Kyiv District Administrative Court of 08.02.2023 in case No. 320/7335/22 ↗; Decision of the Zaporizhzhia District Administrative Court of 01.08.2023 in case No. 280/3718/23 ↗; Decision of the Luhansk District Administrative Court of 20.02.2023 in case No. 360/2115/22. ↗

3960 On Amendments to Certain Laws of Ukraine Regarding the Resumption of Competitions and Improvement of the Procedure for Entry into, Service in and Termination of the Civil Service: Draft Law of Ukraine, registration No. 13478-1 of 16.07.2025. ↗

and salary scales established by Resolution of the Government No. 268.[3961] Currently, the lowest basic salary of a specialist in a local self-government body amounts to UAH 7,100,[3962] which is below the minimum wage in Ukraine (UAH 8,647[3963]). At the same time, the average salary in Ukraine in January 2026 amounted to UAH 27,975,[3964] which is 3.9 times higher than the minimum basic salary in local self-government service.

The remuneration of officials of LSG bodies currently comprises a basic salary, allowances (for rank; for high performance or the performance of particularly important work; for the knowledge and use of a foreign language in the course of duties; and for the honorary title 'Merited'), additional payments, bonuses and financial assistance. The wage fund for employees of LSG bodies is financed from local budget funds. As a result, the level of 'additional' payments is largely determined at the discretion of management, creating risks of subjectivity and undermining impartiality.

However, the remuneration reform envisaged by the Law of Ukraine 'On Service in Local Self-Government Bodies' remains effectively 'on hold' due to the delayed entry into force of the 2023 Law. In this context, Draft Law No. 11054[3965] was initiated in March 2024. The delay in its adoption effectively 'freezes' the problem of low salaries, which limits motivation to serve in local self-government bodies.

Non-compliance with the principle of political impartiality[3966] remains a concern for officials of local self-government bodies,[3967] as this principle is not applied to them under the Law of Ukraine 'On Political Parties in Ukraine' or the currently applicable Law of Ukraine 'On Service in Local Self-Government Bodies'. Against the backdrop of the widespread 'partisation' of local councils following the 2020 local elections, the absence of this principle risks further entrenching political expediency in local self-government bodies.

The combination of the office of a village, settlement or city head with the position of Head of a MAS, in cases where such a head is appointed to lead a MAS, contravenes

3961 On Streamlining the Structure and Remuneration Conditions of Employees of Executive Authorities, Prosecutor's Offices, Courts and Other Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 268 of 09.03.2006, Annexes 48–53, 57. ↗

3962 Ibid.

3963 The monthly minimum wage in Ukraine amounts to UAH 8,647. ↗

3964 The average salary in Ukraine in January 2026 amounted to UAH 27,975. ↗

3965 On Amendments to the Law of Ukraine 'On Service in Local Self-Government Bodies' Regarding Ensuring Decent Remuneration of Local Self-Government Officials: Draft Law of Ukraine, registration No. 11054 of 01.03.2024. ↗

3966 In accordance with para. 8 Part 1 Article 4 of the Law of Ukraine 'On Civil Service', political impartiality, as one of the principles of the civil service, is defined as *'preventing the influence of political views on the actions and decisions of a civil servant, as well as refraining from demonstrating their attitude towards political parties or expressing their own political views in the course of performing official duties'*.

3967 For the first time since Ukraine's independence, the issue of political neutrality was addressed in the Resolution of the Verkhovna Rada of Ukraine 'On the Depoliticisation of State Bodies, Institutions and Organisations' No. 1429-XII of 24.08.1991, which terminated the activities of political party organisations in all state authorities and administration bodies, law enforcement agencies, radio and television institutions and other state bodies and organisations. This Resolution also required employees of the prosecutor's office, the Ministry of Internal Affairs and the Committee for State Security of Ukraine to terminate their membership in any political party or movement.

the statutory prohibition on holding multiple positions.[3968] Draft Law No. 8056[3969] seeks to address this challenge, which emerged following the onset of Russian aggression, by providing that such deviations from the prohibition on holding multiple positions shall not be considered a violation of the Law. The adoption of this initiative would clarify the status of Heads of MAS.

The appointment or dismissal of an elected official nominated through a vote of a representative body depends entirely on the functioning of local councils and their capacity to resolve 'personnel' matters. This issue is exacerbated by trends towards the early termination of the mandates of local council members and the inability to fill vacant mandates without elections in communities where representative bodies were formed in 2020 under a relative majority electoral system. This situation effectively renders an elected official 'hostage', where grounds for dismissal exist but cannot be exercised due to the incapacity of the local council.

A growing trend of resignations from service in LSG bodies has emerged following the entry into force of Resolution of the Government No. 69,[3970] which introduced a ban on crossing the state border for heads of structural units of LSG bodies and for employees reserved for the period of mobilisation and wartime by such bodies. Faced with the choice between retaining their position (mandate) and preserving the ability to freely cross the border (in the absence of other lawful restrictions), officials often opt to terminate their service in local self-government bodies.[3971] This further exacerbates the existing personnel deficit within the local self-government system.[3972]

Another issue is the **risk of destabilisation of local councils due to the increasing number of cases involving the suspension of community heads, council secretaries, or the early termination of their powers**. As elections cannot be held under martial law, where the powers of a head are terminated early, these are exercised by the secretary of the village, settlement or city council[3973] until a newly elected head takes the oath following the next local elections (presumably post-war). Given that, under martial law, village, settlement and city heads are vested with additional powers, including the

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3968 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, Part 4 Article 12 ↗; On Prevention of Corruption: Law of Ukraine No. 1700-VII of 14.10.2014, Part 1 Article 25. ↗

3969 On Amendments to Certain Laws of Ukraine Regarding the Improvement of the Powers of Local Self-Government Bodies and Their Officials during Martial Law: Draft Law of Ukraine, registration No. 8056 of 19.09.2022. ↗

3970 On Amendments to the Rules for Crossing the State Border by Citizens of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 69 of 27.01.2023. ↗

3971 Government Resolution No. 69: What Is Wrong with It? ↗
This initiative has led to a trend towards the early termination of the powers of local council members upon their personal request. The Sixth Administrative Court of Appeal declared this Resolution unlawful; however, the Government is currently appealing that judgment. Acknowledging the issue, the Government, by Resolution No. 1054, clarified that the restriction on crossing the state border *'does not apply to female local council members, except those who are officials of local self-government bodies'.* However, the damage to local self-government had already been done.

3972 Although the Resolution of the Cabinet of Ministers of Ukraine 'Some Issues of Crossing the State Border by Citizens of Ukraine' No. 1054 of 27.08.2025 was adopted, it only partially addressed the problem and created a situation of artificial discrimination: (1) male council members remain subject to the restriction on crossing the state border, meaning that even those entitled to deferment cannot travel abroad; (2) female council members who are officials of LSG bodies also remain subject to the restriction. On 23 April 2026, the High Council of Justice adopted an appeal to the Cabinet of Ministers of Ukraine concerning the regulation of state-border crossing by, inter alia, women public servants who are not liable for military service. By Resolution No. 587, the Government ultimately lifted the restriction on crossing the state border for women public officials, except those holding key senior positions.
For more detail, see the subsection 'Functioning of Local Self-Government Bodies'.

3973 On Local Self-Government in Ukraine: Law of Ukraine No. 280/97-VR of 21.05.1997, para. 1 Part 3 Article 50. ↗

authority to take unilateral decisions,[3974] the position of council secretary often becomes the subject of internal political contestation. There have been cases where both the head and the secretary are suspended, which destabilises the functioning of the local council (e.g. Oliivka Village Council, Zhytomyr region; Pidhorodne City Council, Dnipropetrovsk region).[3975]

Progress can be noted in the introduction of Draft Law No. 14063 and its alternatives No. 14063-1 and No. 14063-2,[3976] which are currently under consideration by the Verkhovna Rada. These draft laws aim to address the issue of **dismissal of employees in temporarily occupied territories**. They may resolve issues related to: (1) clarifying the status of officials of local self-government bodies;[3977] (2) specifying the powers of Heads of MA in personnel matters;[3978] (3) clarifying the grounds for dismissal of employees and early termination of the powers of elected officials who remain in temporarily occupied territories; (4) protecting the rights of employers and employees under martial law; (5) defining the specifics of resuming suspended employment contracts and the conditions for termination of employment contracts in case of non-performance; (6) regulating procedures for early termination of the mandates of local council members in territories that are temporarily occupied, in the event of the establishment of a military administration and the adoption by the Verkhovna Rada of a decision to confer upon such military administration the powers of the respective local council.

The lack of publicly available information on the state of service in LSG bodies limits the ability to analyse this area. The most recent statistical data on the number of local self-government servants available in the public domain dates back to 2015.[3979] Analysis and research into trends in this area are essential for understanding the challenges and for making informed and effective policy decisions.

Recommendations

1. Amend the Law of Ukraine 'On Service in Local Self-Government Bodies' of 2023 to remove the postponement of its entry into force.
2. Establish a unified scientific and methodological centre for the training and professional development of public servants (modelled on *L'Institut national du service public (INSP*[3980]*)*).

3974 On the Legal Regime of Martial Law: Law of Ukraine No. 389-VIII of 12.05.2015, Parts 4 and 5 Article 9. ↗

3975 An Unresolved Paradox: A Lawyer's Commentary on the Suspension from Office of the Head of the Oliivka Community in Zhytomyr Region. Suspilne, 2024 ↗ ; On Early Termination of the Powers of the Secretary of the Pidhorodne City Council and Dismissal of Vitalii Yuriiovych Morhun from Office: Decision of the Pidhorodne City Council No. 3408 of 22.01.2025. ↗

3976 On Amendments to Certain Legislative Acts of Ukraine Regarding the Termination of Civil Service, Service in Local Self-Government Bodies, Dismissal of Employees and Other Specific Aspects of Labour Relations during Martial Law: Draft Law of Ukraine, registration No. 14063 of 22.09.2025. ↗

3977 The current legislation does not define the status of employees of MAS who have transferred to service in such administrations from local self-government bodies, nor does it specify whether their status as officials of LSG bodies is retained.

3978 The current legislation does not explicitly establish the powers of heads of military administrations with regard to dismissing employees of local self-government bodies.

3979 Statistical Bulletin 'Number of Civil Servants and Local Self-Government Officials'. ↗

3980 L'Institut national du service public (INSP), established on the basis of ENA on 01.01.2022, is the leading French public operator responsible for recruitment, initial training and professional development of senior civil servants. ↗

3. Reinstate competitive selection procedures for recruitment to service in local self-government bodies.
4. Improve legislation governing the termination of civil service, service in local self-government bodies, dismissal of employees and other aspects of labour relations under martial law.
5. Introduce monitoring of service in LSG bodies (both quantitative and qualitative composition), modelled on the dashboard on the quantitative composition of civil servants in Ukraine.[3981]

Cooperation of Territorial Communities; Associations of Local Self-Government Bodies; International Territorial Cooperation

The right to cooperate freely, including with local self-government bodies, and to form associations of local self-government bodies, as enshrined in the European Charter of Local Self-Government,[3982] is implemented in Ukraine through inter-municipal cooperation, international territorial cooperation and associations of local self-government bodies.

Inter-municipal cooperation refers to relations between two or more territorial communities carried out on a contractual basis with the aim of ensuring the socio-economic and cultural development of territories, improving the quality of service provision to the population based on shared interests and objectives, and ensuring the effective exercise by LSG bodies of the powers defined by law.[3983]

International territorial cooperation refers to a set of relations aimed at establishing and strengthening economic, social, scientific and technical, environmental, cultural and other ties between entities and participants in Ukraine and their counterparts in foreign states, within the competence defined by national legislation and international treaties of Ukraine approved by the Verkhovna Rada.[3984]

Associations of LSG bodies and their unions are voluntary, non-profit associations established by LSG bodies with the aim of ensuring the more effective exercise of their powers, coordinating the actions of LSG bodies in protecting the rights and interests of territorial communities and promoting local and regional development.[3985]

3981 Dashboard on the Number of Civil Servants in Ukraine. National Agency of Ukraine on Civil Service. ↗

3982 European Charter of Local Self-Government of 05.10.1985, ratified by the Law of Ukraine of 15.07.1997 No. 452/97-VR, Article 10. ↗

3983 On Cooperation of Territorial Communities: Law of Ukraine No. 1508-VII of 17.06.2014, para. 2 Part 1 Article 1. ↗

3984 On International Territorial Cooperation of Ukraine: Law of Ukraine No. 3668-IX of 24.04.2024, para. 5 Part 1 Article 1. ↗

3985 On Associations of Local Self-Government Bodies: Law of Ukraine No. 1275-VI of 16.04.2009, Part 1 Article 1. ↗

State of play

As of early July 2026, 767 territorial communities (+10 compared with the previous quarter) had concluded 848 intermunicipal cooperation agreements (+30). Cooperation projects included 13 projects in housing and communal services, 10 in public amenities, 21 in fire safety, 518 in education, healthcare and social security and 286 in other areas.

The largest numbers of such cooperation agreements were concluded in Rivne (107), Cherkasy (94), Dnipropetrovsk (76) and Poltava (72) regions.

The largest numbers of territorial communities using the cooperation mechanism were recorded in Dnipropetrovsk (54), Ivano-Frankivsk (51), Rivne (51) and Cherkasy (61) regions.[3986]

During 2021–2024, several studies were conducted confirming the continued relevance of cooperation between territorial communities.[3987]

Until May 2025, the legislation provided for five forms of such cooperation:

- *delegation by certain cooperation entities to another cooperation entity of the performance of one or more tasks, with the transfer of the necessary resources;*
- *implementation of joint projects, involving the coordination of activities of cooperation entities and the pooling of their resources for a defined period to carry out relevant measures jointly;*
- *joint financing (maintenance) by cooperation entities of municipal enterprises, institutions and organisations, municipal non-commercial companies, business entities and infrastructure facilities;*
- *establishment by cooperation entities of municipal institutions, organisations, municipal non-commercial companies, business entities and joint infrastructure facilities;*
- *establishment by cooperation entities of a joint governing body for the joint exercise of powers defined by law.*[3988]

The majority of agreements (55.5%) were concluded for the implementation of joint projects; 25.7% — for joint financing of infrastructure; 16.4% — for delegation of tasks;

3986 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 01.07.2026. Presentation / Ministry for Development of Communities and Territories of Ukraine, 2026. ↗

3987 In 2021 — analysis of the implementation of the provisions of the Law of Ukraine 'On Cooperation of Territorial Communities' with regard to the use of forms of cooperation, prepared within the framework of the Council of Europe Programme 'Decentralisation and Public Administration Reform in Ukraine'. ↗ ; In 2022, experts of the USAID Project 'HOVERLA' analysed the implementation of cooperation agreements of territorial communities in Volyn ↗, Zakarpattia ↗, Lviv ↗, Rivne ↗, Odesa ↗ and Poltava ↗ regions. In 2023 — study on the practice of application and effectiveness of legislation on cooperation of territorial communities, carried out with the support of the USAID RADA: Next Generation Programme and the Westminster Foundation for Democracy within the framework of the Committee's oversight function. ↗ ; In 2023, experts of the Swiss-Ukrainian Project DECIDE 'Decentralisation for the Development of Democratic Education' analysed the Register of Cooperation Agreements of Territorial Communities. ↗ ; In 2024 — study on the implementation of the Law of Ukraine 'On Cooperation of Territorial Communities' under the Council of Europe Programme 'Strengthening Good Democratic Governance and Resilience in Ukraine'. ↗

3988 On Cooperation of Territorial Communities: Law of Ukraine No. 1508-VII of 17.06.2014, Part 1 Article 4. ↗

1.8% — for establishing joint enterprises; 0.6% — for establishing joint management bodies.[3989]

The number of signatories varies from two to thirty-nine (61.2% bilateral agreements; 13.3% trilateral; 10.1% involve four signatories).[3990] A significant share of agreements are short-term: 22.9% are concluded for 1–2 years, 18.8% — for up to one year, and 10.1% — for 2–3 years.[3991]

In May 2025, Law No. 4425-IX introduced an additional form of cooperation — agglomerations. These provisions will enter into force upon the entry into force of a law regulating the procedure for establishing agglomerations.[3992] As of now, such a law has not been adopted.[3993]

Despite the absence of legislative regulation, communities around the city of Lviv established the 'Lviv Agglomeration'[3994] association in 2024, which, similarly to the 'Kyiv Agglomeration'[3995] (existing since 2019), operates as a local association of local self-government bodies.

Associations of LSG bodies remain in demand for coordinating actions aimed at protecting the rights and interests of territorial communities and promoting local and regional development.[3996]

Currently, there are four nationwide associations: three representing the basic level ('Association of Ukrainian Cities'; 'All-Ukrainian Association of Communities'; 'Association of Amalgamated Territorial Communities') and one representing district and regional councils ('Ukrainian Association of District and Regional Councils'[3997]).

There are no comprehensive statistics on local associations; however, some have gained particular importance. For instance, in August 2025 the 'Association of Frontline

3989 Study on the implementation of the Law of Ukraine 'On Cooperation of Territorial Communities' under the Council of Europe Programme 'Strengthening Good Democratic Governance and Resilience in Ukraine'. ↗

3990 Ibid.

3991 Ibid.

3992 On Amendments to Certain Laws of Ukraine on the Development of Cooperation of Territorial Communities: Law of Ukraine No. 4425-IX of 13.05.2025, subpara. 1 para. 1; subpara. 3 para. 2 Section I. ↗

3993 Draft Law of Ukraine 'On Urban Agglomerations' (registration No. 6743 of 17.07.2017) was withdrawn. ↗; Draft Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine on Establishing the Legal Framework for the Formation of Agglomerations as a Form of Cooperation of Territorial Communities' (registration No. 2637 of 19.12.2019), as a further attempt to regulate agglomerations, was removed from consideration. ↗

3994 Members of the association — territorial communities: Bibrka City, Velykyi Liubin Settlement, Horodok City, Davydiv Village, Zhovkva City, Zhovtanets Village, Kulykiv Settlement, Lviv City, Murovane Village, Novyi Yarychiv Settlement, Obroshyne Village, Pidberiztsi Village, Pustomyty City. ↗

3995 Members of the association — territorial communities: Boryspil, Boyarka, Brovary, Bucha, Vasylkiv, Vyshneve, Kyiv, Obukhiv, Fastiv; settlements: Vorzel, Hostomel, Kotsiubynske; villages: Velyka Oleksandrivka, Hnidyn, Zazymia, Kniazhychi, Pidhirtsi, Pohreby, Shchaslyve. ↗

3996 On Associations of Local Self-Government Bodies: Law of Ukraine No. 1275-VI of 16.04.2009, Part 1 Article 1. ↗

3997 All-Ukrainian Association of Local Self-Government Bodies 'Association of Ukrainian Cities' ↗; All-Ukrainian Association of Local Self-Government Bodies 'All-Ukrainian Association of Communities' ↗; All-Ukrainian Association of Local Self-Government Bodies 'Association of Amalgamated Territorial Communities' ↗; All-Ukrainian Association of Local Self-Government Bodies 'Ukrainian Association of District and Regional Councils'. ↗

Cities and Communities'[3998] was established to *strengthen cooperation among frontline communities, enhance protection of residents, and support development under wartime conditions*.[3999] Its areas of work include social resilience, recovery coordination, economic revival, and implementation of EU standards.[4000]

International cooperation between territorial communities is also developing. In 2024, the Law of Ukraine 'On International Territorial Cooperation' was adopted, *establishing the legal, economic and organisational framework for Ukraine's international territorial cooperation with foreign states. This cooperation is aimed at fostering international territorial partnerships between states, regions and territories in order to ensure balanced socio-economic development, safeguard state interests and security and promote mutually beneficial cooperation with members of the international community on the basis of generally recognised principles and norms of international law, taking into account the historical, economic, environmental, geographical and demographic characteristics of regions and territories.*[4001]

The activation of cooperation agreements has been driven by the possibility of promptly addressing emerging challenges, the introduction of a simplified procedure for concluding and extending cooperation agreements under martial law, the clarification of conditions for their termination and the ability to combine several forms of cooperation.[4002]

As of early July 2026, 491 territorial communities had 2,112 international partnership agreements (+2) with partners in 64 countries. Territorial communities in Lviv (288), Zakarpattia (287), Volyn (133) and Kyiv (134) regions had the largest numbers of international partners. The broadest geographical coverage of partnerships was recorded among territorial communities in Odesa (partners in 36 countries), Kyiv (35) and Lviv (31) regions and the city of Kyiv (29).[4003]

Progress and issues

It is difficult to assess the effectiveness of existing inter-municipal cooperation agreements, their outcomes and the overall success of cooperation due to the absence of publicly available reports, monitoring data on the implementation of such agreements, and clearly defined evaluation criteria. In addition, no procedures or principles have been established for the dissemination of best practices. The Register of Cooperation

3998 Official website of the Local Association of Local Self-Government Bodies 'Association of Frontline Cities and Communities'. ↗

3999 Ibid.

4000 Official website of the Local Association of Local Self-Government Bodies 'Association of Frontline Cities and Communities'. ↗

4001 On International Territorial Cooperation: Law of Ukraine No. 3668-IX of 24.04.2024. ↗

4002 On Amendments to Certain Laws of Ukraine on the Development of Cooperation of Territorial Communities: Law of Ukraine No. 4425-IX of 13.05.2025, para. 2 Section I. ↗

4003 Monitoring of the Reform of Local Self-Government and the Territorial Organisation of Power as of 01.07.2026. Presentation / Ministry for Development of Communities and Territories of Ukraine, 2026. ↗

Agreements[4004] remains inadequate: there is no information on contractual arrangements that are not being implemented; and a number of technical inaccuracies persist.[4005]

The martial law regime has adversely affected the implementation of existing inter-municipal cooperation agreements (including cases where contractual obligations cannot be fulfilled due to the occupation of a partner community's territory, limited resources or the prioritisation of other urgent tasks).[4006]

A further issue is the **lack of legislative regulation governing the establishment and operation of agglomerations** as a distinct form of cooperation between territorial communities. Delays in introducing such legislative provisions hinder the development of metropolitan areas and encourage the search for alternative models of coexistence among communities within agglomerations.

The positions of all-Ukrainian associations during consultations with state authorities do not always align,[4007] which complicates decision-making where legislation requires consultation with local self-government bodies. In addition, the lack of a unified position among associations, as well as **competition between all-Ukrainian associations of local self-government bodies, weakens their influence on public policy**. This is largely due to shortcomings in the Law of Ukraine 'On Associations of Local Self-Government Bodies'. Draft Law No. 2668[4008] is partially aimed at addressing this issue, as it seeks to remove the restriction limiting LSG bodies to membership in only one all-Ukrainian association. However, there is no political will to adopt it, which perpetuates the problem and intensifies competition among such associations. In the context of war, this creates risks of further centralisation and monopolisation of state power.[4009]

The development of international cooperation between territorial communities is constrained by **insufficient resource and organisational capacity**, manifested in: (1) a lack of funding for co-financing joint projects; (2) a shortage of qualified personnel (in particular, project management specialists with proficiency in a foreign professional language); (3) limited opportunities for professional development; and (4) complex approval procedures for international agreements, which may depend on the specific features of the partner country's national legislation.[4010]

4004 Register of Cooperation Agreements of Territorial Communities: Ministry for Development of Communities and Territories of Ukraine. ↗

4005 Study on the implementation of the Law of Ukraine 'On Cooperation of Territorial Communities' under the Council of Europe Programme 'Strengthening Good Democratic Governance and Resilience in Ukraine'. ↗

4006 Ibid.

4007 How to ensure a 'single voice' of associations of local self-government bodies? Discussion excerpts from the Forum. Decentralisation, 2021. ↗ ; O. Slobozhan: it is important to build a single voice of local self-government; therefore, associations should unite rather than fragment. Association of Ukrainian Cities, 2021. ↗

4008 On Amendments to Article 4 of the Law of Ukraine 'On Associations of Local Self-Government Bodies' (regarding the removal of restrictions on membership of local self-government bodies in all-Ukrainian associations): Draft Law of Ukraine, registration No. 2668 of 23.12.2019. ↗

4009 The Spectre of Monopoly: How to Make the Authorities Hear Local Self-Government During Wartime. Reanimation Package of Reforms, 2023. ↗

4010 Roundtable on 'Participation of Local Self-Government Bodies in International Territorial Cooperation in the Context of the EU Accession Process' (28 March 2024). ↗

A positive development is the approval of the State Programme for the Development of International Territorial Cooperation,[4011] which aims to facilitate access to EU funding and strengthen the institutional capacity of communities. The Programme was approved in December 2025 and, if properly implemented, has the potential to address the problem of insufficient logistical and organisational capacity.

Recommendations

1. Develop and adopt the Law of Ukraine 'On Agglomerations'.
2. Amend the Law of Ukraine 'On Associations of Local Self-Government Bodies' to remove the restriction limiting LSG bodies to membership in only one all-Ukrainian association and to introduce mechanisms for their state support.
3. Ensure adequate methodological support for the development of international cooperation and provide specialised training for local self-government officials in the field of 'Project Management'.

4011 On Approval of the State Programme for the Development of International Territorial Cooperation for 2025–2027: Resolution of the Cabinet of Ministers of Ukraine No. 1647 of 02.12.2025. ↗

Annex 1 to the Report

Information on Progress Achieved During August 2026 in the Area of 'Functioning of Democratic Institutions' of Negotiating Cluster 1 'Fundamentals of the Accession Process'

Parliament

The Verkhovna Rada and Its Bodies

On 18 August, two Members of Parliament, Bohdan Morklianyk and Viktoriia Rieznikova, took the oath, replacing Denys Maslov and Vitalii Bezhin, who had received ministerial portfolios.[4012] The newly elected MPs joined the parliamentary faction of the 'Servant of the People'. MP Mariana Bezuhla, who left the same faction in July 2024, also rejoined it.[4013]

Two MPs (Andrii Zhupanyn and Ostap Shypailo, 'Servant of the People' parliamentary faction) submitted applications to relinquish their mandates. However, the relevant draft Resolutions[4014] were not supported by the Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament) at its sitting on 19 August 2026. Draft Resolutions of the Verkhovna Rada on the early termination of the powers of these two MPs were subsequently registered again.[4015]

4012 Transcript of the plenary sitting of the Verkhovna Rada of Ukraine of 18.08.2026. ↗

4013 MP Mariana Bezuhla Leaves the 'Servant of the People' Faction and Party. Suspilne News. 2024. ↗

4014 On the Early Termination of the Powers of Member of Parliament of Ukraine A. V. Zhupanyn: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15525 of 19.08.2026 ↗; On the Early Termination of the Powers of Member of Parliament of Ukraine O. I. Shypailo: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15526 of 19.08.2026. ↗

4015 On the Early Termination of the Powers of Member of Parliament of Ukraine A. V. Zhupanyn: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15577 of 31.08.2026 ↗; On the Early Termination of the Powers of Member of Parliament of Ukraine O. I. Shypailo: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15578 of 31.08.2026. ↗

The 16th session of the Verkhovna Rada of the ninth convocation will begin on 1 September. Accordingly, some committees have already approved reports on their activities during the 15th session and work plans for the 16th session.[4016]

Status of MPs of Ukraine

In August, MP Vadym Stolar (Restoration of Ukraine parliamentary group) was notified of suspicion. He is suspected of offences under different parts of five Articles of the CC of Ukraine, including establishing a criminal organisation, unlawful seizure of property, forgery of documents and unauthorised interference with information systems.[4017] This is part of a case in which, according to the NABU and SAPO, the participants allegedly laundered UAH 150 million in cash obtained through criminal activity.[4018]

On 21 August, the HACC found assets worth more than UAH 8.2 million acquired by MP Liudmyla Marchenko ('Servant of the People' faction) in 2021–2023 to be unjustified. The court decision may still be appealed to the HACC Appeal Chamber.[4019]

The Prosecutor General's Office (PGO) opened two criminal proceedings concerning MP Viacheslav Medianyk ('Servant of the People' faction) over possible illicit enrichment and the submission of false information in an asset declaration.[4020]

Organisation of the Parliamentary Process

On 31 August, the Secretariat of the Verkhovna Rada announced that measures had been taken to ensure the uninterrupted functioning of Parliament amid frequent air-raid alerts.[4021] For example, on 27 August, air-raid alerts were declared in Kyiv 13 times and lasted for more than 15 hours in total.[4022] Resolution No. 2912-IX[4023] provides that an ongoing plenary sitting is suspended for the duration of an air-raid alert and resumes 15 minutes after it ends where the alert lasts for more than three consecutive hours. Under such conditions, holding a plenary sitting may be complicated by repeated interruptions whenever an air-raid alert is declared.

4016 For example, Decision on the Report on the Work of the Verkhovna Rada Committee on Agrarian and Land Policy during the Fifteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation ↗; Decision on the Work Plan of the Verkhovna Rada Committee on Agrarian and Land Policy for the Sixteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation ↗; Work Plan of the Verkhovna Rada Committee on Public Health, Medical Assistance and Medical Insurance for the Sixteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation ↗; Work Plan of the Verkhovna Rada Committee on Finance, Tax and Customs Policy for the Sixteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation. ↗

4017 Vadym Stolar Notified of Suspicion under Five Different Articles. Bihus.info. 2026. ↗

4018 Businessman Vadym Stolar Was Notified in Absentia of Suspicion Last Week. The Most Severe Penalty under the Articles Imputed to Him Is up to 15 Years' Imprisonment. Suspilne News. 2026. ↗

4019 Publication by the Specialised Anti-Corruption Prosecutor's Office and the NABU on the social network Facebook ↗; Decision of the High Anti-Corruption Court of 21.08.2026 in case No. 991/8984/25. ↗

4020 PGO Opens Two Criminal Proceedings against MP Medianyk following Bihus.Info Investigation. Bihus.Info. 2026. ↗

4021 Publication by the Verkhovna Rada of Ukraine on the social network Telegram. ↗

4022 Enemy Attack on the Capital on 27 August (Information Being Updated). Official Kyiv Portal. 2026. ↗

4023 On Certain Issues of Organising the Work of the Verkhovna Rada of Ukraine of the Ninth Convocation under Martial Law: Resolution of the Verkhovna Rada of Ukraine No. 2912-IX of 07.02.2023. ↗

According to media reports, the Verkhovna Rada is considering introducing voting by telephone and providing for MPs to move to the basement, which has been equipped as a shelter, when an air-raid alert is declared.[4024]

Legislative Procedure

The problem of the President of Ukraine (President) not signing draft laws adopted by the Verkhovna Rada remains relevant. In particular, the President signed Draft Law No. 7087 (Law No. 2541-IX[4025]), which had been adopted by Parliament in August 2022 taking into account all of the President's proposals, almost four years later. Consequently, a Law that was supposed to enter into force as early as January 2023 entered into force only on 5 August 2026 because of the prolonged delay in its signing.

The change of the Cabinet of Ministers of Ukraine (Government) in July 2026 meant that Government draft laws that had not been adopted as a basis at first reading were deemed withdrawn because the Government's powers had terminated.[4026] The Rules of Procedure of the Cabinet of Ministers of Ukraine provide that such draft laws may be resubmitted for consideration by the Government if, according to the conclusion of the principal developer — initiator, the draft has not lost its relevance.[4027] Accordingly, the Cabinet of Ministers of Ukraine is re-registering draft laws that were withdrawn. In July–August 2026, the Government registered 56 draft laws and draft resolutions, most of which duplicate withdrawn legislative initiatives. The withdrawal and resubmission procedure will further lengthen the time required for their consideration because, even where the developer considers a legislative initiative still relevant, the draft will again be considered: 1) by the Cabinet of Ministers of Ukraine before its submission to the Verkhovna Rada; and 2) by parliamentary committees and structural units of the Secretariat of the Verkhovna Rada responsible for conducting expert reviews of draft laws.[4028]

Representative Democracy

Accreditation of media entities for the 16th session of the Verkhovna Rada has commenced in Parliament.[4029]

Parliamentary Oversight

In the area of parliamentary diplomacy, the Chairman of the Verkhovna Rada held a meeting on current foreign policy issues and Parliament's role in their implementation, attended by the heads of permanent delegations and parliamentary groups for interparliamentary

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4024 Verkhovna Rada Considers Voting by Telephone during Air-Raid Alerts – Source. RBC-Ukraine. 2026. ↗

4025 On Amendments to Certain Legislative Acts of Ukraine Regarding the Delineation of Functions of State Authorities and Local Self-Government Bodies in the Area of Protection of Children's Rights in Connection with the Establishment of the State Service of Ukraine for Children: Law of Ukraine No. 2541-IX of 30.08.2022. ↗

4026 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Part 3 Article 105. ↗

4027 On Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 950 of 18.07.2007, para. 12^1. ↗

4028 Three Consequences of a Change of Government for Public Administration. Agency for Legislative Initiatives. 2025. ↗

4029 Accreditation for the Sixteenth Session of the Verkhovna Rada of Ukraine of the Ninth Convocation. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

relations.[4030] He also announced plans to open a Verkhovna Rada representation office at the European Parliament.[4031] A meeting was also held with a delegation of the United for Ukraine (U4U) global parliamentary network.[4032]

Following the change of Government in July, several newly appointed ministers held meetings with the relevant parliamentary committees.[4033]

At its plenary sitting on 19 August, the Verkhovna Rada also appointed two ministers: Yevhen Khmara as Minister of Defence of Ukraine[4034] and Andrii Sybiha as Minister of Foreign Affairs of Ukraine.[4035]

On 17 August, the Government registered its Programme of Activities.[4036] The Rules of Procedure of the Verkhovna Rada provide that the issue of approving the Programme of Activities of the Cabinet of Ministers of Ukraine (Government Programme) is to be considered at a plenary sitting within 15 days of its receipt by the Verkhovna Rada. On 26 August, the main committee[4037] recommended that the Verkhovna Rada consider and approve the Government Programme. However, as of 31 August 2026, Parliament had still not approved it.

In August, several parliamentary committees considered reports of the Accounting Chamber. The Committee on Social Policy and Protection of Veterans' Rights considered the Accounting Chamber report following the audit entitled 'The Veteran Assistant Institution: Support and Reintegration of Veterans into Civilian Life',[4038] while the Committee on Digital Transformation considered the results of the financial audit of the Ministry of Digital Transformation of Ukraine for 2025.[4039]

At its meeting on 26 August 2026, the Committee on Economic Development heard the Annual Report of the Antimonopoly Committee of Ukraine (AMCU) for 2025, as well as the Accounting Chamber's report on the results of its review of the AMCU Annual Report for 2025.[4040] The Committee recommended that the Verkhovna Rada consider the relevant

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4030 Chairman of the Verkhovna Rada of Ukraine Discusses Coordination of Work in the Foreign Policy Area. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

4031 Verkhovna Rada Plans to Open a Representation Office at the European Parliament – Stefanchuk. Ukrinform. 2026. ↗

4032 Leadership of the Verkhovna Rada and Representatives of Parliamentary Factions and Groups Discuss Further Support for Ukraine with U4U Delegation. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

4033 Team of the Ministry of Economy and Environment of Ukraine Presents Strategic Priorities and Main Areas of Activity to Committee Members. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2026 ↗; Committee on Digital Transformation Discusses Strategic Areas of Activity of the Ministry of Digital Transformation. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

4034 On the Appointment of Ye. L. Khmara as Minister of Defence of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4957-IX of 19.08.2026. ↗

4035 On the Appointment of A. I. Sybiha as Minister of Foreign Affairs of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4956-IX of 19.08.2026. ↗

4036 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15521 of 17.08.2026. ↗

4037 The lead committee for preparation and preliminary consideration is the Committee on Economic Development.

4038 Veteran Support System Needs Uniform Rules and Sound Planning: Audit Results Considered by a Verkhovna Rada Committee. ↗

4039 Relevant Verkhovna Rada Committee Considers Results of the 2025 Audit of the Ministry of Digital Transformation. Accounting Chamber. 2026. ↗

4040 Committee on Economic Development Hears the Annual Report of the Antimonopoly Committee of Ukraine for 2025. ↗

AMCU report and registered the corresponding draft Resolution.[4041] The Committee also considered the report on the work of the State Property Fund of Ukraine and the progress of state property privatisation in 2025[4042] and recommended that the Verkhovna Rada consider the relevant report.[4043]

Secretariat of the Verkhovna Rada

The main committee[4044] considered Draft Law No. 15371,[4045] which allows an MP to attend plenary sittings and meetings of Verkhovna Rada bodies with a child under the age of two and recommended that it be included in the agenda.

Civil Society

Funding of Civil Society Organisations

A new mechanism of state support for youth and children's civic associations in the form of budget grants for institutional development has been introduced. The Government approved the relevant Procedure on 19 August 2026.[4046] This is the first state institutional support instrument for civil society organisations (CSOs) aimed not at financing individual projects, but at strengthening the long-term organisational capacity of youth and children's CSOs.[4047]

The mechanism provides for a competitive selection process conducted by the Ukrainian Youth Fund. Grant funds may be used, inter alia, to develop managerial and financial capacity, strategic planning, professional development of teams, communications, digital tools and logistical support. In 2026, the mechanism is to be piloted. The maximum amount of a single grant is UAH 1 million. UAH 5 million has been allocated for the competition in 2026.[4048]

Participation is open to non-profit youth and children's civic associations which, inter alia, have at least five years of experience in youth work, demonstrated results in implementing youth projects, the capacity to scale up their activities and all-Ukrainian status. The requirement to have all-Ukrainian status may create problems in terms of equal access

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4041 On the Annual Report of the Antimonopoly Committee of Ukraine for 2025: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15562 of 27.08.2026. ↗

4042 On the Report on the Work of the State Property Fund of Ukraine and the Progress of State Property Privatisation in 2025: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15580 of 31.08.2026. ↗

4043 Committee Considers the Report of the State Property Fund of Ukraine for 2025. Committee on Economic Development. 2026. ↗

4044 Committee on Rules of Procedure, Parliamentary Ethics and Organisation of Work of the Verkhovna Rada of Ukraine.

4045 On Amendments to Certain Laws of Ukraine Regarding Guarantees of the Employment Rights of a Member of Parliament of Ukraine with a Child: Draft Law of Ukraine, registration No. 15371 of 30.06.2026. ↗

4046 On Approval of the Procedure for Providing State Support to Youth and Children's Civic Associations by Means of Budget Grants as Institutional Support from the State Budget and on Amendment to Paragraph 5 of the Procedure for the Use of Funds Provided in the State Budget for Measures of State Youth Policy and the Promotion of Ukrainian National and Civic Identity: Resolution of the Cabinet of Ministers of Ukraine No. 1031 of 19.08.2026. ↗

4047 State Invests in the Capacity of Youth and Children's Civic Associations: Grants for Institutional Development Introduced. Ministry of Youth and Sports of Ukraine. 2026. ↗

4048 Grants for the Institutional Development of Youth and Children's Civic Associations Introduced. Ukrainian Youth Fund. 2026. ↗

to the new mechanism because it is primarily linked to a formal organisational structure, in particular the existence of separate subdivisions.[4049] For civic associations that may operate effectively in different regions of Ukraine through their own teams, partner networks or project implementation without establishing formal subdivisions, this requirement makes them ineligible for funding.

As of 31 August 2026, the Ukrainian Youth Fund had already announced the competition and was accepting proposals for institutional support for youth and children's civic associations, with applications open from 25 August to 23 September 2026.[4050] Proper implementation of the pilot stage in 2026 is important for assessing how the selection criteria operate in practice, the potential for further development of the mechanism and the possibility of increasing the amount of state funding.

Recommendations

1. Ensure a transparent competition for budget grants for the institutional support of youth and children's civic associations in accordance with the Procedure approved by Resolution of the Cabinet of Ministers of Ukraine No. 1031 in 2026 and subsequent years, with adequate budget funding provided for the relevant mechanism.
2. Based on the results of piloting the mechanism in 2026, assess the effectiveness of the criteria and procedures established by Resolution of the Cabinet of Ministers of Ukraine No. 1031, with the involvement of youth and children's CSOs that received or applied for funding and by collecting their feedback. Particular attention should be paid to assessing the criterion of all-Ukrainian status and its correspondence to the actual scale of organisations' activities.

Financial Monitoring and Banking Services for Civil Society Organisations

CSOs continue to be affected by unintended consequences arising from the implementation of anti-money laundering and countering the financing of terrorism (AML/CFT) legislation.

On 31 August 2026, the Council for Preventing and Countering the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction (hereinafter — the Council) approve[4051] the 2025 National Risk Assessment (NRA) Report. According to the Council's decision, the 2025 NRA Report will not be made publicly available.[4052] Civil society experts were not engaged in the Council's meeting and currently have no access to the approved Report. At present, there are no grounds to conclude that recommendations and proposals from CSOs or international partners were taken into account when the 2025 NRA Report was approved.

During the meeting, the Council decided to approve the Report on the Fourth National Risk Assessment and instructed that a detailed action plan for responding to and mitigating

4049 On Civic Associations: Law of Ukraine No. 4572-VI of 22.03.2012, Article 19. ↗

4050 Competition Proposal under the Priority Area of Support 'Support for Youth and Children's Civic Associations through Institutional Support'. Ukrainian Youth Fund. 2026. ↗

4051 Serhii Marchenko: Approval of the fourth national risk assessment defines the priorities of the financial monitoring system for the next 3 years. Ministry of Finance of Ukraine, 31.08.2026. ↗

4052 Information on publication of the 2025 NRA Report, State Financial Monitoring Service of Ukraine, 1.09.2026. ↗

the identified risks be prepared and submitted to the Cabinet of Ministers of Ukraine for consideration.

Recommendations

1. **The Ministry of Finance of Ukraine** should ensure an inclusive process for developing the detailed action plan to respond to and mitigate the risks identified in the 2025 NRA Report, including the engagement of experts and public consultations.
2. **The State Financial Monitoring Service of Ukraine (SFMS)** should prepare and publish analytical and informational materials explaining the findings of the 2025 NRA Report.
3. **The SFMS**, together with other responsible state authorities and regulators, should develop and implement measures to prevent bank de-risking of non-profit organisations.

Governance

In August 2026, the new Government completed the formation of the main elements of its political and institutional configuration and identified its priorities. At the same time, some of the institutional, staffing and regulatory prerequisites necessary to implement the Government's priorities have yet to be completed.

Changes in the System of Central Executive Bodies

The institutional configuration of the new Government is still underway. Changes to the configuration of the system of central executive bodies (CEBs) are accompanied by the redistribution of competences between ministries. The Cabinet of Ministers of Ukraine (Government) approved the Regulation on the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, defining its tasks and powers.[4053] This Government decision implemented the division of powers between the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, the Ministry for Recovery, Infrastructure and Transport of Ukraine (Ministry for Development) and the Ministry of Social Policy, Family and Unity of Ukraine (Ministry of Social Policy) announced during the formation of the new Government.[4054] Humanitarian and human rights functions concerning internally displaced persons (IDPs), temporarily occupied territories of Ukraine (TOT of Ukraine), deported persons and the return of citizens from abroad are concentrated in the newly established Ministry for Communities, Territories and Internally Displaced Persons. Social protection and adaptation of IDPs remain with the Ministry of Social Policy, while physical reconstruction of infrastructure and housing and communal services remains with the Ministry for Restoration. The Ministry for Communities, Territories and Internally Displaced Persons also retains certain related powers concerning regional development projects and the housing stock in the TOT of Ukraine during reintegration, meaning that the division of functions between the two ministries is not absolute. At the same time,

4053 Certain Issues of Optimising the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1003 of 06.08.2026 ↗; Government Approves the Regulation on the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine. Interfax-Ukraine. 2026. ↗

4054 Certain Issues of Optimising the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1003 of 06.08.2026. ↗

some functions, for example those related to peacebuilding, regulating entry to and exit from the TOT of Ukraine and restoring public authorities following de-occupation, have temporarily been left without a clearly designated responsible authority. This issue will likely require additional regulatory action in the near future.[4055]

There was also an additional redistribution of powers, not previously announced, between the Ministry for Recovery and the Ministry of Culture of Ukraine (Ministry of Culture).[4056] The Ministry of Culture was assigned responsibility for ensuring the formulation and implementation of state policy in the field of tourism and resorts. The Ministry of Culture announced its new powers on its website, but the reasons for this decision were not made public.[4057] This is not the first time that these functions have been concentrated in this Ministry: they were most recently transferred to it from the Ministry of Economic Development and Trade of Ukraine at the end of 2019,[4058] before being transferred to the Ministry of Infrastructure of Ukraine in September 2021.[4059]

The Government also established a new distribution of powers between the Ministry of Economy and Environment of Ukraine (Ministry of Economy) and the Ministry of Agrarian Policy and Food of Ukraine (Ministry of Agrarian Policy).[4060]

The new distribution of powers between ministries was also reflected in the arrangements for the Cabinet of Ministers of Ukraine to direct and coordinate the activities of CEBs through the relevant members of the Government. In particular, the State Agency for Tourism Development of Ukraine is now directed and coordinated through the Deputy Prime Minister for Humanitarian Policy of Ukraine — Minister of Culture of Ukraine, while the State Inspection of Architecture and Urban Planning is directed and coordinated through the Minister for Communities, Territories and Internally Displaced Persons of Ukraine.[4061] The powers of the Minister of Agrarian Policy and Food of Ukraine to direct and coordinate the State Service of Ukraine on Food Safety and Consumer Protection, the State Agency of Forest Resources of Ukraine, the State Agency of Ukraine for the Development of Land Reclamation, Fisheries and Food Programmes and the State Service of Ukraine for Geodesy and Cartography have also been restored.[4062]

At the same time, to complete the regulatory formalisation of the distribution of powers, corresponding amendments must also be made to the regulations governing the CEBs

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4055 Delineation of Powers of the Updated Ministry for Recovery and the Newly Established Ministry for Communities, Territories and Internally Displaced Persons in the Area of Protecting the Rights of People and Territories Affected by Armed Aggression. Vplyv Group. 2026. ↗

4056 Certain Issues of Optimising the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1003 of 06.08.2026. ↗

4057 Ministry of Culture to Formulate State Policy in the Field of Tourism. Ministry of Culture of Ukraine. 2026. ↗

4058 Certain Issues of the Activities of the Ministry of Culture, Youth and Sports of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 885 of 16.10.2019 ↗; Certain Issues of the Activities of the State Agency for Tourism Development: Resolution of the Cabinet of Ministers of Ukraine No. 1162 of 24.12.2019. ↗

4059 On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 937 of 08.09.2021. ↗

4060 Certain Issues of the Activities of the Ministry of Economy and Environment and the Ministry of Agrarian Policy and Food: Resolution of the Cabinet of Ministers of Ukraine No. 1029 of 06.08.2026. ↗

4061 On Amendments to the Scheme for Directing and Coordinating the Activities of Central Executive Bodies by the Cabinet of Ministers of Ukraine through the Relevant Members of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1008 of 10.08.2026. ↗

4062 Ibid; On Optimisation of the System of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 442 of 10.09.2014. ↗

whose coordinating member of the Government has changed. As of 31 August 2026, the relevant amendments to the regulations governing these CEBs had not yet been adopted.

Other Government acts defining the tasks and powers of individual ministries also require updating. For example, the State Targeted Economic Programme for the Development of Livestock Farming until 2033 sets out specific tasks and measures aimed at creating conditions for the sustainable development of livestock farming as an important segment of the agricultural sector and a key element of Ukraine's food security.[4063] At present, however, responsibility for implementing certain provisions of the Programme remains assigned to the Ministry of Economy, even though, following the restoration of the Ministry of Agrarian Policy, the corresponding area of state policy falls within the latter's competence.

Overall, another change in the organisational governance model across a number of public policy areas may indicate that the distribution of competences between ministries depends to a considerable extent on the Government's current political and staffing configuration, including the willingness of a particular minister or candidate for ministerial office to assume responsibility for the relevant public policy area. As a result, following a change in political leadership, the same area may be transferred from one ministry to another. Such practice complicates the formation of sustainable institutional responsibility for the relevant public policy areas and may negatively affect the consistency of their implementation.

Recommendation

1. Complete the alignment of the regulatory framework with the new distribution of competences between ministries and the changes to the arrangements for the Cabinet of Ministers of Ukraine to direct and coordinate CEBs through the relevant members of the Government.

Staffing of the Government

The formation of the Government's membership has been completed. On 18 August 2026, the President submitted to the Verkhovna Rada nominations for the appointment of Yevhen Khmara as Minister of Defence of Ukraine[4064] and Andrii Sybiha as Minister of Foreign Affairs of Ukraine,[4065] and on 19 August 2026 Parliament adopted decisions appointing them to the respective positions.[4066]

Before his appointment as Minister of Defence of Ukraine, Yevhen Khmara acquired civilian status, in compliance with the requirements of the Law of Ukraine 'On National Security of Ukraine'.[4067] Before his appointment as Minister, he had been discharged from

4063 On Approval of the State Targeted Economic Programme for the Development of Livestock Farming until 2033: Resolution of the Cabinet of Ministers of Ukraine No. 72 of 21.01.2026. ↗

4064 On the Appointment of Ye. L. Khmara as Minister of Defence of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15523 of 18.08.2026. ↗

4065 On the Appointment of A. I. Sybiha as Minister of Foreign Affairs of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15524 of 18.08.2026. ↗

4066 On the Appointment of Ye. L. Khmara as Minister of Defence of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4957-IX of 19.08.2026 ↗; On the Appointment of A. I. Sybiha as Minister of Foreign Affairs of Ukraine: Resolution of the Verkhovna Rada of Ukraine No. 4956-IX of 19.08.2026. ↗

4067 On National Security of Ukraine: Law of Ukraine No. 2469-VIII of 21.06.2018, Article 15. ↗

military service in connection with organisational measures concerning senior officers[4068] in accordance with the Law of Ukraine 'On Military Duty and Military Service'.[4069]

At the same time, staffing the Government's activities is not limited to the appointment of ministers, as the effectiveness of their work largely depends on the formation of their teams. The management teams of the ministries are currently being formed.

In particular, amid the ongoing war, a capable and professional management team for the Minister of Defence is essential to ensuring the implementation of defence priorities. On 3 August 2026, the Government appointed Mykola Shvydkyi as a new Deputy Minister of Defence of Ukraine.[4070] According to media reports, his appointment is intended to strengthen practical interaction with the military, including coordination between the Ministry of Defence of Ukraine (MoD), the General Staff of the Armed Forces of Ukraine and the Commander-in-Chief of the Armed Forces of Ukraine.[4071] Media reports also indicate that Yevhen Khmara intends to retain key specialists from the team of the previous Minister, Mykhailo Fedorov, in order to continue procurement reform, including the component related to international support for Ukraine.[4072] This concerns, inter alia, First Deputy Minister of Defence of Ukraine Oleksii Vyskub and Deputy Minister of Defence of Ukraine Mstyslav Banik, who moved to the MoD from the Ministry of Digital Transformation of Ukraine together with Mykhailo Fedorov. As of 31 August 2026, all Deputy Ministers of Defence of Ukraine remained in office.

As of 31 August, more than a month after the new Government was formed, the Government had appointed only one Deputy Minister of Agrarian Policy and Food of Ukraine — Vitalii Holovnia.[4073] As of 28 August 2026, the Government had adopted no decisions concerning Deputy Ministers for Communities, Territories and Internally Displaced Persons of Ukraine.

Selective staffing changes are also taking place at the level of state secretaries. The Government appointed Yurii Severyn as State Secretary of the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine[4074] and Inna Ostradchuk as State Secretary of the Ministry of Agrarian Policy and Food of Ukraine[4075] for a term not exceeding 12 months from the date of termination or cancellation of martial law.

At the same time, following the change of ministers, on 26 August 2026 the state secretaries of the Ministry of Veterans Affairs of Ukraine (Ministry of Veterans Affairs), Yurii Butenko,[4076] and the Ministry for Restoration, Infrastructure and Transport of Ukraine, Serhii

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4068 Khmara Says He Has Been Discharged from Military Service and Has Civilian Status. Ukrinform. 2026. ↗

4069 On Military Duty and Military Service: Law of Ukraine No. 2232-XII of 25.03.1992, Article 26. ↗

4070 On the Appointment of M. O. Shvydkyi as Deputy Minister of Defence of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 751-r of 03.08.2026. ↗

4071 Government Appoints Mykola Shvydkyi as Deputy Minister of Defence of Ukraine. Interfax-Ukraine. 2026. ↗

4072 Khmara Wants to Retain the Core Team at the Ministry of Defence – Media. Novynarnia. 2026. ↗

4073 On the Appointment of V. O. Holovnia as Deputy Minister of Agrarian Policy and Food of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 843-r of 26.08.2026. ↗

4074 On the Appointment of Yu. V. Severyn as State Secretary of the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 765-r of 06.08.2026. ↗

4075 On the Appointment of I. V. Ostradchuk as State Secretary of the Ministry of Agrarian Policy and Food of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 806-r of 19.08.2026. ↗

4076 On the Dismissal of Yu. O. Butenko from the Position of State Secretary of the Ministry of Veterans Affairs of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 841-r of 26.08.2026. ↗

Biletskyi,[4077] were dismissed. The formal ground for dismissal was agreement between the parties. Yurii Butenko had held the position for less than one year and Serhii Biletskyi for less than two years. The duties of state secretaries of these ministries were temporarily assigned to Oleh Nemchinov (Ministry of Veterans Affairs)[4078] and Andrii Opanasenko (Ministry for Development)[4079] until state secretaries are appointed in accordance with the established procedure.

The state secretaries of other ministries continue to serve in their positions under the same conditions. On 26 August 2026, Ivan Turchak, State Secretary of the MoD, who moved to the MoD following Mykhailo Fedorov, was awarded the first rank of civil servant.[4080] This may indicate that he will remain in office under the new Minister of Defence of Ukraine.

At the same time, insufficient time has passed since the new Government took office to draw conclusions regarding the sustainability of this institution and the political independence of state secretaries. The staffing decisions to dismiss state secretaries at the end of August 2026 once again raise the issue of their independence from political office-holders and the stability of the institution of state secretary.

Recommendations

1. Complete the formation of the teams of Deputy Ministers for Communities, Territories and Internally Displaced Persons of Ukraine and the Deputy Ministers of Agrarian Policy and Food of Ukraine.
2. Eliminate factors causing excessive dependence of state secretaries on political office-holders, including by introducing coordinated amendments to the Laws of Ukraine 'On Civil Service' and 'On Central Executive Bodies' to strengthen legal safeguards for the role of state secretaries in ensuring the stability and continuity of ministries' work regardless of changes in political leadership.

Government Priorities

Programme of Activities of the Cabinet of Ministers of Ukraine

The Cabinet of Ministers of Ukraine prepared the Government Programme within the statutory deadline. On 13 August 2026, Prime Minister of Ukraine Serhii Koretskyi, together with members of the Government, presented the draft Government Programme at a meeting of the Coalition Council.[4081] On 17 August 2026, following consideration of comments made at the Coalition Council meeting, the final version of the document

4077 On the Dismissal of S. V. Biletskyi from the Position of State Secretary of the Ministry for Recovery, Infrastructure and Transport of Ukraine: Order of the Cabinet of Ministers of Ukraine No. 840-r of 26.08.2026. ↗

4078 On the Temporary Assignment of the Duties of State Secretary of the Ministry of Veterans Affairs of Ukraine to O. M. Nemchinov: Order of the Cabinet of Ministers of Ukraine No. 847-r of 26.08.2026. ↗

4079 On the Temporary Assignment of the Duties of State Secretary of the Ministry for Recovery, Infrastructure and Transport of Ukraine to A. V. Opanasenko: Order of the Cabinet of Ministers of Ukraine No. 846-r of 26.08.2026. ↗

4080 On Awarding Ranks to Civil Servants: Order of the Cabinet of Ministers of Ukraine No. 852-r of 26.08.2026. ↗

4081 Koretskyi Presents Draft Government Programme at Coalition Council Meeting. Ukrinform. 2026. ↗

was approved at a Government meeting[4082] and submitted to the Verkhovna Rada for consideration.[4083]

The Government's planning horizon extends to the end of 2027. Such a short planning horizon for a second consecutive Government may be linked to expectations that martial law could end and parliamentary elections could be held, which, pursuant to the Constitution of Ukraine, would result in the Government relinquishing its powers before the newly elected Verkhovna Rada.[4084]

The Government of Serhii Koretskyi identified four programme areas of work: (A) strengthening resilience and bringing a just peace closer; (B) restoring and developing human capital; (C) building a capable European state; and (D) accelerating recovery and economic development. Twelve strategic goals are grouped under these areas. Overall, the Government Programme contains 19 programme goals: one cross-cutting goal applies to all members of the Government, while 18 programme goals are distributed among 17 ministers and the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine. The Government Programme defines 85 operational goals, 412 tasks and 160 criteria and indicators for achieving the programme goals.[4085]

The principles governing the Government's work are efficiency, speed of decision-making and accountability for results. Areas, strategic goals and operational goals are allocated among members of the Government, who are responsible for specific tasks within the respective areas and strategic goals.[4086]

A substantial part of the new Government Programme continues the priorities of previous governments. The main difference lies in how these priorities are structured and how responsibility for their implementation is allocated. The new Government Programme appears more focused and operationally suitable for monitoring. At the same time, its analysis shows an uneven level of specificity in the expected results. Some tasks have no specific performance indicators, while in other cases the indicators established do not allow the results to be properly measured.

For example, the task assigned to the **Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine** to continue political dialogue with NATO Member States has the indicator 'a high level of political dialogue ensured'. However, no criteria are established for determining such a level, meaning that almost any action may create an appearance of progress. For the **Minister of Internal Affairs of Ukraine**, of the four tasks in the area of border protection and migration policy, indicators are defined only for engineering infrastructure at the border and integrated border management, while no indicators are provided for tasks concerning multiple citizenship, the Migration Policy Strategy or the management of migration processes.

Some indicators for the programme goals of Government members depend to a considerable extent on decisions by other actors. For example, the **First Deputy Prime Minister of Ukraine – Minister of Energy of Ukraine** is tasked with attracting international

4082 On Approval of the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1028 of 17.08.2026. ↗

4083 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine No. 15521 of 17.08.2026. ↗

4084 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 115. ↗

4085 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine No. 15521 of 17.08.2026, Annex. ↗

4086 Ibid.

financing for energy recovery, while the **Minister of Defence of Ukraine** is tasked with attracting at least EUR 60 billion in European Union (EU) loan financing for armaments and maintaining financing for Ukrainian weapons production at no less than the 2025 level. Achieving these results depends not only on the actions of Government members, but also on decisions by international partners, the availability of financing and the capacity of Ukraine's defence-industrial complex. Such indicators therefore do not always allow the **individual performance** of a Government member to be assessed accurately.[4087]

The cross-cutting tasks relate to the programme goal shared by all ministries — building a modern European public administration system that is professional, stable, digitalised, accountable and results-oriented (Area C). Two operational goals are defined for achieving it: (1) a professional, stable and attractive civil service with transparent access; and (2) an effective, digitalised, adaptive and service-oriented public administration system.

The tasks envisaged effectively cover some of the unimplemented or overdue measures of the Public Administration Reform Roadmap, including restoring competitive recruitment to the civil service, improving the remuneration system, digitalising human resource management, modernising professional training and ensuring transparent access to information on vacancies.[4088]

At the same time, implementation of certain tasks depends not only on the Government, but also on Parliament. In particular, restoring competitive selection and updating the procedures for entering, serving in and terminating civil service require the adoption of Draft Law No. 13478-1, which the Verkhovna Rada adopted as a basis at first reading on 29 April 2026.[4089]

Accordingly, achievement of the key indicator under the operational goal of creating a professional and attractive civil service, including restoring competitions and introducing updated adaptation tools for newly appointed civil servants and war veterans, depends on Parliament adopting the necessary legislative amendments in a timely manner.

The cross-cutting programme goal also envisages a functional review of CEBs, following which their functions and organisational structures are to be optimised by eliminating duplicative and non-core powers and simplifying management processes, while the staffing levels of CEBs are also to be optimised. The Government also plans to optimise the functions, organisational structures and maximum staffing levels of local state administrations, taking into account their powers, the specific features of the administrative-territorial structure, demographic conditions, security challenges and the actual workload of the relevant authorities.

The planned functional review may create an appropriate basis for streamlining the structures of CEBs and local state administrations. At the same time, the outcome of this process will depend on the methodology used for the functional review, including the subject of assessment, analytical criteria and the soundness of its conclusions, as well as on whether its results are taken into account, the availability of financing and, most

4087 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine No. 15521 of 17.08.2026, Annex. ↗

4088 Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process': Order of the Cabinet of Ministers of Ukraine No. 475-r of 14.05.2025. ↗

4089 On Amendments to Certain Laws of Ukraine Regarding the Resumption of Competitions and Improvement of the Procedure for Entry into, Service in and Termination of the Civil Service: Draft Law of Ukraine, registration No. 13478-1 of 16.07.2025. ↗

importantly, balanced decision-making concerning the reconfiguration of the executive system so as to avoid destabilising its work and undermining institutional capacity.

Government Programme and Interaction with Parliament

Parliament has 15 days to consider the Government Programme submitted by the Government.[4090] The Programme has already been supported by the Verkhovna Rada Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning.[4091] The Government team presented the Government Programme to the Verkhovna Rada Committee on Economic Development, which is the main committee for consideration of the relevant draft Resolution of the Verkhovna Rada. The Committee unanimously supported the Government Programme and recommended that Parliament approve it, describing it as a roadmap that would create a common framework for the Government's work and make it possible to assess its performance more clearly.[4092]

The current consideration in Parliament of the Government Programme submitted by Serhii Koretskyi's Government differs from the consideration of the programmes of the previous governments of Denys Shmyhal in 2020 and Yuliia Svyrydenko in 2025.

Parliament returned the Government Programme of Denys Shmyhal's Government for revision, taking into account comments made by the committees. However, the revised document did not receive a sufficient number of votes: only 207 MPs supported it, so no decision was adopted.[4093]

The Government Programme of Yuliia Svyrydenko's Government did not receive an opinion from the main committee and was not considered by Parliament at all. On 16 July 2026, the day the Government resigned, it was withdrawn from the Verkhovna Rada.[4094]

The positive opinion of the main committee following consideration of the Government Programme submitted by Serhii Koretskyi's Government increases the likelihood of its approval by Parliament. If the document is adopted, this Government will become the first since 2019 to operate under a programme agreed with Parliament. This would strengthen parliamentary and public oversight of the Government's work and, notwithstanding the short planning horizon, would also provide the Government with the constitutional protection from consideration of the issue of its responsibility.[4095]

4090 On the Rules of Procedure of the Verkhovna Rada of Ukraine: Law of Ukraine No. 1861-VI of 10.02.2010, Article 227. ↗

4091 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15521 of 17.08.2026 ↗; Committee Recommends Approving the Programme of Activities of the Cabinet of Ministers of Ukraine. Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning. 2026. ↗

4092 Verkhovna Rada Committee on Economic Development Supports Government Programme and Recommends Its Approval. Government Portal. 2026 ↗; Committee on Economic Development Recommends that the Verkhovna Rada Approve the Government Programme. Secretariat of the Committee on Economic Development. 2026 ↗; On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 15521 of 17.08.2026 ↗; Committee on Economic Development Recommends that the Verkhovna Rada Approve the Government Programme. Press Service of the Secretariat of the Verkhovna Rada of Ukraine. 2026. ↗

4093 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 3330 of 13.04.2020. ↗

4094 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Draft Resolution of the Verkhovna Rada of Ukraine, registration No. 14069 of 23.09.2025. ↗

4095 Constitution of Ukraine: Law of Ukraine No. 254k/96-VR of 28.06.1996, Article 87. ↗

Approval of the Government Programme will provide a formal basis for the Government's activities. The next stage should be to translate it into the Government Priority Action Plan, which should convert the programme goals of Government members into specific tasks, measures and measurable results for the remainder of 2026 and for 2027. In the first days of his premiership, Serhii Koretskyi stated that ministries were to submit proposals for the Government Priority Action Plan by 5 August 2026.[4096]

Budgetary Support for Government Priorities

Defence is an undisputed priority of Serhii Koretskyi's Government, including in budgetary policy. The Prime Minister of Ukraine has repeatedly emphasised the need to fully meet the needs of the Defence Forces, scale up the defence-industrial complex and identify resources to finance defence through the end of 2026 and in 2027.[4097]

Despite the increase in the budgetary resources allocated to the security and defence sector to UAH 4.37 trillion in June 2026, needs continue to exceed available resources.[4098] On 23 August 2026, the President of Ukraine stated that the MoD budget faced a shortfall of approximately **USD 27 billion**, of which USD 8–10 billion was required to cover needs at the beginning of 2027 and approximately USD 20 billion for the remuneration of military personnel, payments to the families of those killed and other needs.[4099] According to media reports, the new Minister of Defence estimates the Ministry's additional funding requirement through the end of 2026 at UAH 1.1 trillion.[4100] To cover this shortfall, the Government is considering international assistance, domestic borrowing, proceeds from frozen Russian assets and possible direct financing of Ukraine's defence by European partners.[4101] According to the President, Ukraine expects to receive EUR 30 billion in European financing, although the relevant legislation must first be adopted.[4102]

Another urgent financial priority for the Government in the near term is Ukraine's energy resilience. Ahead of winter, the Government estimates the energy sector's unfunded needs at approximately EUR 650 million. This concerns the restoration of damaged infrastructure and the development of distributed generation.[4103]

In August 2026, the Government focused on analysing current problems in fulfilling European integration commitments, including under the European Union's financial

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4096 Serhii Koretskyi: Ministries Will Submit Proposals for the Government Programme and Government Priority Action Plan during the Week. Government Portal. 2026. ↗

4097 Verkhovna Rada Appoints Serhii Koretskyi Prime Minister of Ukraine. Government Portal. 2026 ↗; Government Defines Key Tasks for Ukrainian Diplomacy. Ukrinform. 2026 ↗; Prime Minister Discusses State Finances and Macroeconomic Situation with Heads of Relevant Authorities. Government Portal. 2026 ↗; Prime Minister Serhii Koretskyi Presents Draft Government Programme to Coalition Council. Government Portal. 2026 ↗; Serhii Koretskyi Discusses Financing of the Security and Defence Sector with Heads of Relevant Authorities. Government Portal. 2026. ↗

4098 On Amendments to the Law of Ukraine 'On the State Budget of Ukraine for 2026' Regarding Financial Support for the Security and Defence Sector: Law of Ukraine No. 4908-IX of 10.06.2026. ↗

4099 President Names Countering Russian Ballistic Missiles and Defence Financing as Ukraine's Main Tasks. ArmyInform. 2026. ↗

4100 Ministry of Defence Requests One Trillion Hryvnias. Where Will the Government Find the Money? Ekonomichna Pravda. 2026. ↗

4101 Ibid.

4102 President Names Countering Russian Ballistic Missiles and Defence Financing as Ukraine's Main Tasks. ArmyInform. 2026. ↗

4103 Koretskyi: Energy Sector's Unfunded Needs Ahead of Winter Amount to Approximately EUR 650 Million. Interfax-Ukraine. ↗

support programme for the country for 2024–2027 (Ukraine Facility), and on identifying overdue and problematic tasks.[4104] At the same time, the Government expects to open the remaining negotiating clusters for EU accession by the end of 2026.[4105]

At the same time, the Government's capacity to attract the necessary resources depends to a significant extent on cooperation with the Verkhovna Rada. On 20 August 2026, the Government, Parliament's leadership and the leaders of parliamentary factions and groups agreed to work jointly on draft laws whose adoption is necessary to attract external financing and fund critical expenditure.[4106]

Accordingly, the key challenge for the Government's priorities is ensuring sufficient financial resources for their implementation. In the short term, this will depend primarily on the ability to mobilise domestic and external resources and ensure coordinated work between the Government and Parliament.

Recommendations

1. Parliament should ensure consideration of the Government Programme within the statutory deadline and should not allow the new Government to operate without an approved Programme.
2. The Government should ensure that the programme goals set out in the Government Programme are elaborated in the Government Priority Action Plan through specific tasks and measures, implementation deadlines, responsible bodies and measurable expected results. Particular attention should be paid to tasks under the programme goals of Government members for which the Government Programme does not define specific performance indicators or sets indicators that cannot be measured.
3. The Government and Parliament should ensure coordinated work and accelerate the preparation and adoption of EU integration-related draft laws.

Multi-Level Governance

State Regional Development Strategy

The newly established Ministry for Communities, Territories and Internally Displaced Persons of Ukraine announced that it is working on a concept for reforming the State Fund for Regional Development (SFRD), work on which had begun before the change of Government under the Ministry for Development of Communities and Territories of Ukraine. The concept proposes transforming the SFRD from a budget programme into a separate institution. It is envisaged that the institution would be able to attract not only State Budget funds, but also international assistance, charitable contributions and, in the future, reparations. The renewed SFRD is intended to become a fully fledged instrument

4104 Prime Minister Holds Meeting with Heads of Central Executive Bodies. Government Portal. 2026 ↗; Serhii Koretskyi: Government Will Accelerate Work to Fulfil Commitments under the Ukraine Facility. Government Portal. 2026. ↗

4105 Ukraine Expects to Open the Remaining Negotiating Clusters for EU Accession by the End of the Year – Serhii Koretskyi. Government Portal. 2026. ↗

4106 Serhii Koretskyi: Government and Verkhovna Rada Will Work Jointly to Ensure Financial Resilience and Meet the Needs of the Defence Forces. Government Portal. 2026. ↗

for implementing state regional policy and channel resources into the development of communities and regions.[4107]

Recommendation

1. Following completion of the SFRD reform process, review the procedure for the use of SFRD funds, where necessary.

Ministry for Communities, Territories and Internally Displaced Persons of Ukraine

The Cabinet of Ministers of Ukraine approved the Regulation on the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine.[4108] The Ministry is the principal body within the system of central executive bodies responsible for formulating and implementing state policy:

- in the area of state regional policy;
- in the area of local self-government development, the territorial organisation of power and the administrative-territorial structure;
- in the area of protection of critical infrastructure in the sector for which it is responsible;
- in the area of housing policy; construction, construction standard-setting, urban planning, spatial planning and architecture, and the creation of a barrier-free environment;
- in the area of technical regulation and pricing in construction, except for public roads;
- in the area of international territorial cooperation;
- in the area of protecting the rights of forcibly displaced or deported persons, including persons deported on ethnic grounds;
- in matters of supporting territories where hostilities are or have been taking place;
- in matters concerning the territory of Ukraine temporarily occupied by the Russian Federation and adjacent territories, as well as compliance with international humanitarian law throughout Ukraine, except for powers related to coordinating searches for persons missing under special circumstances and resolving other related issues in accordance with the Law of Ukraine 'On the Legal Status of Persons Missing under Special Circumstances';
- in matters of facilitating the exercise of the statutory rights and freedoms of IDPs, including the right to housing;

4107 Ministry for Communities, Territories and Internally Displaced Persons Develops Concept for Reforming the State Fund for Regional Development. Decentralisation. 2026. ↗

4108 Certain Issues of Optimising the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1003 of 06.08.2026. ↗

- in matters of providing support during evacuation to persons leaving territories of active or possible hostilities;
- in matters of creating conditions for the voluntary return of citizens of Ukraine who left their place of residence in Ukraine, including as a result of, or in order to avoid, the adverse consequences of armed conflict and/or the temporary occupation of part of Ukraine's territory, and went abroad, either to their former place of residence or to integrate at a new place of residence in Ukraine;
- in matters of adaptation of IDPs at their new place of residence;
- in the area of architectural and construction control and supervision;
- in the area of energy efficiency, including energy efficiency of buildings and alternative types of liquid and solid fuels.[4109]

On 17 August 2026, the Government approved the Government Programme, which defines programme goals for Government members.[4110] The programme goal of the Minister for Communities, Territories and Internally Displaced Persons of Ukraine is to develop territorial communities and territories on the basis of cohesion principles by moving from fragmented support for regions and individual vulnerable groups to a unified territorially oriented recovery and development policy based on the principles of EU cohesion policy. Under this programme goal, the document defines five operational goals: (1) cohesive territorial development through transition to EU cohesion policy; (2) ensuring rights and long-term solutions for IDPs; (3) multi-level governance capable of providing high-quality public services to citizens; (4) a high-quality, safe, accessible, barrier-free and energy-efficient living environment; and (5) systematic international partnerships for the development of territorial communities and territories and the return of Ukrainians from abroad.

On 26 August 2026, the Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, whose remit includes, inter alia, the operational goals and tasks under the programme goal of the Minister for Communities, Territories and Internally Displaced Persons of Ukraine, adopted a decision supporting the Government Programme.[4111]

Recommendation

1. Ensure the achievement of the operational goals under the programme goal of the Minister for Communities, Territories and Internally Displaced Persons of Ukraine in accordance with the Government Programme.

4109 Certain Issues of Optimising the Activities of Central Executive Bodies: Resolution of the Cabinet of Ministers of Ukraine No. 1003 of 06.08.2026 ↗; Part 1 of the Regulation.

4110 On Approval of the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Cabinet of Ministers of Ukraine No. 1173 of 10.09.2025. ↗

4111 Committee Recommends Approving the Programme of Activities of the Cabinet of Ministers of Ukraine. Committee on the Organisation of State Power, Local Self-Government, Regional Development and Urban Planning. 2026. ↗

Military Administrations

A Government draft law entitled 'On Amendments to Article 4 of the Law of Ukraine "On the Legal Regime of Martial Law" Regarding the Status of Employees of Military Administrations of Settlements' has been submitted to the Verkhovna Rada.[4112] The draft law is intended to define the status of employees of military administrations of settlements, including those whose official duties are directly related to the exercise by military administrations of the powers of local self-government bodies. This should contribute to ensuring legal safeguards for such employees and strengthening the staffing capacity of military administrations.

Recommendation

1. Adopt the Law of Ukraine 'On Amendments to Article 4 of the Law of Ukraine "On the Legal Regime of Martial Law" Regarding the Status of Employees of Military Administrations of Settlements'.

Local Resources

The Government adopted a decision allocating almost UAH 2.3 billion in additional grants from the State Budget to local budgets for the exercise of powers by local self-government bodies in de-occupied, temporarily occupied and other territories of Ukraine adversely affected by the Russian Federation's full-scale armed aggression.[4113]

The funds were distributed among 179 territorial community budgets and five oblast budgets. In particular, additional grants will be provided to: (1) Dnipropetrovsk oblast — UAH 314.8 million (20 budgets); (2) Donetsk oblast — UAH 409.6 million (28 budgets); (3) Zaporizhzhia oblast — UAH 520.1 million (24 budgets); (4) Luhansk oblast — UAH 6.1 million (4 budgets); (5) Mykolaiv oblast — UAH 12.3 million (9 budgets); (6) Odesa oblast — UAH 104.1 million (19 budgets); (7) Sumy oblast — UAH 206.8 million (24 budgets); (8) Kharkiv oblast — UAH 627.2 million (34 budgets); (9) Kherson oblast — UAH 39.1 million (17 budgets); and (10) Chernihiv oblast — UAH 33.5 million (5 budgets).[4114]

The mechanism for distributing the additional grant[4115] takes into account the needs of communities adversely affected by the war and is intended to reduce disparities in local budget revenues and ensure adequate financing of priority expenditure, above all remuneration of employees of budget-funded institutions.[4116]

4112 On Amendments to Article 4 of the Law of Ukraine 'On the Legal Regime of Martial Law' Regarding the Status of Employees of Military Administrations of Settlements: Draft Law of Ukraine, registration No. 15543 of 21.08.2026. ↗

4113 On the Distribution of the Amount of an Additional Grant from the State Budget to Local Budgets for the Exercise of Powers by Local Self-Government Bodies in De-Occupied, Temporarily Occupied and Other Territories of Ukraine Adversely Affected by the Russian Federation's Full-Scale Armed Aggression: Order of the Cabinet of Ministers of Ukraine No. 771-r of 13.08.2026. ↗

4114 Financial Support for Communities: Government Allocates Almost UAH 2.3 Billion in Additional Grants. Government Portal. 2026. ↗

4115 On Approval of the Procedure and Conditions for Providing an Additional Grant from the State Budget to Local Budgets in 2026 for the Exercise of Powers by Local Self-Government Bodies in De-Occupied, Temporarily Occupied and Other Territories of Ukraine Adversely Affected by the Russian Federation's Full-Scale Armed Aggression: Resolution of the Cabinet of Ministers of Ukraine No. 80 of 28.01.2026. ↗

4116 Financial Support for Communities: Government Allocates Almost UAH 2.3 Billion in Additional Grants. Government Portal. 2026. ↗

Recommendation

1. Conduct a dialogue on the areas and criteria of state support for the exercise of powers by local self-government bodies in de-occupied, temporarily occupied and other war-affected territories, and update the criteria for compiling the List of Territories Where Hostilities Are or Have Been Taking Place or Which Are Temporarily Occupied by the Russian Federation, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1364.[4117]

4117 Certain Issues of Compiling the List of Territories Where Hostilities Are or Have Been Taking Place or Which Are Temporarily Occupied by the Russian Federation: Resolution of the Cabinet of Ministers of Ukraine No. 1364 of 06.12.2022. ↗

Annex 2 to the Report

Overview of key issues and recommendations in the areas covered under 'Functioning of Democratic Institutions' in Chapter 23 'Judiciary and Fundamental Rights' and Chapter 24 'Justice, Freedom and Security' of Negotiating Cluster 1 'Fundamentals of the Accession Process'

No.	Issues	Recommendations
FUNCTIONING OF DEMOCRATIC INSTITUTIONS		
ELECTIONS		
1	Reduced voter influence on the order in which seats are allocated among candidates on electoral lists under the proportional system, limited political competition and excessive politicisation of local councils.	Amend the Electoral Code of Ukraine (EC of Ukraine) to provide for the following modifications to the open-list proportional electoral system in parliamentary elections and local council elections: › abolish guaranteed seats for the top candidates and include each candidate on the nationwide list in one of the regional lists in parliamentary elections and, in local elections, in one of the territorial electoral lists; › reduce the share of votes that a candidate on a regional/territorial list must receive to move up the list from 25% to 5% of the electoral quota; › provide for the possibility of self-nomination of candidates in elections held under the proportional system, at least in local elections; › apply the proportional electoral system in local council elections in communities with 50,000 or more voters.

No.	Issues	Recommendations
2	Lack of guarantees of political impartiality when forming multi-mandate and territorial constituencies (MMCs and TCs) in local elections.	Amend the EC of Ukraine and the Code of Administrative Procedure of Ukraine (CAP of Ukraine) to: › establish clear requirements for forming multi-mandate and territorial constituencies in local elections, including mandatory consideration of the administrative-territorial structure and compliance with the compactness principle; › reduce the permitted deviation between the number of voters in MMCs to 10% in line with international standards; › require territorial election commissions (TECs) to hold public consultations on draft decisions on the formation of MMCs and/or TCs; › oblige TECs to adopt decisions on the formation of constituencies within time limits that allow potential subjects of electoral process to timely plan their campaigns, including before the electoral process begins; › allow decisions on the formation of constituencies in local elections to be challenged not only by the subjects of electoral process but also by local party organisations that have not acquired such status and are entitled to nominate candidates in the relevant local elections.
3	Risks of subjectivity in decisions on the impossibility of holding elections or voting in certain territories.	Define in law an exhaustive list of requirements for decisions not to hold elections or voting in a certain territory, as well as a decision-making procedure that ensures the impartiality and objectivity of such decisions.
4	Lack of proper legislative guarantees for the independence, professionalism, integrity and transparency of the Central Election Commission (CEC), making the CEC vulnerable to political pressure, conflicts of interest and reduced transparency in election administration.	Exclude the possibility of simultaneous early termination of the powers of the entire CEC composition. Replace the legally defined criteria for establishing a breach of oath by a CEC member, which allow broad interpretation, with grounds that can be objectively verified. Provide in legislation for transparent procedures for forming the CEC on a competitive basis, ensuring the political neutrality, professionalism and public trust in the collegial body. Ensure the stability of the CEC by filling vacant CEC member positions.

No.	Issues	Recommendations
		Ensure the openness of the activities of the Central Election Commission and other election commissions, in particular through the regular publication of decisions, documents, dissenting opinions and materials related to the electoral process.
5	The absence of CEC regional offices leads to ineffective oversight of compliance with electoral legislation and increases the functional burden on the CEC in election administration.	Ensure the phased establishment and operation of CEC regional offices.
6	Risks of political bias in the formation of election commissions, low professionalism among election commission members and the absence of limits on the maximum composition of election commissions in presidential elections.	Amend the EC of Ukraine to provide for: › a maximum number of members of election commissions in presidential elections; › drawing lots for the allocation of leadership positions in parliamentary elections separately for each election commission, rather than once for all commissions simultaneously; › deadlines and clear restrictive grounds for replacing election commission members before election day, limiting the possibility of repeated replacements of commission members by the same party/ local party organisation or candidate; › introduction of a mandatory system of prior training and certification of election commission members, as well as creation of a national register of persons who have completed such training; › adequate remuneration for election commission members.
7	Insufficient digitalisation of the electoral process and continued paper-based document flow reduce the accessibility of electoral procedures, complicate document verification and increase the risk of errors in their preparation.	Introduce electronic document flow in election commissions, electronic submission of documents for the formation of commission membership, automated verification of election documents and phased introduction of electronic drawing of lots after proper audit and certification of the relevant system.
8	Lack of observer access to all stages of the electoral process and the widespread practice of politically motivated observation increase the risks of electoral law violations, reduce the transparency of certain stages of the electoral process and undermine voter trust in civic election observation.	Provide for the right to observe all stages of the electoral process, including those that precede the possibility of obtaining official accreditation. Simplify the formal requirements for CSOs to obtain permission to have official observers.

No.	Issues	Recommendations
		Ensure inclusive discussion with interested stakeholders on possible ways to prevent the use of the observation mechanism for political or other private interests, while avoiding disproportionate barriers to good-faith civic observation. Provide legislative requirements for the openness of political party congresses and conferences at which candidates are nominated.
9	Outdated data in the State Voter Register makes proper election administration impossible and increases the risk of restrictions on the right to vote.	Ensure comprehensive updating of the State Voter Register database before the electoral process of the first post-war elections begins. Ensure updating of state information resources and registers whose data are used to populate the State Voter Register. Restore the operation of State Voter Register maintenance bodies in all territories where this is objectively possible and provide special organisational mechanisms for territories where such bodies cannot operate in the usual mode of exchanging up-to-date data.
10	Imperfect mechanisms for updating data on voters abroad make it impossible to properly organise voting at election precincts abroad (EPAs) and to ensure the right to vote for voters staying in foreign states.	Before the termination or cancellation of martial law, establish in law a mechanism for active voter registration in the election district abroad in combination with the existing passive registration model. Regulate the procedure for submitting applications to vote outside Ukraine in paper and electronic form, including through the Voter's Personal Cabinet and the Diia application. Optimise mechanisms for consular registration and collection of data on voters' actual place of stay abroad for the purposes of planning voting and determining the need for additional foreign election precincts. Introduce separate information programmes for voters abroad on registration in the Register, data updates, change of voting place and the procedure for exercising electoral rights in the foreign constituency.
11	Absence of a legal framework for auditing the State Voter Register makes it impossible to verify the completeness, accuracy and relevance of its data.	Before the termination or cancellation of martial law, adopt amendments to the Law of Ukraine 'On the State Voter Register' defining the legal framework for auditing the State Voter Register and conduct such an audit before the electoral process of the first post-war elections begins.

No.	Issues	Recommendations
12	Lack of proper legislative guarantees for intra-party democracy and transparency in candidate nomination.	Amend the EC of Ukraine and legislation on political parties to establish minimum mandatory guarantees of internal party democracy in candidate nomination procedures, as well as clear legal consequences for violating requirements on the openness of such procedures.
13	Excessive residence requirement for candidates and disproportionate restrictions on the passive electoral right in connection with a conviction for an intentional crime.	In the special law on the procedure for holding the first post-war elections, specify exceptions to the residence requirement for persons who were forced to stay abroad due to the armed Russian aggression against Ukraine. After the restrictions related to martial law are lifted, initiate a review of the constitutional and legislative restrictions of the right to stand for election due to conviction for an intentional crime, narrowing it to clearly defined serious crimes for which such a restriction is justified and proportionate.
14	Absence of legally defined criteria for 'soft lustration' as grounds for permissible restriction of the passive electoral right.	Provide for the introduction of lustration measures for persons who cooperated with the aggressor state, drawing on the Guidelines on Lustration, the case law of the European Court of Human Rights and Venice Commission opinions, the principle of proportionality, proper procedural guarantees and an individual approach to establishing a person's guilt in such cooperation.
15	Excessive formalism in candidate registration requirements increases the risk of unjustified refusals to register candidates in elections.	Provide in the EC of Ukraine, for parliamentary and local elections, a mechanism for correcting minor errors and inaccuracies in documents, an obligation for election commissions to promptly notify submitting entities of identified deficiencies and a realistic deadline for correcting them.
16	The existence of a party-based imperative mandate turns MPs into representatives of the will of party leadership rather than voters and increases the risks of political corruption.	After the restrictions on amending the Constitution of Ukraine due to martial law cease to apply, amend Article 81 of the Constitution of Ukraine to exclude the possibility of early termination of an MP's powers due to MP's failure to join parliamentary faction of the party on whose list he or she was elected or due to leaving such faction, and to guarantee the free nature of the parliamentary mandate.

No.	Issues	Recommendations
17	Possibility of hidden/non-transparent election campaigning before the start of the electoral process and fragmented regulation of election campaigning.	Consolidate restrictions and requirements for election campaigning in the EC of Ukraine. Amend legislation to regulate 'premature' campaigning conducted before candidate registration and to adapt regulation of political advertising to EU Regulations, primarily Regulation (EU) 2024/900 on the transparency and targeting of political advertising.
18	The impossibility of annulling election results and the existence of tolerance thresholds for electoral law violations increase the risks of impunity in cases of mass violations and allow voting/election results to be manipulated in the interests of certain parties or candidates.	Review the provisions of the EC of Ukraine and CAP of Ukraine on declaring voting at an election precinct invalid, ordering a recount and cancelling election results by providing legally defined, unified and proportionate grounds for applying such mechanisms, and clearly delineate the powers of election commissions and courts in this area.
19	Inefficiency and excessive duration of determining voting results delays the process of establishing election results.	Provide for simplified reconciliation procedures, streamline the procedure for uninterrupted meetings of election commissions, introduce mechanisms for phased transfer of documentation and establish additional guarantees of its integrity and proper storage until it is considered by a higher-level commission. Introduce at legislative level the possibility of preparing, preliminarily verifying and checking vote-count and tabulation protocols in electronic form. Ensure full and timely publication on the CEC website of all data from election commission protocols, including updated protocols.
20	Ineffectiveness of out-of-court appeals due to formalism in election commissions' consideration of complaints.	Introduce an electronic complaint administration system containing all complaints submitted to election commissions, information on the course and results of their consideration and decisions adopted following their consideration, with access for all interested persons, including judges. Provide for the CEC's obligation to analyse and summarise the case consideration practice of constituency election commissions and TECs that it forms within a legally defined period after nationwide and local elections.

No.	Issues	Recommendations
		Require election commissions to consider complaints which, although not prepared in accordance with EC of Ukraine requirements or submitted by an improper complainant, contain sufficient evidence of the unlawfulness of decisions, actions and/or omissions and were submitted to the proper complaint-review body within the established appeal deadlines. Require the CEC to publish on its website templates for complaints to election commissions and claims to courts in electoral disputes, instructions for completing them and online assistance in completing complaints/claims, for example using bots and/or artificial intelligence.
21	Non-enforcement of court decisions by election commissions calls the rule of law into question and violates electoral rights.	Provide for mandatory early termination of the entire composition of an election commission if it fails to enforce a final court decision, as well as if it repeatedly adopts a decision that essentially repeats a decision cancelled or declared unlawful by a court.
22	The impossibility of effectively challenging election-related decisions adopted outside the electoral process makes it impossible to effectively protect and restore electoral rights where electoral law violations occur before the electoral process begins.	Amend CAP of Ukraine to provide for the possibility of challenging decisions, actions and omissions adopted, committed or allowed outside the electoral process but relating to the preparation and conduct of elections under the electoral dispute resolution procedure.
23	Ineffectiveness of appeals due to the possibility of simultaneous consideration of the same electoral dispute by a court and an election commission.	Provide in the EC of Ukraine for the mandatory obligation of an election commission to inform the court competent to resolve the relevant category of electoral disputes about receipt of a complaint, its inclusion on the commission meeting agenda and the results of consideration.
24	Inconsistent judicial practice in electoral dispute resolution leads to uneven application of electoral legislation by courts and violations of electoral rights.	Provide mechanisms for harmonising judicial practice, including introducing a preliminary-reference mechanism, and consider assigning the Supreme Court the duty to summarise electoral dispute resolution practice not only by the Supreme Court but also at least by district and appellate administrative courts. Introduce mandatory training, at least online, for judges on judicial resolution of electoral disputes during the inter-election period under a programme approved by the National School of Judges of Ukraine and ensure annual financing of such a programme from the State Budget of Ukraine.

No.	Issues	Recommendations
25	Conditions are created for electoral law violations because sanctions do not meet the principles of proportionality, deterrence and effectiveness, and because accountability for violations is ineffective.	Introduce proportionate, effective and deterrent sanctions for criminal and administrative violations of electoral legislation. Amend the procedural provisions of the Code of Ukraine on Administrative Offences to ensure the effectiveness of administrative liability for electoral violations. Introduce mandatory inter-election training programmes for investigators, police officers and prosecutors on responding to electoral law violations and ensuring public order during the preparation and conduct of elections, investigation of crimes and documentation of administrative offences infringing citizens' electoral rights.
26	The existing system of EPAs makes it impossible to properly realise the electoral rights of forcibly displaced persons and voters who were forced to leave Ukraine.	In the special law defining the procedure for holding the first post-war elections in Ukraine: › require the CEC to review the existing system of regular and special election precincts and establish a new system of such precincts based on the updating and audit of the State Voter Register, as well as a pre-election audit conducted by the CEC, including an analysis of the state of electoral infrastructure at all election precincts; › clearly define the procedure for establishing additional regular election precincts, provide for the possibility of their establishment on the CEC's own initiative and define the procedure for informing voters assigned to such precincts that they have been included in the voter lists for those precincts; › where the first post-war elections are called and based on the analysis of electoral infrastructure, provide financing from the State Budget of Ukraine for expenses related to providing precinct election commissions with temporary structures; › clearly define the deadlines for the Ministry of Foreign Affairs of Ukraine to take actions related to initiating the establishment of additional EPAs outside diplomatic missions, the grounds and procedure for establishing such EPAs and effective mechanisms for informing voters that they have been included in voter lists at additional EPAs;

No.	Issues	Recommendations
		› simplify the procedure for determining and changing an electoral address and changing a voting place without changing the electoral address; › provide for the possibility of submitting applications to change an electoral address and to change a voting place without changing the electoral address electronically, through an authorised person and by other accessible means for voters who cannot apply in person; › extend the deadlines for submitting applications to change an electoral address and voting place to ensure that a significant share of voters can use these procedures; › provide for the possibility of providing precinct election commissions with premises that do not meet established standards but can be repaired and brought into compliance with those standards.
27	The absence of mechanisms and guarantees to ensure the electoral rights of service members in nationwide elections makes their participation in voting impossible and increases the risks of restrictions on passive electoral rights.	In the special law defining the procedure for holding the first post-war elections, determine: › an exhaustive list of grounds for establishing temporary special election precincts on the territory of military units/formations; › an exhaustive list of grounds for service members to vote at their place of stay at a temporary special election precinct on the territory of a military unit/formation, and provide for the mandatory presence during the organisation and conduct of such voting of candidates, their proxies, authorised representatives of parties, official observers and media representatives; › exceptions to the residence requirement; › sufficient free leave for service members to raise funds for the electoral deposit, submit documents for registration as candidates, make corrections to submitted documents and challenge refusals of registration; › interaction between service members and the military command of the relevant units/formations in exercising their passive electoral right.

No.	Issues	Recommendations
28	Imperfect guarantees for ensuring balanced representation of women and men in elected bodies increase the risks of violating women's electoral rights.	Amend the EC of Ukraine to take into account the provisions proposed by Draft Law No. 11300 on improving the effectiveness of gender quotas in parliamentary and local elections, defining sexism and prohibiting sexism in election campaigning. Amend the Law of Ukraine 'On Political Parties in Ukraine' to provide for the distribution of 10% of the annual state funding for political parties equally among parties that have acquired the right to state funding of their statutory activities and whose electoral lists in the single multi-mandate election constituency resulted in no more than 55% of elected MPs of one sex among the total number elected from their lists.
29	Lack of proper mechanisms to ensure the right to vote of voters with disabilities, leading to their stigmatisation and reducing the accessibility of polling stations, voting procedures and information about parties/candidates in elections.	Provide in the EC of Ukraine and the special law on the procedure for holding the first post-war elections for: › mandatory monitoring, before the start of each electoral process, by local executive authorities and local self-government bodies of the accessibility of polling stations for voters with disabilities in accordance with a methodology to be approved by the CEC; › selection of premises for election commissions taking into account architectural and territorial accessibility requirements; › the CEC's obligation to inform voters about accessible polling stations and their provision with reasonable accommodation; › bringing CEC requirements for setting up voting premises into line with the universal design principle; › defining the concepts of reasonable accommodation and assistive device; › election commissions to designate members responsible for interaction with voters with disabilities and to provide prior training for such commission members on communication with these voters; › mandatory use of accessible formats and plain language in information materials on elections and electoral procedures, and ensuring the accessibility of election materials; › exclusion of provisions on automatic inclusion of voters with disabilities in extracts from voter lists for voting at their place of stay.

No.	Issues	Recommendations
30	Deprivation of electoral rights of voters declared legally incapable, leading to their stigmatisation and excluding their integration into political life, contrary to international standards.	After cancellation/termination of martial law in Ukraine, amend Article 70 of the Constitution of Ukraine and the relevant provisions of the EC of Ukraine to abolish automatic deprivation of electoral rights on the grounds of legal incapacity. Provide for an explanation to the voter in plain language of their rights when issuing a ballot. Introduce supported decision-making in the electoral process.
31	Absence of effective mechanisms to ensure representation of national minorities (communities) and Indigenous Peoples in elected bodies.	Define in the Law of Ukraine 'On National Minorities (Communities) of Ukraine' the list of minorities for which Ukraine recognises the right to representation in the Verkhovna Rada of Ukraine (Verkhovna Rada, Parliament) and, after determining the size of such minorities, the recommended/target representation quota. Provide for a representation quota in the Verkhovna Rada for each of the three Indigenous Peoples defined by the Law of Ukraine 'On Indigenous Peoples of Ukraine'. Provide for allocation of part of the total annual state funding for parties to those parties from which representatives of under-represented national minorities were elected. Define the criteria by which a candidate on a list is considered a representative of a national minority (community). Provide for mandatory consideration of areas of compact residence of national minorities, namely settlements where minorities traditionally reside or constitute a majority, when forming multi-mandate and territorial constituencies in local council elections.
32	Absence of effective guarantees for national minorities and Indigenous Peoples to use their languages in electoral processes makes their participation in elections more difficult.	Define the list of election-related materials whose translation into minority languages officially recognised by Ukraine is ensured by the CEC. Ensure proper and timely financing of such translations from the State Budget of Ukraine, provide for their publication on the CEC website and include QR codes linking to such translations in the Ukrainian versions of such materials transferred to the relevant precinct election commissions.

No.	Issues	Recommendations
		Provide for the production of bilingual ballots and vote-count protocol forms, in the state language and duplicated in one of the officially recognised national minority languages, for precinct election commissions in settlements where minorities that use the relevant ballot language traditionally reside or constitute a majority.
33	The absence of a clear definition of political advertising and uncertainty about its relationship with election campaigning make control over compliance with campaigning restrictions ineffective and reduce the effectiveness of sanctions for violating such restrictions.	Start comprehensive development of amendments to current legislation on the regulation of political advertising in line with the model of the EU Regulation on the transparency and targeting of political advertising.
34	Improper funding of the media regulator weakens its independence and the effectiveness of its regulatory and oversight powers.	Ensure the financial independence of the media regulator through proper annual funding of its activities in accordance with budget requests.
35	Lack of regulation of information-sharing platforms (social networks) creates conditions for manipulation/disinformation and shadow financing of election campaigns.	Amend the EC of Ukraine to extend the rules on election campaigning and political advertising to online media, video-sharing platforms and information-sharing platforms.
36	The impossibility of legally paying for political advertising on online platforms leads to non-transparent campaign financing and reduces the effectiveness of control over placement of such advertising.	Provide in the EC of Ukraine for the possibility of direct payment for political advertising to non-resident platforms from election funds. Amend the Law of Ukraine 'On Media' regarding cooperation with online platforms, taking into account Ukraine's limited jurisdiction and the transitional period before EU accession. Hold negotiations with online platforms on formalised cooperation with the CEC and the National Council of Ukraine on Television and Radio Broadcasting (National Council).
37	The prohibition on commenting on and evaluating the content of election programmes is inconsistent with democratic standards on the right to freedom of expression.	Abolish restrictions on commenting on and evaluating campaigning materials, taking into account freedom of expression standards.
38	Fragmented regulation and the absence of legal mechanisms to counter disinformation increase the risks of foreign interference in the electoral process and manipulation of voter opinion.	Enshrine in legislation the definition and legal regime for countering foreign information manipulation and interference (FIMI), identifying the bodies responsible for collecting, analysing and countering FIMI and coordinating activities between these institutions.

No.	Issues	Recommendations
		Approve the Information Security Strategy for 2026–2031, taking into account current challenges, including FIMI and the role of information-sharing platforms. Continue media literacy measures within the powers of the Ministry of Culture of Ukraine and the National Council, in partnership with NGOs, to build the resilience of society and individual vulnerable groups, including adolescents, older people and veterans, to information influence during elections. Establish a permanent coordination body at the level of the Cabinet of Ministers of Ukraine (Government) to counter foreign interference, including during the electoral process, and define the timeframe for its establishment and status. Integrate existing cybersecurity response mechanisms with information-security response mechanisms into a single system for countering threats during elections, involving the CEC and the National Council. Strengthen cooperation with EU mechanisms for countering disinformation and information operations.
39	Uncertainty over the legal status of persons exercising information influence (influencers) creates grounds for voter manipulation, disinformation and shadow financing of election campaigns.	Regulate the legal status of influencers and establish basic transparency requirements for them during the electoral process.
40	Hidden financing of election campaigning by third parties bypassing election funds.	Amend legislation to reduce the risk of hidden financing of political parties and election campaigns.
41	Significant spending by parties and candidates from election funds raises questions about transparency, the origin of such contributions and potential risks of political corruption.	Amend legislation to reduce the scale of election campaign financing from parties' or candidates' own funds.
42	The outdated procedure for financial reporting in elections and superficial analysis of financial reports on the financing of parties and election campaigns increase the risks of selective verification and ineffective control over campaign financing.	› Ensure the launch, before the next elections, of the information and communication reporting system for election fund managers (a system analogous to POLITDATA); › Adopt Draft Law No. 11462; › Adopt Draft Law No. 14289.

No.	Issues	Recommendations
PARLIAMENT		
1	Resolution of the Verkhovna Rada No. 1035-VIII on parliamentary reform has lost relevance and can no longer serve as a benchmark for Parliament's development.	Develop and adopt an updated resolution on parliamentary reform, taking into account the challenges related to the Russian Federation's military aggression. Representatives of all political forces in the Verkhovna Rada and civil society should be involved in developing the new resolution, which should serve as a long-term benchmark and strategic framework for Parliament's development.
2	Parliament has not designated a permanent body responsible for implementing parliamentary reform measures. Parliamentary reform lacks clear political leadership.	Designate or establish a permanent body responsible for updating, implementing and monitoring parliamentary reform measures. Identify a person who has the support of a majority of factions and groups and will bear political responsibility for implementing parliamentary reform.
3	The Rules of Procedure of the Verkhovna Rada are adopted in the form of a law, meaning that the President signs amendments to Parliament's internal rules of procedure, which violates parliamentary autonomy.	Initiate the development of amendments and, after martial law is cancelled or terminated, amend the Constitution to clearly provide that the Rules of Procedure of the Verkhovna Rada are approved in the form of a resolution of the Verkhovna Rada.
4	The Verkhovna Rada does not consider the report on implementation of Parliament's estimate, weakening the accountability of the Secretariat of the Verkhovna Rada to Parliament.	Introduce the practice of considering reports on implementation of the estimate at a plenary meeting of the Verkhovna Rada.
5	Parliament has not defined the procedure for managing state property that supports the activities of the Verkhovna Rada. This complicates management decision-making.	Regulate property management mechanisms by adopting the relevant Procedure in accordance with the requirements of Law of Ukraine No. 594/96-VR.
6	The temporary nature of the decision to hold Conciliation Council meetings in a closed format creates a risk of returning to the open format, which was previously accompanied by political appeals dominating over agenda coordination and a decline in effectiveness.	Review the approach to organising the work of the Conciliation Council and provide for its meetings to be held in a format closed to the media after martial law ends.
7	The closed format of Conciliation Council meetings is not accompanied by an adequate level of publication of summarised information about its work.	Ensure regular publication of summarised information on the dates of Conciliation Council meetings, the list of issues considered and decisions agreed as a result.
8	Secretariats of parliamentary committees have limited staff capacity, which negatively affects prospects for improving Parliament's work.	Review approaches to determining the number of staff in secretariats in line with the actual workload of Verkhovna Rada committees.

No.	Issues	Recommendations
9	The Verkhovna Rada allows the creation of temporary commissions whose main tasks duplicate the remit of committees or other temporary commissions.	Review the grounds for establishing temporary commissions so that they do not duplicate the tasks of other commissions or parliamentary committees.
10	The one-year term of a temporary commission is often insufficient for it to complete all its tasks.	Where the need for certain commissions is permanent, consider whether such powers should be exercised by committees, in the case of temporary special commissions, or allow the Verkhovna Rada to extend the activities of temporary commissions for more than one year.
11	Failure by some temporary investigative commissions to submit reports undermines the effectiveness of their activities, while delayed voting on reports creates legal uncertainty over the status of temporary commissions.	Ensure submission and hearing of temporary commission reports within their term of activity.
12	The activities of inter-factional parliamentary associations are insufficiently transparent and accountable.	Introduce the practice of publishing information on inter-factional parliamentary associations on the Verkhovna Rada website, including information on their composition, purpose of establishment and activities.
13	The Rules of Procedure of the Verkhovna Rada lack mutually consistent legal provisions on the organisation and activities of the coalition and opposition.	Regulate the rights of the coalition and opposition through legislative amendments. The opposition should be provided with opportunities to exercise effective oversight of the Government, adequate opportunities to participate in agenda-setting, necessary resources and proper representation in parliamentary committees.
14	Institutionalised internal procedures for inter-party dialogue within Parliament are limited. Dialogue between political forces depends on external initiatives and support from international partners.	Create a platform for meetings and consultations between representatives of factions and groups in the Verkhovna Rada to overcome disagreements between parliamentary factions and groups.
15	The Constitution provides for an element of the imperative mandate — early termination of powers if an MP leaves the faction of the party on whose list they were elected.	After the termination or cancellation of martial law, abandon the imperative mandate by amending the Constitution.
16	The abolition of parliamentary immunity has left MPs without political protection from the executive.	Initiate a discussion on restoring provisions on parliamentary immunity to the Constitution of Ukraine.

No.	Issues	Recommendations
17	Financial support for MPs is insufficient.	Review the procedure for setting MPs' salaries, linking it with transparency in the use of funds for exercising parliamentary powers, including through declaration of compensation payments and payments received and publication of reports on their use.
18	Discrepancies in MPs' declarations demonstrate the need to further develop mechanisms for ensuring integrity.	Introduce regular mandatory training for MPs and their assistants on standards of integrity, declaration rules and conflict-of-interest management. Develop a guide on standards of integrity and prevention of conflicts of interest in the work of MPs of Ukraine.
19	The absence of a clear gift policy for MPs creates risks of hidden corruption and non-transparent lobbying.	Review the gift policy for MPs, in particular by clarifying the concept of 'permissible hospitality', declaration of gifts and trips paid for by third parties and similar issues.
20	The legislative framework does not provide a comprehensive mechanism for preventing and managing conflicts of interest among MPs. In MPs' activities, conflict-of-interest regulation is largely based on self-declaration without proper internal control. MPs may take part in voting or the work of temporary investigative commissions that affect their private interests.	Define rules for preventing and resolving conflicts of interest of MPs who are members of committees during discussion and decision-making at committee meetings in matters where they have a conflict of interest. Improve rules for preventing and resolving conflicts of interest when an MP votes at a plenary sitting and participates in temporary investigative commissions.
21	Issues of MPs' ethical conduct are regulated mainly by general and declarative legislative provisions that are not accompanied by clear response mechanisms. The system for ensuring parliamentary ethics remains fragmented and is characterised by broad discretion in applying measures and the absence of a single mandatory code of conduct for parliamentarians.	Finalise and adopt the Code of Parliamentary Ethics based on Draft Law No. 8327. Develop and implement Parliament's internal policy on preventing and responding to discrimination and sexual harassment, defining standards of conduct for MPs and procedures for responding to violations of these standards.
22	The Rules of Procedure of the Verkhovna Rada do not comply with the Constitution of Ukraine and need to be aligned with the Law of Ukraine 'On Law-Making Activity'.	Review the Rules of Procedure of the Verkhovna Rada for compliance with the Constitution. Prepare proposals for amendments to the Rules of Procedure to align their provisions with the Law of Ukraine 'On Law-Making Activity'.

No.	Issues	Recommendations
23	The Verkhovna Rada has no established practice of systematically reviewing the Rules of Procedure, which leads to non-functioning provisions and frequent violations.	Introduce a review of the Rules of Procedure of the Verkhovna Rada, annually or once per convocation, based on analysis of the practice of implementing the Rules, identified gaps and conflicts, compliance with international standards and similar criteria. Such a review may be carried out by the relevant committee with the involvement of representatives of all parliamentary factions and groups, the Secretariat of the Verkhovna Rada and experts.
24	The Verkhovna Rada has no experience of systematising the practice of applying the Rules of Procedure, which complicates their uniform interpretation.	Summarise the practice of using the Rules of Procedure of the Verkhovna Rada through guidelines, recommendations or manuals and ensure that MPs and staff of the Secretariat of the Verkhovna Rada of Ukraine are familiarised with them on an ongoing basis.
25	The Rules of Procedure of the Verkhovna Rada do not contain provisions regulating the organisation of the Verkhovna Rada's work during martial law or a state of emergency.	Amend the Rules of Procedure of the Verkhovna Rada to reflect existing practices for organising the activities of the Verkhovna Rada and its bodies during martial law, including agenda-setting, discussion and adoption of draft laws and the exercise of oversight powers.
26	The session agenda plays a formal role and is not a real tool for ensuring predictability of the law-making process.	The session agenda and agendas of plenary meetings should contain a number of draft laws and resolutions that correspond to the Verkhovna Rada's real capacity to consider them.
27	Unrealistic planning of law-making activity makes the legislative process less predictable.	Reduce the number of tasks in the Plan of Legislative Work so that it corresponds to Parliament's real capacity to adopt laws. Parliament's actual work should be based to a greater extent on the Plan.
28	Low quality requirements for draft laws and their accompanying documents, MPs' individual right of legislative initiative and the absence of a pre-registration review stage contribute to 'legislative spam'.	Strengthen the fight against legislative spam, which may include introducing collective legislative initiative for MPs, strengthening quality requirements for draft laws and their accompanying documents and introducing pre-registration review of all draft laws.
29	The absence of a conceptual vision for constitutional initiatives submitted to Parliament and the low quality of such draft laws lead to negative opinions of the Constitutional Court of Ukraine.	Amendments to the Constitution should be made on the basis of a coherent concept, and the process of developing them should include dialogue involving experts, academics and the wider public.
30	Explanatory notes to both Government and MPs' initiatives do not provide sufficient justification for the need for the legislative initiative.	Prepare explanatory notes that contain sufficient justification for adopting the draft law and identify the economic and financial consequences of implementing legislative changes.

No.	Issues	Recommendations
		The Verkhovna Rada should take measures to conduct impact assessments: strengthen the analytical capacity of MPs and staff of structural units of the Verkhovna Rada through education and training; prepare an impact assessment methodology supplemented with supporting materials, such as guides and recommendations.
31	MPs often submit proposals for the second reading that fall outside the subject matter of the draft law adopted in the first reading, negatively affecting the predictability of legislative changes.	MPs should avoid submitting proposals for the second reading that do not concern the subject matter of the draft law adopted in the first reading, and committees should reject such proposals on the basis of the Rules of Procedure of the Verkhovna Rada.
32	The Verkhovna Rada systematically violates the Rules of Procedure when considering draft laws, negatively affecting the quality of the law-making process.	Reduce violations of the Rules of Procedure of the Verkhovna Rada to a minimum.
33	The President does not sign some laws adopted by the Verkhovna Rada ('silent veto') and sometimes violates signing deadlines, disrupting the balance of branches of power and limiting Parliament's legislative function.	Develop a mechanism for cases of the President's 'silent veto'.
34	The Verkhovna Rada does not consider reports on implementation of the State Budget. The reports, except for two, were submitted to the Verkhovna Rada but not considered, reducing the scope of parliamentary oversight.	Return to the practice of considering Government reports on implementation of the State Budget at plenary meetings of Parliament.
35	MPs' work with voters has not been adapted to the challenges of martial law, as there are problems with representing the interests of voters from occupied constituencies, internally displaced persons, Ukrainian refugees and voters in majoritarian constituencies that have lost the representatives elected in those constituencies.	Ensure systematic mechanisms in Parliament for representing interests and communicating with voters from temporarily occupied territories, internally displaced persons and refugees through digital communication tools.
36	Insufficient information provided by MPs to their voters negatively affects parliamentarians' accountability to voters and restricts voters' rights to participate in public administration.	Establish a reporting form for MPs on their activities, to be published twice a year on the Verkhovna Rada website, for example in MPs' profiles.
37	The current legislation on public involvement in the activities of the Verkhovna Rada is imperfect and fragmented, which adversely affects the ability to take citizens' views into account through mechanisms provided for by law.	Introduce procedures for monitoring and evaluating the use of parliamentary mechanisms and instruments for public participation in public consultations. Require the Secretariat of the Verkhovna Rada to publish the relevant reports on the official Verkhovna Rada website in a dedicated section.

No.	Issues	Recommendations
38	The Law of Ukraine 'On Public Consultations' does not oblige MPs and Verkhovna Rada committees to conduct public consultations, which in practice excludes civil society from decision-making at an early stage.	Amend the Law of Ukraine 'On Public Consultations' and the Rules of Procedure of the Verkhovna Rada to provide for mandatory public consultations by MPs and Verkhovna Rada committees.
39	The Verkhovna Rada has low institutional capacity to conduct public discussion and, subsequently, public consultations.	Establish specialised units, or specialist analyst positions, on public consultations within the Secretariat of the Verkhovna Rada and committee secretariats, with clear operating procedures and digital tools for processing public proposals.
40	Parliament does not have an approved communication strategy defining the Verkhovna Rada's priorities in informing the public about its work. There is also no unified approach to informing the public about legislative processes.	Approve and implement the Communication Strategy of the Verkhovna Rada of Ukraine to ensure Parliament's communication with internal and external audiences.
41	The absence of a Strategy for the Development of an Innovative Digital Parliament complicates long-term planning for e-parliamentarism, restrains systemic development of digital solutions and prevents the formation of a unified approach to digital modernisation of parliamentary activity.	Develop and approve the Strategy for the Development of an Innovative Digital Parliament, updating its duration and implementation stages in line with the actual timeframe for its preparation and implementation.
42	The status of the parliamentary TV channel Rada remains unregulated, meaning there are no legislative guarantees of editorial independence or accountability mechanisms for the parliamentary broadcaster.	Regulate the status of the parliamentary TV channel Rada in law and provide guarantees for its operation, editorial independence and political pluralism.
43	Reporting by ministries to the Verkhovna Rada remains fragmented and non-standardised. The current model of parliamentary oversight performs a communication function, involving the exchange of information, but does not ensure accountability.	Ensure the development, adoption and implementation of legislation aimed at improving Government reporting procedures within parliamentary oversight, including: (1) a standardised format for ministry plans and reports on the implementation of programme and strategic documents, (2) defined frequency and formats for ministry reporting to the relevant Verkhovna Rada committees and (3) an annual planning horizon for parliamentary committees' oversight activities to ensure systematic scrutiny of the executive.
44	The insufficient effectiveness of mechanisms of parliamentary oversight and political accountability reduces executive accountability and makes the Verkhovna Rada's oversight function increasingly formal.	Determine the optimal model of interpellation and incorporate it into the Rules of Procedure of the Verkhovna Rada as an instrument of parliamentary oversight and political accountability of members of the Government.

No.	Issues	Recommendations
45	The absence of a final decision on the format of the special committee that should oversee the activities of special-purpose bodies and intelligence agencies limits the prospects for strengthening parliamentary oversight in the security and defence sector.	Define requirements for members of the committee that should oversee special-purpose bodies and intelligence agencies and for its secretariat staff, the procedure, frequency and process for their special vetting to obtain access to state secrets, as well as a mechanism for appealing its results. Take measures to establish such a committee or assign its functions to an existing Verkhovna Rada committee, taking into account legal requirements for members of such a committee and staff of its secretariat.
46	Existing forms of parliamentary oversight in the security and defence sector are applied unsystematically, making continuous oversight difficult and weakening the personal accountability of officials. Despite the Verkhovna Rada's legal right to require sector leaders to attend plenary meetings, practical implementation of this tool remains limited.	Introduce a liability mechanism for violating parliamentary oversight requirements. Establish a procedure for the Verkhovna Rada to respond to unjustified failure by Government members to attend 'Government's Question Hour' or meetings of relevant committees. Provide sanctions for repeated failure to attend without valid reasons or failure to provide requested materials and information.
47	Temporary investigative commissions have limited institutional capacity and weak influence mechanisms, so parliamentary oversight often amounts to recording violations without further response or real change.	Strengthen control over implementation of temporary commission findings. Establish an obligation for authorities and officials to submit, within a defined period, a written report on the results of consideration of recommendations of temporary investigative and temporary special commissions.
48	Parliament lacks unified tools for overseeing implementation of Ukraine's international treaties, limiting the possibilities of parliamentary oversight.	Amend the Rules of Procedure of the Verkhovna Rada and the Law of Ukraine 'On International Treaties of Ukraine' to establish a procedure for regular Government reporting to relevant committees on the implementation status of ratified agreements, including financial and credit instruments.
49	The practice of selective consideration by the Verkhovna Rada of the Ombudsman's special reports limits the impact of his or her recommendations and weakens parliamentary oversight in the field of human rights.	Introduce mandatory adoption of Verkhovna Rada resolutions on each annual and special report of the Ombudsman and mechanisms for monitoring implementation of the recommendations provided in those reports.

No.	Issues	Recommendations
50	The Accounting Chamber operates with incomplete composition, increasing the workload on its members while complicating systemic and timely external financial control.	Adopt Draft Resolution of the Verkhovna Rada No. 14012 to unblock the establishment of the Advisory Group of Experts and competitive selection for vacant positions of Accounting Chamber members.
51	The absence of a single algorithm for further parliamentary follow-up of Accounting Chamber decisions and reports reduces the effectiveness of parliamentary oversight over the receipt and use of state budget funds.	Amend the Rules of Procedure of the Verkhovna Rada and the Law of Ukraine 'On Committees of the Verkhovna Rada of Ukraine' to define an algorithm for committees to respond to Accounting Chamber decisions following external financial control/audit.
52	Systematic disregard of the procedure for considering the Accounting Chamber's annual report at plenary meetings deprives parliamentary oversight of public finances of effectiveness.	Ensure compliance with the Rules of Procedure of the Verkhovna Rada on the mandatory annual hearing of the Accounting Chamber's report at a plenary meeting.
53	The Secretariat of the Verkhovna Rada of Ukraine is not registered as a legal entity, creating legal uncertainty in interaction with counterparties and public authorities.	Register the Secretariat of the Verkhovna Rada as a legal entity and ensure that the full scope of rights and obligations is transferred from the Administrative Office of the Secretariat of the Verkhovna Rada, including employment relations with all Secretariat staff, representation in court and the role of chief spending unit of budget funds.
54	Limited access to public information about the Secretariat of the Verkhovna Rada reduces institutional transparency.	Ensure public access to information on the competence, main tasks and functions of all structural units of the Secretariat of the Verkhovna Rada, by publishing regulations on all its structural units on Parliament's official web portal.
55	The absence of an up-to-date HR strategy limits systematic staff development and creates risks of fragmented reform implementation in the Secretariat.	Adopt and implement a new Strategy for Developing the Human Resources Capacity of the Secretariat of the Verkhovna Rada. Regularly monitor progress in implementing the Strategy and review the Strategy on the basis of the monitoring results.
56	The absence of a special law on parliamentary service limits Parliament's autonomy from the executive and constraints the potential for parliamentary development.	Finalise and adopt the Draft Law No. 4530 on parliamentary service in the second reading.
57	Remuneration in the Secretariat of the Verkhovna Rada remains insufficient and non-competitive on the labour market due to lack of funding.	Continue remuneration reform, in particular by ensuring an adequate level of budget financing for remuneration and reviewing salary levels, taking into account the complexity and responsibility of positions.

No.	Issues	Recommendations
58	A number of aspects of the legal status of MPs' assistant-consultants remain unregulated, including the definition of their duties in job descriptions, the excessive number of assistant-consultants and staffing arrangements.	Update regulation of the status of assistant-consultants by adopting a new regulation, as an interim solution, or by finalising and adopting Draft Law No. 4530.
59	The Ukrainian Parliament has not developed policies aimed at preventing discrimination, sexism and sexual harassment, creating ethical risks that negatively affect the internal political culture of the Verkhovna Rada.	Develop and implement a comprehensive preventive mechanism to prevent cases of discrimination, sexism or sexual harassment.
60	Persons with disabilities do not have full and unhindered access to the buildings and premises of the Verkhovna Rada.	Ensure modernisation of Parliament's physical infrastructure in line with accessibility standards by implementing the results of the accessibility audit, establishing mandatory technical requirements and introducing a mechanism to monitor their implementation.
CIVIL SOCIETY		
1	Peaceful assemblies under martial law may be unlawfully restricted, including because the powers of local authorities are not clearly delineated.	Regulate in law the exercise of freedom of peaceful assembly under martial law, taking into account differentiated security risks and specifying the grounds and conditions for holding assemblies. Resolve discrepancies between para 8 Part 1 Article 8 and Part 1 Article 19 of the Law of Ukraine 'On the Legal Regime of Martial Law', and clearly define powers to prohibit peaceful assemblies, namely who may decide to ban a specific peaceful assembly or assemblies in a certain territory generally and under what conditions.
2	Outdated legislation in the field of humanitarian response complicates the lawful activities of civil society organisations (CSOs) through excessive administrative burden.	Complete the development and adopt an updated version of the Law of Ukraine 'On Humanitarian Aid', which should comprehensively regulate the provisions simplifying CSO activities that were introduced during martial law.
3	Legislative regulation of CSO registration procedures does not meet CSO needs, in particular due to complex and lengthy registration procedures.	Adopt Draft Law No. 8084 to regulate the activities and state registration of public associations.

No.	Issues	Recommendations
4	Lack of uniform interpretation regarding the schematic ownership structure chart for submitting information on ultimate beneficial owners (UBOs) for CSOs, leading to problems for CSOs that may receive discrepancy notices concerning whether UBOs must be indicated and, as a result, face problems with banking services.	The Ministry of Finance of Ukraine should update the sample schematic ownership structures for submitting UBO information for CSOs and improve interaction between primary and state financial monitoring entities.
5	The absence of an effective mechanism of state support for families of fallen volunteers and volunteers who acquired a disability as a result of hostilities negatively affects guarantees for the protection of their rights.	Develop a Government procedure for providing financial assistance to families of fallen volunteers and to volunteers who acquired disabilities while providing assistance to civilians.
6	Imperfect legislation on volunteer insurance creates an additional tax burden for organisations that provide insurance for engaged volunteers.	Make the necessary legislative amendments to reduce the tax burden on non-profit organisations when insuring volunteers.
7	The system of integrated administrative reporting does not perform its functions of collecting and analysing data on non-profit organisations (NPOs) and needs improvement.	Ensure improvement of the system of integrated administrative reporting. To determine the threat assessment for NPOs, responsible public authorities should add an additional criterion for collecting statistical data to existing forms on relevant predicate offences, namely whether an NPO was used to commit the offence or whether it was committed by persons managing an NPO. For this purpose, relevant amendments to comprehensive administrative reporting forms are proposed.
8	CSOs face complex and systemic problems with banking services, including: (1) denial of access to financial services due to excessive financial monitoring measures; (2) automatic classification of CSOs as medium- and high-risk clients; (3) requirements to identify CSO founders; (4) problems receiving foreign transfers.	Amend the Regulation on Financial Monitoring by Banks, approved by Resolution of the Board of the National Bank of Ukraine No. 65 of 19 May 2020, and the Regulation on Financial Monitoring by Institutions, approved by Resolution of the Board of the National Bank of Ukraine No. 107 of 28 July 2020. In particular, the obligation of banks to verify information on founders of public associations should be removed, the activities of non-profit organisations, including charitable activities, activities of religious organisations and political parties, should be excluded from client-type risk criteria, and banks should be exempted from the obligation to examine information on the founder of the relevant legal entity when determining the UBO of a public association or charitable organisation.

No.	Issues	Recommendations
9	Sharp increase in cases of bank de-risking of NPOs, leading to termination of banking services for some CSOs.	The National Bank of Ukraine should develop and take measures to reduce cases of de-risking of non-profit organisations.
10	The complex and outdated procedure for establishing, operating and terminating bodies of self-organisation of the population requires legislative updating.	Adopt Draft Law No. 15165 to improve the legal conditions for the activities of bodies of self-organisation of the population.
11	Risk of formalising the process of considering and responding to citizens' appeals, which may reduce the effectiveness of this tool for interaction between citizens, CSOs and the state.	Revise Draft Law No. 11082 to ensure proper substantive consideration of citizens' appeals and an effective response by authorities to the issues raised in them.
12	Postponement of the entry into force of the Law of Ukraine 'On Public Consultations' and preparation of mechanisms for its implementation, restraining systematic introduction of public consultation practice at state and local levels.	Review the provisions of the Law of Ukraine 'On Public Consultations' concerning its entry into force one year after the end of martial law.
13	Risk of introducing accelerated procedures for considering European integration draft laws without mechanisms for involving CSOs and the expert community in their development.	Ensure public participation in the accelerated procedure for adopting European integration draft laws.
14	Unclear legislative regulation of lobbying activities, in particular the definition of 'commercial interest', preserves risks of potential use of lobbying legislation to pressure civil society organisations.	Monitor implementation of the Law of Ukraine 'On Lobbying' to prevent its application to lawful CSO activities. Amend the Law of Ukraine 'On Lobbying' to clarify definitions, in particular 'commercial interest', in accordance with Council of Europe recommendations to ensure compliance with the principle of legal certainty.
15	Limited and uneven access of civil society organisations to state funding.	Increase the amount of state funding distributed through competitive mechanisms to support CSOs. Introduce competitive funding for institutional support to CSOs. Expand the list of areas in which CSOs eligible for funding from the state budget operate in order to broaden access to support.
16	The threat of insufficient financial support for implementation of the State Target Social Programme for the Development of Volunteer Activity in Ukraine for the period up to 2030 creates a risk of its untimely and ineffective implementation.	Ensure implementation of the State Target Social Programme for the Development of Volunteer Activity in Ukraine for the period up to 2030 and ensure funding for the programme measures.

No.	Issues	Recommendations
17	The Strategy for Promoting the Development of Civil Society expires in 2026. At the same time, the state of development of the next strategic document creates risks of its untimely preparation and approval.	In cooperation with CSOs, work on preparing the National Strategy for Promoting the Development of Civil Society in Ukraine for the next period and approve it. Develop effective mechanisms for monitoring implementation of action plans and introduce an effective implementation monitoring system.
18	The absence of a legislative definition of social entrepreneurship and mechanisms of state support creates legal uncertainty for business entities carrying out entrepreneurial activity for a social purpose. This restrains development of this sector of the economy and limits opportunities to involve such entities in addressing pressing social problems.	Adopt in the first reading Draft Law No. 14156 'On Amendments to the Law of Ukraine "On the Development and State Support of Small and Medium-Sized Enterprises in Ukraine" Regarding the Development of Social Entrepreneurship'. Ensure that the draft law is revised before the second reading with the involvement of expert community representatives and practitioners in the field of social entrepreneurship, including that established on the basis of public and charitable organisations.
19	Imperfect tax regulation of CSO registration, including social service providers, as VAT payers creates an excessive administrative burden on CSOs.	Review tax legislation to regulate the application of thresholds established for registration as VAT payers to non-profit institutions and organisations, in particular public associations and charitable organisations.
EUROPEAN INTEGRATION		
1	The legally provided model of mandatory expert review of draft laws for compliance with the EU acquis is not supported by a mechanism for its full application in the legislative process.	Ensure full application of the mechanism for expert review of draft laws for compliance with the EU acquis.
2	The absence of a modern framework law in the field of European integration limits systematic coordination of the adaptation of Ukrainian legislation to EU law.	Adopt a modern framework law in the field of European integration instead of a fragmented regulatory model.
3	Existing mechanisms for identifying European integration draft laws do not ensure full coverage of the legislative process.	Enshrine in law the concept of a European integration draft law, criteria for assigning a draft law to this category and a formalised procedure for identifying a draft law as European integration draft law.
4	The complexity of the institutional architecture and absence of an integrated coordination mechanism create risks of fragmentation of the European integration process.	Introduce an integrated system for managing the European integration process.

No.	Issues	Recommendations
5	The absence of a single accountability chain between institutions in the negotiation process limits the effectiveness of managing implementation of commitments.	Define a single accountability chain for all institutions involved in European integration.
6	Insufficient institutional capacity of the Secretariat of the Cabinet of Ministers of Ukraine as the coordinating centre limits the effectiveness of interagency cooperation.	Strengthen the institutional capacity of the Secretariat of the Cabinet of Ministers of Ukraine as the centre of government.
7	The development of the parliamentary system for considering European integration issues is not fully accompanied by unified standards for the work of relevant subcommittees.	Unify the standards of activity of subcommittees on European integration.
8	Insufficiently effective multi-level coordination between central and regional levels of governance negatively affects the pace of European integration.	Introduce mechanisms for multi-level coordination between central and regional levels of governance.
9	Fragmentation of reforms and the absence of an institutionalised mechanism for integrating civil society initiatives into decision-making complicate fulfilment of EU membership criteria.	Ensure effective application of the Law of Ukraine 'On Public Consultations' in the field of European integration.
10	There is no sufficiently clear and verified methodology for prioritising measures of the National Programme for the Adaptation of Ukrainian Legislation to the EU acquis.	Approve a methodology for prioritising measures of the National Programme for the Adaptation of Ukrainian Legislation to the EU acquis.
11	The absence of a clear budgetary link between measures of the National Programme, responsible implementers and sources of funding limits the realistic implementation of planned reforms.	Integrate the National Programme into medium-term budget planning.
12	The limited normative force and interinstitutional reach of the National Programme, reflected in the fact that its mandatory implementation does not extend to Parliament.	Enshrine in law the status and mandatory nature of the National Programme. Synchronise the National Programme with the Plan of Legislative Work of the Verkhovna Rada and the negotiation process calendar.
13	Fragmentation of data between the Government monitoring system and the legislative process negatively affects their coordination.	Conduct an annual independent audit of implementation of the National Programme.
14	Procedural uncertainty of public reporting by negotiation structures complicates external assessment of progress.	Introduce a unified standard for public reporting by negotiating groups.

No.	Issues	Recommendations
15	Uneven institutional capacity of individual sectors may affect the pace of negotiation progress.	Introduce internal monitoring of negotiating groups' capacity.
16	There is no state communication strategy on European integration tailored to the negotiation stage of Ukraine's accession to the EU after 2026.	Develop and approve the Communication Strategy on Ukraine's European Integration for 2027–2030, tailored to the needs of the EU accession negotiations, implementation of the EU acquis, the regional dimension of preparations for membership and the shaping of realistic public expectations.
17	Sociological data are insufficiently integrated into decision-making in the field of European integration.	Integrate sociological monitoring into the European integration policy management system.
18	The risk of disinformation and manipulative narratives concerning European integration persists.	Strengthen efforts to counter disinformation concerning European integration in Ukraine's domestic information space.
GOVERNANCE		
1	The practice of unjustified restructuring the system of central executive bodies shows the absence of a coherent strategic vision of its architecture and distribution of competences, complicating the work of individual ministries and the system as a whole.	Introduce a practice of reformatting the system of central executive bodies only on the basis of a prior functional review and public justification of proposed changes, with independent expert discussion of their alternatives and risks.
2	Dependence of state secretaries on political leadership (ministers) negatively affects the institutional stability and capacity of public authorities.	Make coordinated amendments to the Laws of Ukraine 'On Civil Service' and 'On Central Executive Bodies' to strengthen legal guarantees of the role of state secretaries in ensuring the stability and continuity of ministries' work regardless of changes in political leadership.
3	The absence of a Programme of Activities of the Cabinet of Ministers approved by the Verkhovna Rada disrupts the constitutional mechanism of interaction between the legislative and executive branches, depriving it of a clear strategic basis.	The Government should prepare the Government Programme on the basis of an analysis of the previous Government's achievement of planned results, fulfilment of international commitments and current public policy challenges, providing for a medium-term planning horizon. The Verkhovna Rada should ensure its timely processing and consideration as a basis for parliamentary assessment of the Cabinet of Ministers of Ukraine's performance and for ensuring the stability of its work, avoiding a repetition of the practice of a Government operating without an approved Programme.

No.	Issues	Recommendations
4	The actual timing for approving the Government Priority Action Plan, at the end of the first quarter, reduces its significance as an annual planning tool.	Ensure timely approval of the GPAP by synchronising the timing of its adoption, aligning ministry and other CEB plans with it and submitting reports on implementation.
5	The incomplete system of strategic planning fragments Government priorities, financial and investment resources and reduces the predictability of reforms.	Complete formation of the state strategic planning system by defining the hierarchy of strategic documents, the procedure for aligning them with budgetary and investment planning and mechanisms for monitoring, evaluation and review.
6	Insufficient financial and economic justification of Government priorities makes it difficult to properly take them into account during budget planning and implementation.	Ensure proper financial and economic justification of Government decisions affecting budget indicators and full application of medium-term budget planning tools, including spending reviews.
7	The framework and predominantly political nature of the Government Priority Action Plan, without clear performance indicators, creates a risk of non-fulfilment of international obligations.	Include in the GPAP all international obligations whose implementation falls within the competence of the Government, ministries and other central executive bodies, with specific measurable implementation results corresponding to indicators for fulfilling international obligations, as well as the procedure for monitoring implementation and the method of verification.
MULTI-LEVEL GOVERNANCE		
1	The action plan for implementing the specific aspects of reforming local self-government and territorial organisation of power under martial law and in preparation for Ukraine's accession to the EU has not been approved.	Approve the action plan for implementing the specific aspects of reforming local self-government and territorial organisation of power under martial law and in preparation for Ukraine's accession to the EU.
2	Insufficient cost recovery of administrative services and absence of clear legislative regulation of administrative fee issues.	Adopt the Law of Ukraine 'On Administrative Fee'.
3	The task of the Concept for Reforming Local Self-Government and Territorial Organisation of Power in Ukraine to achieve an optimal distribution of powers between local self-government bodies (LSG bodies) and executive authorities remains unimplemented: the distribution and delineation of powers of public administration bodies is currently not fully ensured in law.	Define the delineation and distribution of powers between levels of public governance as a strategic and relevant area for implementation of the Concept for Reforming Local Self-Government and Territorial Organisation of Power in Ukraine. Review the criteria for the capacity of territorial communities and update approaches and methodologies for assessing such capacity.

No.	Issues	Recommendations
		Adopt the Law of Ukraine 'On the Principles of Delineation and Distribution of Powers between Levels of Public Governance' with revisions, in particular on: (1) general approaches to defining conditions and criteria for delineating and distributing powers; (2) clarifying key terms; (3) improving criteria for delineating powers and mechanisms for linking powers with financial support for their implementation; (4) detailing mechanisms for implementing state and local self-government powers, including under martial law or emergency situations; (5) introducing coordination and consultation mechanisms between different levels of public governance; (6) aligning the draft law with other provisions of current legislation.
4	The Law of Ukraine 'On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine' has a problem of legal uncertainty. In particular: (1) current legislation actively uses the term 'administrative-territorial structure' but does not define it; (2) territorial communities are not mentioned in the system of administrative-territorial structure, so the procedure for their formation, establishment, change of boundaries and renaming is not defined; (3) the benchmarks are population size and the nature of development (compact or individual residential development) are limited, with only one benchmark, population size; (4) there is no legal regulation of the procedure for changing the administrative-territorial structure of regions.	Adopt the Law of Ukraine 'On the Principles of Administrative-Territorial Structure'.
5	Certain challenges concerning administrative-territorial structure remain relevant because national legislation has still not been harmonised with the Law of Ukraine 'On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine'.	Adopt the Law of Ukraine 'On Amendments to Certain Legislative Acts in Connection with the Adoption of the Law of Ukraine "On the Procedure for Resolving Certain Issues of the Administrative-Territorial Structure of Ukraine"'.
6	Legislative regulation of certain forms of direct democracy at the local level remains insufficient.	Adopt the Law of Ukraine 'On Local Referendum'.
7	Parliament's rejection of Draft Law No. 6319 preserves old problems, primarily complex procedures for establishing bodies of self-organisation of the population, and constitutes non-implementation of the Action Plan for Reforming Local Self-Government and Territorial Organisation of Power in Ukraine for 2024–2027.	Ensure legislative improvement of the procedure for organising, operating and terminating a body of self-organisation of the population.

No.	Issues	Recommendations
8	Key principles of EU cohesion policy are not integrated into the State Fund for Regional Development. The capacity of the system for preparing, evaluating and selecting investment projects is low, reflected in insufficient application quality, complexity of evaluation, risks of influence on competitive selection, weak consideration of residents' needs and insufficient orientation of projects towards local economic development.	Reform the State Fund for Regional Development to bring the system of regional development financing into line with EU standards and public investment management reform. Step up training for representatives of LSG bodies on working with investment projects.
9	The gap between strategic planning and implementation of regional development projects, caused by the absence of state programmes that should link strategies with specific projects, complicates work with planning documents and leads to declarative strategies and chaotic project implementation.	Approve state programmes for implementation of the Regional Development Strategy.
10	Excessive 'partisation' of local councils as a result of changes to the electoral system.	When reviewing electoral legislation, take into account the experience of the 2020 local elections and take measures to reduce the impact of 'partisation' on the formation of representative bodies of local self-government in the next local elections.
11	As a result of decentralisation, the district level of local self-government has been weakened by the transfer of resources to the basic level.	Define the role of the district level of local self-government and the powers of district councils and resolve the issue of their resource provision.
12	A decrease in the number of local council members risks making it impossible for local councils to adopt decisions.	Take measures to preserve the capacity of local councils by adopting Draft Law No. 14405 and lifting the ban on border crossing for all local council members introduced by Resolution of the Cabinet of Ministers of Ukraine No. 69 of 27 January 2023.
13	The absence of amendments to the Constitution of Ukraine on decentralisation makes it impossible to establish the institution of prefects as a full-fledged instrument of legality oversight.	Amend the Constitution of Ukraine on decentralisation to establish the institution of prefects in Ukraine as a full-fledged instrument for overseeing the legality of decisions of local self-government bodies.
14	State oversight of acts of LSG bodies issued in the exercise of their own powers remains overlooked, creating risks to their legality.	Following the termination or cancellation of martial law, amend the Law of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies' to introduce state oversight, including over acts of local self-government bodies issued in the exercise of their own powers.

No.	Issues	Recommendations
15	Insufficient transparency in the functioning of LSG bodies.	Amend the Laws of Ukraine 'On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring Legality and Transparency in the Activities of Local Self-Government Bodies' and 'On Public Consultations' to cancel the postponement of their entry into force and implementation, including individual provisions. Introduce systematic monitoring of transparency in the activities of LSG bodies.
16	The absence of legally established criteria for creating military administrations of settlements (MASs) and Parliament's adoption of decisions to transfer powers of local self-government bodies to heads of MASs leads to political confrontations and destabilisation of local governance.	Amend the Law of Ukraine 'On the Legal Regime of Martial Law' to establish criteria for creating MASs and an exhaustive list of grounds for restricting the right to local self-government based exclusively on security and defence needs.
17	Legal uncertainty concerning responsibility, accountability and control of MASs when they are vested with the powers of LSG bodies.	Amend the Law of Ukraine 'On the Legal Regime of Martial Law' to increase the transparency and accountability of military administrations (MAs).
18	Duplication of powers of MAs and LSG bodies.	Amend the Law of Ukraine 'On the Legal Regime of Martial Law' to delineate the powers of MAs and LSG bodies.
19	The complexity of the public governance model in Kyiv, where the combination of functions of the Kyiv City State Administration as the executive body of the city council, a state executive authority and, since 2022, a military administration, creates a competence dispute with the Kyiv City Council and the Kyiv Mayor.	Regulate the organisation of public governance in Kyiv under martial law.
20	Fiscal risks remain for local budgets: (1) LSG bodies have no legislative basis for tax administration; (2) withdrawal of the personal income tax paid by military personnel; (3) unpredictability and non-fulfilment of planned revenues.	Ensure fiscal stability for local councils: create a legislative basis for administration of local taxes by local self-government bodies; determine the place of tax payment; return to the practice of paying personal income tax from salaries of security and defence personnel to local budgets.
21	The formula for horizontal equalisation of the tax capacity of local budgets preserves existing inter-municipal financial imbalances.	Improve the formula for horizontal equalisation of the tax capacity of local budgets.

No.	Issues	Recommendations
22	Weak management of communal property, in particular: (1) inventory of communal property is incomplete; (2) LSG bodies do not properly publish open-data information on communal property objects on their official websites; (3) inefficient management of communal enterprises, their loss-making nature and lack of transparency.	Conduct an inventory of communal property on an ongoing basis and make information on communal property objects transparent.
23	Postponement of the entry into force of the Law of Ukraine 'On Service in Local Self-Government Bodies', which limits development of an effective service in LSG bodies, regulation of remuneration for service in LSG bodies and professionalisation of service in LSG bodies.	Amend the 2023 Law of Ukraine 'On Service in Local Self-Government Bodies' to cancel the postponement of its entry into force.
24	Non-transparent recruitment to public service creates risks of appointing incompetent persons and creates corruption risks.	Restore competitive procedures for recruitment to service in local self-government bodies.
25	Absence of legislative support for the establishment and operation of agglomerations as a separate form of cooperation between territorial communities.	Develop and adopt the Law of Ukraine 'On Agglomerations'.
26	Competition between nationwide associations of local self-government bodies weakens their influence on state policy.	Amend the Law of Ukraine 'On Associations of Local Self-Government Bodies' to cancel the restriction on local self-government bodies participating in only one nationwide association and introduce a mechanism of state support for them.
27	Development of international cooperation of territorial communities is limited by insufficient resource and organisational support.	Ensure proper methodological support for the development of international cooperation and professional training for specialists of local self-government bodies in the specialisation 'Project Management'.

Annex 3 to the Report

List of public authorities, auxiliary and advisory bodies, and state institutions that shape and/or implement state policy in the relevant areas, whose representatives took part in interviews consultations and written surveys within the framework of assessing Ukraine's progress in implementing the European Commission's recommendations within the Cluster 1 'Fundamentals of the Accession Process'

1. Administration of the State Border Guard Service of Ukraine
2. Administration of the Verkhovna Rada of Ukraine
3. Central Election Commission
4. Commissioner of the Verkhovna Rada of Ukraine for Human Rights (representatives)
5. Constitutional Court of Ukraine
6. Council of Judges of Ukraine
7. High Anti-Corruption Court
8. High Council of Justice
9. High Qualification Commission of Judges of Ukraine
10. Military Ombudsman
11. Ministry of Finance of Ukraine
12. Ministry of Justice of Ukraine
13. National Agency on Corruption Prevention
14. National Anti-Corruption Bureau of Ukraine
15. National Bank of Ukraine
16. National Police of Ukraine
17. National School of Judges of Ukraine

18. Office of the Deputy Prime Minister for European and Euro-Atlantic Integration
19. Office of the Government Commissioner for Gender Policy
20. Office of the President of Ukraine
21. Prosecutor General's Office
22. Public Integrity Council
23. Research Service of the Verkhovna Rada of Ukraine
24. Secretariat of the Cabinet of Ministers of Ukraine
25. Secretariat of the Commissioner of the Verkhovna Rada of Ukraine for Human Rights
26. Security Service of Ukraine
27. State Bureau of Investigation
28. State Judicial Administration of Ukraine
29. State Migration Service of Ukraine
30. State University of Trade and Economics
31. Supreme Court
32. Uzhhorod National University
33. Verkhovna Rada of Ukraine
34. Yaroslav Mudryi National Law University