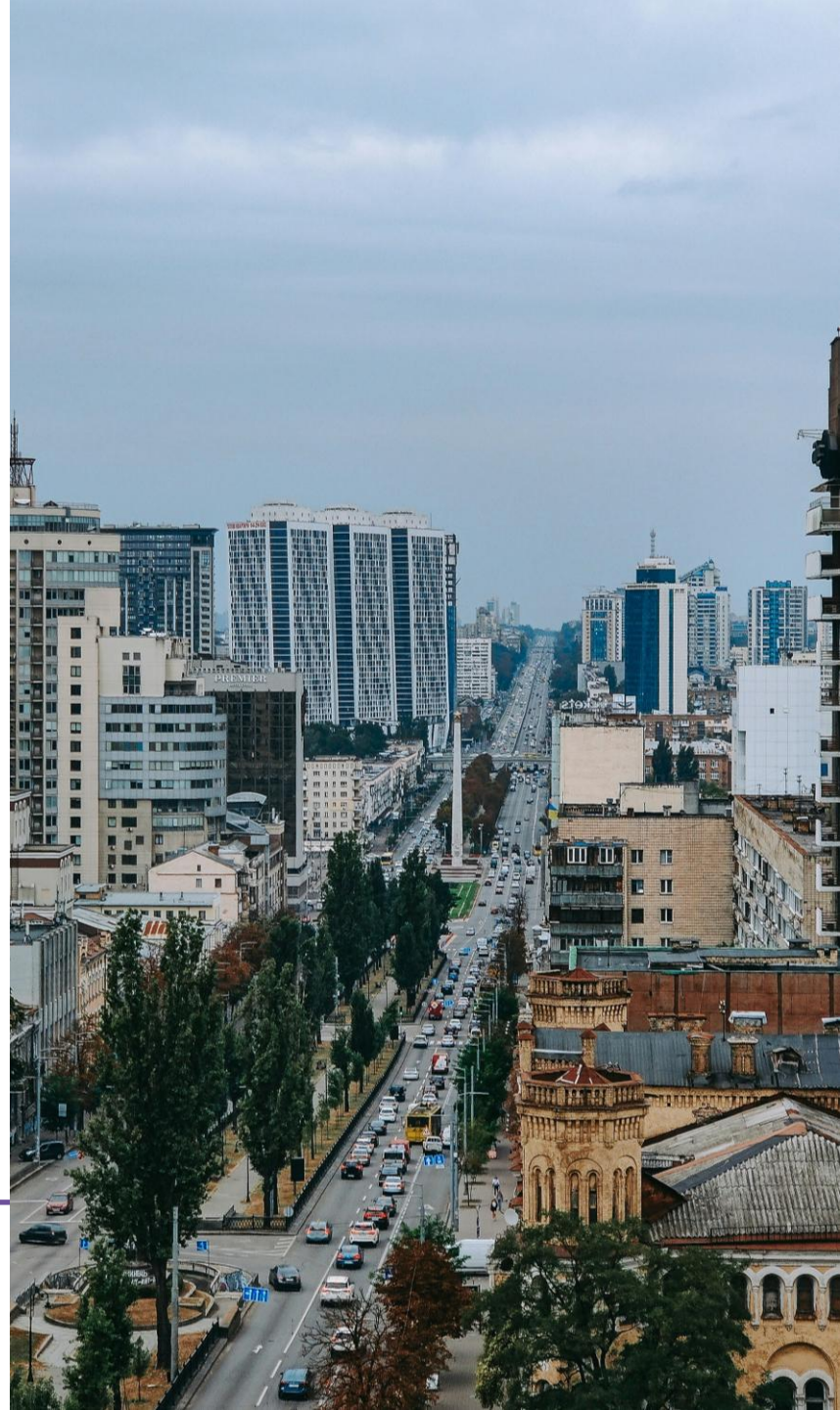
Big Recovery Portal

Public Investment Watchdog

#33, October 2026

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CENTRE FOR ECONOMIC STRATEGY

INSTITUTE FOR ECONOMIC RESEARCH AND POLICY CONSULTING

TECHNOLOGY OF PROGRESS

RISE UKRAINE

Executive summary

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- The Government has regulated the raising of state loans from foreign states and financial institutions to finance PIPs.
- The Government announced the selection of projects under EIB programmes and for the creation of barrier-free routes from among the PIPs that local authorities have already submitted via DREAM. However, the selection deadlines are short and the co-financing requirements are high, which limits the participation of less well-resourced local authorities.
- A simplified regime outside the general PIM procedures has been introduced for projects under the comprehensive resilience plans. The new mechanisms may speed up the implementation of resilience projects, but they create parallel procedures.
- At local authority level, activity in DREAM fell in October: 614 new PIPs were registered, compared with 1,616 in September, mainly in education (274) and municipal infrastructure and services (119) – together 64% of all new projects. The estimated cost of the new PIPs was UAH 177.1 bn, expected financing was UAH 3.3 bn, while financing received fell to UAH 0.4 bn.
- In September 2026, the value of construction procurement fell by 27% compared with August owing to the suspension of capital expenditure, although it remained higher than in September 2025. The largest procurement in September – the reconstruction of a trunk water pipeline – accounted for 31% of the total value of completed construction procurements.
- In October 2026, the Government approved the Public Procurement Development Strategy for 2027-2030, which is intended to harmonise procurement procedures with EU law. However, the Strategy closes only some of the existing gaps; in particular, the anti-corruption measures do not fully meet the EC’s recommendations.

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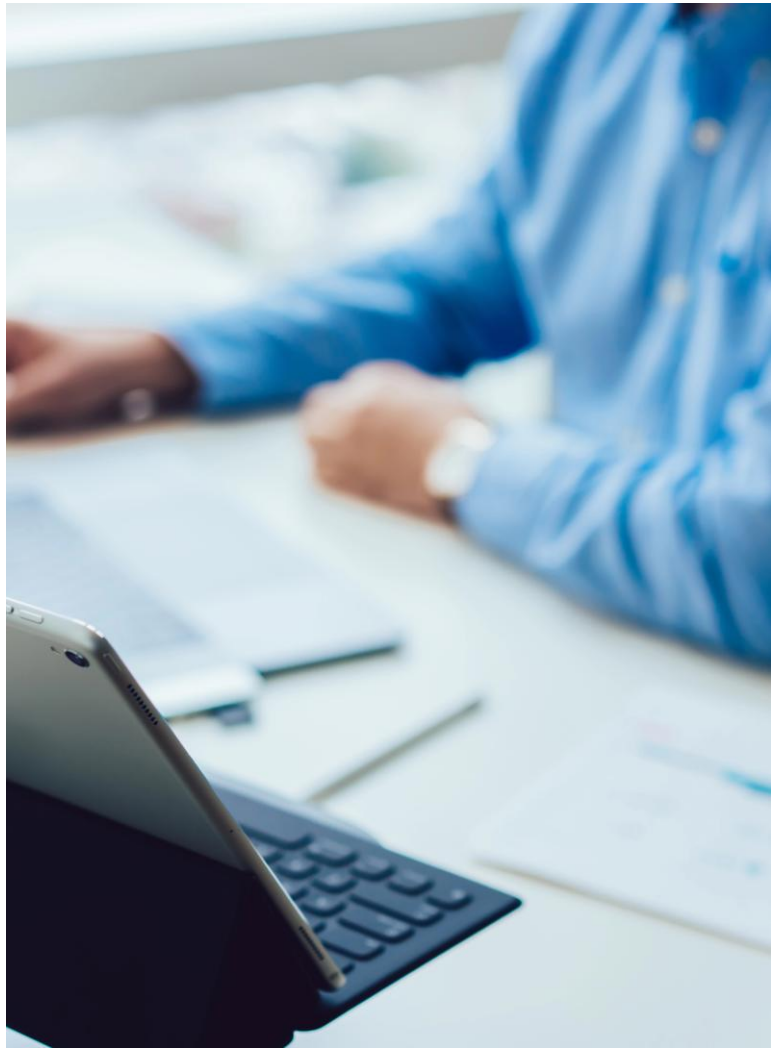
News on the Public Investment Management System Reform

SPP Update in DREAM

Analysis of Reconstruction Procurement

Public Procurement Development Strategy 2027-2030: a European Integration Perspective

Appendices



List of Abbreviations

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SE – State Enterprise

SFRD – State Fund for Regional Development

MBFM – Main Budget Fund Manager

USESC – Unified State Electronic System in Construction

SPP – Single Project Pipeline

IFI – International Financial Institutions

PI – Public Investments

PIP – Public Investment Project

DED – Design and Estimate Documentation

RDDP – Register of Damaged and Destroyed Property

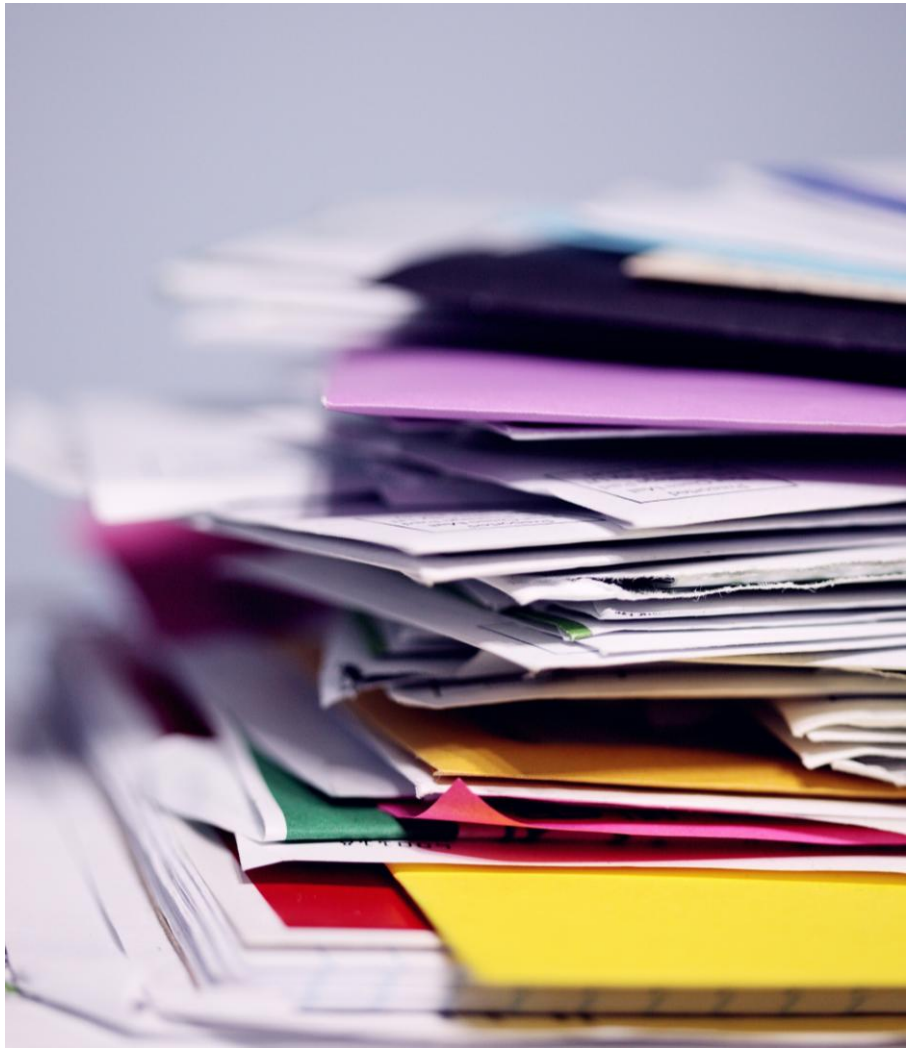
MTP – Medium-Term Plan of Priority Public Investments

FS – Feasibility Study

PIM – Public Investment Management

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News on the Public Investment Management System Reform



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Government establishes a separate procedure for state loans from foreign states and financial institutions (1)

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On 7 October, by Resolution No. 1249, the Government set out the rules for preparing and implementing projects financed by loans that the state raises from foreign states and foreign financial institutions.

- This is a procedure for the preparation, financing, implementation and monitoring of projects financed by loans that **the state raises** from foreign states and foreign financial institutions. The procedure concerns state external borrowing, not loans that local authorities raise on their own. The Ministry of Finance is the responsible body.
- The procedure covers project preparation, selection of the lender, negotiations, conclusion of the loan documents, transfer of funds to the implementing entity, monitoring and control.
- A PIP may receive financing only after it has been prepared, appraised and included in the national SPP.
- The Ministry of Finance selects the lender on the basis of the interest rate, fees, loan maturity and other terms, unless the lender has already been determined by an international agreement.
- The implementing entity may be a local self-government body or a municipal enterprise in which the local authority holds a stake of more than 50%. A local self-government body may receive the funds on a non-repayable basis. For a municipal enterprise, a sub-loan with an obligation to repay the funds applies.
- The procedure also covers tied-aid loans, where the financing may be tied to the purchase of goods or services in a specified country.
- The new rules do not apply to projects of the World Bank, the EIB, the EBRD and other international financial institutions. A separate procedure continues to apply to them under Resolution No. 70.

Source: analysis of Resolution No. 1249, text of Resolution No. 1249

Government establishes a separate procedure for state loans from foreign states and financial institutions (2)

Funded by the European Union

Thus, Resolution No. 1249 supplemented, rather than replaced, the general PIM rules

The new resolution does not create an additional full PIP preparation cycle. It regulates the loan component of the financing depending on the type of lender.

- Resolution No. 527 sets out the general rules for the preparation, appraisal, inclusion in project pipelines and implementation of PIPs.
- Resolution No. 1249 regulates the raising by the state of loans from foreign states and foreign financial institutions: selection of the lender, negotiations, loan agreements, and the transfer and drawdown of funds.
- Resolution No. 70 continues to regulate projects supported by international financial institutions. Resolution No. 1249 does not directly apply to them.
- KfW, although a German financial institution, is expressly excluded from Resolution No. 1249: KfW projects are implemented under Resolution No. 70.
- Local budgets continue to be governed by Resolution No. 110 when raising loans.

What this changes. **Loans from foreign states and financial institutions (excluding IFIs and KfW) now have a defined route from a prepared PIP and the selection of a lender to the transfer of funds to the final implementing entity and the monitoring of their use.**

Points to note. **Resolution No. 1249 does not replace the general rules of public investment management. Resolution No. 527 applies to a PIP first, while the procedure for raising and using a loan depends on the lender: No. 1249 for loans from foreign states and foreign financial institutions, and No. 70 for IFI and KfW projects. Local authorities' own local borrowing continues to be governed by the Budget Code and Resolution No. 110.**

Special financing regime introduced for projects under resilience plans

Funded by the European Union

A special regime has been introduced for projects under resilience plans

On 13 October, by Resolution No. 1256 (amending Resolution No. 393), the Government simplified the implementation of projects under the experiment on comprehensive resilience plans for regions and cities.

Key facts:

- The general requirements of Resolution No. 232 on the allocation of public investment and Resolution No. 527 on public investment management do not apply to the experiment's projects. A special procedure under Resolution No. 393 applies to them instead.
- Water supply projects can be implemented without separate approval from the Coordination Centre.
- In nine oblasts, additional projects can be included in the resilience plans as needed, without waiting for the regular review held every two months.
- For design-and-build contracts, a provisional price may be set on the basis of a consulting engineer's opinion.
- The price may include a reserve for refining design and technical solutions of up to 50% of the cost of design and/or construction works.
- A price increase within this reserve after approval of the design documentation is not considered a change to the essential terms of the contract.

What this changes. **Critical water supply and resilience projects can be prepared and implemented faster, including without going through some of the standard PIM procedures.**

Challenge**. A parallel mechanism for selecting and implementing projects outside the general PIM system is taking shape. The reserve of up to 50% also requires particular attention to cost justification, independent control and publication of the final price.**

Source: Resolution No. 1256

New selection of projects under EIB programmes launched

Funded by the European Union

Ministry for Development announces a new selection of projects under EIB programmes

On 9 October, the Ministry for Development announced a selection of projects to be financed from the unallocated balances of the Ukraine Recovery Programme and Ukraine Recovery Programme III. They will most likely be financed only in 2027.

Key facts:

- Local authorities in Volyn, Ivano-Frankivsk, Rivne, Ternopil, Chernivtsi and Chernihiv oblasts are taking part in the selection.
- The funds may be directed to social infrastructure, housing and utilities, and other facilities in affected regions and in local authorities with a large number of IDPs.
- A project must be registered as a PIP in DREAM and included in the SPP of the region or local authority.
- Mandatory co-financing from the local budget is at least 23%.
- A project must have up-to-date design documentation and be implemented within no more than 18 months.
- Each oblast could submit one to three priority projects with a total value of no more than UAH 100 m.
- Local authorities had to submit documents by 16 October, and oblasts had to forward the selected proposals to the Ministry for Development by 25 October.

What this changes. **Unallocated funds under EIB programmes are moving to the stage of selecting specific projects, while DREAM and local project pipelines are becoming mandatory elements of access to financing.**

Challenge**. Announcing a selection does not yet mean that funds will be allocated (local authorities due to be financed under the previous allocation have still not received it in full). After the regional selection, projects require review by the Ministry for Development, EIB approval and Government approval of the allocation. The seven-day submission period and the 23% co-financing requirement favour local authorities with greater financial resources and capacity. The money is likely to be allocated only in 2027.**

Source: Ministry for Development announcement

Barrier-free route projects selected via DREAM

Funded by the European Union

Selection of barrier-free route projects launched via DREAM

On 22 October, the Ministry for Development announced a selection of PIPs for the state programme ‘Creation of Barrier-Free Routes in Settlements’.

Key facts:

- Projects entered in DREAM and included in the state sectoral pipeline ‘Municipal Infrastructure and Services’ were eligible for selection.
- The route must be approved by the local authority, include multi-apartment buildings and accessible public transport, or provide for its purchase.
- The local authority must designate a responsible person, a dedicated unit and a local barrier-free council.
- The amount of local co-financing depends on the tax capacity of the budget, with a minimum local authority contribution of 50%, 65% or 80%.
- Priority is given to projects with completed design documentation and to facilities where works have already begun.
- Applications were accepted only from 22 to 28 October.

What this changes. **State financing for barrier-free access is starting to be allocated through PIM tools.**

Challenge**. The high share of local co-financing and the six-day submission period may have limited the participation of less financially capable local authorities, even where they need barrier-free infrastructure.**
Since the funds are being allocated under a procedure adopted for 2026, and given the freeze on capital expenditure, it seems doubtful that the funds will be allocated and spent this year.

Source: Ministry for Development announcement

Ministry for Communities plans to reform the SFRD

Funded by the European Union

Ministry for Communities and Territories plans to turn the SFRD into a separate institution

On 2 October, Minister for Communities and Territories Vitalii Bezhin announced that a new model of the State Fund for Regional Development is being prepared.

Key facts:

- It is proposed to transform the SFRD from a budget programme into a separate autonomous institution.
- The Fund could potentially raise not only State Budget funds but also grants and resources from partner programmes.
- A separate function could be financing the cash-flow gaps of local authorities participating in European programmes that reimburse costs after project implementation.
- It is proposed to allocate funds taking into account the functional types of territories, rather than only population size and tax capacity.
- Amendments to the rules for using the SFRD are planned to be prepared by spring.

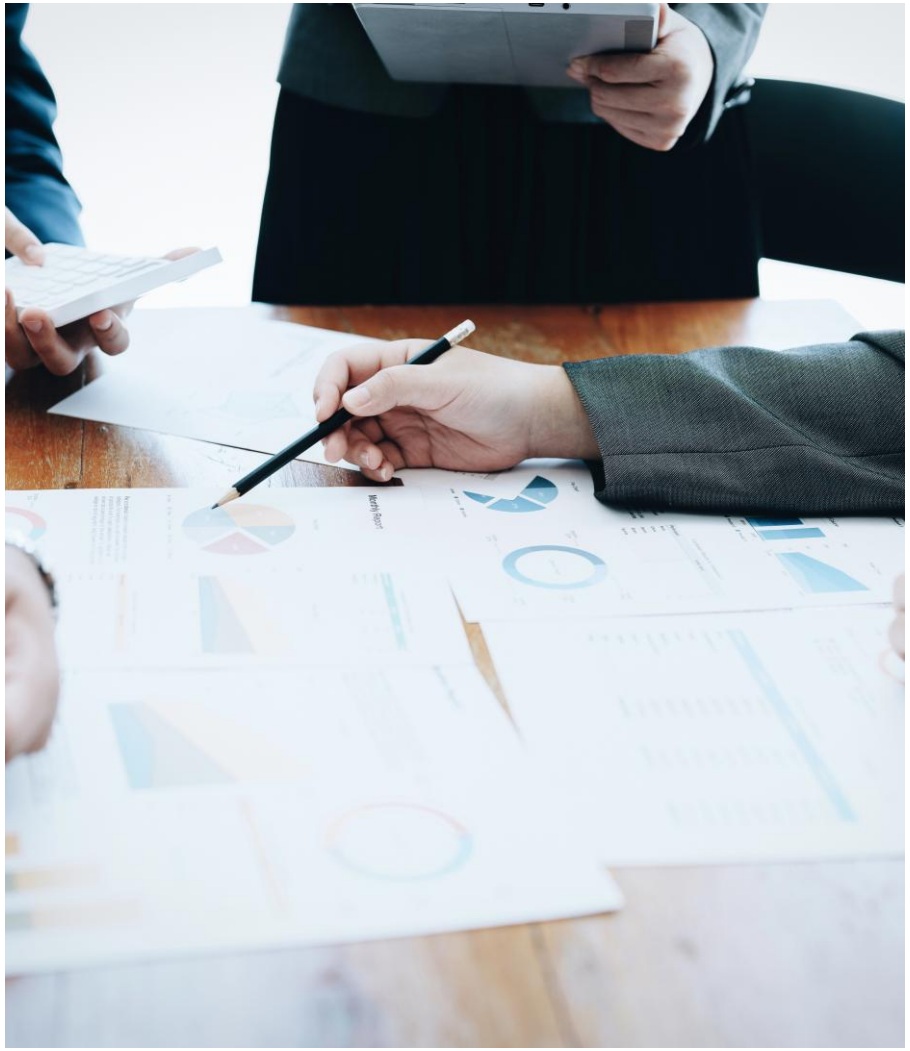
What this changes. **If implemented, the SFRD could become a permanent financial instrument of regional policy. One of the reasons for the reform is the implementation of changes under negotiating Chapter 22 (cohesion policy). The previous leadership of the Ministry for Development also worked on a similar concept.**

Challenge**. For now, this is a policy proposal rather than an adopted decision. Creating a separate institution will require a clear legal status and governance rules.**

Source: interview with Vitalii Bezhin

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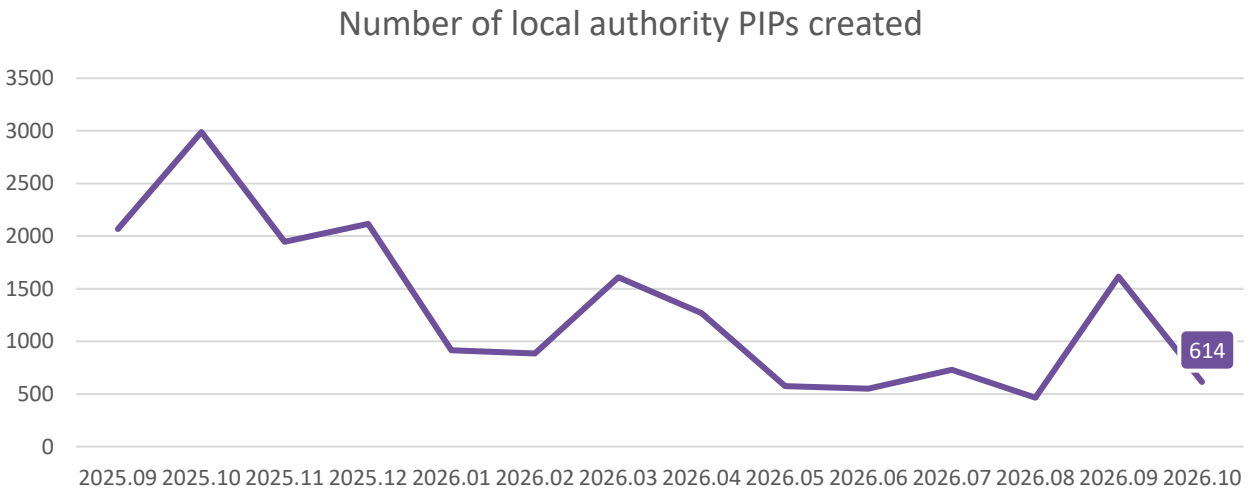
SPP Update in DREAM



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In October, *local authorities* added fewer PIPs, mainly in education and municipal infrastructure

Funded by the European Union



In October*, 614 new PIPs were registered on the DREAM platform.

274 of the new projects relate to education and a further 119 to municipal infrastructure and services, together accounting for 64% of all new local authority PIPs in October.

More than 40 PIPs each were also registered in the healthcare (43) and housing (42) sectors.

Sector	Total as of end of September*	Registered in October*
Agriculture	19	0
Public safety	536	15
Environment	140	11
Economic activity	42	0
Energy	310	12
Housing	718	42
Culture and information	521	18
Municipal infrastructure and services	4322	119
Education and science	7329	274
Healthcare	1793	43
Social sphere	601	23
Justice	1	0
Transport and postal services	905	29
Digital transformation of the state and society	174	6
Sport, physical education and youth development	318	22
Grand total	**17729**	**614**

Note: local authority level – the project initiator is a territorial local authority.

*Data as of 2 November 2026.
Since September 2025, DREAM has presented national, regional and local MTPs and SPPs; all previous projects can be found in the DREAM archive
Source: DREAM

In October, local authorities registered fewer PIPs than in September, and their financing also decreased

Funded by the European Union

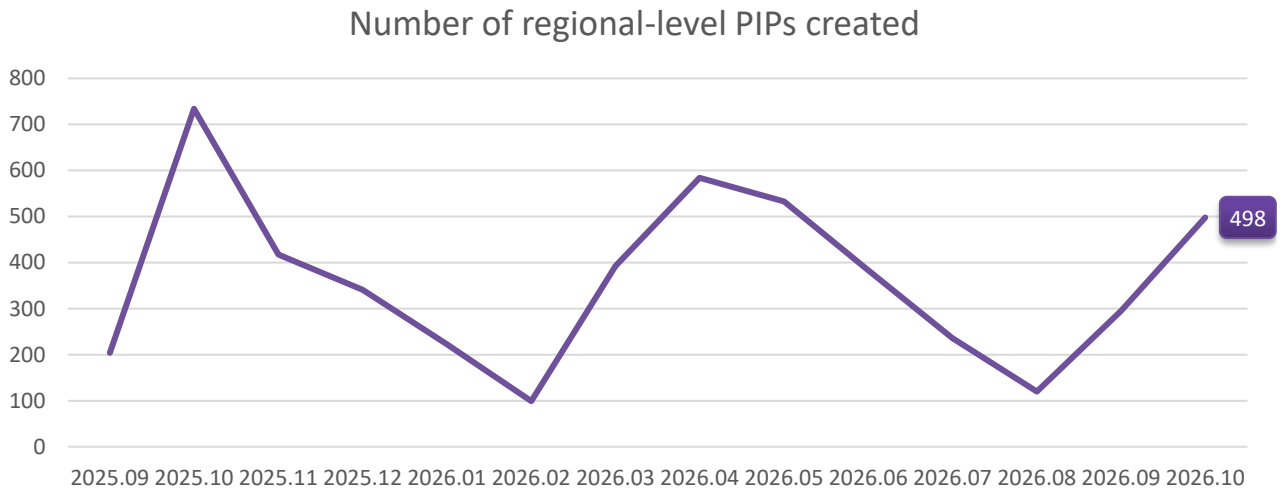
Month	Number of PIPs, units	Financing received, UAH bn	Expected financing, UAH bn	Estimated cost, UAH bn
June	549	0.3	6.5	30.8
July	730	3.5	47.8	47.8
August	465	0.5	27.2	14.9
September	1616	1.5	3.3	39.1
October	614	0.4	3.3	177.1
Total in DREAM*	18343	48.3	242.1	1,425.8

In October*, local authorities registered 614 PIPs, compared with 1,616 in September.
Expected financing amounted to UAH 3.3 bn (of which UAH 1.8 bn was for the restoration of a damaged multi-apartment building in Odesa), while financing received was UAH 0.4 bn (of which UAH 297 m was for the construction of a Sports Palace in Khmelnytskyi).
The estimated cost of the new projects (the total expected cost of projects, including those without financing) was UAH 177.1 bn, of which UAH 115.2 bn relates to a single project – the construction of a kindergarten in the village of Kolodenka, Rivne Oblast (probably a technical error).

* Data as of 2 November 2026. Overall, the data cover the period September 2025 - October 2026. Since September 2025, DREAM has presented national, regional and local MTPs and SPPs; all previous projects can be found in the DREAM archive
Source: DREAM

At *regional* level, the October increase in PIPs came mainly from education and housing

Funded by the European Union



Sector	Total as of end of September*	Registered in October*
Agriculture	16	0
Public safety	214	32
Environment	53	14
Energy	64	3
Housing	800	66
Culture and information	215	36
Municipal infrastructure and services	267	29
Education and science	1485	239
Healthcare	712	17
Mine action	1	0
Public finance	4	0
Social sphere	308	20
Justice	1	0
Transport and postal services	319	18
Digital transformation of the state and society	33	3
Sport, physical education and youth development	69	21
Grand total	**4561**	**498**

In October, 498 new PIPs were registered at regional level.

239 of the new projects relate to education and a further 66 to housing, together accounting for over 61% of all new regional-level PIPs in October.

In addition, 36 PIPs were created in the culture and information sector and 32 PIPs in public safety.

Regional level – the project initiator is a Regional State Administration (RSA) or the Kyiv City State Administration (KCSA).

*Data as of 2 November 2026.
Since September 2025, DREAM has presented national, regional and local MTPs and SPPs; all previous projects can be found in the DREAM archive
Source: DREAM

At regional level, 1.7 times more PIPs were registered in October than a month earlier

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Month	Number of PIPs, units	Financing received, UAH bn	Expected financing, UAH bn	Estimated cost, UAH bn
June	383	0.2	4.7	13.1
July	236	0.8	3.2	15.3
August	120	1.5	5.0	15.7
September	295	1.6	2.5	35.8
October	498	0.9	17.8	102.6
Total*	5059	42.3	121.1	4,007.1

In October, the number of new PIPs and expected financing increased, while financing received decreased.
The estimated cost of projects in October was almost three times higher than in September.
In October, the most expensive regional PIP was the major repair/restoration of bridges and overpasses in Kyiv (over UAH 23.6 bn).
The largest amount of financing received in October was for the major repair of outdoor lighting networks in Kyiv (UAH 290 m).

Note: SPP – Single Project Pipeline
PIP – Public Investment Project

* Data as of 2 November 2026 for the period September 2025 - October 2026.
Since September 2025, DREAM has presented national, regional and local MTPs and SPPs; all previous reconstruction projects can be found in the DREAM archive
Source: DREAM

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Reconstruction procurement as of September 2026*



*preliminary data, subject to revision

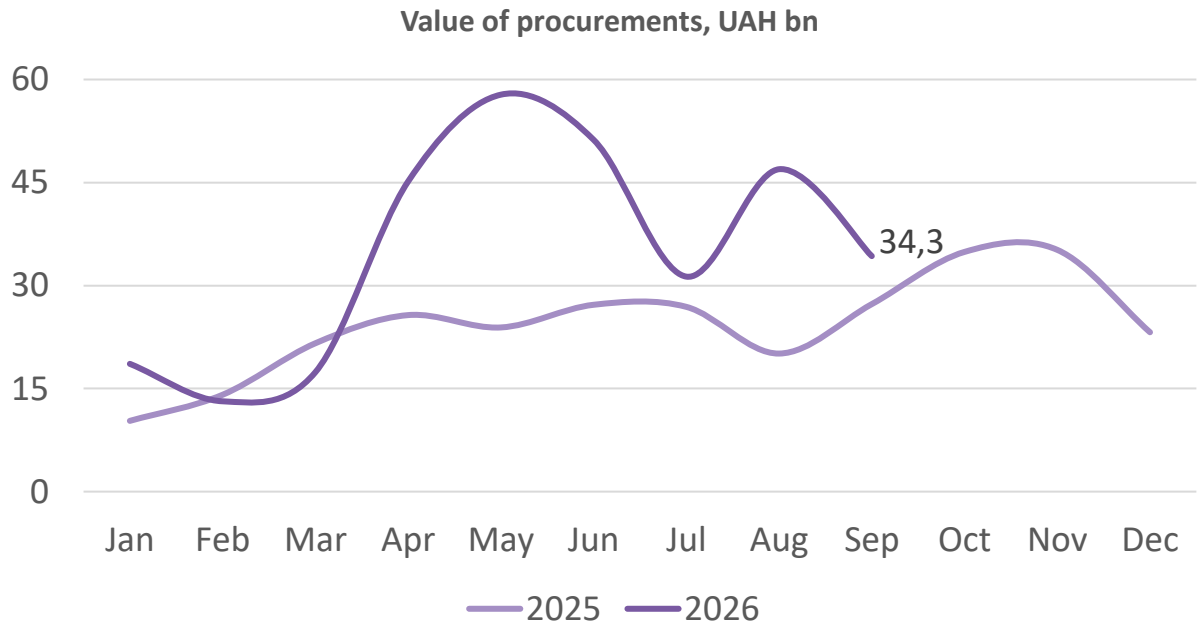
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In September, construction procurement* fell amid the suspension of budget capital expenditure

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- The vast majority of procurements announced in September 2026 have already been completed – 12 thousand (88%). A further 5% are ongoing, 6% failed and 1% were cancelled.
- The number of procurements in September 2026 fell by 4% on September last year, while their value rose by 26% y-o-y. This was accompanied by a 14% y-o-y rise in consolidated budget capital expenditure in September. At the same time, owing to the postponement of UAH 39 bn to December, the value of procurements in September fell by 27% compared with August. Despite the suspended expenditure, project implementation continues, and so does procurement.
- The largest procuring entity in September was the Infrastructure Restoration and Development Service in Dnipropetrovsk Oblast, responsible for several procurements totalling UAH 10.5 bn, including the reconstruction of a trunk water pipeline.





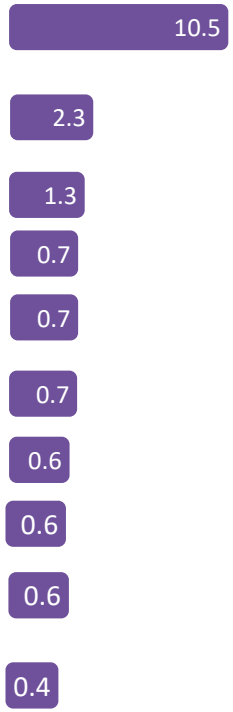
Source: Bi Prozorro

*procurement of construction works and current repairs

The largest winner accounts for 42% of the value of all completed procurements, and the largest procuring entity for 36%

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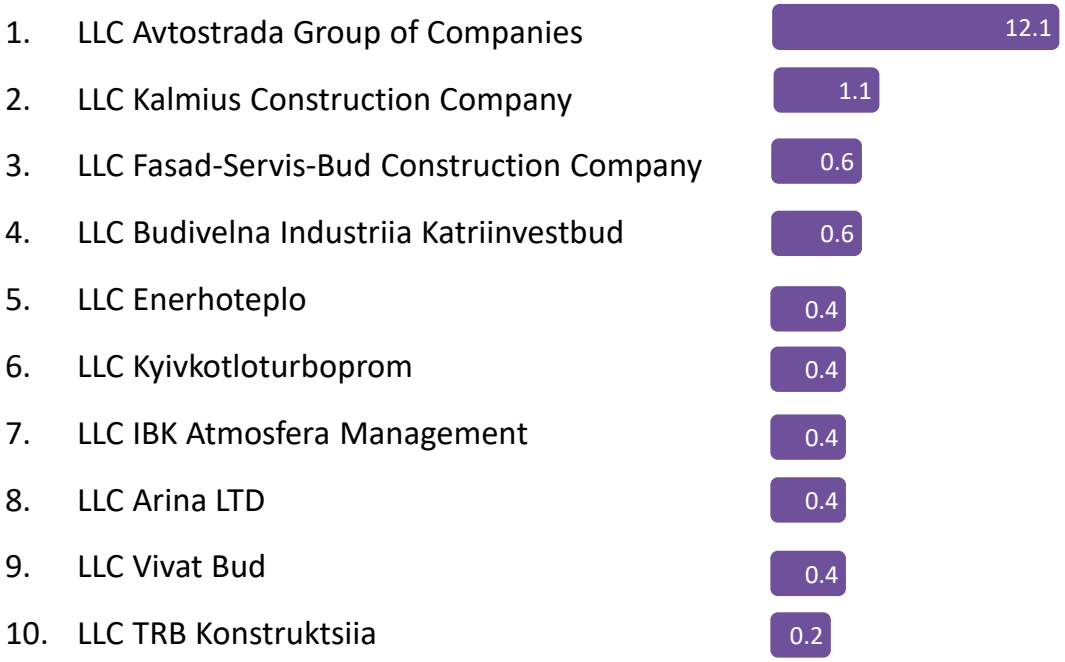
Top 10 procuring entities (UAH bn)



Share of top 10 in all procurements



Top 10 winners (UAH bn)



Share of top 10 in all procurements



Source: Bi Prozorro

*procurement of construction works and current repairs

Implementation of the Resilience Plans continued in September

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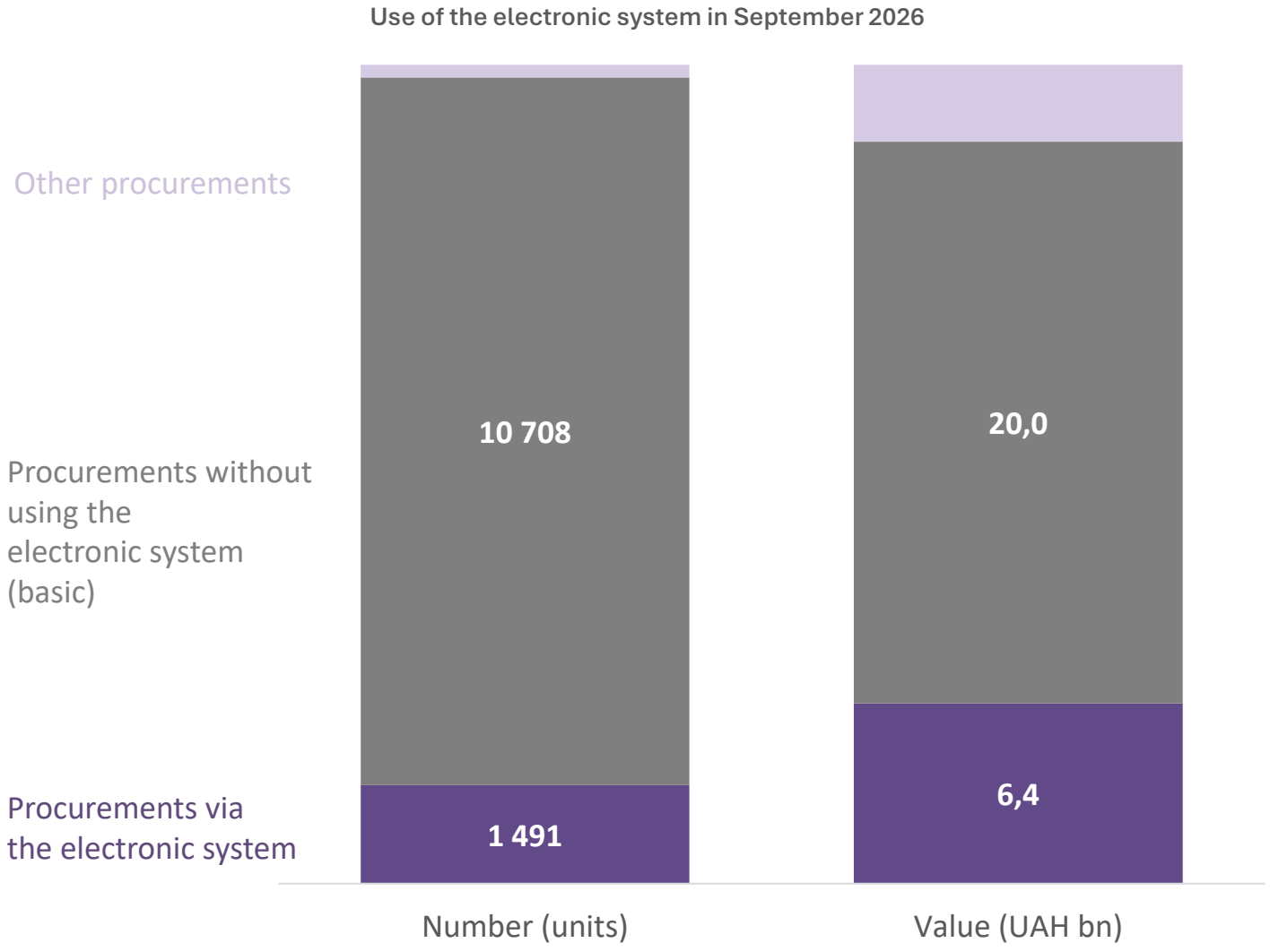
№	Procurement subject	Procuring entity	Winner	Procurement value, UAH bn
1	Reconstruction of the Bila Tserkva - Uman trunk water pipeline	Infrastructure Restoration and Development Service in Dnipropetrovsk Oblast	LLC Avtostrada Group of Companies	9.0
2	Facility under the comprehensive resilience plans	Executive Committee of Khust City Council	LLC Avtostrada Group of Companies	2.3
3	New construction of a standby modular boiler house, Odesa	ME Odesa City Heat Supply	LLC Enerhoteplo, LLC Odesahrohaz, et al.	0.7
4	Reconstruction of a non-residential building into a comprehensive rehabilitation centre, Kyiv	Department of Social and Veterans Policy, Solomianskyi DSA (Kyiv)	LLC Budivelna Industriia Katriinvestbud	0.6
5	Design and reconstruction of a facility	Infrastructure Restoration and Development Service in Dnipropetrovsk Oblast	LLC Kalmius Construction Company	0.5
6	Design and reconstruction of a facility	Infrastructure Restoration and Development Service in Dnipropetrovsk Oblast	LLC Kalmius Construction Company	0.5
7	Installation of a protective structure around the perimeter of a gas distribution station	LLC Gas Transmission System Operator of Ukraine	LLC Construction and Installation Department Enerhoiuzhspetsstroi	0.5
8	Reconstruction of the heat-mechanical section, Kyiv	ME Kyivteploenergo	LLC Kyivkotloturboprom	0.4
9	Construction of a pipeline interconnection	ME Kyivteploenergo	LLC IBK Atmosfera Management	0.4
10	New construction of a protective structure for a transformer	Department of Housing and Utilities, Kharkiv RSA	PE BF Promteks, et al.	0.4

Source: Bi Prozorro

*procurement of construction works and current repairs

Most procurements* in September took place without using the electronic system

Funded by the European Union



- The electronic system was used for 1.5 thousand completed procurements (12% of all completed) worth UAH 6.4 bn (22% of all procurements) in September 2026.
- 88% of completed procurements in September took place outside the electronic system, accounting for 68% of the total value.

Source: Bi Prozorro

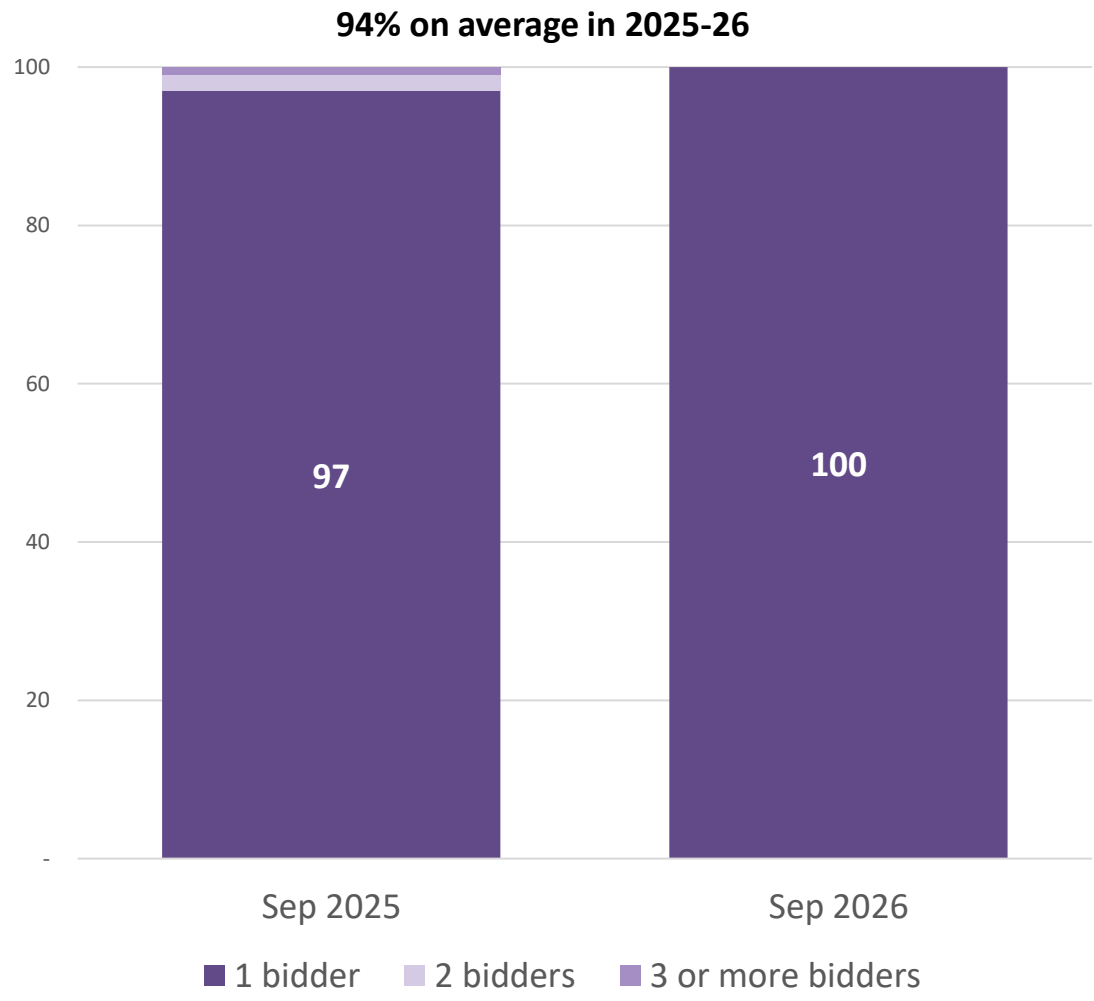
*procurement of construction works and current repairs

Almost all procurements* in September had only one bidder

Funded by the European Union

- In September, the share of single-bidder procurements increased compared with the previous month (99.9% of all completed procurements, accounting for 97% of the total procurement value).
- Using the electronic system, the share of completed single-bidder construction procurements was 92.1% of the total number and 91.2% of the value (Appendix 1).
- By contrast, in January-September 2026 the share of single-bidder procurements using the electronic system was 85.8% of the number of procurements and 80.1% of the total value.
- In September, there were 2 procurements with 7 bidders (their value fell by 64% compared with the expected value) and 2 procurements with 6 bidders (their value fell by an average of 53% from the expected value).

Share of procurements by number of bidders, %



Source: Bi Prozorro

*procurement of construction works and current repairs

Prices fell noticeably in procurements* with more bidders

Funded by the European Union

№	Procurement subject	Procuring entity	Winner	Value, UAH m expected/current	Bidders
All procurements					
1	Development of design documentation for the major repair of a road	Infrastructure Restoration and Development Service in Rivne Oblast	PE Polissia-Proekt	7.5 / 2.3 (-69%)	7
2	Major repair to install a fire alarm system in a lyceum	Department of Education, Culture, Tourism, Youth and Sports, Chyhyryn City Council	LLC Ventpromelektro-montazh	1.4 / 0.9 (-37%)	7
3	Installation of fire alarm systems in a lyceum	Department of Education, Youth and Sports, Piatykhatky City Council	LLC Pozavidomcha Okhorona-Azov	1.2 / 0.5 (-57%)	6
Procurements worth over UAH 20 m					
1	Construction of an anti-radiation shelter for a lyceum	Department of Education, Culture, Youth and Sports, Stepivka Village Council	LLC Yur Proekt Bud	52.4 / 51.3 (-2%)	3
2	Reconstruction of an equipment warehouse	Western Directorate of the Works Customer	LLC Artemzbud	31.2 / 29.9 (-4%)	3
3	Major repair of retaining walls and hydraulic structures, Kyiv	Kyiv City Council ME Specialised Department for Anti-Landslide Underground Works	LLC Spetstekhnika 2017	93.2 / 92.3 (-1%)	2

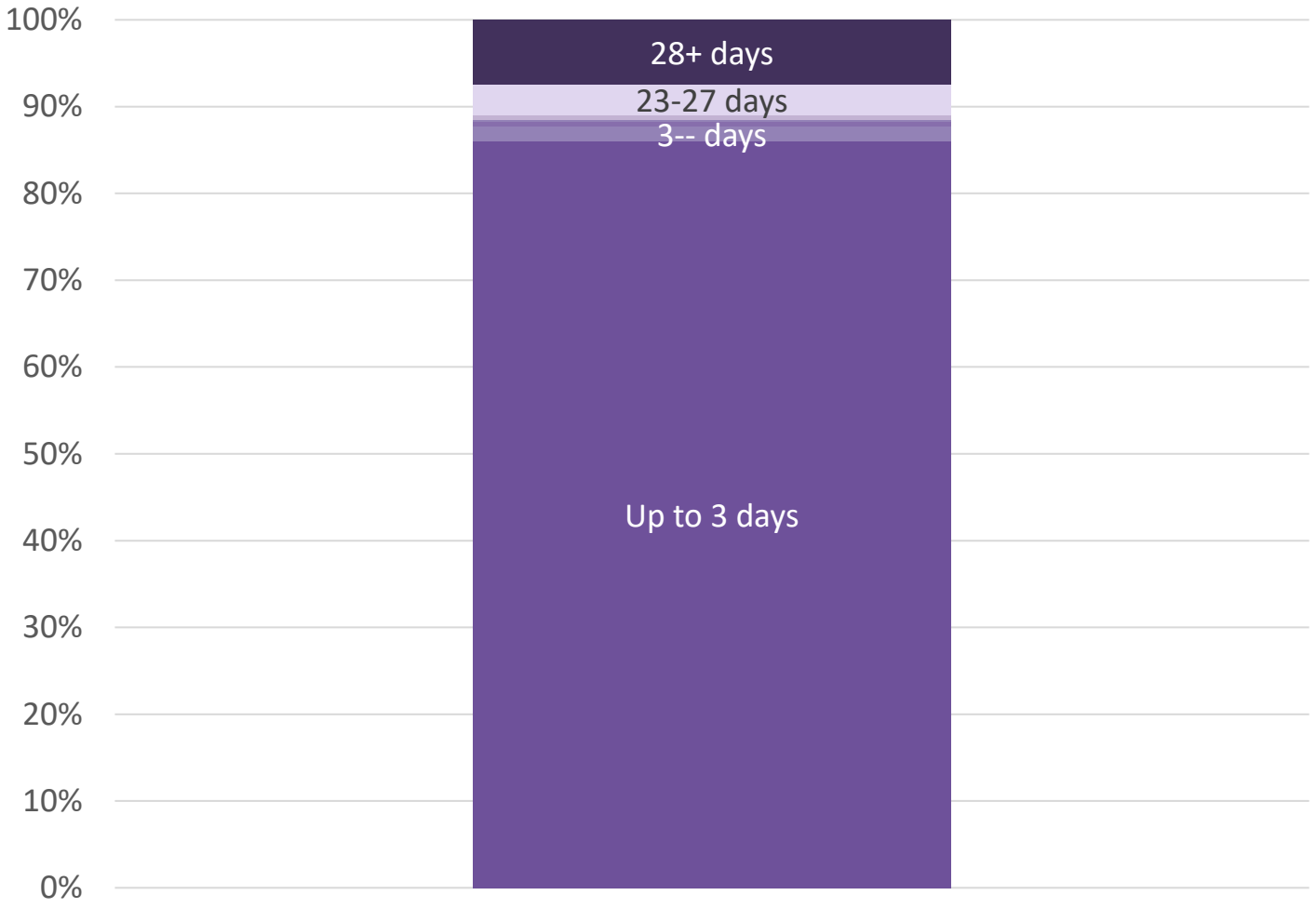
Source: Bi Prozorro

*procurement of construction works and current repairs

Most procurements* are completed very quickly – within 3 days

Funded by the European Union

Share of construction procurements by duration



- In September, about 86% of tenders lasted up to 3 days. At the same time, 89% lasted up to 22 days. This is a noticeably larger share than in August, when 77% lasted up to 3 days.
- In 2026, the average share of tenders lasting less than 3 days was 79%, and 83% over 2023-2026.
- The share of tenders lasting more than 28 days fell to 7% in September, 2 p.p. below the August figure.
- The vast majority of tenders lasting up to 5 days have only one bidder. This indicates very low competition in procurement.

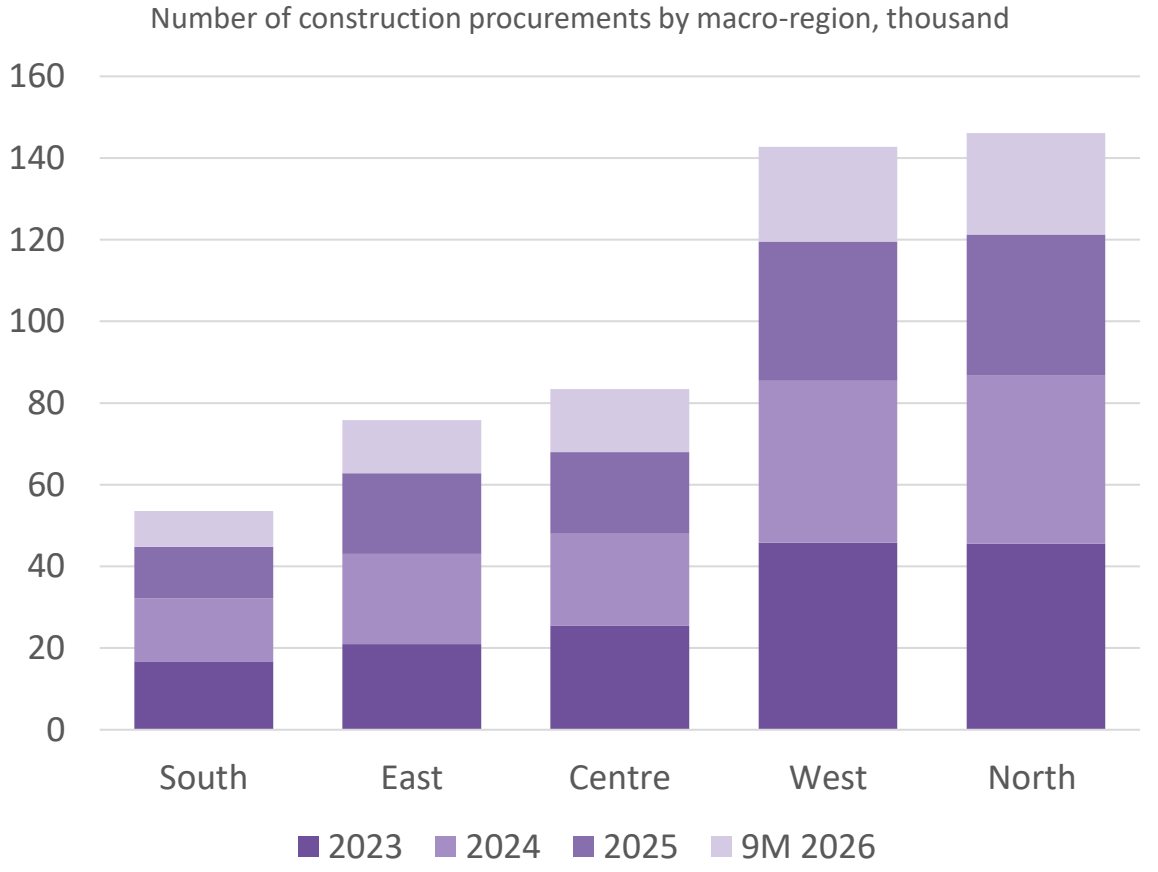
Source: Bi Prozorro

*procurement of construction works and current repairs

Procurements* are concentrated in the largest oblasts, especially in Kyiv and Kyiv Oblast

Funded by the European Union

- The largest number of completed construction procurements in September took place in Kyiv, Dnipropetrovsk and Lviv oblasts. Procurements in these oblasts accounted for 33% of all construction procurements.
- More than half of all construction procurements in the East took place in Dnipropetrovsk Oblast. The smallest number of procurements was in Kherson and Luhansk oblasts.
- 19% of all procurements were organised in Kyiv Oblast and the city of Kyiv. Among the largest construction procurements in Kyiv was the reconstruction of a non-residential building into a comprehensive rehabilitation centre in Kyiv's Solomianskyi District.
- In September, Kyiv and Kyiv Oblast saw 15% more procurements than the Centre, 47% more than the East and 74% more than the South.



** South: AR of Crimea, Zaporizhzhia, Mykolaiv, Odesa and Kherson oblasts
North: Zhytomyr, Kyiv and the city of Kyiv, Sumy, Chernihiv oblasts
West: Volyn, Zakarpattia, Ivano-Frankivsk, Lviv, Rivne, Ternopil, Khmelnytskyi, Chernivtsi oblasts
East: Dnipropetrovsk, Donetsk, Luhansk, Kharkiv oblasts
Centre: Vinnytsia, Kirovohrad, Poltava, Cherkasy oblasts

Source: Bi Prozorro

*procurement of construction works and current repairs

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Public Procurement Development Strategy 2027-2030: a European Integration Perspective



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Government approves the Public Procurement Development Strategy for 2027-2030 2030

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The updated Public Procurement Development Strategy for 2027-2030 was approved on 13 October 2026*.

KEY POINTS

- The European Commission's 2025 Enlargement Report noted limited progress in public procurement reform in Ukraine under the previous 2024-2026 Strategy. **The Commission therefore recommended adjusting the Strategy.**
- The updated Strategy replaces the 2024-2026 document in light of the European Commission's recommendations and changes in the legislative framework.
- First and foremost, the Strategy is intended **to give practical effect to the new Law 'On Public Procurement'** (No. 4888), which entered into force on 24.06.2026 and will be enacted on 24.03.2027.
- Defence procurement is outside the scope of this Strategy; a separate strategic document is to be developed for it (under Law No. 2958).

*The Operational Plan and the final text of the Strategy had not been published as of the end of October: the assessment is based on the draft that was posted on the Ministry of Economy website until 22 October 2026 (no longer available since then).

Source: draft CMU Order on the approval of the Public Procurement Development Strategy for 2027-2030 (Ministry of Economy).

Achievement of the strategic objectives will be measured by a number of indicators indicators

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1

Harmonisation with EU law

50% (2025) -> 75% (2027) -> 100% (2028). This refers to harmonisation with Directive 2014/24/EU, Directive 2014/25/EU, Directive 2014/23/EU and Directive 2007/66/EC.

2

Share of competitive procurement in the total value of contracts

71.6% (2025) -> 77% (2030).

3

Average number of bidders per procurement

1.9 (2025) -> 2.3 (2030). The so-called competition ratio.

4

Share of monitoring exercises selected using automated risk indicators

Current baseline value not yet determined -> at least 30% (2030).

There are targets, but no path to them yet: the measures are to be set out in the Operational Plan. The EC's 2025 Report recommendations are implemented only partially. Details by recommendation are on the next slide.

Source: draft CMU Order on the approval of the Public Procurement Development Strategy for 2027-2030 (Ministry of Economy).

The draft Strategy partially addresses the recommendations of the EC's 2025 Report

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Although the draft was developed to bring the Strategy closer to EU requirements, it does not fully address last year' s recommendations

EC 2025 recommendation	What the draft Strategy contains	Assessment
1. Align legislation with the acquis: procurement, concessions, PPPs, defence; non-discriminatory access for EU operators.	The Strategy provides for alignment with four key Directives (Objective 1). Defence procurement is left out, PPPs and concessions are mentioned descriptively, without tasks or indicators, and for EU operators there is only a general declared principle of non-discrimination.	Partially meets the recommendation. The acquis on procurement – covered; concessions and PPPs – declaratively; access for EU operators – not covered.
2. Develop e-procurement functionality: e-contracts in Prozorro, interoperability with DREAM and other systems	Adaptation of Prozorro to the changes under Law No. 4888 (Objective 4) – all new procurement methods (negotiated procedure, dynamic purchasing system, joint procurement): the plan is for 75% of methods to be implemented in the system in 2027 and 100% in 2028. Development of e-contracts (without an indicator), APIs and structured data. Integration with other systems is planned at 1 → 2 → 3 integrations per year until 2029; DREAM is not explicitly named.	Largely meets the recommendation, but the specifics should be set out in the Operational Plan.
3. Revise the Strategy and add: clear objectives and indicators; anti-corruption measures and exclusion grounds, including for corruption convictions.	Five general objectives and eight indicators with targets for 2027-2030; an annual implementation report is envisaged from 2028. The anti-corruption component is in Objective 5, including the task of speeding up the judicial review of cases challenging the decisions of the review body. The draft contains no exclusion grounds for corruption convictions and no integrity indicators.	Does not sufficiently meet the recommendation. The draft provides little detail on the objectives and the measures to achieve them; the anti-corruption component is mentioned only in general terms.

Sources: EC Ukraine 2025 Report (Chapter 5); draft Strategy 2027-2030.

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Appendices

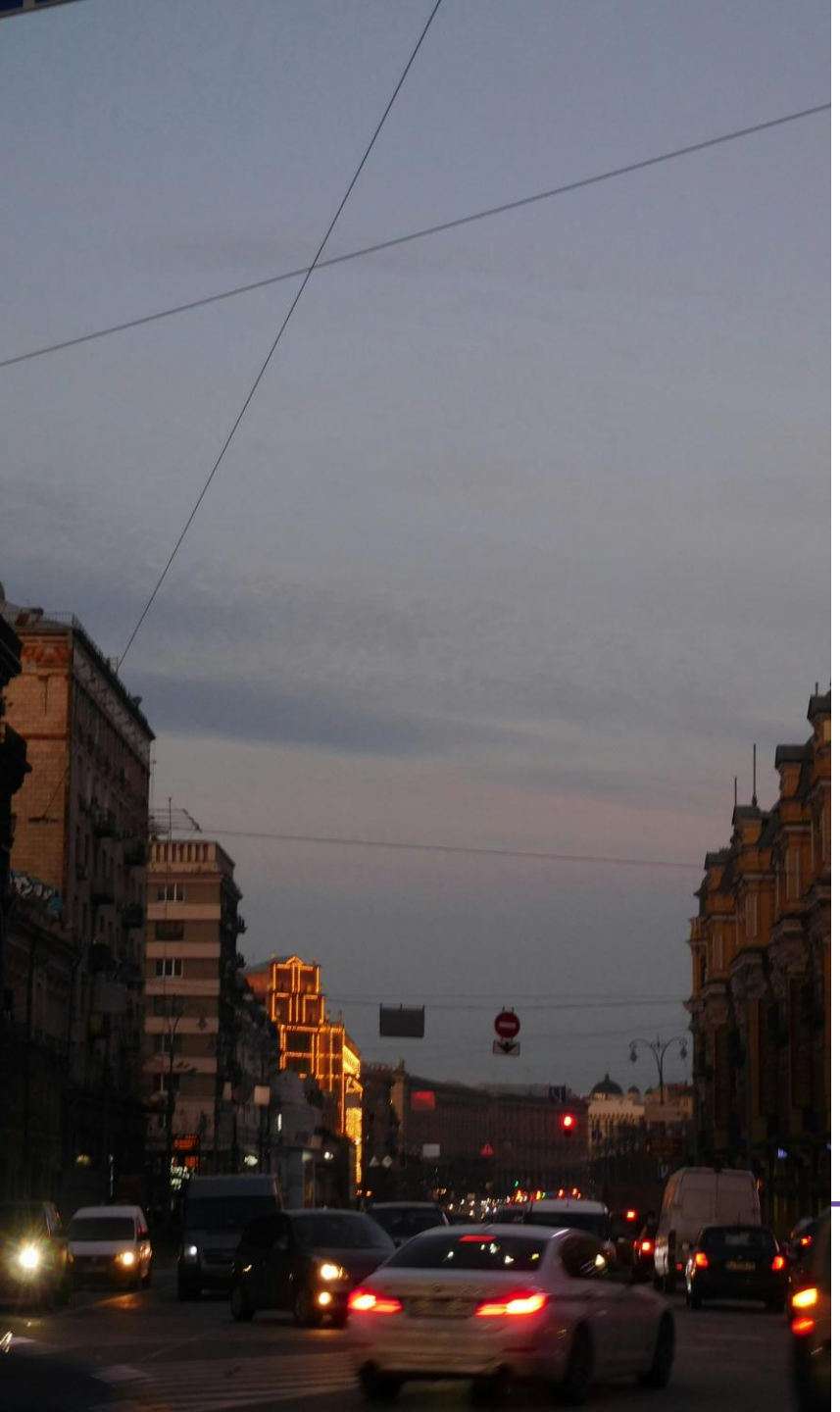
Appendix 1. Procurements* using the electronic system

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Number of bidders	Number and % of procurements in January-September		Value (UAH bn) and % of procurements in January-September		Number and % of procurements in September		Value (UAH bn) and % of procurements in September	
1 bidder	15,560	85.8	143.6	80.1	1,549	92.1	8.4	91.2
2 bidders	1,812	10.0	26.3	14.7	102	6.1	0.7	7.3
3 bidders	480	2.6	6.9	3.8	25	1.5	0.1	1.4
4 bidders	163	0.8	1.1	0.6	2	0.0	0.0	0.0
5 bidders	70	0.4	1.1	0.6	0	0.0	0.0	0.0
6 bidders	26	0.1	0.2	0.1	2	0.0	0.0	0.0
7–17 bidders	25	0.1	0.0	0.0	2	0.0	0.0	0.0
Total completed procurements using the electronic system	**18,136**	**100.0**	**160.9**	**100.0**	**1,682**	**100.0**	**9.2**	**100.0**

Source: Bi Prozorro

*procurement of construction works and current repairs



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