



THE ENVIRONMENTAL DIMENSION OF THE UKRAINE FACILITY AND THE UKRAINE PLAN: STATE OF PLAY AND RECOMMENDATIONS

Executive Summary

September 2025

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The policy paper was developed within the framework of the initiative “The Role of the Ukraine Facility in Promoting Environmental Reforms”, which is implemented by the Resource and Analysis Center “Society and Environment” in partnership with the National Ecological Center of Ukraine and the Information Center “Green Dossier” within the framework of the Ukrainian National Platform of the Eastern Partnership Civil Society Forum.

This publication was produced within the project “Supporting the activities of the Ukrainian National Platform of the EaP CSF in 2025-2026” implemented by the Institute for Economic Research and Policy Consulting with the financial support of the European Union. Its contents are the sole responsibility of the Resource and Analysis Center “Society and Environment” and do not necessarily reflect the views of the European Union or the Institute for Economic Research and Policy Consulting.

The Ukrainian National Platform of the Eastern Partnership Civil Society Forum (<http://eap-csf.org.ua/>) is a network of more than 150 non-governmental organizations in Ukraine that advocates Ukrainian interests within the framework of the Eastern Partnership. The platform is part of the Eastern Partnership Civil Society Forum (EaP CSF). The Eastern Partnership Civil Society Forum is unique multi-layered regional civil society platform aimed at promoting European integration, facilitating reforms and democratic transformations in the six Eastern Partnership countries – Armenia, Azerbaijan, Belarus, Georgia, Moldova and Ukraine. Serving as the civil society and people-to-people dimension of the Eastern Partnership, the EaP CSF strives to strengthen civil society in the region, boost pluralism in public discourse and policy making by promoting participatory democracy and fundamental freedoms. The EaP CSF is a non-partisan bona fide non-governmental organisation.

SUMMARY

The post-war reconstruction of Ukraine is one of the priorities of the Ukrainian National Platform of the Eastern Partnership Civil Society Forum, as has been repeatedly emphasized in several position papers and platform statements.

The Regulation establishing the Ukraine Facility adopted by the European Union to support Ukraine's post-war reconstruction and European integration reforms offers a new financial instrument for EU assistance to Ukraine for the period 2024-2027. The Regulation contains 3 main pillars of support: Ukraine Plan, Ukraine Investment Framework, and Union Accession Assistance.

To implement the EU initiative on the Ukraine Facility, the Cabinet of Ministers of Ukraine has approved the **Ukraine Plan**. The Plan contains a set of reforms in key sectors that contribute to growth and investment, and is positioned as a driving force “for Ukraine's transition to a green, digital and inclusive economy.”

Reforms implemented under the Plan must comply with the principles of “build back better” and “do no significant harm.” A separate section of the Plan is dedicated to the green transition and environmental protection. This covers six reforms, each with its own performance indicators. The reforms relate to the prevention of industrial pollution, climate policy, market mechanisms for carbon pricing, restoration and conservation of natural resources, and the development of a circular economy.

The indicators envisaged in the field of green transition and environmental protection are currently being implemented according to the established schedule. Thanks to their inclusion in the Plan, it was possible to adopt two important laws, the adoption of which had previously been difficult, namely the Law of Ukraine “On Integrated Prevention and Control of Industrial Pollution” and the Law of Ukraine “On the Basic Principles of State Climate Policy.”

The Ukraine Plan was revised in August 2025, but no substantive changes were made, only regarding the postponement of the timeframes for the implementation of certain indicators.

Implementation of the Plan requires **effective involvement and interaction of all stakeholders**: state authorities, parliament, European institutions, and the public. Unfortunately, the main body responsible for the implementation of the Plan of Ukraine, the Ministry of Economy, Environment and Agriculture, does not ensure proper involvement of civil society in monitoring the implementation of the Ukraine Plan and its revision.

There are currently no mechanisms for applying the principle of “do no significant harm” and determining the 20% share of investments for climate initiatives and biodiversity protection.

If properly implemented, the Ukraine Facility can be an important driver of green recovery and support for European integration reforms in the field of environment and climate change. **The recommendations** proposed in the policy paper relate to the following main areas:

I. Creating political conditions and legislative frameworks for the implementation of the Ukraine Facility.

The principle of partnership must be applied at all stages of the Ukraine Facility implementation and at all levels. All stakeholders must formulate ideas for uniting the nation for recovery. Mechanisms and tools should be developed to ensure the application of the “do no significant harm” principle and the determination of a 20% share of investments for climate and biodiversity. It is important

to start planning the next phase of the Ukraine Facility implementation now, as the Ukraine Plan ends in 2027. However, such planning should be systemic: include all necessary reforms, provide for proper monitoring and public involvement, ensure compliance with European integration requirements, and take into account the need for reconstruction “in wartime conditions.”

II. Ensuring proper public involvement at all stages of the Plan’s implementation.

The public should conduct constant monitoring of the implementation of the Ukraine Plan. Such monitoring should be carried out not only regarding the implementation of reforms, but also regarding the use of green financing criteria. It is necessary to strengthen support for civil society in Ukraine, which is actively working on issues of reform and European integration, in particular through the allocation of funds for this purpose within the framework of the Ukraine Facility.

III. Ensure proper community engagement and appropriate communication about the Ukraine Facility opportunities, including funding.

The communication component of the Ukraine Facility should be strengthened, with particular attention to community engagement. Clear conditions for community funding should be defined, as it is assumed that at least 20% of the grant funds of the Ukraine Plan should be spent at the local level. It is necessary to consider the possibility of creating monitoring committees, which can become an effective platform for involving all stakeholders, conducting monitoring and making decisions at each stage.

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