

ANALYTICAL STUDY ON IMPROVING GOOD GOVERNANCE IN UKRAINE

ANALYTICAL STUDY ON IMPROVING GOOD GOVERNANCE IN UKRAINE

Kyiv
2026

Authors:

Ihor Koliushko, Head of the Board of the Centre of Policy and Legal Reform (CPLR);

Viktor Tymoshchuk, Deputy Head of the Board, Lead of the “Governance: Administrative Procedure and Administrative Services” area of the CPLR;

Oleksandr Saienko, co-lead of the “Governance: Policy-Making, Accountability, Civil Service” area of the CPLR;

Viktoriia Melnyk, lead of the “European Integration” area of the CPLR;

Viktoriia Derets, expert of the “Governance: Policy-Making, Accountability, Civil Service” area of the CPLR;

Andrii Zabolotnyi, expert of the “Governance: Policy-Making, Accountability, Civil Service” area of the CPLR;

Mykola Slipchenko, expert of the CPLR;

Yevhen Shkolnyi, expert of the “Governance: Administrative Procedure and Administrative Services” area of the CPLR.

This publication was compiled with the support of the European Union and the International Renaissance Foundation within the framework «Whole-of-Society Accession» project. Its content is the exclusive responsibility of the authors and does not necessarily reflect the views of the European Union and the International Renaissance Foundation.

Table of Contents

List of Abbreviations and Acronyms	5
1. Summary of the Study	7
2. Introduction	10
3. Public Administration Reform and Its Importance for the EU Accession Process for Candidate Countries	12
4. Research Methodology	16
5. Analysis of the Current Situation (Legal Framework and Practice)	17
a. Strategic Foundations of Public Administration Reform	21
b. Policy development and coordination	25
c. Civil Service and Human Resource Management	40
d. Accountability	49
e. Service delivery	58
6. Conclusions	62
7. Target Indicator Matrix	63
Annexes	85

List of Abbreviations and Acronyms

ASSN	Administrative Services of Social Nature
RIA	Regulatory Impact Analysis
DPM	Deputy Prime Minister
SRCSA	State Registration of Civil Status Acts
EC	European Commission
EU	European Union
LAP	Law of Ukraine “On Administrative Procedure”
CMU	Cabinet of Ministers of Ukraine
MIA	Ministry of Internal Affairs of Ukraine
MFA	Ministry of Foreign Affairs of Ukraine
MEEA	Ministry of Economy, Environment and Agriculture of Ukraine
MoE	Ministry of Energy of Ukraine
MVA	Ministry of Veterans Affairs of Ukraine
MoC	Ministry of Culture of Ukraine
MYS	Ministry of Youth and Sports of Ukraine
MoD	Ministry of Defence of Ukraine
MCTD	Ministry for Communities and Territories Development of Ukraine
MSPFU	Ministry of Social Policy, Family and Unity of Ukraine
MoF	Ministry of Finance of Ukraine
MDT	Ministry of Digital Transformation of Ukraine
MoJ	Ministry of Justice of Ukraine
MoH	Ministry of Health of Ukraine
MES	Ministry of Education and Science of Ukraine

NACS	National Agency of Ukraine on Civil Service
NACP	National Agency on Corruption Prevention
NCSP	National Concept of Strategic Planning
NSSMC	National Securities and Stock Market Commission
LSGB	Local Self-Government Bodies
PFU	Pension Fund of Ukraine
PAR	Public Administration Reform
SCMU	Secretariat of the Cabinet of Ministers of Ukraine
CPAS	Centre for provision of administrative services
CEA	Central Executive Authority
HRMIS	Human Resources Management Information System

1. Summary of the Study

Despite Russia's full-scale invasion, Ukraine has continued its efforts to join the European Union (EU), a strategic objective established in the aftermath of the Revolution of Dignity in 2014

Several years ago, the European Commission launched accession negotiations with Ukraine, monitoring progress and emphasising that the pace of negotiations depends on compliance with strict conditions, particularly in the fundamental area of good governance reform, defined in Cluster 1 "Fundamentals of the EU Accession Process".

In June 2026, the European Union officially opened the first negotiating cluster with Ukraine.

According to recent media reports, Ukraine is expected to open its first accession negotiation cluster in June 2026, while the current draft peace plan includes a provision on Ukraine's accession to the EU by 1 January 2027.

It should be recalled that the foundation for EU accession is the Copenhagen criteria, which require that a state possesses institutions capable of safeguarding democratic governance and human rights, a functioning market economy, and compliance with the *acquis communautaire* (harmonisation of national legislation with the EU legal order).

In this study, we sought to thoroughly assess the current state and future prospects for improving good governance in Ukraine, evaluate the measures undertaken within this key reform, analyze achievements and shortcomings that hinder progress, and prepare recommendations for the Government. These recommendations include both tactical objectives (to be achieved without delay) and long-term objectives (whose achievement is expected to yield results in the foreseeable future).

The study is based on a normative-empirical analysis of the state of public administration reform (PAR) in Ukraine, aimed at identifying its challenges and needs in the context of European integration. The methodology includes examining both legislation and its practical implementation across several components. The results of the study are presented in the form of recommendations structured as a "Matrix of Target Indicators" for improving the relevant public policy based on the identified gaps.

The analysis demonstrates both the achievements of the reform, the challenges and areas that require the development of comprehensive solutions, given their significance and cross-cutting nature.

The foundational components are the strategic principles of PAR, which, according to the SIGMA/OECD methodology, must not only be enshrined in legislation but also adhered to in practice. These principles include: developing and implementing an effective PAR agenda that responds to key challenges; ensuring purposeful implementation of PAR; defining target results and regularly monitoring their achievement; and securing the financial sustainability of PAR, supported by strong and effective governance and coordination structures at both the political and administrative levels to steer the process of reform design and implementation.

In addition, the study highlights issues related to policy development and coordination, noting that, for analytical and policy development purposes, public policy can be broadly divided into twelve major policy domains covering the essential needs that citizens expect the state to address: legal; economic; law enforcement and public safety; financial; regional; social; education and science; infrastructure development; environmental; culture and sports development; foreign affairs; and defence.

Particular attention is paid to delineating policy-making and policy implementation functions. The study emphasises that ministries must be responsible for policy-making — defining goals, standards, instruments, and the legislative framework; central executive authorities (CEAs) must be responsible for policy implementation — managing state-owned assets, service delivery, supervision (control), and the implementation of regulatory decisions; while independent regulators must perform regulatory and supervisory functions within their delegated mandate.

The publication provides a detailed review of the critically important issue of the state of the public service and human resource management, an area in which the European Commission has highlighted persistent problems in both its Ukraine Reports 2024¹ and Ukraine Reports 2025². These include the absence of competitive selection procedures for civil service positions, resulting in non-transparent direct appointments that undermine professionalism, political impartiality and the stability of the civil service; high staff turnover, including resignations; and a remuneration system based on the concept of “jurisdictional levels” of public authorities, without transparent

¹ https://enlargement.ec.europa.eu/ukraine-report-2024_en

² https://enlargement.ec.europa.eu/ukraine-report-2025_en

criteria for differentiation, resulting in non-compliance with the principle of equal pay for work of equal value.

The study also emphasises challenges in service delivery and provides a detailed description of the significant achievements in the area of administrative service provision — in particular, the development of a broad network of centres for the provision of administrative services (CPASs) and the decentralisation of a wide range of basic services for citizens. It further offers proposals for improving the legislative framework, underscoring the importance of adopting the Code of Ukraine on Administrative Offences, which should be fully aligned with the provisions of the Law of Ukraine “On Administrative Procedure”³ (LAP) and reflect best European standards.

The publication concludes with several annexes presenting “Policy Areas and the Bodies Responsible for Their Development and Implementation,” “Availability of Policy-Making Functions (Directorates/Departments),” and “Degree of Concentration of Policy Implementation Functions within Ministry Apparatuses”.

Among the study’s recommendations are the following: to ensure the prompt preparation and approval by the Cabinet of Ministers of Ukraine (CMU) of the Public Administration Reform Strategy for 2026–2030, covering all areas defined by the Principles of Public Administration (*at the time of finalisation of the study, the document had not yet been published*); to strengthen the role of the Government in preparing and submitting draft laws by designating it as the primary initiator of legislative proposals, and to reinforce the role of the Secretariat of the Cabinet of Ministers of Ukraine (SCMU) as the key institution for strategic planning, policy coordination, and setting Government priorities; to approve a list of policy analysis and policy-making units across all ministries for all policy areas (e.g., directorates); to align civil service legislation with the OECD/SIGMA Principles of Good Governance; and to ensure the full and proper implementation of the Law of Ukraine “On Administrative Procedure” by bringing all relevant legislation into full conformity with its provisions.

The study draws two groups of key conclusions. The first relates directly to the reform itself and highlights the progress made since the 2014 Revolution of Dignity towards establishing and strengthening a good governance system in line with European standards, while also identifying the challenges that remain to be addressed in the course of the reform. The second concerns the need to improve the effectiveness of fulfilling commitments under the accession negotiation process, with particular

³ <https://zakon.rada.gov.ua/laws/show/2073-20#Text>

attention to the European Commission's recommendations for 2024–2025 and the application of a problem-oriented approach to their implementation.

Through this study, the authors aim to foster a broad discussion among stakeholders and express their readiness to incorporate new constructive proposals from the community as part of the review and discussion of the draft findings presented below. Such a discussion will enable all interested parties to assess and monitor the state of this truly fundamental reform and to identify realistic and effective solutions given its complexity, while drawing greater attention to the above-mentioned cluster (Fundamentals) from both the Ukrainian authorities and the EU.

Through this study, the authors aim to foster broad discussion among stakeholders and invite constructive feedback on the draft findings presented below. Such a discussion can contribute to a better understanding of the state of implementation of this reform, help identify realistic and effective solutions to the challenges it faces, and strengthen attention to the Fundamentals Cluster on the part of both the Ukrainian authorities and the EU.

2. Introduction

Alongside the unprecedented challenges posed by Russia's full-scale aggression, Ukraine continues to advance confidently toward its European future.

According to the European Commission, the most recent Enlargement Package (2025) confirms that the dynamics of enlargement remain among the EU's top political priorities. It also demonstrates that the accession of new Member States is becoming increasingly attainable. Consistency and adherence to a merit-based approach are key to successful EU accession, and Ukraine, together with other candidate countries, continues on its path toward the European Union. The pace of reforms in these countries — particularly in the areas of democracy, the rule of law, and fundamental rights — directly affects the speed of accession.

For this reason, the reform of good governance and the need for its dynamic implementation in Ukraine remain among the priorities highlighted both by the EU and the G7 countries.

As noted by the EU Commissioner for Enlargement during the communication event “Civil Society as a Driver of European Integration

Reforms in Ukraine” in December 2025, the role of civil society in Ukraine during wartime is even more significant than in countries that pursued EU accession under peacetime conditions. In her view, for the EU, Ukraine’s civil society is not merely a stakeholder, but one of the key partners in shaping policies, monitoring reforms, and ensuring their effective implementation.

It is expected that the opening of accession negotiations will provide additional drivers for long held back changes — hindered both by the war and insufficient political will within the country — particularly those related to Sub-chapter 2.1.2 “Public Administration Reform” of Cluster 1.

This study offers a normative-empirical analysis of the effectiveness of Ukraine’s governance system, outlining the current situation and public policy across the following areas: strategic foundations of PAR; policy development and coordination; civil service and human resource management; accountability; and service delivery.

These areas are aligned with the relevant recommendations and priorities set out in the European Commission’s annual reports on Ukraine, SIGMA monitoring reports, and the Public Administration Reform Roadmap. The conclusions and recommendations emerging from this analysis may serve as a basis for a corresponding “shadow report” on good governance for consideration by Ukraine’s international partners and, above all, the national government.

The authors of the study aim not only to present the current legal and empirical state of Ukraine’s public administration system, but also to develop a roadmap for the reforms required, taking into account the policy and institutional requirements of the EU accession process. The study also proposes a new economic and legal approach to analysing policy areas and the functions of public authorities. It provides an expanded mapping of the 33 negotiation chapters and 128 policy areas covered by the National Programme for the Adoption of the Acquis (NPAA), including information on the responsible public authorities, implementation priorities and the stages of the proposed reform roadmap. Particular attention is paid to policy areas involving overlapping institutional responsibilities, identified on the basis of a survey of central executive authorities in which several institutions claimed primary responsibility for policy development.

The findings presented in this study are based on a combination of two methodological approaches: 1. a normative approach, involving the content analysis of legal norms and administrative regulations adopted and implemented as a basis for improving the effectiveness of good governance

in Ukraine with a view to achieving target indicators; and 2. a problem-oriented empirical approach, focused on the practical aspects of ensuring good governance standards, assessing reform progress, and identifying gaps and potential inconsistencies between the adopted legislation and the actual state of reform implementation.

3. Public Administration Reform and Its Importance for the EU Accession Process for Candidate Countries

Public administration reform is one of the key components of the EU integration process, enshrined in the Copenhagen Criteria as the foundation of a candidate country's ability to effectively implement its obligations within the accession negotiation process and, ultimately, to function as an EU Member State. Following the adoption of the revised EU enlargement methodology in 2020, with its structured system of clusters and negotiation chapters, public administration reform retained its place within the Fundamentals Cluster. In the context of accession negotiations, this reform remains a central element of compliance, as the quality of governance determines the state's capacity to implement the full spectrum of sectoral reforms.

A distinctive feature of this reform lies in the combination of EU requirements and the degree of discretion afforded to candidate countries. While the EU establishes the basic requirements, guided by the Principles of Public Administration, it nevertheless leaves room for each country to design its own institutional architecture of the executive branch. Consequently, public administration reform is both critically important to the accession negotiation process and, at the same time, often perceived by governments as an internal, technical, and less politically visible reform area.

Within Cluster 1, the primary focus traditionally lies on rule of law issues — including judicial reform, anti-corruption institutions, and law enforcement bodies. In these areas, the EU employs mechanisms within the accession negotiation process that enable more robust monitoring of reform implementation. By contrast, comparable instruments in the field of public administration reform are applied only to a limited extent: progress is assessed primarily through the European Commission's annual reports and

SIGMA/OECD monitoring reports, without the parallel establishment of staged benchmarks or conditionality mechanisms that would increase attention to this reform.

For candidate countries, such an imbalance creates significant risks. Sectoral reforms are carried out in parallel with the reform intended to ensure adequate institutional capacity. According to a number of experts, the experience of candidate countries in the Western Balkans demonstrates that insufficient attention to the development of public administration at the early stages of the accession process generated risks to the sustainability and effectiveness of sectoral transformations.

In Ukraine's case, these challenges are further exacerbated by martial law, imbalances within the institutional power triangle, and the overall low visibility of the reform both among international partners and within society. The complexity of the subject matter, the technical nature of the processes, and the internal character of the changes often encourage political postponement, thereby creating risks for the fulfilment of obligations across all clusters and negotiation chapters.

Prior to obtaining candidate status, Ukraine relied on the Principles of Public Administration developed by the OECD/SIGMA Programme as the basis for designing and implementing public administration reform. Throughout the reform process, the Government actively cooperated with the SIGMA Programme at various stages of policy development, implementation, monitoring, and evaluation. The European Commission relies on the same principles when assessing candidate countries, which simplifies the Government's work by eliminating the need to restructure its approach to this reform. At the same time, the absence of additional instruments within the accession negotiation framework creates risks of a formalistic approach to reform implementation.

Following the launch of the accession process, the European Commission issued seven recommendations that Ukraine was required to fulfil in order to obtain candidate status. None of these recommendations addressed public administration reform. The next instrument aimed at incentivising reforms was the Ukraine Facility and the Ukraine Plan, which introduced clear indicators and applied the principle of "money in exchange for reforms". Within this framework, public administration reform is also addressed, albeit to a more limited extent compared to other reform areas: only 5 indicators relate to public administration reform, focused exclusively on the civil service, whereas 15 indicators were established for judicial reform and 11 for anti-corruption measures.

On 25 June 2025, during the first Intergovernmental Conference on Ukraine's accession to the European Union, the EU adopted the Negotiating Framework governing negotiations with Ukraine. Among other things, the Framework established opening benchmarks for negotiations under the Fundamentals Cluster, including the development of roadmaps in the areas of the rule of law and public administration reform. In May 2025, these roadmaps were approved by the Government and submitted to the European Commission for assessment, and in September the Government submitted its first implementation report.

In 2025, both Ukraine and the EU faced risks to further progress within the negotiation process, including challenges related to threats to reforms and the blocking of negotiations by certain EU Member States. At the same time, both sides began seeking instruments to address these challenges. One such instrument was the strengthening of the technical dimension of the negotiation process, alongside the publication of a joint statement by the EU Commissioner for Enlargement and the Deputy Prime Minister (DPM) for European and Euro-Atlantic Integration, identifying priority tasks exclusively in the areas of the rule of law and anti-corruption reform.

In the 2025 EU Enlargement Package Report, public administration reform was identified as one of the most successful reforms in Ukraine. This progress was largely driven by advances in digitalization and the development of the system of administrative services. At the same time, the European Commission has consistently identified persistent gaps in policy development, strategic planning, institutional coordination, and the overall capacity of the Government.

The importance and complexity of public administration reform must be viewed in the context of an active accession negotiation process and the ongoing state of martial law, both of which significantly complicate institutional planning and reform implementation. Particular consideration should also be given to the fact that both in Ukraine and within the EU, the year 2030 is increasingly cited as a target date for accession — an exceptionally ambitious timeline given the scale and complexity of aligning national legislation with EU law. This timeline appears even more compressed considering that the substantive work on legislative approximation and institutional preparation must, in practice, be largely completed at least two years prior to accession, while the final stage requires approval by the Member States and the signing of the Accession Treaty. Under these conditions, public administration reform assumes decisive importance, particularly in the context of policy-making capacity, the Government's coordination role, and effective interaction with

Parliament. This helps explain the growing attention paid by the expert community in recent years to identifying instruments and mechanisms for improving the design and implementation of this reform.

One of the instruments proposed to address the challenges outlined above is the institutional mainstreaming of public administration reform, introduced within a joint analytical initiative of the Centre of Policy and Legal Reform, the Ukrainian Centre for European Policy, and the German Marshall Fund (GMF). This approach envisages integrating administrative capacity requirements across all negotiation chapters and clusters, as well as applying to public administration reform conditionality, staged benchmarking, and capacity assessment mechanisms similar to those used in the area of anti-corruption reform. In practical terms, this means incorporating into the assessment of *acquis* alignment an analysis of the quality of policy development, staff stability, inter-institutional coordination, strategic planning, and the capacity to ensure the implementation of EU integration reforms. Such an approach would make public administration reform more systemic, more visible within the negotiation process, and more directly linked to Ukraine's preparation to fulfil the obligations arising from future EU membership.

Despite the EU's recognition of the central role of public administration reform in the accession negotiation process, commitments in this area are often formulated in overly general terms and do not encompass all the elements necessary to strengthen the state's institutional capacity. This creates a risk of a formalistic or fragmented approach, whereby critically important components such as strategic planning, policy development and co-ordination, and civil service stability remain outside the focus of both EU and national implementation efforts. The excessive generality of reform commitments has also been highlighted in other analytical studies, including a paper on improving approaches to defining target indicators under the Fundamentals Cluster, using judicial reform as an example. That paper emphasised the need for clearly defined directions of change. This analytical paper seeks to apply the same approach to public administration reform by identifying the components that are critical to achieving two interrelated objectives: ensuring the Government's capacity to fulfil its commitments under the accession process, and (re)building institutions capable of meeting the Copenhagen Criteria and functioning effectively as institutions of an EU Member State.

4. Research Methodology

This analytical study is based on a normative and empirical analysis of the state of public administration reform in Ukraine, aimed at identifying existing challenges and determining the needs to be addressed in the context of European integration.

The research methodology envisions an analysis of the following components of public administration reform: the strategic foundations of public administration reform, policy development and coordination, civil service and human resource management, accountability, and service delivery.

The study was conducted in two stages. During the first stage, the current state in each of the above-mentioned components of the reform was assessed using the following instruments: expert assessment of existing legislation and legislative initiatives; study of law-enforcement and administrative practice; analysis of the implementation of national strategic policy documents; review of reports of the Government and European institutions on their implementation; and assessment of expert opinions.

In particular, the study took into account the status and results of the implementation of the Public Administration Reform Strategy of Ukraine for 2022–2025, approved by Resolution of the CMU No. 831-r⁴ of July 21, 2021; the Ukraine Plan (Ukraine Facility), approved by Resolution of the CMU No. 244-r⁵ of March 18, 2024; and the Roadmap on Public Administration Reform, approved by Resolution of the CMU № 475-r⁶ dated May 14, 2025. Particular attention is devoted to the state of implementation in Ukraine of the SIGMA Principles of Public Administration (2023 edition).

The main findings of the study are visualised through a matrix of target indicators developed in accordance with the components of public administration reform examined in the study. The matrix includes current indicators (tactical objectives) and final indicators (strategic, long-term objectives), as well as a graphical matrix of function concentration versus institutional completion and a series of analytical tables. These tables present: the correspondence between public policy areas and the authorities responsible for their development and implementation; a comparison of the list of ministries in the Government headed by D. Shmyhal and the Government headed by Yu. Svyrydenko; the existence of policy-making

⁴ <https://zakon.rada.gov.ua/laws/show/831-2021-%D1%80#Text>

⁵ <https://zakon.rada.gov.ua/laws/show/244-2024-%D1%80#Text>

⁶ <https://zakon.rada.gov.ua/laws/show/475-2025-%D1%80#Text>

directorates and departments within ministries; the degree of concentration of public policy implementation functions within ministry apparatuses; and the degree of institutional completion in ensuring the implementation of public policy.

The second stage of the study consisted of developing findings based on the data collected during the first stage of the research. These findings comprise conclusions and recommendations on future directions for public policy aimed at addressing the issues identified, developing comprehensive solutions, and proposing improvements to legislation and law-enforcement practice, taking into account European principles and standards and the EU's experience in public administration reform.

The conclusions and recommendations are further substantiated, *inter alia*, by references to the relevant provisions of the SIGMA Monitoring Report - Public Administration in Ukraine 2023⁷, as well as the European Commission's Ukraine Report 2024 and Ukraine Report 2025. At the same time, the study notes the rather critical expert assessment of the Government's report on the implementation of the Public Administration Reform Strategy in Ukraine during the previous year.

5. Analysis of the Current Situation (Legal Framework and Practice)

Among the legal and regulatory acts considered in this section, particular attention should be given to the above-mentioned Public Administration Reform Roadmap, approved by Resolution № 475-r of the Cabinet of Ministers of Ukraine of 14 May 2025.

The Roadmap sets out 25 strategic outcome indicators and more than 90 measures.

It covers a number of key reforms, including strengthening policy-making and legislative capacity through improved planning, co-ordination and management mechanisms; developing a capable, professional and motivated civil service; ensuring the proper and comprehensive implementation of the Law of Ukraine "On Administrative Procedure"; improving the quality of administrative services by establishing a

⁷https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/02/public-administration-in-ukraine_27a46a58/078d08d4-en.pdf

unified legal framework for administrative service fees; advancing digitalisation; and strengthening public financial management.

Among the positive features of the Roadmap are its clearly defined strategic outcomes, which largely correspond to the areas covered by the OECD/SIGMA Principles of Public Administration, as well as its practical “next steps” format, which specifies the tasks, timelines and authorities responsible for implementation.

At the same time, the Roadmap fails to address a number of systemic reforms that, according to the OECD/SIGMA Principles of Public Administration, constitute essential elements of a modern governance model. Thus, the following significant gaps remain:

- a) With regard to “Strategic Foundations”, there is a need to strengthen both the political and administrative dimensions of reform co-ordination. The Prime Minister should play a more proactive role in providing political leadership and driving the reform forward. The abolition of the position of Minister of the Cabinet of Ministers of Ukraine risks reducing political attention to public administration reform, particularly as the Deputy Prime Minister responsible for this area already has a heavy workload related to European and Euro-Atlantic integration and trade representation. The role and powers of the State Secretary of the Cabinet of Ministers of Ukraine in public administration reform should be clearly defined, given that the Secretariat of the Cabinet of Ministers of Ukraine is responsible for providing the institutional support necessary for its implementation.
- b) With regards to “Policy Development and Co-ordination”, several important areas remain unaddressed by the Roadmap:
 - the lack of reform of government co-ordination and insufficient attention to strengthening the institutional capacity of the Centre of Government as the key actor in policy coordination;
 - the lack of an effective system of inter-institutional co-ordination for the development and implementation of public policies;
 - the absence of comprehensive policy evaluation mechanisms and of systematic use of their findings in decision-making. Public administration reform should not be evaluated solely in terms of whether a particular legal act has been adopted. SIGMA emphasises a continuous cycle of planning, monitoring, evaluation and learning;

- the lack of a coherent model for institutionalising evidence-based policymaking, involving the systematic use of data, analysis and impact assessment in the development of public policies;
- weak integration of policy planning with the budgetary process.

The Roadmap also does not address the functional separation of policy development from policy implementation or the completion of the institutional reform of central executive authorities. These are essential preconditions for establishing a modern public administration model in line with the OECD/SIGMA Principles of Public Administration. The reform of the executive branch architecture and the final delineation of functions between ministries and central executive authorities also remain outside the scope of government planning.

- c) With regards to “Civil Service and Human Resource Management”, there is a need to ensure the stability of civil service and prevent unjustified dismissals.
- d) With regards to “Accountability”, a number of systemic issues related to the functioning of territorial bodies of executive authorities remain unaddressed. These include a comprehensive review of their organisational model, the criteria for their establishment and the optimisation of their network; a clear allocation of functions between central executive authorities, their territorial bodies and local self-government bodies; and the establishment of modern mechanisms for assessing their performance and ensuring accountability. In addition, the Roadmap does not provide for measures to eliminate overlapping powers between different levels of the executive branch or to establish a transparent framework for accountability for the results of public policy implementation.
- e) With regards to “Service Delivery”, the Roadmap’s strategic objective of improving the accessibility and quality of public services, including e-services, does not provide for an important reform measure: the decentralisation of powers for the delivery of the majority of basic and most frequently used administrative services. This includes full decentralisation of civil status registration services, land plot registration and vehicle registration, as well as at least partial decentralisation of administrative services of a social nature. Delegating these powers to local self-government bodies is essential for ensuring the territorial accessibility of and improving the quality of the services most frequently used by citizens. At the same time,

ministries should focus exclusively on their core functions of public policy development and co-ordination rather than on direct provision of administrative services.

The analysis of the implementation of the Roadmap indicates that a number of measures are either delayed or remain unimplemented.

An illustrative example is the failure to complete the first task identified in the Roadmap: “Development and approval by the Government of the Public Administration Reform Strategy for 2026–2030 in accordance with European standards of public administration”. The task was scheduled for completion in the fourth quarter of 2025. Several other measures due for implementation in the same period also remain outstanding.

With regards to the strategic objective of ensuring the full implementation of the Law of Ukraine “On Administrative Procedure”, several measures remain outstanding beyond the deadlines set out in the Roadmap. These include bringing land legislation into compliance with the LAP; ensuring the full implementation of the LAP through secondary legislation; and adopting a new Law “On Petitions”. The remaining unimplemented measures, including bringing customs and tax legislation into compliance with the LAP, are scheduled for implementation in the fourth quarter of 2026 or later. However, these measures should have been implemented a while ago.

Regarding the achievement of the strategic objective of improving the accessibility and quality of public services, including e-services, there are formally no overdue measures, as the majority of actions are scheduled for implementation in the fourth quarter of 2026 or in 2027. Nevertheless, certain measures — in particular, the adoption of the Law on Administrative Fees and legislation aimed at aligning procedures for the provision of administrative services in electronic form with the requirements of the LAP — should be implemented without further delay.

As of the end of the second quarter of 2026, the share of unimplemented tasks cannot be reliably determined due to the absence of an official Government report. Therefore, this study — in particular Section 7 “Target Indicator Matrix” — separately analyses the relationship between the tactical and long-term objectives and the Roadmap.

The main challenges affecting the implementation of the Roadmap include insufficient political support for advancing public administration reform, weak co-ordination among the institutions responsible for implementation, and inadequate implementation discipline in ensuring the timely delivery of agreed measures and fulfilment of reform commitments.

a. Strategic Foundations of Public Administration Reform

Current Situation and Public Policy

According to the SIGMA Programme methodology, the assessment of the current state of affairs and the development of proposals in the area of “Strategic Foundations of Public Administration Reform” should be based not only on the formal enshrinement of the following **four principles** in legislation, but also on their effective implementation in practice:

1. The government has developed and is implementing an effective public administration reform agenda that addresses key challenges.
2. Public administration reform is implemented in a targeted manner; targeted results have been defined, and progress towards their achievement is regularly monitored.
3. Financial sustainability of public administration reform is ensured.
4. Public administration reform is supported by strong and effective governance and coordination structures at both the political and administrative levels, ensuring the effective management of the reform design and implementation process.

The main document that until recently **defined** the public administration **reform agenda** was the Public Administration Reform Strategy of Ukraine for 2022–2025, approved by Resolution of the CMU No. 831-r of July 21, 2021. In addition, the reform priorities were reflected in the Government Action Programme, approved on 18 August 2025 and submitted to the Verkhovna Rada of Ukraine for further approval. According to the Programme, the operational objective of the DPM for European and Euro-Atlantic Integration is “the implementation of a comprehensive PAR in line with European standards”. The Government is tasked with “establishing a comprehensive strategic framework for public administration reform aimed at building in Ukraine a capable, service-oriented, and digital state that protects the interests of Ukrainian citizens on the basis of European standards and experience, while effectively implementing EU policies”. The PAR Strategy for 2026–2030, aligned with European public administration standards, was to be approved by 31 December 2025.

It should be noted that the latest SIGMA Monitoring Report provides a largely positive assessment of the PAR Strategy for 2022–2025. In particular, the experts noted that *the strategic framework is well established and covers all areas of the Principles of Public Administration, and that the document*

sets out policy objectives and identifies performance indicators for assessing progress.

Another important document defining reform priorities, including the implementation of the EU Principles of Public Administration, is the Public Administration Reform Roadmap, approved by both the Government of Ukraine and the European Commission in May 2025. It would be reasonable to ensure systematic monitoring of and reporting on its implementation, given that, as of December 2025, none of the tasks envisaged in the Roadmap had been completed.

With regard to the **principle of the targeted implementation of reform and the monitoring of targeted results**, it should be noted that the full-scale invasion had a significant negative impact on the pace and overall reform's dynamics. Most reform measures were postponed to a later stage, while key political decisions — including the introduction of policy analysis into the work of ministries, the modernization of ministerial structures, the distribution of powers between deputy ministers and state secretaries, and the resumption of open competitive recruitment to the civil service — were deferred. Meetings of the Coordination Council were held primarily for the formal approval of procedural decisions rather than for meaningful and substantive discussions on reform priorities or achieved results. The report on the implementation of the PAR Strategy for 2022–2025 in respect of 2024 was presented only in December 2025 and without providing an opportunity for open discussion of the existing challenges in this area.

The issue of ensuring adequate financial support for the reform remains unresolved. As noted in the SIGMA Monitoring Report *“Financial sustainability of the reform agenda remains the weakest area of the current strategic framework for PAR. Neither of the PAR planning documents includes comprehensive cost estimates for the planned reform measures, creating risks for their implementation. Only 4.9% of the action plans of the Public Administration Reform Strategy for 2022-2025 provide costing information”*. The European Commission's *Ukraine 2025 Report*, published this year, likewise identifies the financial sustainability of the reform as a major challenge.

The existing governance and coordination structures at the political and administrative levels responsible for steering the design and implementation of the reform play a critically important role both in ensuring the success of the reform itself and in building a sound system of public governance in Ukraine more broadly. Historically, weak political leadership, blurred lines of responsibility, the absence of a coherent and systemic vision

of the necessary changes, insufficient involvement of the Prime Minister, and inadequate institutional support have been among the key factors hindering meaningful progress in this area.

At present, political responsibility for public administration reform within the Government is assigned to the DPM for European and Euro-Atlantic Integration, while the position of the Minister of the Cabinet of Ministers, which previously oversaw the reform has been abolished.

The position of Deputy Prime Minister does not entail heading a ministry. Instead, organisational support for the exercise of the Deputy Prime Minister's powers in this area is provided by the Secretariat of the Cabinet of Ministers of Ukraine, in particular through the Directorate for Public Governance and the Office for European and Euro-Atlantic Integration. This arrangement accordingly requires coordination with the State Secretary of the Cabinet of Ministers, who not only heads the Secretariat but also serves as de facto the highest-ranking civil servant within the system of public administration. At the same time, the National Agency of Ukraine on Civil Service (NACS) is likewise vested with policy-making powers in this area, creating a degree of functional overlap.

Despite the establishment and functioning of the **Coordination Council on Civil Service**, its meetings are often irregular and largely formalistic in nature, serving primarily to approve decisions that have already been prepared and informally agreed upon in advance. Oversight of the implementation of the Council's decisions remains insufficient. A notable example is the repeatedly adopted decision during 2023–2025 to establish directorates in all ministries and introduce their new organisational structures, which has nevertheless remained unimplemented. It is necessary to strengthen oversight over the implementation of the Council's decisions and to transform the Council from a formal advisory body into a genuine platform for open dialogue and substantive discussion on the priorities and results of public governance reform. The Council should also play a more active role in coordinating all stakeholders involved in the implementation of the reform. The importance of strengthening the role of the Coordination Council was also emphasised in the European Commission's Ukraine 2025 Report, which stated: *"The role of the PAR Coordination Council in overseeing the implementation of the PAR strategy should be strengthened to ensure a more results-oriented approach, particularly in addressing reform bottlenecks, improving inter-institutional coordination and ensuring effective and strategic steering of reform"*.

Recommendations

1. Ensure the CMU's prompt preparation and approval of the Public Administration Reform Strategy for 2026–2030, covering all areas defined by the Principles of Public Administration *(at the time of finalisation of the study, the document had not yet been published)*.
2. Ensure that public administration reform priorities are incorporated into the Government's key strategic policy documents and the corresponding plans for their implementations.
3. Establish systematic reporting on the implementation of reform measures. Involve representatives of the expert community and civil society in discussions. Analyse the reasons why reform measures have not been implemented or have been implemented inadequately, hear reports from responsible officials, and adopt the necessary management decisions based on the findings.
4. Strengthen oversight of the implementation of the Public Administration Reform Roadmap. Update the composition of the relevant working (negotiation) group with the EU, ensure systematic reporting, and review implementation progress at joint events involving representatives of the European Commission, experts, and civil society.
5. Conduct a detailed financial assessment of reform implementation measures. Include the necessary expenditures in the new Public Administration Reform Strategy for 2026-2030. Ensure that the corresponding funding is allocated annually during the preparation of the state budget for the relevant year.
6. Institutionally strengthen the Public Governance Directorate of the SCMU, including by assigning it a more active role in civil service policy development, coordination, and oversight of the implementation by ministries and other executive authorities of Government decisions and decisions of the Coordination Council in this area.
7. Consider the feasibility of reforming the National Agency of Ukraine on Civil Service (NACS), including by transferring policy-making powers in this area to the relevant member of the Government and the Public Governance Directorate of the SCMU, while assigning support for the work of the Commission and other tasks related to the management of the senior civil service to a newly established collegial body — the High Council of the Civil Service. Institutionally strengthen the NACS in its role of implementing policy in this area, particularly with regard to

monitoring compliance with civil service legislation, including supervision of competitive recruitment procedures.

8. Strengthen the role of the Coordination Council on Civil Service in organising and ensuring inter-agency coordination of reform implementation. Ensure that its meetings are held systematically and that all key issues related to reform priorities and implementation results are reviewed with the involvement of experts and civil society, while exercising proper oversight of the implementation of adopted decisions.

b. Policy development and coordination

The Cabinet of Ministers of Ukraine is responsible not only for the implementation of public policy, but also for its development within the scope of powers delegated by legislation.

Its primary role is to ensure the coherence, systemic functioning, and effectiveness of the executive branch through institutional policy, coordination, programme management, and accountability to Parliament and society.

According with the Constitution of Ukraine the tasks of the CMU fall into two main categories:

- ensuring the implementation of public policy;
- developing public policy.

In general, for the purposes of policy analysis and development public policy may be grouped into twelve broad policy areas that cover the key needs citizens expect the state to address. Further consolidation would risk creating internal conflicts between objectives and methodologies:

- 1) legal policy;
- 2) economic policy;
- 3) public order and citizen security policy;
- 4) financial policy;
- 5) regional policy;
- 6) social policy (social protection and healthcare policy);
- 7) education and science development policy;
- 8) infrastructure development policy;
- 9) environmental policy;
- 10) culture and sports development policy;

- 11) foreign policy;
- 12) defence policy.

Responsibility for these policy areas, delegated to the state under the Constitution and laws of Ukraine, lies with the Cabinet of Ministers of Ukraine. The approach to structuring public policy into 12 areas is based on a functional model of public governance focused on citizens' needs and the constitutional mandate of the state.

The proposed framework makes it possible to clearly delineate the responsibilities of executive authorities, ensure the internal logic of policy development, and create the conditions for a balanced institutional architecture.

1. Functional Criterion for Structuring

Policy areas are defined not according to the organisational structure of ministries, but according to the types of citizens' needs and the nature of the state's public functions. This approach aligns with SIGMA principles, which emphasise the differentiation of policies according to their substance, expected outcomes, and the institutional logic of implementation.

2. Classification into four groups of public functions

2.1. Fundamental State Functions

This group includes:

- legal policy;
- public order and citizen security policy;
- defence policy;
- foreign policy.

These areas constitute the core architecture of statehood, as they are exercised exclusively by the state and cannot be delegated to private or non-public actors. They establish the legal framework, ensure the protection of citizens, safeguard sovereignty, and provide for the conduct of external relations.

2.2. Areas Shaping the Economic Conditions for Development

These include:

- economic policy;
- financial policy;
- regional policy;
- infrastructure development policy;

- environmental policy.

These areas provide the foundation of economic development: markets, investment, financial stability, spatial development, and mobility. They complement one another by ensuring coherence between state regulation, macro-financial stability, access to infrastructure, and balanced territorial development.

2.3. Human Capital Development Areas

This group covers:

- education and science policy;
- social policy (social protection and healthcare);
- culture and sports development policy.

These areas contribute to the development of human capital, competencies, health, social resilience, and societal cohesion, reflecting the OECD/SIGMA logic of human-centred policies.

2.4. Balancing functions (checks and balances).

The model identifies policy areas that naturally balance one another and contribute to the overall strategic resilience of state policy. Two key examples are:

Legal Policy ↔ Public Order Policy

Legal policy should be aimed at guaranteeing human rights and freedoms, whereas public order policy should focus on ensuring compliance with established rules of conduct and their enforcement.

Economic Policy ↔ Financial Policy

Economic policy should be aimed at creating favourable conditions for business operations, market development, and the development of economic sectors, whereas financial policy should focus on securing sufficient financial resources to finance the functioning and development of the state, as well as ensuring their rational use.

Combining these functions within a single institution would create conflicts of interest and risks of excessive concentration of power, while excessive separation would create risks of ineffective governance.

3. Institutional significance of the 12-area model

Structuring public policy into twelve areas allows the state to:

- ensure the systematic delineation of policies without linking them to the current structure of ministries, the number of which may vary;
- increase transparency in defining responsibilities and expected outcomes;
- avoid duplication and conflicts of functions;
- ensure institutional balance, which is a key principle of public administration reform;
- create a basis for assessing the capacity of public authorities (institutional capacity assessment).

4. Conclusion

The 12-area model provides an appropriate framework for the strategic analysis of public policy, as it:

- 1) reflects the real needs of citizens;
- 2) creates institutional checks and balances;
- 3) enables comprehensive and rational allocation of functions among ministries;
- 4) supports the assessment and development of the capacity of public authorities in line with the OECD/SIGMA logic;
- 5) provides a comprehensive basis for reforming the Government's institutional architecture.

As of June 2026, 15 ministries operate within Ukraine's CEAs.

The organisation and functioning of the CMU in the area of public policy development are based on the use of the following instruments (see Annex 1):

1. Legal and regulatory framework;
2. Strategic-policy and analytical support;
3. Institutional and organisational support;
4. Financial support.

This study focuses on the first three instruments, while financial provision is the subject

Legal and regulatory framework

Ukraine has an extensive regulatory framework for public policy development; however, in practice, the system remains fragmented and inconsistent.

The constitutional design set out in Article 85 of the Constitution of

Ukraine⁸ provides that the Verkhovna Rada of Ukraine adopts laws and defines the principles of domestic and foreign policy. From a doctrinal perspective, this provision has two dimensions: a law-making dimension and a policy-determination dimension. Conflating these dimensions creates the false perception that the mere existence of a framework law automatically means that a national development strategy exists.

The Constitution establishes the basic institutional architecture of public authority. It defines:

- parliament as the legislative authority;
- Government as the highest body within the executive branch;
- delineation of powers between the branches of government;
- accountability of the Cabinet of Ministers to the Verkhovna Rada.

However, the Constitution neither establishes a strategic planning model nor defines procedures for setting long-term national objectives.

The institutional dimension of policy development is further detailed in the Law of Ukraine “On the Cabinet of Ministers of Ukraine”⁹. This law defines the CMU as the highest body within the executive branch and entrusts it with the function of ensuring the implementation of domestic and foreign policy. It regulates the preparation of the Government’s Action Programme, the coordination of ministries, and the organisation of the government process.

At the same time, the Law “On the Cabinet of Ministers of Ukraine” focuses primarily on the procedural organisation of government activity. It does not establish a hierarchy of strategic documents or define the strategic cycle as a mandatory model of public administration. The Government’s Action Programme is political in nature and is not systematically integrated into medium-term budget planning as part of a legally established strategic framework.

The functional delineation of policy roles is also set out in the Law of Ukraine “On Central Executive Authorities”¹⁰. This law defines ministries as bodies responsible for policy development in their respective areas, and other central executive authorities as bodies responsible for policy implementation. Thus, the delineation between policy development and policy implementation is formally established at the legislative level.

However, this law also does not establish a general model of strategic planning. It describes institutional roles but does not define mandatory

⁸ <https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80#Text>

⁹ <https://zakon.rada.gov.ua/laws/show/794-18#Text>

¹⁰ <https://zakon.rada.gov.ua/laws/show/3166-17#Text>

strategic documents, establish mechanisms for their alignment, or provide for a systematic link with the budget process.

The adoption of the Law of Ukraine “On Law-Making Activity”¹¹ in 2023 added a procedural dimension to the regulatory system. The law regulates the stages of the law-making process, requirements for the justification of draft laws, the planning of legislative activity, and the principles of legislative coherence. It rationalises the legal drafting process but does not transform it into a strategic instrument. Although adopted, the law will take effect only after martial law is lifted.

Within this regulatory configuration, three levels of regulation have been established:

constitutional — defining the separation of powers and basic competences;

institutional — regulating the activities of the Government and central executive authorities;

procedural — establishing law-making rules.

At the same time, a fourth level — the strategic level — is missing. Such a level would ensure:

- the definition of long-term national objectives;
- a hierarchy of strategic documents;
- integration of strategies with budget planning;
- a system of monitoring and performance evaluation;
- mandatory policy adjustment based on evaluation results.

Attempts to assign this function to the Law of Ukraine “On the Principles of Domestic and Foreign Policy”¹² are difficult to justify from a doctrinal perspective. This law is eclectic and declarative in nature and does not create a governance mechanism for implementing the defined policy directions. It is not integrated with the Law of Ukraine “On the Cabinet of Ministers of Ukraine”, is not aligned with the Law of Ukraine “On Central Executive Authorities”, and does not establish procedures for the strategic cycle.

The institutional problem lies not in the absence of legislation as such, but in the lack of a systemic legal framework capable of translating the constitutional mandate for defining policy principles into a structured model for the state’s long-term development.

¹¹ <https://zakon.rada.gov.ua/laws/show/3354-20#Text>

¹² <https://zakon.rada.gov.ua/laws/show/2411-17#Text>

Only by legally establishing strategic planning as a distinct governance function can coherence between political priorities, institutional responsibility, and budgetary resources be ensured.

In the European Commission's Ukraine 2024 Report, the section "Policy development and coordination" highlights several additional issues: the coordinating role of the Secretariat of the Cabinet of Ministers of Ukraine (SCMU) in policy development; the limited role of the Government in the legislative process; shortcomings of the Law of Ukraine "On Public Consultations"¹³, in particular the fact that, for Members of Parliament, public consultations remain optional and at their discretion; and the monitoring of policy implementation.

In its Ukraine 2024 Report, the European Commission highlights the persistence of several of the issues identified above. The report repeatedly emphasises insufficient capacity for evidence-based policy development and reiterates the limited role of the Government as a legislative initiator, given that most draft laws are submitted by MPs, while only 35% of adopted laws are initiated by the Cabinet of Ministers.

According to SIGMA, only 11% of legislative obligations related to approximation with the EU acquis were fulfilled in 2021, and only 7% in 2022. By contrast, the Government's "Pulse of the Association Agreement" monitoring system, which also covers non-legislative commitments, reported a much higher overall implementation rate under the Association Agreement Implementation Plan: 60% in 2021 and 42% in 2022¹⁴.

Strategic Policy and Analytical Instruments

The documents defining the strategic policy framework are the Action Programme of the CMU and the annual address of the President of Ukraine to the Verkhovna Rada.

The Concept of the National Strategic Planning System was approved by CMU Order № 853-r of August 13, 2025¹⁵. While acknowledging the terminological and regulatory challenges related to defining "strategic planning" and related concepts such as "strategic documents" and "strategic planning documents", this framework document identifies the following gaps:

- 1) the absence of a vision of national development, long-term objectives, and reference points supported by society;

¹³ <https://zakon.rada.gov.ua/laws/show/3841-20#Text>

¹⁴ https://www.sigmaweb.org/en/publications/public-administration-in-ukraine_078d08d4-en.html

¹⁵ <https://zakon.rada.gov.ua/laws/show/853-2025-%D1%80#Text>

- 2) the absence of coordination and hierarchical links among a large number of fragmented documents;
- 3) the lack of an established practice for assessing the effectiveness of the implementation of strategic documents, as well as the absence of accountability for the failure to implement them.

The analysis of the current situation shows that Ukraine has developed a practice of developing a large number of strategic documents. According to the Ministry of Economy, as of today 333 strategic documents of various types have been adopted at the national level (excluding action plans of public authorities). At the same time, Ukraine lacks a **unified long-term development document** that would serve as the hierarchical foundation for the entire system of state strategic planning documents aimed at achieving long-term objectives.

The National Strategic Planning Concept (NSPC) formally establishes a coherent architecture of strategic documents and seeks to introduce a modern, hierarchical, and measurable system for setting objectives. The Concept also incorporates elements that SIGMA has repeatedly highlighted across several assessment cycles of Ukraine's governance system:

A clear division of planning levels: a 14-year strategic horizon → 7-year medium-term strategies → implementation plans → budgeting. SIGMA has explicitly noted in its reports that, previously, *“the frameworks for medium-term and sectoral planning were fragmented”*

An effort to **eliminate duplication of institutional mandates**. SIGMA confirms that duplication between the centre of government and ministries was partially reduced during 2018–2021. The Concept could institutionalise this progress.

An intention to **synchronise strategic and budgetary planning**. This is one of the weakest areas consistently identified by SIGMA: *“it is not possible to assess the alignment of planning documents with budgetary frameworks; medium-term budgetary frameworks and the Government's Action Programme are missing”*.

An official **mandate for policy monitoring and evaluation**. SIGMA emphasises that *“performance measurement, monitoring, and costing remain the weakest areas”*. The Concept seeks to address this through introducing monitoring standards, KPIs and regular evaluation.

At the same time, Ukraine faces several institutional deficiencies that directly threaten the implementation of the National Strategic Planning Concept:

- **weakness of the centre of government.** The SCMU performs key coordination functions but lacks the authority to return low-quality documents, does not conduct effective financial assessments, and does not ensure the alignment of priorities, partly due to the simplified procedures introduced during wartime. The Government Office for European and Euro-Atlantic Integration conducts a formal compliance check against the *acquis*, but mechanisms for managing negotiations have not been defined and no inter-agency structure is in place;

- **absence of a comprehensive methodological framework.** SIGMA notes that *“guidelines for the development of sectoral strategies have been drafted but not adopted”*;

- **low quality of plans and strategies in practice.** SIGMA reports that *“although the quality of sectoral strategies has improved, they remain focused on outputs rather than outcomes, while monitoring and performance measurement remain weak”*;

- **institutional weakening under martial law.** Coordination procedures have been shortened or reduced to formalities, transparency has declined, a significant number of decisions are taken through emergency procedures, and reporting on state programmes has been interrupted.

The Concept of the National Strategic Planning System is a step in the right direction, as it represents a **document** that finally introduces the strategic architecture required by the state. However, **SIGMA data** clearly indicates that the main challenge lies not in the absence of a concept, but in the institutional capacity to implement it. Unless the centre of government is strengthened, strategic procedures are formalised, and monitoring and budget synchronisation are ensured, the Concept risks remaining a **formal document** with limited impact on actual governance practice.

Organisational and Institutional Instruments

The organisation of ministries as bodies responsible for policy development is a key element of an effective public governance system. The extent to which the ministerial system is structured logically and coherently determines both the effectiveness of policy implementation, the quality of policy development and, consequently, the state's capacity for strategic development.

In Ukraine, however, the allocation of areas of responsibility has long lacked coherence, leading to duplication of functions, policy fragmentation and gaps.

Some ministries are excessively fragmented, while others encompass overly broad areas of responsibility, including functions that are only weakly related to each other. For example:

Some ministries are excessively fragmented, while others cover overly broad areas of responsibility, including functions that are only loosely related to one another. For example:

The Ministry of Economy, Environment and Agriculture covers the entire economic policy domain as well as environmental policy. This may weaken the focus on environmental protection, as natural resources risk being viewed primarily through the prism of economic or agricultural interests. Economic policy is oriented towards growth, whereas environmental policy defines the limits of permissible impact and sets standards for sustainable development. Combining these areas within a single institution creates an institutional asymmetry in which the objective of promoting economic growth may prevail over environmental limits.

By contrast:

- **The Ministry for Veterans' Affairs** has an overly narrow policy scope and limited implementation capacity, as most aspects of veterans' policy fall within the mandates of other ministries, including the Ministry of Defence, the Ministry of Social Policy, the Ministry of Education and Science, the Ministry of Health, the Ministry of Economy, and the Ministry of Youth and Sports.

In some cases, policy development is replaced by *implementation functions*. The establishment of a separate Ministry of Digital Transformation strengthened attention to digitalisation, but it also created misalignment with other policy areas. This is particularly evident in the area of administrative services, where responsibilities are distributed across several ministries. Registers are held by different central executive authorities, creating potential conflicts of interest between the Ministry of Digital Transformation and the Ministry of Justice (MoJ), the Ministry of Internal Affairs (MIA), the National Agency on Corruption Prevention (NACP), and other bodies. The Ministry of Digital Transformation was established without a substantive, cross-cutting state policy on digitalisation having first been developed. From the outset, it was oriented towards implementation rather than strategic policy development, resulting in technical innovation being treated as a standalone policy.

An **overall** analysis of Ukraine's 12 public policy areas in terms of **completeness of coverage** shows that most policies have a conceptually clear structure and reflect core state functions. However, the degree of completeness varies significantly depending on institutional maturity and the level of inter-agency cooperation.

Policy areas with comprehensive coverage include economic policy, public order and security policy, financial policy, defense policy. These policy areas have clearly defined objectives, established implementation mechanisms, and cover all core state functions.

Policy areas with partial or fragmented coverage include infrastructure policy and legal policy. These policies often lack institutional instruments for policy implementation.

The most common gaps include:

- the practical exclusion of ministries from policy development, instead of their participation in a collaborative policy-development process, with responsibility for policy development transferred to other bodies (e.g. communications, competition policy, crime prevention handled by the Prosecutor's Office rather than the MIA; judicial reform driven by the Office of the President rather than the Ministry of Justice).
- lack of influence over human-resource development in the sectors for which ministries are responsible (education, training and institutional capacity). In many areas, ministries have neither responsibility nor effective leverage to develop the human capital required for sectoral development.
- incomplete institutional support for policy implementation (not all ministries have services, inspectorates or supervisory bodies). As a result, they cannot effectively establish implementation instruments, budgets or partnerships.

These gaps indicate that public policy in Ukraine remains shaped by sectoral-silo thinking, whereas modern challenges require a cross-sectoral approach and more flexible implementation arrangements. All policy areas contain basic policy elements, but **only a few** — financial, education and defense policy — can be considered as systemic. The remaining areas are **fragmented** and lack alignment between strategic objectives, institutional capacity, financing and performance monitoring.

Public administration reform provided for the establishment of **directorates** within ministries to strengthen policy-development capacity. In

practice, however, the implementation of this reform has faced a number of challenges that limit, and in some cases undermine, the achievement of this objective:

- directorates have not been established in all ministries, creating uneven policy-development capacity across the ministerial system;
- several ministries have reduced the number of positions for reform specialists, while in some cases entire directorates have been abolished;
- no methodology for policy analysis and development has been approved for use by directorates and ministries, resulting in directorates performing tasks unrelated to policy development and reducing their effectiveness;
- in some ministries, directorates cover only part of the policy portfolio, leaving other areas without adequate analytical support;
- ministries lack effective consultative and advisory bodies, such as collegia or similar mechanisms, to maintain regular engagement with policy stakeholders and involve them in policy development;
- in ministries where policy development is assigned to departments, divisions or politically appointed officials, such as deputy ministers or advisers, the process is often marked by weak strategic planning, limited analytical capacity, duplication of functions, insufficient separation between policy development and implementation, weak institutionalisation, and dependence on individuals rather than institutions.

Recommendations

1. Approve a standardised list of policy analysis and development units (e.g. directorates) in all ministries and across all policy areas.
2. Amend the Laws of Ukraine on the CMU and on CEAs to ensure that the functions of directorates are aligned with their core mandate — policy analysis and development.
3. Strengthen personnel capacity through competitive recruitment, the attraction of qualified specialists, and the retention of existing human resources.
4. Ensure adequate funding, logistical support, and working conditions for directorates to enable them to perform their functions effectively.

Institutional Framework for Ukraine's European Integration

As part of preparations for EU integration, the Government assessed its policy-development readiness using the **ACI Communiqué** (Assessment of Clustered Integration) model, which comprises **35 chapters** grouped into **6 clusters**. The survey showed that Ukraine's EU accession negotiation chapters cover 128 policy areas.

We mapped these 128 policy areas, including the responsible authorities, implementation priorities, and roadmap stages (see Annex 2).

The analysis showed that in 12 of the 128 policy areas, no lead authority for policy development has been designated (see Annex 3). In another 27 areas, several authorities identified themselves as the lead body, indicating overlapping mandates (see Annex 4). In total, 3,259 specialists are employed in bodies directly involved in developing policies covered by the negotiation chapters. However, they spend only 44% of their working time on negotiation-related policy work, pointing to a significant capacity-allocation issue that needs to be addressed.

The distribution of specialists involved in policy development is uneven, reflecting significant differences across negotiation chapters in both the number of policy areas covered and the workload generated. The study also identifies another structural distortion in the organisational and institutional setup: the excessive concentration of policy-development functions within the ministerial headquarters. Policy development is an intellectually demanding process that requires access to high-quality analysis, reliable data, market consultations, inter-agency coordination, and engagement with external stakeholders. In Ukraine, however, these functions are overly concentrated in several “mega-ministries”:

- the Ministry of Economy, Environment and Agriculture of Ukraine,
- the Ministry for Communities, Territories and Infrastructure Development of Ukraine,
- the Ministry of Finance,
- the Ministry of Justice.

The analysis of personnel arrangements in public administration conducted within this study reveals a **systemic imbalance**: **only 44% of specialists are involved in policy development and legislative drafting work in ministries**. By contrast, **more than 56%** are employed by **CEAs, services, agencies and independent regulators**, which in practice perform the bulk of expert work in their respective policy areas, including those

covered by the *acquis* negotiation chapters. This points to an institutional inversion of roles that is inconsistent with the European model of public administration.

According to the OECD/SIGMA approach and the EU governance model:

- ministries should lead *policy development* by defining objectives, standards, instruments and the legislative framework;
- CEAs should *implement policy* by managing state-owned assets, delivering services, exercising supervision (control), and applying regulatory decisions;
- independent regulators should perform *regulatory and supervisory functions* within their delegated mandates.

In Ukraine, the opposite is true: the main expert capacity for policy development is concentrated in CEAs and regulators, while ministries perform primarily coordination and procedural functions. This means that policy is *de facto* developed by bodies that, according to institutional logic, should only implement it.

In Ukraine, the opposite pattern is observed: the main expert capacity for policy development is concentrated in CEAs and regulators, while ministries primarily perform coordination and procedural functions. This means that policy is *de facto* developed by bodies that, by institutional design, should be responsible only for its implementation.

The European Commission and SIGMA identify a number of systemic institutional deficiencies that significantly reduce the policy quality and the state's capacity to implement strategic priorities:

1. Limited role of the Government as the actual policy-maker

- Ministries are formally responsible for policy development, but most legislative initiatives originate from MPs or are submitted "through MPs" to bypass lengthy inter-agency coordination procedures.
- Only 35% of adopted laws are initiated by the Cabinet of Ministers.
- Internal support procedures, including analysis, consultations and impact assessment, do not apply to MPs' draft laws, creating an asymmetry that undermines the quality of legislation.

2. Underdeveloped internal policy-making processes within ministries

- No unified internal regulations or policy-development methodologies are in place.
- More than half of ministry staff are involved in policy development, but their work is not guided by common standards.
- Legal departments are systematically involved, while financial departments are rarely engaged, weakening the quality of impact assessments and reducing the realism of draft laws.

3. Weak institutional coordination and limited capacity of the centre of government

- The SCMU has a formal mandate to ensure policy quality but lacks the authority to reject low-quality documents.
- The Government Office for European and Euro-Atlantic Integration carries out acquis-compliance reviews, but timely transposition is not ensured.
- Legislative approximation to the acquis remains low: 11% (2021) → 7% (2022).

4. Fragmented policy analysis instruments

- Regulatory Impact Assessment is applied only to a limited range of policy documents.
- Regulatory Impact Assessment (RIA) has been abolished for acquis-related legislation, reducing the quality of EU-integration acts.
- Existing tools (RIA, impact forecasts and explanatory notes) overlap and duplicate one another.
- The quality of impact analysis and assessment of alternatives remains low and shows no improvement.

5. Public consultations: selective application and low quality

- The Law on Public Consultations has been adopted but has not yet entered into force, while draft laws submitted by MPs are not subject to mandatory public consultations.
- Ministries apply rules governing public consultations inconsistently.

6. Policy monitoring remains the weakest link

- Monitoring reports focus on “actions completed” rather than on outcomes.
- The Government adopts only one third of secondary legislation within the required timeframe.
- The absence of a full policy-evaluation cycle → results in a lack of policy learning.

Recommendations

1. Strengthen the role of the Government in preparing and submitting draft laws.
2. Update the Laws “On the Cabinet of Ministers of Ukraine” and “On Central Executive Authorities” in line with the recommendations above.
3. Strengthen the Secretariat of the Cabinet of Ministers as the central institution responsible for strategic planning, policy coordination and setting Government priorities.
4. Ensure that the Legislative Work Plan approved by the Verkhovna Rada is based on Government proposals.
5. Establish policy analysis and development units in all ministries and across all policy areas.
6. Standardise policy analysis, eliminate duplication between RIA and impact forecasts, and make impact assessment mandatory for all laws, including those transposing the acquis.
7. Standardise internal policy development procedures within ministries.
8. Improve legislation governing public consultations by making consultations mandatory for all legislative initiatives without exception.
9. Introduce a full cycle of policy monitoring, evaluation, and policy adjustment.

c. Civil Service and Human Resource Management

Current Situation and Public Policy Context

The civil service rarely attracts sustained public attention. When it does attract public attention, perceptions are often shaped by stereotypes that link

the civil service to corruption, misuse of public funds, and arrogant or inappropriate behaviour by individual officials.

These perceptions may stem, on the one hand, from cases of integrity breaches by certain individuals authorised to perform state functions, which quickly become headline news. On the other hand, they are also linked to the opacity of decision-making processes, particularly those concerning appointments and the allocation of budgetary resources, as well as to the limited meaningful involvement of society in policy-making, where genuine engagement is often replaced by formalistic responses.

At the same time, in the vast majority of cases, civil servants comply with the law, carefully prepare draft documents and decisions, provide services, respond quickly to changing circumstances, submit proposals for implementing assigned tasks, and perform other state functions.

According to data published by NAUCS¹⁶, as of the end of 31 March 2026, the number of civil service positions according to approved staffing tables was 189,920, while the actual number of employees was 154,980. More than 30,000 vacancies have remained unfilled for several years, and their number continues to increase for the reasons discussed below.

Stakeholders influencing the design and/or implementation of civil service reform include citizens of Ukraine, civil servants themselves, politicians, judges, trade unions, the European Union, and others.

The Ukraine Plan under the Ukraine Facility, approved by CMU Order №244-r of March 18, 2024, and the Public Administration Reform Roadmap, approved by CMU Order № 475-r of May 14, 2025, identify several challenges facing the civil service.

At the same time, the development of the civil service remains constrained by a number of persistent issues:

- absence of a reform strategy for developing the civil service and improving its effectiveness by those responsible for the reform;
- continued direct appointments and prolonged delays in restoring competitive recruitment, combined with the absence of conditions that would make the civil service attractive, including adequate remuneration and less burdensome requirements, such as the lifetime status of a public official;
- an unequal and non-competitive remuneration system;

¹⁶ <https://nads.gov.ua/storage/app/sites/5/uploaded-files/infografika-1-kv-26.pdf>

- lack of transparency in planning and communicating payroll expenditure limits;
- high staff turnover and unjustified dismissals;
- lack of career progression for experienced and high-performing civil servants;
- a non-functioning HR management information system (HRMIS) in most public authorities operating as public-law legal entities;
- lack of an adequate system for preparing and selecting Category “A” civil servants;
- politicisation of the Commission on Senior Civil Service, as well as of selection and disciplinary commissions;
- professional development that remains largely formalistic, including training in HR management and performance management;
- absence of analysis and forecasting of staffing needs in public authorities, with “mathematical” percentage-based staff reductions repeatedly proposed instead;
- absence of protection and response mechanisms in cases involving unlawful instructions or orders;
- limited autonomy in preparing and adopting decisions, with civil servants often not perceiving the importance or value of their contribution to the country and their work often reduced to routine administrative tasks.

The European Commission, in its Ukraine 2024 Report, highlighted several priority issues requiring attention in this area:

- 1) the failure to conduct competitive recruitment for civil service positions, including non-transparent direct appointments, which undermine the professionalism, political neutrality and stability of the civil service;
- 2) high staff turnover (dismissals);
- 3) reliance of the remuneration system on “jurisdictional levels” of public authorities, with three categories of authorities and five base-salary levels, without transparent criteria for differentiation (failure to comply with the principle of equal pay for equal work).

Earlier, the SIGMA/OECD Monitoring Report (2023) assessed the state of public administration reform in Ukraine as relatively weak.

Similar conclusions and recommendations are reflected in the European Commission’s Ukraine 2025 Report, published on 4 November 2025.

The key aspects of civil service reform are as follows:

a) Competitive Recruitment

There has been no progress in restoring competitive recruitment, and the issue of stable civil service tenure remains unresolved. The draft Laws of Ukraine amending the Law of Ukraine “On Civil Service” (Reg. № 13478 and 13478-1), were put forward to restore competitive recruitment and improve procedures for entry into, service in and termination of the civil service; however, they included several controversial provisions. The timelines proposed in Section II, “Final and Transitional Provisions”, of the Government’s draft law are excessively prolonged. Competitions for Category “A” civil service positions would resume from June 1, 2026, with a maximum period of 12 months for announcing such competitions; for Category “B” positions, from July 1, 2026, also with a maximum announcement period of 12 months; and for Category “C” positions, from September 1, 2026, with a maximum announcement period of 18 months. The alternative draft law contains nearly identical provisions, except for clarifications regarding experience requirements for membership of the Senior Civil Service Commission and slightly shorter timelines for Category “A” positions; the timelines for other categories remain lengthy.

In April 2026, Draft Law № 13478-1¹⁷ was adopted at first reading by the Verkhovna Rada of Ukraine, representing a step towards restoring merit-based principles in recruitment to civil service and service in local self-government bodies.

At a roundtable discussion on the draft law organised by the Parliamentary Committee on State Building, Local Governance, Regional Development and Urban Planning¹⁸, Ukrainian and EU experts highlighted several positive elements, including the preservation of the autonomy of the Senior Civil Service Commission; the clarification of which policy-related requirements should be assessed by the Commission and which should be assessed by HR professionals; the introduction of a reserve list of successful candidates; expanded opportunities for internal career progression; and preferential consideration in appointments for candidates from among veterans and youth. At the same time, the experts also highlighted a number of significant risks. These include:

1) unduly **prolonged timelines for the resumption of competitive recruitment**, including *for Category “A” and Category “B” civil service*

¹⁷ <https://itd.rada.gov.ua/billinfo/Bills/Card/56817>

¹⁸ https://komsamovr.rada.gov.ua/news/main_news/86579.html

positions, where competitions would resume only from 1 September 2026 and could be announced up to 18 months thereafter;

2) continued **politicisation of the composition** of Senior Civil Service Commission, given that a *majority of its members (four out of seven)* are appointed by the Verkhovna Rada, the President and the Government;

3) the **absence** of provisions aimed at restoring stability of tenure in the civil service and *limiting arbitrary dismissals resulting from staff reductions or changes to the structure or staffing of public authorities without clearly defined criteria*, despite persistent challenges related to staff turnover.

Moreover, the draft law empowers the appointing authority to decide whether civil servants appointed during martial law without competitive selection under the Law of Ukraine “On the Legal Regime of Martial Law” may continue in service.

These provisions on direct appointments and on allowing individuals appointed through non-transparent procedures to remain in office pose clear corruption risks and indicate non-compliance with several SIGMA Principles of Public Administration (2023 edition)¹⁹.

Finally, it is worth noting that, at its meeting prior to the first-reading vote on Draft Law № 13478-1, the above-mentioned parliamentary Committee adopted an opinion containing, inter alia, proposals to amend the timelines for holding competitions and extend the deadlines for announcing them²⁰.

Given that more than 30,000 positions in public authorities remain vacant, such closed procedures are particularly concerning in light of the demand for public-sector employment among Ukrainian citizens and the need to provide first employment opportunities for graduates of the Public Administration and Management programme (D4) from more than 100 higher education institutions in Ukraine. Failure to engage trained specialists at this stage may contribute to their outflow to the private sector or abroad. Another significant challenge for young people is the excessively high entry threshold for admission to this programme. The minimum National Multi-Subject Test (NMT) score is set at 150, while mathematics is a compulsory subject for all. These requirements already appear to be reducing the pool of prospective students and may result in the loss of a substantial number of future specialists. Thus, lowering the admission threshold to at least 140 points should be considered, as staffing shortages in the public sector may otherwise become more acute over the next four to five years.

¹⁹https://www.sigmaweb.org/content/dam/sigma/en/publications/reports/2023/11/the-principles-of-public-administration_5e68f805/7f5ec453-en.pdf

²⁰ <https://itd.rada.gov.ua/billinfo/Bills/Card/56817>

b) Career progression and dismissals

Under the model introduced in 2015 by the revised Law of Ukraine “On Civil Service”, competitions are required for all positions. These somewhat limits opportunities to promote high-performing civil servants in a timely manner and undermines public trust when “internal candidates” consistently win competitions.

SIGMA/OECD has noted exceptionally high staff turnover in recent years. However, the draft law contains no provisions aimed at restoring stability of tenure in the civil service or limiting arbitrary dismissals.

A further challenge concerns the retention of experienced senior civil servants.

To illustrate this issue, the tenure of ministry state secretaries over the period from 14 April 2016 to 1 May 2026 was analysed. The analysis covers the governments of Volodymyr Groysman, Oleksii Honcharuk, Denys Shmyhal and Yuliia Svyrydenko.

During this ten-year period, 97 appointments to state secretary positions were made (including repeated appointments of some individuals).

Approximately 30% of all state secretary appointments made during the period under review involved individuals who served, or continue to serve, under two or more ministers (including acting ministers).

There have been cases where the reassignment of ministers to other ministries was accompanied by the transfer of their state secretaries. For example, on 19 January 2026, the State Secretary of the Ministry of Defence left office by mutual agreement and was subsequently appointed State Secretary of the Ministry of Energy. On the same date, the State Secretary of the Ministry of Digital Transformation left office to take up the position of State Secretary of the Ministry of Defence.

The tenure profile of the 85 state secretaries included in the analysis shows the following distribution²¹:

more than 2 years — 36.47%, with the longest continuous tenure recorded at 5 years and 9 months and counting²².

1-2 years — 30.59%, with the longest continuous tenure recorded at 1 year, 10 months and 18 days

²¹ Repeated appointments were counted separately where there was a break in service between terms. Consecutive appointments without interruption were counted as a single term.

²² As of 1 May 2026.

6-12 months — 20.00%, with the longest continuous tenure recorded at 11 months and 21 days.

less than 6 months — 12.94%, with the longest continuous tenure recorded at 5 months and 28 days.

Overall, the largest share of state secretaries remained in office for more than 2 years, although this group still represents less than 50% of all individuals included in the analysis. Tenures exceeding 5 years are rare, while the majority of state secretaries serve for only 2-3 years. This indicates that, 10 years after its introduction, the institution of state secretaries has yet to fulfil its intended role of ensuring continuity, institutional memory and stability in public administration.

Over the ten-year period under review, 79 dismissals of state secretaries were recorded. The grounds for dismissal were as follows:

- 1) transfer to another position — 20 individuals (25.32%);
- 2) termination by mutual agreement (para. 3, part 1, Article 83 of the Law of Ukraine “On Civil Service”) — 17 individuals (21.52%);
- 3) resignation at the employee’s own initiative — 16 individuals (20.25%);
- 4) pursuant to part 1 of Article 87-1 of the Law of Ukraine “On Civil Service” (provision subsequently repealed) — 10 individuals (12.65%);
- 5) expiry of a fixed-term contract (part 1, Article 85 of the Law of Ukraine “On Civil Service”) — 7 individuals (8.86%);
- 6) expiry of the term of appointment (para. 1, part 1, Article 85 of the Law of Ukraine “On Civil Service”) — 2 individuals (2.53%);
- 7) negative performance assessment results (para. 3, part 1, Article 87 of the Law of Ukraine “On Civil Service”) — 2 individuals (2.53%);
- 8) pursuant to para. 4, part 1, Article 87 of the Law of Ukraine “On Civil Service” for committing a disciplinary offence under para. 1, part 2, Article 65 involving a breach of the Civil Servant’s Oath — 1 individual (1.27%);
- 9) reorganisation of a ministry (para. 1, part 1, Article 87 of the Law of Ukraine “On Civil Service”) — 1 individual (1.27%);
- 10) liquidation of a ministry (para. 11, part 1, Article 87 of the Law of Ukraine “On Civil Service”) — 2 individuals (2.53%);
- 11) incapacity to perform official duties due to health reasons (para. 2, part 1, Article 88 of the Law of Ukraine “On Civil Service”) — 1 individual (1.27%).

In addition, one state secretary died while in office.

Thus, transfers to other positions, termination by mutual agreement and voluntary resignation were the most common grounds for dismissal. Notably, termination by mutual agreement ranked second among all grounds for dismissal. However, in the case of termination by mutual agreement, the frequent use of this mechanism at the initiative of the CMU appears to undermine the very purpose of the state secretary institution.

Changes of the Government have also frequently been accompanied by the dismissal of state secretaries appointed by previous governments. The grounds for dismissal varied. During the government of Oleksii Honcharuk, ten state secretaries appointed by the preceding government were dismissed. Their tenure in office (excluding periods served in an acting capacity and without aggregating previous terms of office) ranged from 1 month and 20 days to 2 years, 11 months and 12 days.

During the government of Denys Shmyhal, 13 state secretaries appointed by previous governments were dismissed. Their tenure in office (excluding periods served in an acting capacity and without aggregating previous terms of office) ranged from 5 months and 19 days to 4 years, 7 months and 13 days.

During the government of Yuliia Svyrydenko, up to 1 May 2026, 11 state secretaries appointed by previous governments were dismissed. Their tenure in office, excluding periods served in an acting capacity and without aggregating previous terms of office, ranged from 5 months to 4 years, 7 months and 16 days.

Given that the number of ministries in Ukraine (currently 15) has changed only marginally over the past decade, more than half of all state secretaries were dismissed following a change of government.

During periods of transition between state secretaries, their responsibilities are temporarily assigned to other civil servants. Over the 10-year period, 50 acting state secretaries were appointed, including cases where the same individual served in an acting capacity more than once. The tenure profile of the 48 individuals included in the analysis is as follows: more than 1 year — 2 individuals (4.17%); 6–12 months — 4 individuals (8.33%); 3–6 months — 8 individuals (16.67%); 1–3 months — 12 individuals (25.00%); less than 1 month — 22 individuals (45.83%). Thus, the largest share consists of acting state secretaries who served for less than one month.

c) Remuneration.

Some progress has been made in reforming the remuneration system following the adoption of Law of Ukraine №4282-IX of March 11, 2025, “On Amendments to Certain Laws of Ukraine Regarding the Introduction of Unified Approaches to Civil Service Remuneration Based on Job Classification”²³. However, unified approaches have not yet been fully implemented, and this remains a significant challenge.

The positive elements of the law include the following:

a stable remuneration structure, with a defined base salary as the main component and a limited variable component consisting of bonuses, seniority and rank allowances, as well as compensation for access to state secrets. Another positive element is retention of the requirement to approve a unified Procedure for forming the payroll fund. Although this requirement has been included in the Law since 2019, the procedure was adopted only recently, in 2025²⁴. However, it does not address the problem of non-transparent and unequal approaches to allocating payroll funds across public authorities. This conclusion is confirmed by the findings of the Accounting Chamber set out in its published Decision “On the Review of the Report on the Results of the Compliance Audit on Reforming the Remuneration System in Public Administration” №26-1 of October 28, 2025²⁵.

The shortcomings of the law include the following:

failure to comply with the international principle of “equal pay for equal work”, as in Type 1 public authorities (including the Office of the President, the National Security and Defence Council, the Central Election Commission and others) the base salary for administrative support staff, such as clerical, accounting, internal audit and procurement, etc. will be significantly higher than for equivalent positions in Type 2 public authorities, including ministries and others, and Type 3 public authorities with the same jurisdiction;

failure to implement the recommendations of the European Commission, set out in the above-mentioned monitoring report namely that the remuneration system is based on the concept of “jurisdictional levels” without transparent criteria for differentiation.

Work on remuneration reform, and on civil service reform more broadly, is complicated by the limited involvement of civil society organisations in

²³ <https://zakon.rada.gov.ua/laws/show/4282-20#Text>

²⁴ <https://zakon.rada.gov.ua/laws/show/668-2025-%D0%BF#Text>

²⁵ <https://rp.gov.ua/Collegium/Collegium2025/?id=2827>

policy development, allowing public authorities, as interested parties, to exercise disproportionate influence.

Recommendations

1. Restore competitive recruitment for all civil service positions as soon as possible by amending Article 10 of the Law of Ukraine “On the Legal Regime of Martial Law”.
2. Reduce staff turnover by limiting managers’ discretion to abolish positions without justification, modify organisational structures and staffing tables, or carry out reorganisations, and by removing an unsatisfactory annual performance appraisal as a ground for dismissal through amendments to Article 87 of the Law of Ukraine “On Civil Service”.
3. Introduce a career-based civil service model that enables civil servants to be promoted to higher positions on the basis of merit and performance, without requiring a separate competition for each promotion.
4. Reform the remuneration system by revising the practice of assigning all positions in a public authority to higher-paid categories solely on the basis of the authority’s jurisdictional level (I, II or III). Base salaries should instead be determined on the basis of the place and role of the position within the public authority, the level of responsibility, communication requirements, budgetary responsibility and other relevant factors.
5. Align civil service legislation with the OECD/SIGMA Principles of Public Administration.

d. Accountability

Distribution of Functions

A key principle of the contemporary model of public administration is the **separation of policy development from policy implementation**. Ministries define strategic policy objectives and public policy frameworks and contribute to their regulatory design. Other central executive authorities, in turn, are responsible for practical implementation: they manage state-owned assets and natural resources, provide administrative services that cannot be

delegated to local self-government, exercise supervisory and inspection powers to ensure compliance with legislation, and take enforcement action in cases of violations. In Ukraine's system of public administration, this separation is not merely a managerial requirement but an **institutional necessity**, without which accountability, effectiveness and legal certainty cannot be ensured.

Ministries should not be responsible for the operational or administrative implementation of policy. Their role is to **define policy**, establish regulatory frameworks, set strategic objectives, instruments and standards, and coordination mechanisms.

Any blending of political and administrative functions creates conflicts of interest, reduces transparency and blurs responsibility (see Annex 3). A high concentration of policy implementation functions within a ministry's apparatus — and, in some cases, the existence of territorial bodies responsible for carrying out such administrative functions, as in the case of the Ministry of Justice — is an **institutionally flawed practice** that contradicts European good-governance principles and undermines the logic of public administration. The conflation of two distinct levels of state authority — **strategic and executive** — gives rise to a number of systemic problems:

- loss of strategic focus and weakening of the policy-making function;
- conflict of interest between policy development, policy implementation and oversight;
- disruption of the vertical chain of responsibility and erosion of accountability mechanisms;
- inefficient use of resources;
- violation of the principle of separation between the political and administrative levels;
- territorial fragmentation of policy, as ministries cannot effectively manage large networks of territorial units;
- reduced capacity for European integration and implementation of the *acquis*.

As the concentration matrix shows (Annex 9), ministries where implementation functions are concentrated within ministry apparatuses demonstrate the most pronounced blending of policy and operational functions, as well as the highest risks of overload and loss of accountability. These include the Ministry of Justice, the Ministry of Social Policy, the Ministry of Youth and Sports, the Ministry of Culture and, to some extent, the Ministry for Veterans Affairs.

CEAs should implement the policy of **one specific ministry**. Their steering and coordination should be exercised by the relevant minister. **Cross-sectoral subordination is therefore unacceptable**, as it undermines the logic of responsibility and accountability: an institution cannot be accountable to two different decision-making centres at the same time.

This rule ensures:

- **clear subordination;**
- unified political responsibility;
- coherence of decisions within the relevant sector;
- proper distribution of functions between policy development and policy implementation.

The institutional architecture of CEAs requires a **clear distribution of powers** between:

- **administrative (service-delivery) functions;**
- **inspection, supervisory (control) powers.**

To this end, CEAs are established as:

- services, responsible for providing administrative services and exercising supervisory functions;
- agencies, responsible for managing state-owned assets;
- inspectorates, responsible for carrying out inspection activities.

More complete and balanced models are found where ministries rely on a developed network of CEAs and operators (the Ministry of Defence, the Ministry of Internal Affairs, the Ministry of Health, the Ministry of Education and Science, and the merged economy-agriculture-environment ministry, see Annex 10). In these cases, the ministry develops policy, while practical implementation is assigned to separate services, agencies and operators.

Ministers steer and coordinate the central executive authorities operating within their area of responsibility. To this end, they are authorised to:

- define or approve the objectives, tasks and annual plans of CEA;
- participate in the appointment of the head of the CEA and in setting requirements for competitive selection;
- prepare the budget request for CEA;
- approve the annual performance report of CEA.

Ministers should have neither the legal authority nor the practical ability to interfere in the operational activities of CEAs or to take administrative decisions. Where ministries in practice administer programmes and payments directly (the Ministry of Social Policy, the Ministry of Justice, the Ministry of Culture and the Ministry of Youth and Sports — Annexes 10–12) — this distorts institutional roles: political leadership descends to the level of operational decision-making, contrary to the logic of the division of powers.

The level of institutional completion of policy implementation is, the presence of specialised CEAs within the systems of the respective ministries — is described in Annex 10. A comparison of the concentration of implementation functions with the level of institutional completion (Annex 12) reveals typical deviations from the desired PAR model:

- **critical imbalance** — high concentration in the absence of sufficient implementing institutions (the Ministry of Justice, the Ministry of Social Policy, the Ministry of Youth and Sports and the Ministry of Culture);
- **hybrid models with risks** — medium concentration and medium institutional completion, where some implementation functions are still retained within the ministry's apparatus (the Ministry of Finance, the Ministry of Digital Transformation and the Ministry for Communities Development);
- **excessive institutional completion** — where a ministry coordinates an excessively large executive system (the Ministry of Defence, the Ministry of Internal Affairs), effectively turning it into a “super-agency” rather than a purely policy-making body;
- **relatively clean models** (Ministry of Foreign Affairs and the Ministry of Energy) — where the ministry's apparatus is focused on policy development, while implementation is assigned to foreign missions and operators/regulators.

The territorial structure of CEAs and their subdivisions should correspond to the administrative-territorial system. Any institutional disproportion between the centre and the territories leads to failures in policy implementation — from service delivery to supervision and control.

Public policy should be implemented not through the administrative dominance of the state, but through **partnership with communities** and further decentralisation, in line with the European principle of subsidiarity.

This means that:

- the state performs only those functions that communities cannot carry

out on their own;

- CEAs do not duplicate the functions of local self-government bodies (LSGBs);
- local authorities are not subordinated to CEAs; instead, they cooperate with them within defined policy areas.

This approach ensures a balance between national interests and local autonomy, reduces administrative pressure and contributes to a more resilient system of policy implementation.

The modern public administration model requires a **clear hierarchy and distribution of functions**:

- **ministries** — develop public policy;
- **other CEAs** — implement public policy;
- **territorial bodies of CEAs** — implement unified policy within the administrative-territorial structure;
- **local self-government** — performs functions that are closest to citizens and can be most effectively carried out at the local level, in line with the principle of subsidiarity.

Any blurring of these roles results in institutional failures, loss of accountability and weakened capacity to ensure the effective implementation of public policy. The consolidated matrices of concentration and institutional completion (Annexes 3–6) show that the highest risks of overload, duplication of functions, bureaucratisation and, ultimately, policy implementation failures arise precisely where the system deviates from this model.

Recommendations:

1. Remove policy-implementation powers from ministries and institutionally establish their exclusive responsibility for policy formulation.
2. Enshrine the principle of a single political centre of responsibility for each CEA. Each CEA should implement the policy of one ministry only and be steered and coordinated by that ministry; cross-sectoral subordination should not be allowed.
3. Separate CEAs' powers to provide administrative services from their inspection, control and supervisory powers within the same sector.
4. Align the territorial bodies and subdivisions of CEAs with the administrative-territorial structure. Cooperation with local

self-government should be guided by the principle of subsidiarity.

Administrative Procedure

One of the key mechanisms for ensuring the accountability of public authorities to citizens is a proper general administrative procedure. For this reason, shortly before Ukraine was granted the status of an EU candidate country on 23 June 2022, the President of Ukraine signed an important European integration law — the Law of Ukraine “On Administrative Procedure”. The Law had been adopted at second reading and as a whole just one week before the Russia’s full-scale military invasion of Ukraine. The LAP guarantees Ukrainian citizens’ rights that correspond to those enshrined in one of the European Union’s foundational documents, the EU Charter of Fundamental Rights of 7 December 2000. These include, in particular: 1) the right of each individual to be heard before any individual measure that may adversely affect them is taken; 2) the right of each individual to access their case file; 3) the obligation of the administration to provide reasons for negative (adverse) decisions; and a number of other important rights and standards governing the adoption of administrative (individual) acts concerning individuals.

Since the LAP entered into force on December 15, 2023, its implementation has progressed gradually. Training on the Law has been provided to public servants and judges, including by the Higher School of Public Administration, the EU4PAR programme and the EU Pravo-Justice project. According to the 2024 Report on the Implementation of the Public Administration Reform Strategy of Ukraine for 2022–2025²⁶, presented at the meeting of the Public Administration Reform Coordination Council on November 25, 2025, one year after the LAP entered into force, 8,788 public servants and local self-government officials had participated in training activities. More than 22,100 citizens²⁷ completed the online course “General Administrative Procedure” on the “Zrozumilo” platform and received certificates. According to the Higher School of Public Administration²⁸, since 2023, 3,377 public servants have completed professional development under its training programme “General Administrative Procedure”. Overall²⁹, as of the first quarter of 2026, more than 61,000 Ukrainian public officials had enhanced their knowledge and completed training on the application of the

²⁶ <https://www.kmu.gov.ua/storage/app/sites/1/2024-par-strategy-annual-report-ukr.pdf>

²⁷ <https://par.in.ua/information/publications/400-rik-iz-zakonom-pro-administratyvnu-protseduru-holovni-pidsumky-vid-ekspertiv>

²⁸ <https://hs.gov.ua/zavershilosya-navchannya-z-pitan-zagalnoyi-administrativnoyi-proceduri/>

²⁹ <https://eu4par.eu/dva-roky-reformy-administrativnoyi-procedury-v-ukrayini-pidtrymanyi-yes-krok-na-shlyahu-do-ye-vrointegraciyi/>

LAP, including through activities supported by the European Union.

Overall, officials of administrative bodies are developing a better understanding of the LAP and gradually applying its standards, including by allowing individuals to correct deficiencies in their applications and ensuring their right to be heard before an adverse decision is adopted. Judicial practice on the application of the LAP has also begun to emerge.

National legislation governing the adoption of administrative acts is also gradually being aligned with the norms and standards of the LAP. On October 10, 2024, the Verkhovna Rada adopted Law of Ukraine №4017-IX, which amended 196 legislative acts to align them with the LAP. These include laws regulating core administrative services, such as licensing of economic activities; civil status registration; state registration of rights to immovable property and their encumbrances; state registration of legal entities, individual entrepreneurs and civil society organisations; passport services; and social protection services, including the award of pensions and state benefits). They also include legislation in the areas of urban planning and architecture, state supervision (control) of economic activity, and the permitting system for economic activity. This is a highly significant step towards the proper implementation of the LAP. As emphasised by SIGMA in its Public Administration Monitoring Report for Ukraine as of December 2023, *“the LAP is an important milestone, but harmonisation of special legislation and sub-legal acts is key to correct implementation to ensure that citizens and businesses of Ukraine enjoy the level of protection guaranteed by the LAP without needing to initiate an administrative dispute”*. However, the alignment of secondary legislation with the LAP is progressing more slowly.

Despite significant progress in implementing the general administrative procedure in Ukraine, a **number of challenges remain**. In particular:

- a substantial share of secondary legislation remains misaligned with the LAP. It is estimated that at least 70% of secondary legal acts still require harmonisation with the LAP. It should be noted, that in its 2025 Enlargement Package Progress Report on Ukraine, the European Commission emphasised that **all secondary legislation (i.e. subordinate legislation) should be aligned with the LAP**;
- attempts to introduce new exceptions to the LAP have become increasingly concerning. Certain CEAs have sought to exclude areas within their competence from the scope of the LAP, including through legislative initiatives introduced by Members of Parliament. For example, in June 2024, Law №3813-IX was adopted, which, according

to the Ministry of Finance, excludes the tax matters from the scope of the LAP. In October of the same year, Law № 3993-IX, amending the Land Code of Ukraine, was adopted, introducing excessive and unjustified deviations from the LAP in administrative proceedings concerning land matters. The European Commission reiterated this concern in its 2025 Enlargement Package Report, stressing the need to **“complete legislative alignment and harmonisation with the LAP, particularly in the areas of taxation, customs and land relations, and align digital administrative procedures and secondary legislation with the LAP”**. A positive step taken by the previous Government towards aligning tax-related legal relations with the LAP was the submission, in November 2025, of Draft Law № 14196 “On Amendments to the Tax Code of Ukraine in connection with the adoption of the Law of Ukraine “On Administrative Procedure””³⁰. However, the Draft Law was never brought before the Verkhovna Rada for a vote, even at first reading. The newly formed Government should resubmit it, while the Verkhovna Rada should proceed with its adoption.

- customs legislation has not yet been fully aligned with the LAP. To address this, the Government prepared a new version of the Customs Code of Ukraine based on the EU Customs Code and presented it to businesses and the public on 3 October 2025. At the request of the Cabinet of Ministers, the draft was submitted to the European Commission for assessment³¹. It is essential that the final version, once revised and submitted by the Government to the Verkhovna Rada, be fully aligned with the LAP;
- digital legislation has not yet been fully aligned with the LAP, in particular regarding the procedural framework for the provision of public services in electronic form. An important step was taken only in February 2026, when the Ministry of Digital Transformation published³² for public consultation a draft Law “On Amendments to the Law of Ukraine “On the Peculiarities of the Provision of Public Services (Public E-services)” regarding the regulation of consideration and resolution of administrative cases in the area of public services (public e-services)”. However, since then, progress towards its registration and adoption has stalled;
- despite extensive training on the fundamentals of the LAP for officials of

³⁰ <https://itd.rada.gov.ua/billinfo/Bills/Card/58688>

³¹ https://mof.gov.ua/uk/news/novii_mitnij_kodeks_ukraini_biznesu_prezentuvali_zakonoproiekt_rozroblennia_na_osnovi_mitnogo_kodeksu_ies-5357

³² <https://thedigital.gov.ua/documents/legislation/povidomlennia-pro-opryliudnennia-proektu-pro-vnesennia-zmin-do-zakonu-ukrayiny-pro-osoblyvosti-nadannia-publichnykh-elektronnykh-publichnykh-posluh-shchodo-unormuvannia-pytannia-rozhliadu-i-vyrishennia-administrativnykh-sprav-u-sferi-nadannia-publichnykh-elektronnykh-publichnykh-posluh>

administrative bodies at different levels and for judges, a significant number of officials still require further training. In its 2025 Enlargement Package Report, the European Commission noted that such training should be strengthened particularly at the level of local authorities;

- the Law of Ukraine “On Petitions” has not yet been adopted (currently Draft Law №11082 of March 13, 2024), although it is needed to complete the clear delineation of its regulatory scope from that of the LAP. The European Commission reiterated this concern in its 2025 Enlargement Package Report. It is also important to note the need to eliminate Soviet-era elements from and rationalise legislation governing citizens’ applications, including by removing mandatory procedural rights such as the right to be present during the consideration of an application, the right to access materials related to its consideration, and the right to appeal the outcome, given that such applications concern matters of a purely advisory rather than administrative nature.

Recommendations:

1. Fully align tax, customs and land legislation with the provisions and standards of the LAP to ensure its proper and full implementation. In particular, introduce the relevant amendments to the Land Code of Ukraine and the Tax Code of Ukraine (Draft Law № 14196), and adopt a new version of the Customs Code of Ukraine that fully complies with the LAP. It is also important to adopt a Code of Ukraine on Administrative Offences that is fully aligned with the LAP.
2. Adapt state and local self-government information systems to the requirements and standards of the LAP. In particular, these systems should ensure compliance with LAP requirements and standards when public services are provided to citizens electronically, especially with regard to the right to participate in administrative proceedings. The Ministry of Digital Transformation should intensify efforts to advance the adoption of the draft law amending the Law of Ukraine “On Specific Features of the Provision of Public Services (Public E-services)” regarding the regulation of the consideration and resolution of administrative cases in the area of public services (public e-services)”, which was developed and published by the Ministry’s previous leadership.
3. Adopt a new Law “On Petitions” to eliminate regulatory overlap with the LAP. This Law should clearly distinguish between legal relations in which citizens submit applications, complaints or motions to

administrative bodies to exercise or protect their rights and legitimate interests, and legal relations involving proposals, petitions, comments or requests for clarification addressed to officials on matters of policy development, policy implementation or issues of local significance.

4. Within the next year, ensure the alignment of 100% of laws and more than 90% of secondary legislation governing legal relations covered by the LAP with its norms and standards.
5. Ensure that all public servants and judges who still require training on the fundamentals of the LAP have the opportunity to complete it, with support from the Government and international programmes and projects. As a result, the Law should be applied consistently and effectively in administrative and judicial practice.

e. Service delivery

Following the adoption of the Law of Ukraine “On Administrative Services” in 2012, Ukraine began developing a nationwide network of Centres for the Provision of Administrative Services (CPASs). Today, CPASs have been established in the vast majority of territorial communities. According to the Ministry of Digital Transformation’s³³ monitoring report on the CPASs network, as of the first quarter of 2026, 1,337 CPASs and 167 territorial units were operating across Ukraine under wartime conditions. These centres provide most core groups of administrative services, including business, property and residence registration services, which were fully transferred to local self-government bodies in 2015–2016. A significant number of smaller integrated service access points have also been created, including 3,652 remote workstations as of the first quarter of 2026³⁴.

As a result of the full-scale war, a number of CPASs have been relocated from temporarily occupied territories and areas of active hostilities to relatively safe communities under Ukrainian control. Ukraine has a total of 1,469 communities. According to the latest data³⁵ from the Ministry for Communities and Territories Development, 31.31% of communities are occupied and 10.89% are affected by active hostilities. These figures change constantly, and the Ministry therefore regularly updates the List of territories where hostilities are ongoing or have taken place, or that are temporarily

³³ <https://center.diia.gov.ua/rezultati-monitoringu-merezi-centriv-2>

³⁴ Ibid.

³⁵ <https://news.liga.net/ua/politics/news/v-ukraini-okupovano-31-hromad-shche-mayzhe-11-pid-vplyvom-aktyvnykh-boyovykh-diy>

occupied by the Russian Federation approved by Order №. 376. Accordingly, the full functioning of CPASs in such communities is not feasible. According to the Ministry of Digital Transformation³⁶, 142 CPASs have been relocated within Ukraine, including: 22 CPASs from communities in Luhansk Oblast; 37 from Donetsk Oblast; 19 from Zaporizhzhia Oblast; 9 from Dnipropetrovsk Oblast; 4 from Kharkiv Oblast; 34 from Kherson Oblast; 2 from Mykolaiv Oblast; 14 from Sumy Oblast; 1 from Chernihiv Oblast. At the same time, residents of communities whose CPASs have been relocated retain the right to access services at local CPASs in the communities where they have resettled. Relocated CPASs, in turn, maintain contact with residents of their home communities not only in the host communities but across Ukraine, including for the purposes of collecting data on these residents and assisting them in obtaining humanitarian aid.

For each CPAS, the Government approved³⁷ a list of the most in-demand administrative services that must be provided, taking into account their social importance (Resolution № 1226 of 1 October 2025). The purpose of the resolution was to optimise and update the previous list approved by Government Order №. 523. The revised list includes 373 services across 18 categories, ranging from business and real estate registration to veterans' services and social protection. Certain tax and pension-related services, such as the issuance of an individual tax identification number, have also become mandatory. For CPASs located in frontline regions, the list of mandatory services is significantly shorter (245 services).

Since 2019, digitalisation has been a key focus of government policy on the delivery of administrative services. In early 2020, the “Diia” electronic portal was launched, enabling citizens to access administrative services fully or partially online. According to the Ministry of Digital Transformation³⁸ 24 million Ukrainians now use digital documents and online services through Diia. More than 170 services³⁹ are already available on the Diia web portal, including services related to civil status registration (CSR), administrative services of a social nature (SAS), construction, business registration, property registration, place of residence registration, vehicles and other areas.

Despite significant achievements in administrative service delivery, including the development of an extensive CPAS network and the decentralisation of a wide range of core services, a ***number of challenges***

³⁶ <https://center.diia.gov.ua/mapa-centriv-so-pracuut-pid-cas-vijni-2>

³⁷ <https://thedigital.gov.ua/news/progress/onovlyuemo-perelik-derzhavnikh-poslug-u-tsnapakh-ta-sistematizujemo-ikh-na-dannya>

³⁸ <https://diia.gov.ua/news/vzhe-24-miliony-ukraintsiv-obraly-diiu-derzhavni-posluhy-v-kilka-klikiv>

³⁹ <https://diia.gov.ua/news/7-milioniv-ukraintsiv-otrymuyut-derzhavni-posluhy-onlain-na-portali-diia>

remain. In particular:

- absence of legislative regulation of payment for administrative services. This often results in non-transparent, insufficiently justified and, in some cases, outdated administrative fees that no longer reflect the country's current economic situation. Such fees are mostly set by secondary legislation. Under current legislation, more than 90% of administrative services provided in communities are free of charge. At the same time, the state continues to assign additional tasks to CPASs operated by local self-government bodies. Communities and their CPASs lack sufficient resources to retain qualified staff and ensure adequate equipment and infrastructure. It is important to note that, in its 2025 EU Enlargement Package Report, the European Commission reiterated its call for Ukraine to adopt a law on administrative fees;
- partial decentralisation of civil status registration services. These services are still provided primarily by the Ministry of Justice through its civil status registration offices rather than by local self-government bodies. Their integration into CPASs remains constrained by artificial departmental barriers, including special requirements for obtaining and storing templates, maintaining registers, and installing safes. According to the 2024 Public Administration Reform Strategy Implementation Report, only 2.6% of CPAS administrators have access to the State Register of Civil Status Acts with registrar rights, while only 1.8% have document receipt and issuance rights. Some communities provide civil status registration services not as a delegated power but on the basis of so-called "agreed" decisions. As a result, even routine civil status registration services cannot be provided immediately and require service users to make at least two visits;
- insufficient decentralisation of land plot registration powers. Local self-government bodies still lack key powers in this area. At the same time, the state has sought to assign some of these functions to private actors, namely certified land surveyors, increasing the risk of errors and abuse. The Government took a positive step by submitting Draft Law No. 12453 of 28 January 2025, which would have allowed land-registration powers to be delegated to local self-government bodies. However, the draft law was subsequently withdrawn;
- limited involvement of CPASs in the provision of administrative services of a social nature (ASSN). In areas such as housing subsidies and other state benefits, CPASs established by local self-government bodies primarily perform front-office functions. Meanwhile, a broad

range of powers in this area is vested in the Pension Fund of Ukraine. Interaction between CPASs and the Pension Fund is further complicated by the so-called principle of “extraterritoriality”, whereby a case is decided by a distant Pension Fund unit with which neither the CPAS nor the service recipient interacts. As a result, even simple cases are decided by officials in a system that is not connected to the service recipient;

- the increasing remoteness of tax-related administrative services from service recipients (including services such as the issuance of tax identification numbers). Although more than 2.5 million such services are provided offline each year, the number of departmental tax offices and territorial bodies of the tax service has been reduced by more than 150 and 190 respectively. At the same time, no mechanism has been introduced, including through CPASs, to preserve the accessibility of these services for citizens and businesses. Cabinet of Ministers Resolution № 1226 of 1 October 2025 provides for two tax services to be delivered through CPASs; however, the relevant implementation mechanism has not yet been published.

Recommendations

1. Adopt the Law of Ukraine “On Administrative Fees” at second reading and as a whole, ensuring that its final version is rational and balanced. It should define the principles of state policy on payment for administrative services, establish the procedure for calculating and paying administrative fees, and contain a list of all core administrative services with a clearly defined fee for each. This approach should be reflected in the revised version of Draft Law № 4380 prepared for second reading.
2. Fully delegate powers related to the vast majority of core (most in-demand) administrative services to LSGBs by amending the relevant laws and secondary legislation. In particular, this concerns civil status registration services, land plot registration services and vehicle registration services.
3. Delegate social administrative services (ASSN), at least on an optional basis, to communities that are ready to assume responsibility for allocating housing subsidies and other types of state assistance.
4. Delegate tax-related services to communities that are prepared to assume responsibility for them and/or integrate such services into their CPASs.

5. Temporarily retain passport services within the competence of the State Migration Service of Ukraine for the duration of martial law. At the same time, require the Service to fully facilitate the integration of these services into CPASs and transfer its equipment to them free of charge when optimising its territorial bodies or subdivisions.

As a result, the administrative services most in demand among citizens and businesses will become more accessible across the country and of higher quality by being provided through every CPAS. Ministries should not provide administrative services, particularly core and high-volume services; instead, they should focus exclusively on policy development and oversight in their respective areas of competence.

6. Conclusions

Based on the findings of the study, the authors consider it necessary to set out two groups of conclusions: those concerning the state of public administration reform in Ukraine, and those concerning methodological approaches to assessing and planning this reform as part of EU integration measures.

At the same time, these conclusions should not only be recorded, but also actively promoted and translated into the work of public administration, especially given that both Ukrainian and European experts point to a significant pause in public administration reform in Ukraine and a lack of political will to change the situation.

It was only after last year's change of Government that a key stakeholder and reform lead was identified at the level of Deputy Prime Minister and work began on a new version of the Public Administration Reform Strategy for the next five years. The first proposals and the "framework" for the future policy document were also presented. However, the pace of this work needs to be accelerated, and the process should involve broader engagement and discussion of proposals for the draft Strategy, rather than merely collecting them and informing stakeholders which provisions have or have not been taken into account.

Together with the Matrix of Target Indicators, these proposals may serve as a basis for discussion and substantive coordination with stakeholders. The CPLR plans to submit the acceptable versions of the

proposals and indicators to the Government and the EU Delegation to Ukraine for consideration and possible incorporation into public policy documents in the area of good governance.

All recommendations resulting from the study, structured by Blocks of Principles / Problem Areas, are presented below in Section 7, “Matrix of Target Indicators”.

This section not only contains policy recommendations but also serves as an effective tool for monitoring reform progress and assessing the approximation of Ukrainian legislation to EU law.

The CPLR will publish the study on its information platforms for public access and expresses its appreciation to the representatives of civil society, government and business who contributed throughout the series of discussions. The outcomes of these discussions will be taken into account in the preparation of the final version of the study, which will be published together with the corresponding implementation proposals.

7. Target Indicator Matrix

No	Principle Areas / Key Challenges	Target indicator (tactical objectives - short-term reform actions)	Objective / (expected long-term outcome)	Connection to the Public Administration Reform Roadmap
1.	Strategic framework for public administration reform	A Government member responsible for the reform has been designated, the Prime Minister provides active political support for the reform.	A minister responsible for improving the public governance system is systematically appointed upon the formation of the Government and granted the necessary powers and institutional basis to perform this role.	Not mentioned in Roadmap

		The Government member responsible for the reform has the necessary powers and sufficient institutional support within the Secretariat of the Cabinet of Ministers of Ukraine to exercise those powers effectively.	Improvement of the public governance system is established as a separate area of state policy under the Government's responsibility. The relevant member of the Government is granted the necessary powers and institutional basis to exercise this role. Institutional monitoring of PAR is ensured, and a permanent mechanism for its improvement is in place, providing continued impetus to the reform.	Not mentioned in Roadmap
		The Government has approved a reform strategy aligned with EU requirements.	Tasks/measures aimed at improving the public governance system are incorporated into the Government Programme of Action and strategic policy documents, with a long-term vision for development in place.	Measure: Development and approval by the Government of the Public Administration Reform Strategy for 2026–2030 in accordance with European standards of public administration, including cost estimates where appropriate Deadline: Q4 2025 Responsible authorities: Minister of the Cabinet of Ministers of Ukraine, SCMU, CMU

				Implementation status: Not implemented (<i>at the time of finalisation of the study, the document had not yet been published; however, it is currently available at the following link</i>).
		An effective coordination mechanism for reform implementation has been established.	A sustainable institutional mechanism is established to coordinate tasks and measures for improving the public governance system and responding to new circumstances. All draft decisions are systematically discussed at Coordination Council meetings, and regular reporting is ensured.	Not mentioned in Roadmap
		Adequate financing for the reform has been secured, including through the State Budget.	Measures to improve the public governance system are adequately funded through annual allocations in the State Budget.	Measure: Preparation of proposals for the establishment of a new multi-donor budget support programme for Ukraine aimed at public administration reform, including ensuring proper arrangements for merit-based civil service competitions and civil servants' remuneration. Deadline: Q1 2026.

				Responsible authorities: Minister of the Cabinet of Ministers of Ukraine, SCMU, MoF, NACS Implementation status: Not implemented.
2.	Policy development and coordination	The Government is responsible for all public policy areas; a list of these areas has been established, and responsibility for them has been allocated among Government members.	The Government is formed on the basis of a clear delineation of policy areas and responsibilities of each member of the Government. The Government is legally responsible for all areas of state policy, with their list defined by law or by an act of the CMU.	Not mentioned in Roadmap
		An EU-aligned concept for reforming the centre of government has been developed, with the Secretariat of the CMU as the key institution. A detailed reform plan has been prepared, providing for the institutional strengthening of the SCMU, particularly in policy coordination and compliance with procedures for preparing policy documents and	The core functions of the centre of government are concentrated and effectively organised within the Secretariat of the CMU. The Secretariat of the CMU is institutionally strengthened and serves as the main body responsible for strategic planning, setting Government priorities, coordinating policy, ensuring compliance with requirements for the	Strategic outcome: The capacity of the Secretariat of the Cabinet of Ministers of Ukraine to perform the functions of the Centre of Government is strengthened, including the capacity to ensure the quality of policies and regulatory legal acts and to co-ordinate Ukraine's EU accession process. Measure: Amendment of legislation, including

		legal acts.	preparation of policy documents and legal acts, and providing expert and other support to the Prime Minister and members of the Government who do not head ministries.	the Regulation on the Secretariat of the Cabinet of Ministers of Ukraine and the Rules of Procedure of the CMU to improve inter-agency cooperation between the SCMU and ministries and other CEAs in the planning, development and implementation of policies and in the preparation of regulatory acts, in line with EU Member States' best practices. Deadline: Q2, 2026 Responsible authorities: Minister of the Cabinet of Ministers of Ukraine, SCMU Measure: Introduction of an information and analytical task-management system for monitoring and overseeing the implementation of tasks by executive authorities and optimising policy co-ordination procedures within the Secretariat of the Cabinet of Ministers of Ukraine. Deadline: Q2 2026
--	--	-------------	--	---

				Responsible authorities: SCMU, MDT
		The Government has approved a list of policy analysis and policy development units in all ministries and across all policy areas, such as directorates. Amendments have been made to the laws on the CMU and central executive authorities. Proposals have been prepared to amend the regulations governing ministries in order to avoid overlaps and gaps in responsibilities.	Policy analysis and policy-making units are established in all ministries across all policy areas. New requirements for regulations on ministries are defined by the CMU. Regulations on ministries clearly define powers in the relevant policy areas and prevent overlaps or gaps.	Partially addressed by the Roadmap. Strategic outcome: The quality and coherence of strategic and policy documents is improved Measure: Strengthening the capacity of ministries and other CEAs through methodological support, approval of guidelines, consultations, trainings, and information support for staff involved in developing and monitoring strategic, programme and policy-planning documents implementation. Deadline: Q4 2027 Responsible authorities: SCMU, ministries and other CEAs At the same time, the Roadmap does not explicitly provide for the establishment or designation of specialised policy analysis and policy development units in all ministries or

				for the approval of a list of such units.
		The role of the relevant ministry units in policy analysis and policy development, as well as the role of the civil service as a whole, has been strengthened. EU-aligned proposals have been prepared to reduce the number of deputy ministers and to redefine the role of the ministry state secretary and the heads of the relevant units.	Policy analysis and policy-making are carried out effectively by the relevant units of ministries, under the coordination and oversight of the Secretariat of the CMU. Effective communication with the academic community, experts, and other stakeholders is ensured. The work of ministry units is directly coordinated by state secretaries.	Partially reflected in the Roadmap. Strategic outcome: Ministries are focused on policy development, with optimal institutional capacity and effective use of human resources. Measure: Introduction of a unified organisational model for ministries with clear lines of accountability and a clear separation between the political leadership and the civil service. Deadline: Q4 2025 Adoption of legislative amendments to limit the number of deputy ministers and review their functions, expand the functions of State Secretaries in managing ministry staff, and clearly delineate the respective powers of State Secretaries and deputy ministers - Q4 2026. Responsible authorities: Ministry of the Cabinet of Ministers of Ukraine, MoJ,

				SKMU, Verkhovna Rada of Ukraine
		Government–Parliament cooperation has been substantially improved. The Government has been granted the necessary powers to support draft laws and acts as the main source of legislative initiative. The legislative work plan is based on the Government's proposals. Ministries cooperate closely with Verkhovna Rada committees in the preparation of both policy documents and legislative initiatives.	The Government's role in initiating draft laws is strengthened, along with the quality of its initiatives, which are in most cases adopted by Parliament without the regular need for alternative draft laws submitted by MPs.	Direct alignment with the Roadmap Strategic outcome: The quality of legislation is improved, with effective mechanisms established for legislative planning and post-legislative scrutiny. Measure: Amendment of legislation and ensuring its implementation to improve the procedures for planning, development, coordination and adoption of draft laws, including those aimed at strengthening the role of the Government in the legislative process and conducting the necessary governmental reviews. Deadline: Q4 2026 Responsible authorities: Ministry of the Cabinet of Ministers of Ukraine, MoJ, SKMU, Verkhovna Rada of Ukraine, Apparatus of the Verkhovna Rada of Ukraine

				The establishment of an effective post-legislative scrutiny mechanism through co-operation between the Government and Parliament is also envisioned. Deadline: Q4 2026
		Citizens, civil society organisations and other stakeholders have been informed about the adoption and forthcoming entry into force of the Law of Ukraine “On Public Consultations” and are familiar with the procedure for participating in such consultations.	The procedure for organising public consultations by executive authorities is developed and implemented. Public consultations on draft laws initiated by members of Parliament of Ukraine are also mandatory.	Direct alignment with the Roadmap Measure: Development, adoption and implementation of amendments to the Law of Ukraine “On Public Consultations” with the aim of extending its requirements to draft laws initiated by Members of Parliament of Ukraine. Deadline: Q4 2027 Responsible authorities: MoJ, Verkhovna Rada of Ukraine
3.	Civil service and human resource management	Direct non-transparent appointments to civil service positions without competitive selection, as well as unjustified dismissals from such positions, have been	Competitions for civil service positions are conducted on the basis of candidates’ merit and achievements. Persons appointed without competitive selection during martial law are also	Strategic outcome: The civil service attracts professional and integrity-driven staff through merit-based and integrity-based recruitment procedures aligned with European standards and

		stopped, and competitive selection procedures have been restored.	required to undergo competitive selection.	principles of public administration. Deadline: Q3 2026 Responsible authorities: NACS Implementation status: Ongoing (Draft Law № 13478-1 has been adopted at first reading).
		The Law of Ukraine “On Civil Service” reflects the key OECD/SIGMA Principles of Public Administration (2023).	Civil service legislation is aligned with the OECD/SIGMA Principles of Public Administration, as confirmed by annual Monitoring Reports.	Measure: Adoption and entry into force of legislation that improves the procedures for entry into, progression within and termination of civil service and ensures compliance with the principles of merit and integrity, as well as with European standards and principles of public administration. Deadline: Q3 2025 Responsible authorities: NACS Implementation status: Not implemented
		Political office-holders have been excluded from the Commission on Senior Civil Service, and procedures have been established to ensure that position	Commission on the Senior Civil Service, as well as other competition and disciplinary commissions, enjoys public trust, act in a politically impartial and professional manner, include	Measure: Improvement and professionalisation of selection procedures for candidates for Category “A” civil service positions based on an assessment of professional

		requirements are assessed on a professional basis.	representatives of civil society, are independent in their activities, and are guided solely by law.	competence, including enhanced integrity checks. Deadline: Q3 2026 Responsible authorities: NACS, NACP Implementation status: Ongoing (Draft Law № 13478-1 has been adopted at first reading).
4.	Accountability	Ministries have been stripped of administrative powers related to policy implementation. CEAs implement the policy of a single ministry and are coordinated and directed by that ministry; cross-sectoral subordination is not permitted. For CEAs, administrative service delivery has been separated from inspection, control and supervisory functions in the same policy area.	State policy implementation is carried out by CEAs established by the Government within the area of responsibility of each minister. Specialised CEAs are in place to exercise all administrative powers. They are controlled by, accountable to, and responsible before the Government. Ministers do not have the right to interfere in the operational activities of CEAs related to policy implementation.	There is direct but partial alignment with the Roadmap. Strategic outcome: Ministries focused on policy development, with optimal institutional capacity and effective use of human resources, and policy implementation functions transferred to other central executive authorities. Measure: Amend legislation to ensure that ministries provide strategic leadership and co-ordination of all central executive authorities within their respective areas of competence by setting objectives and monitoring performance. Deadline: Q4 2026

				Responsible authorities: Ministry of the Cabinet of Ministers of Ukraine, MoJ, SKMU, Verkhovna Rada of Ukraine
		Territorial bodies and units of CEAs have been aligned with the administrative-territorial structure. Cooperation with local self-government in implementing public policy is carried out in accordance with the principle of subsidiarity.	Territorial units of CEAs are separated from local state administrations. Local state administrations perform exclusively supervisory and coordination functions.	Partially addressed by the Roadmap Strategic outcome: Reform of local self-government and the territorial organisation of government implemented in line with the European Charter of Local Self-Government and European standards. Provided for: - development of a conceptual framework for the criteria and principles for the delineation of areas of competence between the state and local self-government, and for distinguishing own and delegated powers of local self-government bodies. Deadline: Q2 2025 – amendments to the Law of Ukraine “On Local Self-Government in

				Ukraine” and sectoral legislation to delineate the powers of LSGBs at different levels, as well as LSBGs and central and local executive authorities, in accordance with the principle of subsidiarity. Deadline: Q1 2026 – implementation of the Government Action Plan for reforming local self-government and the territorial organisation of power. Deadline: Q4 2027 At the same time, the Roadmap does not explicitly provide for, as separate measures, aligning the network of territorial bodies and units of central executive authorities with the administrative-territorial structure or organisationally separating them from local state administrations.
		The Tax Code, land, customs and digital legislation have been aligned with the LAP. A new Law “On	In all areas of legal relations involving the adoption of administrative acts, the requirements and standards of	Strategic outcome: The Law of Ukraine “On Administrative Procedure” is fully implemented. Measure:

		Petitions” and a Code of Administrative Offences have been adopted, eliminating competing regulation with the LAP and streamlining the mechanism for handling petitions. Information systems have been upgraded to reflect the requirements of the LAP. All laws and more than All laws and more than 90% of secondary legal acts in areas regulated by the LAP have been brought into compliance with it.	the requirements and standards of the LAP are fully applied, including to the electronic delivery of public services. In particular, individuals are guaranteed the opportunity to correct errors or omissions in their applications, the right to be heard before an adverse administrative act is adopted, the right to administrative appeal, and other procedural guarantees. Administrative acts enter into force once they are communicated to the addressee, while adverse acts are duly reasoned. Submissions by individuals that do not concern their rights, legitimate interests, or the fulfilment of their obligations are considered under separate legislation outside the scope of the LAP.	Alignment of tax and customs legislation with the Law of Ukraine “On Administrative Procedure” Deadline: Q4 2026 Responsible authorities: Ministry of Finance, State Tax Service, State Customs Service, National Bank of Ukraine Implementation status: The previous Government, headed by Yuliia Svyrydenko, submitted to the Verkhovna Rada Draft Law № 14196 “On Amendments to the Tax Code of Ukraine in connection with the adoption of the Law of Ukraine “On Administrative Procedure”” of 7 November 2025, as well as the draft Customs Code of Ukraine (reg. № 15295) of 3 June 2026. Following the change in Government, both drafts were withdrawn from consideration. The newly formed Government should re-submit them. Measure: Alignment of the
--	--	---	--	--

				Land Code of Ukraine with the Law of Ukraine “On Administrative Procedure” Deadline: Q1 2026 Responsible authorities: Ministry of Agrarian Policy and Food, Verkhovna Rada of Ukraine Implementation status: Not implemented Measure: Alignment of the Law of Ukraine “On Citizens’ Petitions” with the Law of Ukraine “On Administrative Procedure” and European standards, followed by its adoption Deadline: Q4 2025 Responsible authorities: Verkhovna Rada of Ukraine, MoJ Implementation status: In March 2024, the Government submitted Draft Law №11082 “On Petitions” to the Verkhovna Rada. The draft was designed to provide for a clear delineation of its scope of regulation from that of the Law of Ukraine “On
--	--	--	--	---

				Administrative Procedure”. It was adopted at first reading on 24 April 2024 and subsequently prepared for second reading by the relevant parliamentary committees. At certain stages, the wording of the draft became less clear with regard to its delineation from the provisions of the LAP. The latest version is more balanced. The Draft Law is currently being prepared for consideration at second reading. Measure: Training of civil servants and employees of local self-government bodies on the application of the Law of Ukraine “On Administrative Procedure” and the Law of Ukraine “On Petitions”. Deadline: Q4 2027 Responsible authorities: NACS, MoJ, SCMU Implementation status: Not implemented with regard to the Law of Ukraine “On Petitions”, which has not yet been adopted.
--	--	--	--	--

				Measure: Comprehensive implementation of the Law of Ukraine “On Administrative Procedure” through secondary legislation, including the adoption of regulatory legal acts necessary for the implementation of the Law of Ukraine “On Administrative Procedure” and the Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine in connection with the Adoption of the Law of Ukraine “On Administrative Procedure””. Deadline: Q4 2025 Responsible authorities: MoJ, Ministries, Ministry of other central executive authorities, other public authorities (National Bank of Ukraine, NSSMC) Implementation status: The process is ongoing. According to the latest data (Q1 2026), amendments have already been made to approximately 300 regulatory legal acts to bring them into compliance with the LAP. However, a
--	--	--	--	---

				substantial volume of secondary legislation still requires alignment with the LAP. Strategic outcome: The list of administrative offences is unified, the system of authorities responsible for imposing liability is streamlined, the list of administrative sanctions is updated, and administrative offence legislation is aligned with Council of Europe standards. Measure: Adoption of a new version of the Code of Ukraine on Administrative Offences aligned with European standards, best practices and the Law of Ukraine “On Administrative Procedure”, together with the introduction of training for the relevant public authorities. Deadline: Q4 2026 Responsible: MoJ, Verkhovna Rada of Ukraine, NACS Implementation status: Not implemented. In June 2024, a group of Members of the
--	--	--	--	---

				Verkhovna Rada of Ukraine registered Draft Code “On Administrative Offences” № 11386. It remains pending before the relevant parliamentary committee. Strategic outcome: Improved accessibility and quality of public services (including e-services) Measure: Adoption of amendments to the Law of Ukraine “On Peculiarities of the Provision of Public Services (Public E-services)” to ensure its alignment with the Law of Ukraine “On Administrative Procedure” and define the specific features of the consideration and resolution of administrative cases in the provision of public services (public e-services) Deadline: Q4 2026 Responsible authorities: MDT, Verkhovna Rada of Ukraine Implementation status: Not implemented. In February 2026, the Ministry of Digital Transformation published for public
--	--	--	--	--

				consultation a draft Law “On Amendments to the Law of Ukraine “On Peculiarities of the Provision of Public Services (Public E-services)” regarding the regulation of the consideration and resolution of administrative cases in the area of public services (public e-services)”. However, since then, no further progress has been made towards registering the draft Law with the Verkhovna Rada and securing its adoption. Measure: Review of the list of public digital services and alignment of those services with the Law of Ukraine “On Administrative Procedure” Deadline: Q4 2027 Responsible authorities: MDT Implementation status: Not implemented
		All public servants and judges who needed it have received high-quality training on applying the LAP, and the	The LAP is properly and effectively applied by officials of administrative bodies when adopting administrative acts.	Strategic outcome: The Law of Ukraine “On Administrative Procedure” is fully implemented. Measure: Training of civil servants and

		professional development system is sustainable and continuous.	The principles of the LAP are observed in the administrative activities of these bodies. The LAP is actively applied in judicial practice.	employees of local self-government bodies on the application of the Law of Ukraine “On Administrative Procedure” and the Law of Ukraine “On Petitions” Deadline: Q4 2027 Responsible authorities: NACS, MoJ, SCMU Implementation status: According to EU4PAR data, as of Q1 2026, more than 61,000 officials of administrative authorities had completed training on the fundamentals of the LAP.
5.	Service delivery	The draft Law “On Administrative Fees” has been adopted in the second reading and as a whole. It also sets the levels of administrative fees for basic administrative services in a transparent manner.	CPASs and the overall administrative service delivery system function sustainably due to the adoption of a rational and balanced Law “On Administrative Fees”. Administrative fees are designed to compensate communities for the costs of service delivery, thereby enabling them to provide high-quality administrative services.	Strategic outcome: The accessibility and quality of public services (including e-services) are improved. Measure: Adoption of legislation governing administrative service fees Deadline: Q4 2026 Responsible authorities: Verkhovna Rada of Ukraine Implementation status: Not implemented. Draft

				Law № 4380 “On Administrative Fees”, registered on 16 November 2020, was adopted only at first reading on 5 June 2025. It is still being prepared for second reading, including consideration of proposals submitted by associations of LSBGs and other stakeholders.
		Powers concerning the vast majority of core administrative services have been fully delegated to LSGB through relevant legislative amendments regulating their provision (including state registration of civil status acts (in full), land plot registration and vehicle registration). Administrative services of social nature have been delegated to all communities that demonstrated readiness to provide them. Passport services and certain tax-related administrative services have been introduced in more than 50% of CPASs with	Citizens and businesses have access to all basic administrative services, as well as certain tax-related services, through the CPAS in every community. These services are of high quality and territorially accessible. Ministries do not provide administrative services and focus exclusively on policy development in the relevant areas of legal relations.	–

		material and technical support from the relevant CEAs.		
--	--	--	--	--

Organisational and Operational Instruments of the CMU in Public Policy-Making

Tools category	Main types of tools	Purpose / role in policy development	Typical implementing institutions	Examples of application in Ukraine
1. Strategic and analytical	• Policy analysis; • Regulatory Impact Assessment (RIA) • Programme evaluation (Evaluation) • Monitoring of implementation • Consultations with stakeholders	Identifying policy problems, substantiating alternative solutions, and building an evidence base for decision-making	Policy directorates; Secretariat of the CMU; NACS; MEEA	RIA methodology (under CMU Resolution №. 308); PAR implementation reports; SIGMA assessments
2. Organisational and institutional	• Policy-making directorates; • inter-agency coordination committees; • public councils and advisory bodies; • policy implementation agencies	Ensuring accountability, coordination, and public participation in policy-making	Ministries; government committees; NACS; Reform Office; Secretariat of the CMU	Reform of ministerial structures (2017–2024); establishment of directorates; electronic consultations on gov.ua
3. Legal (regulatory)	• Laws and resolutions; • intergovernmental agreements and memoranda	Providing decisions with legal effect and formalising objectives and powers	Verkhovna Rada; CMU; MoJ; CEAs	Law “On the Principles of State Regulatory Policy” (2003); Public Administration Reform Strategy for 2021–2025

Negotiation Chapters (33) and Policy Areas (128) from the National Programme for the Adoption of the EU Acquis (Mapping)

Cluster	No	Chapter Title	Policy Area	Priority (2026–2030)	Lead Institution (suggested)	Risks (1-5)	Key dependencies
Fundamentals	23	Judiciary and fundamental rights	Procedural safeguards and access to justice	High	MoJ/ HCJ/ HQCJ/ NABU–SAP O-HACC (overlap)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	23	Judiciary and fundamental rights	Judicial independence and disciplinary responsibility	High	MoJ/ HCJ/ HQCJ/ NABU–SAP O-HACC (overlap)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	23	Judiciary and fundamental rights	Anti-corruption policy and integrity	High	MoJ/ HCJ/ HQCJ/ NABU–SAP O-HACC (overlap)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	23	Judiciary and fundamental rights	Personal data protection and privacy	High	MoJ/ HCJ/ HQCJ/ NABU–SAP O-HACC (overlap)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	24	Justice, freedom and security	Migration and asylum (acquis asylum)	High	MoIA / SBGS / MoJ — (international cooperation)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	24	Justice, freedom and security	Border management and visa policy	High	MoIA / SBGS / MoJ — (international cooperation)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	24	Justice, freedom and security	Police cooperation (Europol)	High	MoIA / SBGS / MoJ — (international cooperation)	5	LAP harmonisation / human resource

							capacity / budget
Fundamentals	24	Justice, freedom and security	Judicial cooperation in criminal/civil matters	High	MoIA / SBGS / MoJ — (international cooperation)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	5	Public procurement	Procurement legislation (2014/24, 2014/25)	High	MEEA/ Prozorro SE / AMCU (appeals)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	5	Public procurement	Centralised procurement and e-procurement	High	MEEA/ Prozorro SE / AMCU (appeals)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	5	Public procurement	Monitoring, appeals and control	High	MEEA/ Prozorro SE / AMCU (appeals)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	18	Statistics	ESS harmonisation	High	State Statistics Service of Ukraine / MoF	5	LAP harmonisation / human resource capacity / budget
Fundamentals	18	Statistics	Official statistics: national accounts, labour and prices	High	State Statistics Service of Ukraine / MoF	5	LAP harmonisation / human resource capacity / budget
Fundamentals	18	Statistics	Confidentiality / quality (Code of Practice)	High	State Statistics Service of Ukraine / MoF	5	LAP harmonisation / human resource capacity / budget
Fundamentals	32	Financial control	PIFC / internal control	High	MoF / Accounting Chamber / State Audit Service /	5	LAP harmonisation / human resource

					NACP (overlap)		capacity / budget
Fundamentals	32	Financial control	External audit and SAI	High	MoF / Accounting Chamber / State Audit Service / NACP (overlap)	5	LAP harmonisation / human resource capacity / budget
Fundamentals	32	Financial control	OLAF / EPPO and anti-fraud	High	MoF / Accounting Chamber / State Audit Service / NACP (overlap)	5	LAP harmonisation / human resource capacity / budget
Internal Market	1	Free movement of goods	Technical regulations/ standards (NLF)	Medium-High	MEEA/ NSO (standartisation) / State Service on Food Safety and Consumer Protection	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	1	Free movement of goods	Notification and market surveillance	Medium-High	MEEA/ NSO (standartisation) / State Service on Food Safety and Consumer Protection	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	1	Free movement of goods	Mutual recognition	Medium-High	MEEA/ NSO (standartisation) / State Service on Food Safety and Consumer Protection	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	2	Freedom of movement for workers	Access to the labour market	Medium-High	MEEA/ MSPFU / State Migration Service	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	2	Freedom of movement	Coordination of social security	Medium-High	MEEA/ MSPFU / State	4	EU acquis transposition / regulatory and

		for workers			Migration Service		institutional capacity
Internal Market	2	Freedom of movement for workers	Recognition of qualifications	Medium-High	MEEA/ MSPFU / State Migration Service	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	3	Right of establishment and freedom to provide services	Freedom to provide services	Medium-High	MEEA/ MoJ/ relevant regulators	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	3	Right of establishment and freedom to provide services	Professional qualifications (PQD)	Medium-High	MEEA/ MoJ/ relevant regulators	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	3	Right of establishment and freedom to provide services	E-commerce and platforms	Medium-High	MEEA/ MoJ/ relevant regulators	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	4	Free movement of capital	Free movement of capital and investment	Medium-High	NBU / MoF / NSSMC / MoJ	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	4	Free movement of capital	AML/CFT	Medium-High	NBU/ MoF/ NSSMC / MoJ	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	4	Free movement of capital	Sanctions and movement of capital	Medium-High	NBU/ MoF/ NSSMC / MoJ	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	6	Company law	Company law and corporate governance	Medium-High	MoJ/ NSSMC/ MEEA	4	EU acquis transposition / regulatory and

							institutional capacity
Internal Market	6	Company law	Accounting and audit	Medium-High	MoJ/ NSSMC / MEEA	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	6	Company law	Incapacity / restructuring	Medium-High	MoJ/ NSSMC/ MEEA	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	7	Intellectual property law	Copyright and related rights	Medium-High	MEEA/ MoJ/ Ukrainian National Office for Intellectual Property and Innovations	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	7	Intellectual property law	Trade marks/designs/patents	Medium-High	MEEA/ MoJ/ Ukrainian National Office for Intellectual Property and Innovations	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	7	Intellectual property law	Enforcement of intellectual property rights	Medium-High	MEEA/ MoJ/ Ukrainian National Office for Intellectual Property and Innovations	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	28	Consumer and health protection	Product safety and surveillance	Medium-High	State Service on Food Safety and Consumer Protection / MoH / MEEA	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	28	Consumer and health protection	Consumer rights (ADR/ODR)	Medium-High	State Service on Food Safety and Consumer Protection / MoH / MEEA	4	EU acquis transposition / regulatory and institutional capacity

Internal Market	28	Consumer and health protection	Healthcare/ pharmaceuticals	Medium-High	State Service on Food Safety and Consumer Protection / MoH / MEEA	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	9	Financial services	Banking sector (CRR/CRD)	Medium-High	NBU / NSSMC/ National Commission for State Regulation of Financial Services Markets, if applicable / MoF	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	9	Financial services	Capital markets (MiFID/MiFIR)	Medium-High	NBU / NSSMC/ National Commission for State Regulation of Financial Services Markets, if applicable / MoF	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	9	Financial services	Insurance (Solvency II)	Medium-High	NBU / NSSMC/ National Commission for State Regulation of Financial Services Markets, if applicable / MoF	4	EU acquis transposition / regulatory and institutional capacity
Internal Market	9	Financial services	Macroprudential supervision	Medium-High	NBU / NSSMC/ National Commission for State Regulation of Financial Services Markets, if applicable / MoF	4	EU acquis transposition / regulatory and institutional capacity

Competitiveness and Inclusive Growth	10	Information society and media	Electronic communications (EECC)	Medium	National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and Postal Services / MDT	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	10	Information society and media	DSA/DMA	Medium	National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and Postal Services / MDT	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	10	Information society and media	Cybersecurity (NIS2)/eIDAS	Medium	National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and Postal Services / MDT	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	16	Taxation	Direct taxation/ATAD	Medium	MoF/ State Tax Service	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	16	Taxation	VAT	Medium	MoF/ State Tax Service	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and	16	Taxation	Administrative	Medium	MoF/ State Tax Service	3	EU acquis transposition / regulatory

Inclusive Growth			cooperation (DAC)				and institutional capacity
Competitiveness and Inclusive Growth	17	Economic and monetary policy	Central bank independence/EMU	Medium	NBU/ MoF/ MEEA	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	17	Economic and monetary policy	Economic governance	Medium	NBU/ MoF/ MEEA	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	17	Economic and monetary policy	Fiscal rules (SGP)	Medium	NBU/ MoF/ MEEA	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	19	Social policy and employment	Occupational health and safety	Medium	MSP / State Labour Service / MoH (overlap)	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	19	Social policy and employment	Equality/non-discrimination	Medium	MSP / State Labour Service / MoH (overlap)	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	19	Social policy and employment	Social dialogue/youth	Medium	MSP / State Labour Service / MoH (overlap)	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	20	Enterprise and industrial policy	SME policy/industrial policy	Medium	MEEA/ Ministry for Strategic Industries (functions redistributed)	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	20	Enterprise and industrial policy	State aid for innovation	Medium	MEEA/ Ministry for Strategic Industries	3	EU acquis transposition / regulatory and

					(functions redistributed)		institutional capacity
Competitiveness and Inclusive Growth	20	Enterprise and industrial policy	Standardisation of production	Medium	MEEA/ Ministry for Strategic Industries (functions redistributed)	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	25	Science and research	Horizon Europe	Medium	MES/ NASU	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	25	Science and research	Research infrastructure/mobility	Medium	MES/ NASU	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	25	Science and research	Open science data/ERA	Medium	MES/ NASU	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	26	Education and culture	Education/Bologna Process	Medium	MES/ MoC	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	26	Education and culture	Culture/creative industries	Medium	MES/ MoC	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	26	Education and culture	Erasmus+/mobility	Medium	MES/ MoC	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	29	Customs union	UCC/simplifications	Medium	State Customs Service / MoF	3	EU acquis transposition / regulatory and

							institutional capacity
Competitiveness and Inclusive Growth	29	Customs union	Tariffs/codification	Medium	State Customs Service / MoF	3	EU acquis transposition / regulatory and institutional capacity
Competitiveness and Inclusive Growth	29	Customs union	Customs IT/data exchange	Medium	State Customs Service / MoF	3	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	14	Transport policy	Market access (road/rail/aviation/maritime)	High	Ministry of Infrastructure / Antimonopoly Committee of Ukraine (PSO) / relevant sectoral agencies	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	14	Transport policy	Safety/standards	High	Ministry of Infrastructure / Antimonopoly Committee of Ukraine (PSO) / relevant sectoral agencies	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	14	Transport policy	Logistics/multimodality	High	Ministry of Infrastructure / Antimonopoly Committee of Ukraine (PSO) / relevant sectoral agencies	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	15	Energy	Electricity and gas markets	High	MoE/ NEURC / State Energy Supervision Inspectorate	5	EU acquis transposition / regulatory and institutional capacity

Green Agenda and Sustainable Connectivity	15	Energy	Renewable energy/energy efficiency	High	MoE/ NEURC / State Energy Supervision Inspectorate	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	15	Energy	Security of supply/ENT SO-E/G	High	MoE/ NEURC / State Energy Supervision Inspectorate	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	21	Trans-European networks	TEN-T/TEN-E	High	Ministry of Infrastructure / MoE/ MEEA (coordination)	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	21	Trans-European networks	Interoperability/standards	High	Ministry of Infrastructure / MoE/ MEEA (coordination)	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	21	Trans-European networks	Project cycle/assessment	High	Ministry of Infrastructure / MoE/ MEEA (coordination)	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	27	Environment and climate change	Air/water/waste	High	Ministry of Environmental Protection and Natural Resources / State Environmental Inspectorate / agencies	5	EU acquis transposition / regulatory and institutional capacity
Green Agenda and Sustainable Connectivity	27	Environment and climate change	Climate/ETS/ESR/LULUCF	High	Ministry of Environmental Protection and Natural Resources / State Environmental Inspectorate / agencies	5	EU acquis transposition / regulatory and institutional capacity

**Policy areas with overlapping lead responsibilities
(based on a survey of CEAs where multiple institutions reported having
a lead role in policy development)**

№	Acquis Chapter	Policy Area	Authorities Reporting a Lead Role
1	5. Public Procurement	Public procurement monitoring	MEEA, State Audit Service of Ukraine, Antimonopoly Committee of Ukraine
2	9. Financial Services	Banking regulation	NBU, MoF
3	9. Financial Services	Insurance	National Securities and Stock Market Commission, MoF
4	9. Financial Services	Capital markets	National Securities and Stock Market Commission, MEEA
5	15. Energy	Renewable energy policy	MoE, State Agency on Energy Efficiency and Energy Saving of Ukraine
6	27. Environment and Climate Change	Climate policy (ETS/LULUCF)	Ministry of Environmental Protection and Natural Resources of Ukraine, MEEA
7	27. Environment and Climate Change	Circular economy and waste management	Ministry of Environmental Protection and Natural Resources of Ukraine, MCTD
8	20. Enterprise and Industrial Policy	Industrial parks	MEEA, Ministry of Strategic Industries of Ukraine
9	20. Enterprise and Industrial Policy	State aid for innovation	MEEA, MES
10	25. Science and Research	Horizon Europe	MES, National Academy of Sciences of Ukraine

11	10. Digital Transformation and Media	Cybersecurity	MDT, State Service of Special Communications and Information Protection of Ukraine
12	10. Digital Transformation and Media	DSA/DMA implementation	MDT, MEEA
13	16. Taxation	VAT administration	MoF, State Tax Service of Ukraine
14	16. Taxation	BEPS and transfer pricing	MoF, NBU
15	19. Social Policy and Employment	Youth employment	MSPFU, MYS
16	19. Social Policy and Employment	Equality and non-discrimination	MSPFU, Ukrainian Parliament Commissioner for Human Rights
17	2. Freedom of Movement for Workers	Labour mobility	MSPFU, MFA
18	4. Free Movement of Capital	AML/CFT	NBU, MoF, NACP
19	28. Consumer and Health Protection	Pharmaceuticals	MoH, State Service of Ukraine on Medicines and Drugs Control
20	12. Food Safety, Veterinary and Phytosanitary Policy	Veterinary policy	Ministry of Agrarian Policy and Food of Ukraine, State Service of Ukraine on Food Safety and Consumer Protection
21	13. Fisheries and Aquaculture	Controls and inspections	Ministry of Agrarian Policy and Food of Ukraine, State Agency for the Development of Melioration, Fisheries and Food Programmes
22	22. Regional Policy and Coordination of Structural Instruments	Management of EU funds	MCTD, MoF
23	14. Transport Policy	Transport safety	Ministry of Infrastructure, MIA

24	31. CFSP/CSDP	Sanctions	MFA, National Security and Defence Council of Ukraine
25	33. Financial and Budgetary Provisions	Audit of EU funds	MoF, Accounting Chamber of Ukraine
26	32. Financial Control	Public Internal Financial Control (PIFC)	MoF, State Audit Service of Ukraine
27	1. Free Movement of Goods	Standardisation	MEEA, State Enterprise "Ukrainian Research and Training Center for Standardization, Certification and Quality"

Policy Areas without a Designated Lead Authority

№	Negotiation Chapter	Indicative Policy Area	Possible Reason for the Absence of a Lead Authority
1	27. Environment and Climate Change	Chemical safety (REACH/CLP)	No dedicated authority with responsibility for chemical safety exists (beyond the State Environmental Inspectorate)
2	27. Environment and Climate Change	Nature protection directives (Natura 2000)	Responsibilities between the Ministry of Environment and the State Forest Resources Agency are not clearly defined.
3	30. External Relations	Export control of dual-use goods	The function is split between the State Service for Export Control and the Ministry of Economy.
4	31. CFSP/CSDP	EU security policy	No dedicated unit exists within the Ministry of Foreign Affairs for coordinating the CFSP/CSDP acquis.
5	15. Energy	Energy storage and market flexibility	Overlapping responsibilities between the Ministry of Energy and NEURC
6	10. Digital Transformation and Media	eIDAS 2 and digital identity	No clearly agreed rules between the Ministry of Digital Transformation and the Ministry of Justice
7	16. Taxation	Electronic VAT administration (e-invoicing)	The function is split between the Ministry of Finance, the State Tax Service and the Ministry of Digital Transformation
8	11. Agriculture and Rural Development	Organic production and labelling	No dedicated directorate responsible for this policy area exists within the Ministry of Agriculture
9	22. Regional Policy and Coordination of Structural Instruments	Territorial Just Transition	Overlapping responsibilities between the Ministry for Communities and Territories Development, the Ministry of Environment and the Ministry of Economy.
10	19. Social Policy and Employment	Youth entrepreneurship / Youth Guarantee	No dedicated coordinating authority exists between the Ministry of Youth and Sports and the Ministry of Social Policy.

11	21. TEN-T/TEN-E	TEN-E project portfolio	No designated national coordinator exists in the energy sector.
12	6. Company Law	ESG/CSRD implementation	No designated lead authority among the Ministry of Economy, the National Securities and Stock Market Commission and the Ministry of Justice

Statistical Workload and Risk of Institutional Overload

The table presents the share of the 128 reconstructed policy areas for which each body serves as the lead authority, together with an indicative assessment of the risk of institutional overload (High/Medium/Low) based on the relative concentration of policy responsibilities.

Authority	Number of Policy Areas (Lead)	Share of 128 Policy Areas (%)	Risk of Overload
Ministry of Economy, Environment and Agriculture of Ukraine	44	34.4 %	High
Ministry of Finance of Ukraine	20	15.6 %	High
Ministry for Communities, Territories and Infrastructure Development of Ukraine	12	9.4 %	Medium
Ministry of Justice of Ukraine	7	5.5 %	Medium
Ministry of Education and Science of Ukraine	6	4.7 %	Low
Ministry of Internal Affairs of Ukraine	4	3.1 %	Low
National Bank of Ukraine	4	3.1 %	Low
Ministry of Digital Transformation of Ukraine	4	3.1 %	Low
State Service of Ukraine on Food Safety and Consumer Protection	4	3.1 %	Low
Antimonopoly Committee of Ukraine	4	3.1 %	Low
Ministry of Energy of Ukraine	4	3.1 %	Low
Ministry of Foreign Affairs of Ukraine	4	3.1 %	Low
Ministry of Defence of Ukraine	4	3.1 %	Low
State Customs Service of Ukraine	4	3.1 %	Low
State Statistics Service of Ukraine	3	2.3 %	Low

Areas of Public Policy and the Authorities Responsible for Policy Development and Implementation (after July 17, 2025)

Black — the authority exists and is directed and coordinated by this ministry;

Blue — the authority exists but is not directed or coordinated by this ministry;

Red — such an authority does not currently exist but should be established.

*** — CEAs whose activities are directly guided and coordinated by the CMU.

	Policy area	Ministries	CEAs and SEs
1.	Legal policy	Ministry of Justice	State Archival Service State Registration Service State Enforcement Service State Penitentiary Service State Judicial Administration State Enterprise “Center for Forensic Examination and Expert Research”
2.	Law and order policy	Ministry of Internal Affairs	National Police Administration of the State Border Guard Service State Migration Service State Emergency Service State Security Service National Guard
3.	Financial policy	Ministry of Finance	State Tax Service State Customs Service State Treasury Service State Financial Monitoring Service State Audit Service Public Debt Management Agency Bureau of Economic Security *** National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes ***

4.	Regional policy	Ministry for Communities and Territories Development	State Regional Development Fund State Inspectorate for Architecture and Urban Planning State Agency for Tourism Development
5.	Infrastructure development policy		State Aviation Service State Service for Transport Safety State Service for Maritime, Inland Waterway Transport and Shipping SE “Ukrainian Railways” SE “Ukrainian Motorways” State Enterprise "Ukrainian State Centre of Radio Frequencies" SE “Ukrenergotrans” SE “Ukrnaftogaztranssystem” State Agency for Restoration and Infrastructure Development National Commission for State Regulation in the Areas of Electronic Communications, Radio Frequency Spectrum and Postal Services *** Administration of the State Service for Special Communications and Information Protection ***
		Ministry of Digital Transformation	State Agency PlayCity ***
6.	Economic policy	Ministry of Energy	State Energy Supervision Inspectorate State Agency of Ukraine on Exclusion Zone Management State Nuclear Regulatory Inspectorate *** State Agency on Energy Efficiency and Energy Saving ***
		Ministry of Economy, Environment and Agriculture	State Regulatory Service *** State Statistics Service *** State Labour Service State Reserve Management Agency State Export Control Service State Service on Food Safety and Consumer Protection ***

			Land Quality Control Inspectorate State Agency of Ukraine for the Development of Land Reclamation, Fisheries and Food Programmes State Service for Geodesy, Cartography and Cadastre ***
7.	Environmental policy		State Environmental Inspectorate State Forest Resources Agency State Water Resources Agency State Service of Geology and Subsoil
8.	Education and science development policy	Ministry of Education and Science	State Education Quality Inspectorate National Commission on State Language Standards
9.	Social protection and healthcare policy	Ministry of Social Policy, Family and Unity	National Social Service Pension Fund State Service for Children's Affairs
		Ministry of Health	Sanitary and Epidemiological Inspectorate Emergency Medical Service National Health Service State Service on Medicines and Drug Control
10.	Culture and sports development policy	Ministry of Culture and Strategic Communications	Ukrainian Institute of National Memory*** State Agency for Arts and Art Education State Committee for Television and Radio Broadcasting *** State Film Agency of Ukraine State Service for Ethnopolitics and Freedom of Conscience State Agency for Tourism Development
		Ministry of Youth and Sports	National Olympic Committee

11.	Defence policy	Ministry of Defence	General Staff and the Armed Forces of Ukraine Main Intelligence Office State Service for Manning the Armed Forces of Ukraine SE "Defence Procurement Agency"
		Ministry for Veterans Affairs	
12.	Foreign affairs policy	Ministry of Foreign Affairs	Office for Support of Diplomatic Missions and Residences of the MFA Foreign Intelligence Service
	Cross-sectoral policies within the SCMU		
	Public Policy Strategy	Prime Minister SCMU Directorate for Strategic Planning	
	Public Governance Development (Reform)	Deputy Prime Minister or Minister without Portfolio SCMU Directorate for Public Governance	
	European and Euro-Atlantic Integration	Deputy Prime Minister or Minister without Portfolio SCMU Directorate for European and Euro-Atlantic Integration	

		Accountable to and overseen by the CMU	State Property Fund *** National Agency of Ukraine on Civil Service *** National Agency on Corruption Prevention *** Antimonopoly Committee *** National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes *** National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and Postal Services *** National Energy and Utilities Regulatory Commission ***
		Accountable to and overseen by Parliament	National Bank State Committee for Television and Radio Broadcasting ***
			National Anti-Corruption Bureau
		Accountable to and overseen by the President	Security Service

Comparative Table of Ministries Before and After the Formation of Yu. Svyrydenko Government in July 2025

Ministry before July 2025	Ministry after July 2025	Status / Comment
Ministry of Economy of Ukraine	Ministry of Economy, Environment and Agriculture of Ukraine	Renamed and enlarged; legal succession to the Ministry of Agrarian Policy and the Ministry of Environmental Protection
Ministry of Agrarian Policy and Food of Ukraine	Merged into the Ministry of Economy, Environment and Agriculture	Liquidated, with its functions transferred
Ministry of Environmental Protection and Natural Resources of Ukraine	Merged into the Ministry of Economy, Environment and Agriculture	Liquidated, with its functions transferred
Ministry for Strategic Industries of Ukraine	Functions transferred to the Ministry of Defence of Ukraine	Liquidated; the Ministry of Defence of Ukraine is the legal successor
Ministry of Social Policy of Ukraine	Ministry of Social Policy, Family and Unity of Ukraine	Renamed; Ministry of National Unity merged into it (No. 904 of 21.07.2025)
Ministry of National Unity of Ukraine (legal successor to the Ministry for Reintegration since 12.2024)	Merged into the Ministry of Social Policy, Family and Unity	Reorganised by merger (No. 904 of 21.07.2025)
Ministry for Reintegration of Temporarily Occupied Territories of Ukraine (before 12.2024)	→ Renamed as the Ministry of National Unity (12.2024) → merged into the Ministry of Social Policy, Family and Unity (07.2025)	Powers partially redistributed to the Ministry for Communities and Territories Development (List of territories — 2025 orders)
Ministry for Communities, Territories and Infrastructure Development of Ukraine	Ministry for Communities and Territories Development of Ukraine	Renamed, with continuity of functions
Ministry of Energy of Ukraine	Ministry of Energy of Ukraine	No change
Ministry of Digital Transformation of Ukraine	Ministry of Digital Transformation of Ukraine	No change
Ministry of Finance of Ukraine	Ministry of Finance of Ukraine	No change
Ministry of Justice of Ukraine	Ministry of Justice of Ukraine	No change

Ministry of Internal Affairs of Ukraine	Ministry of Internal Affairs of Ukraine	No change
Ministry of Defence of Ukraine	Ministry of Defence of Ukraine	Expanded to include functions of the Ministry for Strategic Industries
Ministry of Foreign Affairs of Ukraine	Ministry of Foreign Affairs of Ukraine	No change
Ministry of Health of Ukraine	Ministry of Health of Ukraine	No change
Ministry of Education and Science of Ukraine	Ministry of Education and Science of Ukraine	No change
Ministry of Culture and Information Policy of Ukraine	Ministry of Culture of Ukraine	Updated configuration; subordinated to the Deputy Prime Minister
Ministry for Veterans Affairs of Ukraine	Ministry for Veterans Affairs of Ukraine	No change
Ministry of Youth and Sports of Ukraine	Ministry of Youth and Sports of Ukraine	No change

**Existence of policy development functions
(directorates/departments)**

	Ministry	Policy and Strategic Planning Unit (directorate/depa rtment)	Policy development areas	Notes (overlaps/gaps)	Key official source
1	MoD	Department of Military Policy and Strategic Planning	Military policy and defence planning	Potential overlap exists, as strategic planning is also performed by the General Staff of the Armed Forces of Ukraine (at the operational level)	mil.gov.ua
		Department of International Defence Cooperation	- defence integration policy; - cooperation with NATO; - implementation of standards.		
		Department of Public Procurement and Supply of Material Resources	- defence procurement policy; - resource management policy; - transparency and control standards.	Overlap with the Defence Procurement Agency	
		Department of Social and Humanitarian Policy	Develops sectoral social policy for military personnel and their families.		
		Department of Personnel Policy	- military education policy; - training standards; - integration with NATO standards (educational component)		

		Department of Military Education and Science	- military education policy; - training standards; - integration with NATO standards (educational component)		
2	MIA	Directorate for Strategic Planning and European Integration	European integration of the MIA, coordination of policy development, planning	Overlap with relevant departments (such as public security departments, in policy-related matters)	mvs.gov.ua
		Department for Cooperation with the National Police of Ukraine	- public security policy; - criminal policy within the competence of the MIA; - the police service function		
		Office for Cooperation with the State Emergency Service of Ukraine	- civil protection policy; - fire safety; - emergency response		
		Office for Cooperation with the State Border Guard Service of Ukraine	- border control policy; - migration security; - integrated border management		
		Office for Cooperation with the State Migration Service of Ukraine	- migration; - asylum; - population registration		

		Office for Cooperation with the National Guard of Ukraine	- internal security; - use of the National Guard forces; - legal regimes		
		Office for Mobilisation, Civil Protection and Critical Infrastructure			
3	MoH	Directorate for Strategic Planning and Coordination	Strategic planning of the MoH, coordination of policy development	Possible overlap with the public health / medical services directorates	moz.gov.ua
		Department of Public Health	- policy on prevention of infectious diseases; - non-communicable diseases; - immunisation; - environmental health and safety; - public health system forecasting		
		Department of Medical Services	- primary and emergency care policy; - specialised care policy; - the Medical Guarantees Programme; - medical provision; - mental health		

		Department of Digital Transformation in Healthcare	- eHealth policy; - the digital architecture of the system; - cybersecurity policy in healthcare; - the regulatory model for electronic healthcare		
		Department of High-Tech Medical Care and Innovation	- transplantation policy; - development of the blood system; - innovation; - forensic medical examination		
		Pharmaceutical Office	- medicines policy; - medical devices; - regulation of the pharmaceutical market		
		Office for Medical Personnel, Education and Science	- medical workforce policy; - medical education; - coordination of science policy		
4	MES	Directorate for Strategic Planning and Recovery	Strategic planning and coordination of education/science policy development	Overlap with sectoral policy directorates (general secondary education / higher education / science)	mon.gov.ua
		Directorate for Preschool and School Education	- policy on general secondary education; - education standards; - curricula; - the New Ukrainian School; - school inclusion		

		Directorate for Vocational Education	- vocational education policy; - qualification frameworks; - cooperation with the labour market; - dual education		
		Directorate for Professional Pre-Higher and Higher Education	- policy on higher education institutions; - autonomy of higher education institutions; - higher education standards and state-funded places; - integration into EHEA		
		Directorate for Science and Innovation	Develops policy on: - science; - the grant system; - the National Research Foundation of Ukraine; - integration into Horizon Europe; - research infrastructure		
		Directorate for Digital Transformation of Education	- digital education policy; - EdTech; - educational platforms; - electronic registers		
		Directorate for European Integration and International Cooperation	- policy on European integration in education; - implementation of the acquis;		

			- international education agreements		
5	MEEA	Department of Strategic Planning and Macroeconomic Forecasting	- macroeconomic policy; - strategic economic planning; - macroeconomic forecasting; - analytical support for economic policy	Overlap with sectoral blocks (agriculture, environment) as the result of the merger	me.gov.ua
		Department of Regulatory Policy and Entrepreneurship Department of Employment	- state regulatory policy; - economic deregulation; - entrepreneurship development policy; - support for SMEs		
		Department of Labour	- employment policy; - labour relations; - remuneration; - labour migration; - occupational safety		
		Department of Employment	- employment policy; - labour market regulation; - active employment programmes; - professional adaptation of the population; - integration of unemployed persons into the labour market		

		Department for Technical Regulation	- policy on technical regulation; - standardisation; - conformity assessment; - market surveillance; - harmonisation of technical regulations with the EU		
		Department for Management of State-Owned Assets	- policy on management of state-owned enterprises; - corporate governance in the state sector; - privatisation; - management of state assets	Implementation through the State Property Fund	
		Office for Sanctions Policy	- sanctions policy; - economic sanctions and trade restrictions; - international coordination of sanctions	Overlap with the National Security and Defence Council, as well as the Security Service of Ukraine and MFA	
		Department for Industrial Policy	- industrial policy; - industrial modernisation; - development of industrial clusters; - support for strategic industries; - technological development of production	Overlap with: MES; MCTD; MoD; MDT	
		Department for Economic Policy in the Security and Defence Sectors	- economic policy in the security and defence sector; - economics of the defence-industrial complex;	Overlap with the National Defence Council, as well as with the MoD and the Defence Procurement Agency	

			- economic mechanisms of defence procurement; - mobilisation economy		
		Department for Foreign Economic Activity and Trade Defence	- foreign economic policy; - international trade policy; - trade defence; - anti-dumping policy; - trade integration	Overlap with the MFA, the State Customs Service and the Interdepartmental Commission on International Trade	
		Office for Industrial Parks and Investment Support	- policy on industrial parks development; - investment policy; - support for investment projects; - regional industrial development	Overlap with the MCTD	
		Department for Rural Development	- policy on rural development; - support for rural communities; - diversification of rural economies; - infrastructure development of rural areas	Overlap with the MCTD	
		Office for Regulation of Land Relations, Development of State Cadastres and Soil Fertility	- policy in the area of land relations; - development of the State Land Cadastre; - protection and restoration of soil fertility; - monitoring of land resources		

		Department for Agrarian Development	- policy in the area of agrarian economic; - support for agricultural production; - development of agrarian entrepreneurship; - enhancing the competitiveness of the agricultural sector	Overlap with the Ministry of Finance in relation to support for the agricultural sector	
		Department for State Policy on Sanitary and Phytosanitary Measures and Food Security	- policy in the area of sanitary and phytosanitary measures; - food safety; - veterinary policy; - phytosanitary policy; - food security		
		Forest Resources Policy and Protection Unit	- policy in the area of forest protection; - sustainable forestry development; - conservation of forest ecosystems; - restoration of forest resources	Overlap with the State Forest Resources Agency	
		Department for Protected Areas and Biodiversity	- policy in the area of biodiversity conservation; - development of the nature reserve fund; - ecosystem protection; - management of protected areas	Overlap with the State Forest Resources Agency	

		Office for Environmental Protection, Prevention and Control of Industrial Pollution	- policy in the area of industrial pollution control; - integrated pollution prevention and control (IPPC); - environmental standards for production; - environmental compliance of enterprises		
		Office for Regulation of Fisheries, Land Reclamation, Water Resources and Marine Ecosystems	- policy in the area of fisheries; - protection of marine ecosystems; - water resources management; - environmental regulation of land reclamation	Overlap with the MCTD, as well as with the State Water Resources Agency	
6	MoF	Directorate for Strategic Planning	- financial policy (methodological framework); - strategic planning in the financial sector	Overlap with the State Budget, Tax Policy and Customs Policy Departments Overlap with the State Customs Service	mof.gov.ua
		Department for the State Budget	- budget policy; - budgetary rules; - expenditure allocation; - medium-term budget planning (MTBP)		
		Department for Tax Policy	- tax legislation policy; - tax rates, bases and exemptions; - tax regimes; - harmonisation with the acquis	Overlap with the State Tax Service (which implements policy but, in some cases, performs non-core policy development functions)	

		Department for Customs Policy	- policy in the area of customs regulation; - tariff policy; - harmonisation with the EU; - administrative rules and procedures	Overlap with the State Customs Service	
		Department for Debt Policy	- policy in the area of public debt management; - borrowing strategy; - risk management; - cooperation with international financial institutions	Overlap with the Public Debt Management Agency	
		Department for International Taxation, Accounting and Regulatory Support for Audit Activities	- state financial control policy - public sector accounting standards; - financial reporting reform		
		Department for Intergovernmental Fiscal Relations and Local Budgets Policy	- policy in the area of intergovernmental fiscal relations; - fiscal transfers; - fiscal decentralisation	Overlap with the State Audit Service	
7	MDT	Directorate for Strategic Planning and International Cooperation	- digital development policy; - strategic planning; - coordination of international technical assistance	Overlap with the European Integration Directorate	thedigital.gov.ua (orders/organisational structure)

		Directorate for Development of Electronic Services	- integration of digital services; - development of the Diia programme	Falls between policy development and policy implementation	
		Directorate for Digital Economy	- policy on the development of the IT industry; - the Diia City framework; - regulation of digital business; - development of the startup ecosystem		
		Directorate for Development of the National Informatization Programme	- policy on state (technical) regulation of the informatisation sector; - policy on the development of e-document management and interagency electronic interaction		
		Directorate for Electronic Registers	- policy on public electronic registers; - standards for state registers		
		Directorate for Development of Broadband Internet Access Infrastructure	- policy on the development of broadband internet; - policy on the development of internet infrastructure; - digital inclusion of territories	Overlap with the regulator (the National Commission for the State Regulation of Electronic Communications)	

		Directorate for Digital Skills and Digitalisation of Education	- policy on digital literacy; - digital skills programmes; - integration of digital skills into the education system	Overlap with the MES	
8	MCTD	Office for Strategic Planning	- coordination of policy development within the ministry; - monitoring of regional policy		kmu.gov.ua
		Directorate for International Cooperation and European Integration	- implementation of the EU acquis in the field of regional policy; - integration into EU cohesion policy		
		Department for Regional Policy and Reintegration of Territories	- state regional policy; - the regional development strategy; - mechanisms for state support to regions; - territorial cohesion policy		
9	MFA	Department for Policy Planning	- long-term foreign policy strategies; - coordination of policy across regional departments; - analytical support; - preparation of decisions for the country's leadership	Overlap with the public and economic diplomacy departments	mfa.gov.ua

		Department for EU Affairs	- European integration policy; - implementation of the acquis in the area of foreign policy; - Ukraine's negotiating position with the EU	Overlap with the Office of the Deputy Prime Minister for European and Euro-Atlantic Integration	
		Departments for Regional Policy / geographically structured departments	- bilateral policy; - regional strategies; - diplomatic positions		
		Department for Economic Diplomacy and Recovery	- export promotion policy; - investment diplomacy; - promotion of Ukrainian business abroad	Overlap with the MEEA	
		Department for Public Diplomacy and Strategic Communications	- international communication policy; - cultural diplomacy; - promotion of Ukraine's image abroad	Overlap with the Ministry of Culture and Strategic Communications	
10	MoJ	Directorate for Strategic Planning and European Integration	- strategy for legal reforms; - approximation of legislation to the EU acquis		minjust.gov.ua
		Department for Public Law	- policy in the area of administrative legislation; - public administration reform; - administrative procedures;	Overlap with the CMU and the National Agency of Ukraine on Civil Service	

			- legal regulation of public authorities		
		Department for Private Law	- policy in the area of civil legislation; - corporate law; - family law; - reform of the Civil Code		
		Department for International Law	- development of Ukraine's legal positions for international courts; - treaty policy; - participates in international legal mechanisms		
		Directorate for Justice and Criminal Justice	- policy on the functioning of the justice system; - criminal law policy; - criminal procedure reform; - policy on the execution of criminal sanctions; - protection of human rights in criminal proceedings	Overlap with the MIA and the Office of the Prosecutor General	
		Department for Anti-Corruption Policy	- development of legal framework for the anti-corruption system - harmonisation with international standards; - anti-corruption legislation	Overlap with the NACP	

		Department for State Registration	- policy on state registers; - notarial policy; - regulation of legal entities		
11	MoC	Department for Strategic Planning and Investment Development	- strategy for cultural policy; - coordination of reforms; - monitoring state programmes		mkip.gov.ua
		Department for Strategic Communications and Promotion of Ukrainian Culture	- public communications policy; - Ukraine's international image; - coordination of government communication campaigns		
		Department for European and Euro-Atlantic Integration and International Cooperation	- implementation of EU cultural policy; - international cooperation		
		Department for Arts and Creative Industries	- development of arts policy; - state cultural programmes; - creative economy development policy		

		Department for Protection and Preservation of Cultural Heritage	- policy on monument protection; - regulation of cultural heritage; - restoration and preservation policy	Overlap with the MCTD (urban planning, spatial planning)	
12	MYS	Office for Strategic Planning and Communications	- development of strategy for sport and youth policy; - international sports programmes; - integration into European sports institutions		mms.gov.ua
		Office for Youth Policy	- development of state youth policy; - youth development programmes; - support for youth organisations and development of youth centres	Overlap with the MES (education and student policy)	
		Office for Strengthening Ukrainian National and Civic Identity	- development of state programmes for strengthening national identity; - state policy on national and patriotic education; - youth education programmes; - policy on historical memory among young people; - policy on youth resilience	Overlap with the MES, as well as with the MCSC	

		Department for High-Performance Sport	- policy on support for Olympic sports; - policy on support for non-Olympic sports; - the national teams training system; - cooperation with national federations; - international cooperation in sport	Overlap with the National Olympic Committee	
		Department for Mass Sport and National Health	- mass sport policy; - promotion of physical activity; - policy on the development of youth sports schools; - sports infrastructure development policy	Overlap with the MES, as well as with the MCTD (construction of sports facilities)	
13	MVA	Office for Strategic Planning and Cooperation with Public Authorities	- development of the strategy for veterans policy; - coordination of interministerial programmes; - monitoring of policy implementation	Overlap with relevant rehabilitation/employment departments	mva.gov.ua
		Department for Social Policy	- state social policy for veterans; - a system of social guarantees, benefits and compensation; - state programmes supporting veterans	Overlap with the MSPFU	

		Office for Veterans' Education and Business	- policy on reintegration of veterans into civilian life; - support for veteran entrepreneurship; - employment programmes	Overlap with the MEEA	
		Office for Physical and Mental Health	- medical rehabilitation policy; - the system of psychological support for veterans; - standards and protocols for rehabilitation programmes	Overlap with the MoH	
		Office for Commemoration and Memorialisation	- policy on honouring veterans; - policy on fostering veterans' identity; - state memorial programmes	Overlap with the MCSC	
14	MSPFU	Directorate for Strategic Planning and Policy Coordination	- development of the strategy for social policy and unity policy; - coordination of reforms; - adaptation to EU standards; - demographic policy		msp.gov.ua / kmu.gov.ua
		Department for Policy on Social Insurance Development, Pension Provision and Protection of Older Persons	- policy on social benefits and assistance; - state social support and subsidy programmes; - pension system policy; - pension reform;	Pension policy is implemented through the Pension Fund of Ukraine	

			- rules governing the solidarity-based pension system		
		Department for Support and Integration Policy for Internally Displaced Persons	- policy on social support for IDPs; - policy on integration of IDPs into host communities; - policy on housing provision for IDPs; - economic integration policy; - policy on registration and records of IDPs	Overlap with the MEEA, as well as with the MDT in developing the regulatory framework for the IDP register	
		Department for Policies on the Development of a Barrier-Free Society	- policy on physical accessibility; - social inclusion policy; - economic accessibility policy; - policy on digital accessibility and barrier-free public services	Overlap with the MoH, as well as with the MES, the MDT, and the MEEA	
		Department for Policy on the Protection of the Rights and Well-Being of Families and Children	- family support policy; - gender equality and prevention of domestic violence; - child protection policy; - adoption policy; - support for children in difficult life circumstances	Overlap with the MES, as well as with the MIA and the MoJ	
		Department for Policy on Maintaining Ties with Ukrainians Abroad	- policy on engagement with the Ukrainian diaspora; - policy on preserving	Overlap with the MFA, as well as with the MEEA Overlap with the MDT in developing digital	

			Ukrainian identity abroad; - policy on communication with Ukrainian citizens abroad; - citizen return policy	communication mechanisms	
		Office for Humanitarian Policy and Volunteer Development	- state policy on volunteer development; - programmes promoting civic engagement and youth participation in humanitarian activities; - social cohesion policy	Overlap with the MCSC	
15	MoE	Directorate for Strategic Planning	- Ukraine's energy strategy; - implementation of the EU acquis; - integration into the Energy Community; - coordination of energy sector reforms	Overlap with sectoral directorates (oil and gas, energy markets)	mev.gov.ua
		Directorate for the Electricity Sector and Electricity Market Development	- policy on development of the electricity market; - generation balance; - integration of the power system with the EU; - development of the renewable energy market	Overlap with the National Energy and Utilities Regulatory Commission	
		Directorate for the Oil and Gas Sector and Development of Oil, Natural Gas and Petroleum Products Markets	- policy on the functioning of natural gas and oil markets; - development of gas and oil production;	Overlap with Naftogaz and the Gas Transmission System Operator	

			- gas infrastructure; - gas transit		
		Directorate for Energy and Resource Efficiency Policy Development	- policy on energy efficiency and energy transition; - emissions reduction; - decarbonisation of the energy sector	Overlap with the MEEA	
		Department for Nuclear Energy and the Nuclear Industry	- policy on nuclear energy development; - operation of nuclear power plants; - cooperation with the IAEA; - development of new technologies	Overlap with Energoatom	
		Department for the Coal Industry	- policy on the transformation of coal regions; - mine closure; - reform of the coal sector		

Level of Concentration of Policy Implementation Functions within the Ministry Apparatus

High	Medium	Low
MoJ	MoD	MoE
MSPFU	MIA	MFA
MYS	MoH	MVA
MoCSC	MES	
	MoF	
	MDT	
	MCTD	
	MEEA	

Degree of Completion of Institutional Arrangements for Policy Implementation

High	Medium	Low
Ministry of Defence	Ministry of Finance	Ministry of Justice
Ministry of Internal Affairs	Ministry of Digital Transformation	Ministry of Culture and Strategic Communications
Ministry of Health	Ministry for Communities, Territories and Infrastructure Development	Ministry of Youth and Sports
Ministry of Education and Science	Ministry of Foreign Affairs	Ministry of Veterans Affairs
Ministry of Economy, Environment and Agrarian Policy		Ministry of Social Policy, Family and Unity
		Ministry of Energy

Degree of Completion of Institutional Arrangements for Policy Implementation

by CEAs

Ministry	Degree of completion of institutional arrangements	Comment
Ministry of Defence	High	Includes the General Staff, the Armed Forces of Ukraine, state-owned enterprises-concerns, and defence industry institutes.
Ministry of Internal Affairs	High	Includes the National Police, the State Border Guard Service, the State Emergency Service, the Migration Service, and the National Guard, forming an extensive network of implementing bodies.
Ministry of Health	High	Includes the National Health Service of Ukraine, the Public Health Centre, laboratory centres, and sanitary-epidemiological services.
Ministry of Education and Science	High	Includes state agencies (NAQA and the National Research Fund) as well as education and research institutions.
Ministry of Economy, Environment and Agrarian Policy	High	Includes the State Food and Consumer Service, specialised agencies, the environmental inspectorate, and subordinate enterprises.
Ministry of Finance	Medium	The tax and customs services operate as separate bodies, while other areas are implemented directly by the ministry's apparatus.
Ministry of Digital Transformation	Medium	Includes the Diia system and the CDTO network as implementation instruments, but lacks its own inspectorates.
Ministry for Communities, Territories and Infrastructure Development	Medium	Includes agencies such as Ukrzaliznytsia, Ukravtodor, and the Recovery Agency, while many functions are coordinated directly by the ministry's apparatus.

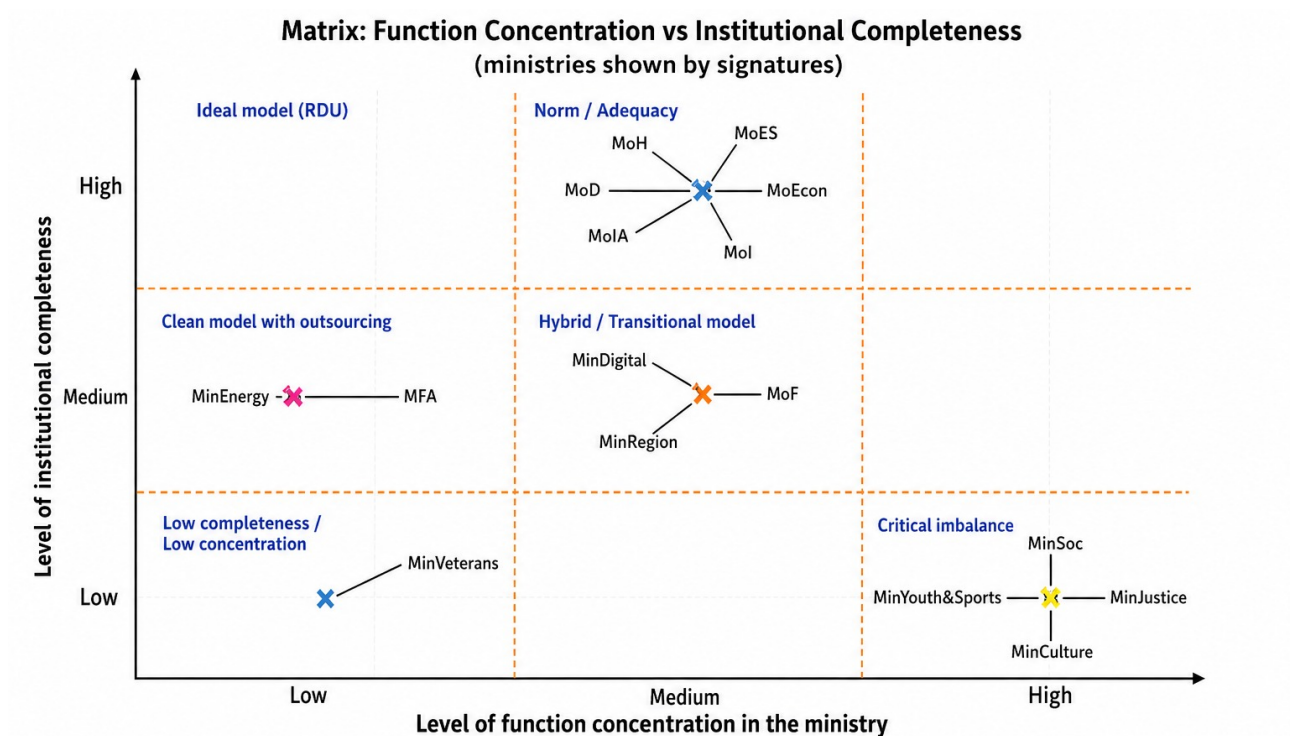
Ministry of Foreign Affairs	Medium	Implementation is carried out through foreign diplomatic missions, without classical inspectorates or agencies.
Ministry of Justice	Low	Enforcement and probation services are integrated, with no external agencies; the ministry's apparatus directly administers most functions.
Ministry of Culture and Strategic Communications	Low	Programme implementation is carried out through the ministry's apparatus and public institutions; the ministry lacks its own inspectorates.
Ministry of Youth and Sports	Low	Includes sports federations and state training centres as implementing structures but lacks separate CEAs or inspectorates.
Ministry of Veterans Affairs	Low	Includes the Ukrainian Veterans Fund as its sole implementation instrument but lacks inspectorates or specialised agencies.
Ministry of Social Policy, Family and Unity	Low	The ministry's apparatus directly performs most social payment and oversight functions.
Ministry of Energy	Medium	Includes subordinate operators such as Energoatom and Ukrenergo, while the regulator, NEURC, is not formally subordinated to the ministry.

Level of Functional Concentration vs. Level of Institutional Completeness

Ministry	Level of concentration	Level of institutional completeness	Comment	Deviation / status
MoJ	High	Low	The ministry apparatus performs almost all functions → critical imbalance	✗
MSPFU	High	Low	The ministry apparatus administers social payments → lack of institutional capacity	✗
MYS	High	Low	Ministry departments perform implementation functions; the lack of CEAs	✗
MoC	High	Low	The ministry apparatus manages programme funding	✗
MoV	Low	Low	Policy exists, but implementation is carried out by the Veterans Fund	⚠
MoF	Medium	Medium	Services exist (STS, SMS), but certain functions are carried out by the ministry's apparatus	⚠
MDT	Medium	Medium	Implementation is carried out through Diia and CDTOs, but no inspectorates exist	⚠
MCTD	Medium	Medium	Agencies exist (UZ, Ukravtodor), but many functions are controlled by the ministry apparatus	

MEEA	Medium	High	Numerous agencies and inspectorates are in place	
MoH	Medium	High	NHSU, the Public Health Centre, and healthcare institutions	
MES	Medium	High	NAQA, the National Research Foundation, and educational institutions	
MoD	Medium	High	The General Staff, the Armed Forces of Ukraine, and defence enterprises	 Institutional redundancy
MIA	Medium	High	National Police of Ukraine, State Border Guard Service, State Emergency Service of Ukraine, National Guard of Ukraine perform implementation functions	 Institutional redundancy
MFA	Low	Medium	Diplomatic missions perform implementation functions; no classic inspectorates are in place	
MoE	Low	Medium	Operators exist, but the regulator NEURC is outside ministerial subordination	

Graphical Matrix: Function Concentration vs Institutional Completeness



The Centre of Policy and Legal Reform is a non-governmental think tank established in 1996 after the adoption of the Constitution of Ukraine. CPLR's mission is to promote institutional reforms in Ukraine to strengthen democracy, the rule of law, and good governance.

Website : <https://pravo.org.ua/>

Facebook: www.facebook.com/pravo.org.ua

The International Renaissance Foundation is one of the largest charitable foundations in Ukraine. Since 1990 we have been helping to develop an open society based on democratic values in Ukraine. During its activity, the Foundation has supported over 20 thousand projects. The funding amounted to over \$ 365 million.

Website : www.irf.ua

Facebook: www.fb.com/irf.ukraine

The European Union is an economic and political union of 27 European countries. It is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. It acts globally to promote sustainable development of societies, environment and economies, so that everyone can benefit.