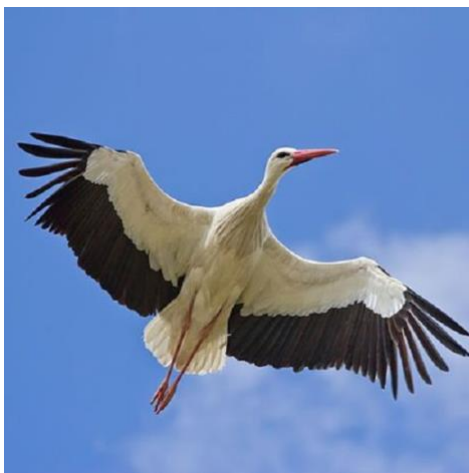


Position Paper

Environmental reforms and improvement of environmental policy for the green reconstruction of Ukraine

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Working Group 3 “Environment, climate change, and energy security”, UNP EaP Civil Society Platform



We, representatives of the working groups on environment and energy of two pro-european platforms, believe in the following:

- the recovery of Ukraine should take place on the basis of sustainable development, taking into account the principles of green reconstruction,
- improvement of the environmental policy is vital for European integration, for defeating the Russian aggressor, and for the further development of our country.

Ukraine wants to join the club of civilized countries and become a member of the EU. In order for these intentions to be realized, it is necessary to meet all the criteria and requirements of this community. Environmental and climate issues are an integral part of the political agenda and daily efforts of the European Union, therefore **Ukraine**, as a future EU member state, **must ensure the effective and timely implementation of the EU acquis in the field of environment, climate and other related areas.**

In accordance with the recommendations of the European Commission, Ukraine needs to ensure cross-sectoral integration of environmental and climate issues into the country's recovery plans, define a green recovery strategy for key sectors, and prioritize relevant EU legislation and standards in its National Program on Adaptation to EU Acquis.

Investment policy and finance involvement for the recovery of the economy must be consistent with the goals of sustainable development and be primarily aimed at the development of production chains with high added value, and not at the resource-export economy. Reconstruction on green principles will not only contribute to the reconstruction of infrastructure and the economy, but will also ensure the creation of additional green jobs, which will help bring people back to Ukraine and provide them with decent work.

The practical implementation of the recommendations means that fairly thorough changes should be made in the near future. First of all, changes should take place in environmental policy and in the system of the good environmental governance.

The issue of implementing the EU environmental and climate acquis is closely related to issues of post-war reconstruction on green principles. That is why the recently developed draftlaw "On the principles of the restoration of Ukraine" should be significantly revised and include all components of post-war reconstruction, including the restoration of nature.

In our opinion, the environmental component of sustainable development is completely absent in the draftlaw "On the principles of the restoration of Ukraine", which is another proof of the lack of understanding of the necessity of integrating environmental requirements into the policies of the country's economic sectors and any economic activity on its territory.

In particular, we believe that the Government should concentrate the efforts of the executive power and society on overcoming the consequences of the war, using modern coordination mechanisms, financial and administrative incentives. At the same time, the Government's policy in the field of post-war reconstruction should not contradict either the Constitution of Ukraine or the current legislation.

Green recovery, with innovative ideas and approaches, can become the basis of new legislation, when all approaches to economic activity will need to be checked in terms of environmental benefits, adaptation to climate change, conservation and reuse of resources, zero waste, circular

economy, reproduction and further conservation of nature, in accordance with the European Green Deal. Norms regarding the mandatory integration of environmental requirements into the policy of economic sectors, the transition to a green economy, new ambitious environmental basic standards for construction and development of territories should be enshrined in legislation.

In the future, it is necessary to take into account environmental objects that are not and cannot be property. Natural objects not only cannot be separated from the rest of the restoration objects, they form the basis of the environment for a full-fledged human habitation, and the economy as a whole. These are water bodies, nature reserves, green zones in populated areas, forests, marine environment objects, etc. Particular attention must be paid to the restoration and expansion of the ecological network, which is also required by EU legislation/membership requirements. Similarly, the restoration of agricultural territories and the agrarian business dependent on them should take place on the basis of the European Green Deal and the "From Farm to Fork" strategy, taking into account the need to create a national strategic plan for the EU's Common Agricultural Policy.

We welcome the inclusion in the **Ukraine Facility** of environmental and climate conditions for Ukraine to receive funding, as well as the fact that green reforms are included as an integral part of the Ukraine Plan. At the same time, we emphasize the need to include indicators of green reconstruction in the monitoring of the implementation of the Ukraine Plan in order to ensure the implementation of the foreseen reforms, the cross-cutting of the environmental and climate component and the financing of environmental and climate-oriented projects, as well as the reconstruction of infrastructure, industry and buildings based on the principles of decarbonization, climate neutrality and energy efficiency.

The basis for improvement of environmental policy during recovery should become

- principles of sustainable development - ensuring mutual coordination of environmental, economic and social factors of reconstruction,
- transparency, compliance with environmental standards,
- the principle of "rebuilding greener than it was" - taking into account the issues of decarbonization and achieving climate neutrality in the process of reconstruction, which will contribute to improving the quality of life of people in a safe environment;
- the principles of the New European Bauhaus - sustainability, aesthetics, co-creation to achieve the goals of the European Green Deal,

- principles of good governance - ensuring transparency, accountability, efficiency, including ensuring effective public participation at all stages of post-war reconstruction and restoration of Ukraine,

- transparency and accountability of the decision-making process on issues related to the environment should be ensured by a fair balance between security considerations and transparency of the processes and accountability of the authorities in wartime conditions; it is important not to allow the weakening of already existing horizontal legislation adopted to fulfill European integration requirements, in particular in the field of environmental impact assessment and strategic environmental assessment, as well as to provide access to existing plans for reforming and improving environmental policy.

We call on the Government, the Parliament of Ukraine, our international partners and all those interested in the processes of recovery and reconstruction of Ukraine to take into account the recommendations of the European Commission and representatives of the environmental movement and to start the process of reforming and improving the environmental policy as soon as possible, to ensure that the interests of green reconstruction are taken into account in plans and programs, and that the principles of openness, accountability and public involvement.