УКРАЇНСЬКА СТОРОНА
ПЛАТФОРМИ ГРОМАДЯНСЬКОГО СУСПІЛЬСТВА УКРАЇНА-ЄС

УКРАЇНСЬКА НАЦІОНАЛЬНА ПЛАТФОРМА
ФОРУМУ ГРОМАДЯНСЬКОГО СУСПІЛЬСТВА СХІДНОГО ПАРТНЕРСТВА

Position Paper

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Ukraine's recovery must be built on the principles of sustainable development and European integration

WG 3 “Environment, Climate Change and Energy Security” of the Ukrainian Platform of the Eastern Partnership Civil Society Forum

WG 5 “Energy, Transport, Environment and Climate Change” of the Ukrainian Side of the EU-Ukraine Civil Society Platform

We, representatives of the working groups on environment and energy issues of pro-European platforms of Ukraine, insist that the recovery of Ukraine must take place on the basis of sustainable development, taking into account the principles of green recovery, which must be integrated into all recovery plans and programs.

The main principles we declared earlier remain unchanged: the principles of sustainable development, good governance, the cross-cutting nature of environmental issues, "build back better", European integration, and the New European Bauhaus.

Transparency and accountability of decision-making on environmental issues should be ensured by striking a **fair balance between security considerations and the public interest** in wartime. It is important to avoid weakening of existing horizontal legislation adopted to implement European integration requirements, in particular in the field of environmental impact assessment and strategic environmental assessment, as well as to provide access to/publish existing plans for reforming and improving environmental policy.

Ukraine is actively moving towards EU membership: official negotiations on EU accession were launched in June 2024, bilateral screening negotiations have taken place on several chapters, and we expect the opening of the first negotiation clusters. CSO representatives, members of both pro-European platforms, are actively participating in this process.

The environmental and climate components of the European integration process remain among the most difficult to implement. Despite the adoption of important strategic and legislative acts in the field of climate change, industrial pollution, and waste management in 2024-2025, there are still many complex reforms ahead that require immediate action, strengthening institutional capacity, and financial instruments. A new challenge will be the formation of a negotiating position under Chapter 27: taking into account public interests and environmental conservation interests in this case must take precedence over narrow private business interests.

In line with previous recommendations from the European Commission, Ukraine needs to ensure **cross-sectoral integration of environment 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 Programme on the Adaptation to the EU acts. Unfortunately, environmental and climate issues are not properly integrated into sectoral recovery programs, and recovery plans remain fragmented and do not take into account the cross-cutting nature of the environmental and climate components.

European integration creates a framework for green recovery both through the adoption of relevant legislation, and through the **Ukraine Facility and the Ukraine Plan**. The “money for reforms” approach is working, but the Ukraine Plan does not cover all the issues necessary for the sustainable reconstruction of Ukraine. The principles of “do no significant harm” and “build back better” enshrined in the Ukraine Facility should become an important indicator for the implementation of the second and third elements of this instrument (Investment Framework and EU Accession Assistance).

Investment policy and further financial support within the framework of international programs is increasingly based on the implementation of sustainable development principles, which is reflected in the Strategy for the introduction of sustainable development reporting by enterprises, in the financing rules approved by leading banks, as well as in the general interest of large business companies in implementing sustainability principles, driven by the need for reporting and information-disclosure in accordance with EU standards. The main driver for these changes for the better is the further integration of Ukrainian companies into the EU market and the need to adhere to EU standards if companies plan to further develop together with the European community.

We welcome business interest in the principles of sustainable development and hope for the continuation and deepening of this process, including in the process of Ukraine’s recovery.

It is necessary to legislatively consolidate the strategic framework to stimulate investment in projects that will contribute to achieving climate neutrality and the transition to a green economy. **The draft law of Ukraine “On the Principles of Green Recovery of Ukraine”**, announced by the Ministry of Environmental Protection and Natural Resources of Ukraine, could serve this role. The sustainable investment mechanism will have a positive impact on the green reconstruction of Ukraine, and also transpose the relevant EU legislation on green taxonomy.

At the same time, state policy in the field of post-war reconstruction should not contradict either the Constitution of Ukraine or current legislation. Unfortunately, we continue to see the Government's unjustified deviations from ensuring the fundamental environmental rights of Ukrainians, including restrictions on access to environmental information and public participation in the decision-making process. However, we are increasingly observing cases where **the needs of martial law or green reconstruction are used to cover up the implementation of projects that contradict**

public interests, violate legal requirements, and destroy nature (Runa, Svydovets, Markhalivka).

It is also necessary to return to the issue of planning for post-war reconstruction and recovery, since **the long-awaited architecture of post-war recovery** has not been created. The work of the Government is focused on implementing projects to ensure the country's vital activities. This is confirmed, among other things, by the activities of the State Agency for Rehabilitation and Infrastructure Development (only 20% of all agency expenditures go to recovery) and the content and geography of projects in the DREAM system (activities within the framework of "reconstruction" cover almost all possible areas and types of projects).

Instead, the principles of green recovery proposed by the public, with innovative ideas and approaches, when economic activities are verified in terms of environmental benefits, adaptation to climate change, conservation and reuse of resources, zero waste, circular economy, restoration and further preservation of the natural environment, in accordance with the European Green Deal, will contribute to sustainable recovery and further development.

The norms for the mandatory integration of environmental requirements into the policies of economic sectors, the transition to a green economy, and new ambitious environmental basic standards for construction and territorial development should be enshrined in legislation.

We call on the Government, the Parliament of Ukraine, our international partners, and all those interested in the recovery of Ukraine to take into account the recommendations of the European Commission and representatives of the environmental movement and ensure that plans and programs take into account the interests of green reconstruction and adherence to the principles of sustainable development.