



CENTRE OF EXPERTISE FOR MULTILEVEL GOVERNANCE

Strasbourg, 3 December 2024  
CEMG/PAD(2024)6

**Policy Advice**  
**on the “Concept of the reform of local self-government**  
**and territorial organisation of power in Ukraine”**

This document was prepared by the Centre of Expertise for Multilevel Governance  
which operates within the secretariat of the Congress of Local and Regional Authorities  
of the Council of Europe

## **Executive summary**

*The 2014 “Concept of the reform of local self-government and territorial organisation of power in Ukraine” aimed to decentralise power, empower communities, and improve public service delivery. Approved in the wake of the Revolution of Dignity, this policy framework set out to create a more effective, citizen-centred local governance structure, promoting more participatory democracy and aligning and balancing state and community interests. Although not passed as a law, it provided critical guidance for legislative and executive actions. Structured around identifying problems, defining goals, and establishing principles, objectives, and phases, the Concept addressed issues like inconsistent public services, limited local decision-making power, and weak mechanisms for direct democracy. Its four main priorities were to improve service accessibility, clarify division of authority between local and state entities, restructure territorial governance, and ensure adequate financial resources for local authorities.*

*The concept itself is a very valuable document, establishing a coherent vision for a decentralised, modern territorial organisation of power in Ukraine. However, since its adoption several new challenges have been raised, linked to unforeseen events such as the 2022 Russian Federation’s war of aggression against Ukraine, but also the prospect of a fast track towards integration in the European Union. Moreover, adopted on 1 April 2014, meaning very soon after the voting in the office of the first post-Maidan government, this document was not the subject of wide consultations with politicians, local authorities and civil society.*

**Achievements of the Reform.** *Since 2014 notable progress has been achieved. Public service delivery has improved significantly after the local authorities were empowered to expand services. Territorial consolidation, driven by legislation passed starting with 2015, has streamlined governance and strengthened local governance capabilities. By 2020 the almost twelve thousand local communities were consolidated into 1470 larger local government units, while the number of rayons was reduced from 490 to 136, leading to an improved multilevel governance system.*

*The reform has also fostered collaboration between local and regional authorities. The 2014 and 2024 laws on “Inter-Municipal Co-operation” and “International Territorial Co-operation” have enabled significant inter-municipal and international partnerships. By mid-2024, 744 communities had signed 495 inter-municipal agreements, while 485 communities established over 2,000 international agreements, enhancing resource sharing and best practice adoption. However, these pieces of legislation are not sufficient as a framework to ensure coherence of policies and services in large metropolitan areas.*

**Pending problems.** *Key challenges remain. The elected authorities have no executive body at oblast and rayon levels. The role of rayon-level governance is still unclear, with minor responsibilities affecting coordination. Fiscal decentralisation has made progress, yet local authorities face budget limitations, hindering fiscal autonomy. War-related infrastructure deterioration has appeared and increased and insufficient legal authority over land management persists.*

*Furthermore, local authorities and state sub-national authorities face staffing shortages and professionalism challenges, exacerbated by migration and military drafts. Transparency issues and inconsistent sectoral reforms limit further progress. The 2022 Russian Federation’s war of aggression against Ukraine introduced additional challenges, destabilising local budgets and necessitating the temporary establishment of military administrations. While probably necessary, these administrations represent a departure from European Charter principles, potentially impacting long-term decentralisation and should be set in place based on clear criteria and regulation, respect the principle of proportionality with the objectives to be achieved, and should be terminated as soon as the situation allows for it.*

**Recommendations.** *To fully realise the Concept's goals, Ukraine needs constitutional amendments to formally establish a multilevel governance framework, clarifying roles at all levels. A revised Concept, created after meaningful consultations, with key stakeholders, including local authorities and civil society, and with expert input, should build on the 2014 document while addressing current issues. Strengthening local fiscal frameworks, clarifying rayon and oblast roles, and reinforcing local administrative capacity will be essential for Ukraine's recovery and reconstruction, sustainable development and alignment with European standards. The revised Concept should be closely aligned with the EU accession process by incorporating insights from relevant EU documents which highlight the role of self-government authorities in the recovery effort and the importance of civil society involvement in consultations.*

## **I. Introduction**

1. This Policy Advice was prepared in response to a request formulated by the Chair of the Parliamentary Committee on State Building, Local Self-Government, Regional and Urban Development (hereinafter – the Specialised Parliamentary Committee) as of 13 September 2024, following the agreement reached within the third round of the High-Level Dialogue “Good Democratic Governance in Ukraine: Achievements, Challenges and the Way Forward in Post-War Period” (July 2024, Strasbourg).
2. The document was prepared by the [Centre of Expertise for Multilevel Governance](#) (hereinafter – the Centre of Expertise), which operates within the secretariat of the Congress of Local and Regional Authorities of the Council of Europe. It is based on contributions from an international consultant, Mr Sorin IONIȚĂ, and a national consultant, Ms. Olena BOIKO, within the framework of the Programme “[Strengthening Good Democratic Governance and Resilience in Ukraine](#)”, implemented under the Council of Europe Action Plan for Ukraine “Resilience, Recovery and Reconstruction” 2023-2026.
3. This Policy Advice contains in particular an overall analysis of the state of implementation of the “Concept of the reform of local self-government and territorial organisation of power in Ukraine” as of 1 April 2014 and general recommendations for its possible revision.
4. The document also takes into account findings of consultations with national stakeholders and expert community carried out by the Council of Europe in October 2024 for the purpose to collect their feedback on the current state of play in the area and their opinion about its possible revision of the Concept (the list appears in Appendix 1).

## **II. Analysis**

### **The 2014 Concept**

5. The “Concept of the reform of local self-government and territorial organisation of power in Ukraine” (hereinafter – the Concept) was approved by the Cabinet of Ministers on 1 April 2014, shortly after the Revolution of Dignity. This timing reflects the urgency for reform as Ukraine transitioned to a new democratic government during a political crisis. The document, although not a law passed by the Verkhovna Rada of Ukraine, serves as a government policy framework under Ordinance No. 333-r. Its primary aim is to establish effective local self-government structures, create a conducive living environment for citizens, improve the accessibility and quality of public services, introduce institutions of direct democracy, and align local and state interests. The need for reform was urgent in view of the inadequacies in the then-existing local government system, which was mostly functional only in city communities of regional significance, leaving smaller, fragmented communities with limited financial and material resources to fully serve their inhabitants.
6. Despite its non-legislative status, the Concept has become a cornerstone for shaping Ukraine’s local governance policies, guiding both legislative and executive decision-making. It promotes decentralisation by redistributing authority from the central government to local levels, empowering communities to address local needs more effectively. This approach was intended to overcome the previous fragmentation and financial weakness of many local communities, supporting a more balanced and resilient governance structure nationwide. Developed with input from earlier administrative reform discussions dating back to 1998, the Concept has successfully provided a strategic pathway for Ukraine to modernise its multilevel governance system in alignment with democratic values, best European practice and the standards of the Council of Europe, including, but not limited to the European Charter of Local Self-Government.

7. The document is well-organised and serves as a practical guide for implementing subsequent reforms. It is structured into seven main sections: *Problems to be Addressed*, the *Main Goal* (a broad vision for the reform), *Means and Actions* to translate this vision into practice, *Principles of Action*, *Objectives* (the key priorities), *Phases of Implementation*, and *Expected Results*. It begins by identifying several critical problems within Ukraine's public governance system back in 2014. The key ones were the declining quality and accessibility of public and housing services, poor maintenance of communal infrastructure, and a complex demographic landscape. Local policies for socio-economic development were often misaligned with community needs, and mechanisms of direct democracy were underdeveloped. Additionally, local public officials faced declining professionalism, while local authorities were often corporatised and non-transparent. Excessive centralisation limited local authorities' ability to make decisions independently, reducing the overall effectiveness and responsiveness of local self-government. At the same time, excessive territorial fragmentation and lack of horizontal co-operation meant that, regardless of any potential decentralisation efforts, most local authorities would remain unable to become autonomous in providing any meaningful services to their citizens.

8. The *Objectives* section is the core part of the document and highlights four clear priorities for reforming the sub-national governance system: (a) enhancing the quality and accessibility of public services; (b) clarifying and delineating responsibilities between local state authorities and local authorities, with measures to strengthen the latter; (c) territorial reform, including by restructuring state authority systems across various levels; and (d) ensuring that local authorities have sufficient financial resources to fulfil their assigned responsibilities effectively.

## **Achievements**

9. Since 2014, Ukraine's multilevel governance reform, widely referred to as decentralisation reform, has achieved substantial progress, addressing many previously critical challenges and transforming local governance structures. Key improvements were made on the objectives specified in the Concept: enhanced quality and accessibility of public services, strengthened alignment and balance between local policies and the needs of territorial communities, and expanded mechanisms for participatory and direct democracy. Local authorities were granted additional competences to manage issues locally, resulting in a system that is more responsive to the needs of citizens and effectively devolving powers from the central government. This decentralisation reform has enabled local authorities to operate with greater autonomy and efficiency, although some objectives remain only partially realised.

10. The reform tackled the long-standing issue of defining an appropriate territorial structure for local and state authorities. Through the 2015 law "On the Voluntary Amalgamation of Territorial Communities" and its supporting methodology, the process for community consolidation began on a voluntary basis. This reform phase, from 2015 to 2019, saw the creation of 1,029 new communities, merging the previous 4,698 smaller ones, positioning it as one of Europe's most significant municipal-level reforms. In 2020, the government mandated consolidation for communities that had not voluntarily merged, defining administrative centres and boundaries for 1,470 territorial communities. That same year, the sub-regional level was consolidated, reducing the number of districts (*rayons*) from 490 to 136 (including 17 *rayons* in the temporarily occupied territories of Donetsk and Luhansk regions and the Autonomous Republic of Crimea). This reorganisation established a more effective governance structure at three tiers: 1,470 communities at basic level, 136 *rayons* at sub-regional level, and 24 regions plus the Autonomous Republic of Crimea, creating a more cohesive territorial basis for improved multilevel governance and enhancing the capacity for effective public service delivery.

11. Inter-municipal and international co-operation have become increasingly important in Ukraine. The 2014 law “On Inter-Municipal Co-operation of Territorial Communities” and the 2024 law “On International Territorial Co-operation” establish the legal, economic, and organisational frameworks for such partnerships. To further streamline these processes, a draft law, “On Amendments to Certain Laws of Ukraine Regarding Inter-Municipal Co-operation” (No. 11412), has been submitted to parliament, aiming to improve procedures for initiating, organising, and terminating co-operation agreements. This co-operation has shown positive growth: by July 2024, 744 communities had signed 495 inter-municipal agreements, while 485 communities had established 2,085 international partnership agreements across 64 countries.

12. The reform addressed the distribution of competences between state and local authorities, although multiple challenges persist. Decentralisation transferred numerous responsibilities to local governments under the subsidiarity principle, yet issues of overlapping competences remain, affecting coordination between state and sub-national levels. Moreover, the current conflict has added complexity, with military administrations temporarily assuming some local powers. In respect of military administrations of local level, there are persisting questions as to the criteria and decision-making mechanisms which would allow a swift transition back to civilian administration when the situation allows for it. There is an ongoing need to refine the distribution of competences, particularly concerning the roles (and even status itself) of rayon-level authorities, to ensure that all government tiers can function effectively without duplication.

13. One of the primary achievements is the improvement in the accessibility and quality of public services. Substantial social sectors such as secondary education or primary healthcare, adding up to over 60% of local expenditures today, have been decentralised. The 2015 law “On Amendments to Certain Legislative Acts of Ukraine regarding Expanding the Competences of Local Self-Government Bodies and Optimising the Provision of Administrative Services” empowered local authorities to expand and improve service delivery, by establishing a network of Centres for the Provision of Administrative Services (CNAPs) across all communities. A comprehensive training programme for local officials was introduced, boosting the professionalism of public service delivery at local level. Further legislation, such as the “On Service in Local Self-Government Bodies” law, has fortified the legal framework supporting these improvements, although the continuity of quality services will depend on sustained resource allocation, network optimisation, and alignment across government branches.

14. Financial decentralisation also marked a significant step forward, enabling local authorities to handle their responsibilities more robustly. With amendments to the Tax and Budget Codes in 2015, local authorities gained greater financial resources, enhancing their autonomy and capacity to respond to community needs. Following the 2020 elections, all communities entered direct financial relations with the state, receiving transfers for delegated competences, including grants and subventions for education, healthcare, and infrastructure development. Legislative changes also allowed local authorities to approve their budgets independently of the state budget’s adoption timeline, supporting smoother fiscal planning. Newly consolidated communities received rights to revenue sources, such as personal income tax (PIT), land and property taxes etc., which collectively quadrupled local budget revenues by 2021. The reform also transferred 2,306,440 hectares of state-owned agricultural land to community ownership, expanding the local resource base. However, since the 2022 Russian invasion, some of the financial decentralisation successes have been capped, reduced or are put into question. In general, the PIT system may need a comprehensive review in itself. The tax base of the PIT has already diminished with the elimination of the military and security personnel income and there are discussions about reducing the share of this tax remaining at local level and revising the “reverse subsidies” system (horizontal equalisation scheme). It is fair to state that all levels of government need to participate in the current Ukrainian war effort; however, many

local authorities already do that. The issues of financial decentralisation (or recentralisation) go beyond the scope of this analysis and are technically difficult and politically sensitive questions, which should be based on solid data. The Council of Europe's Centre of Expertise can analyse them separately if this is required; the current document will do no more than flag out their importance.

15. The decentralisation reform has created a foundation for stronger local self-government, though some objectives need further development. A reassessment of the criteria for territorial community capacity is necessary to ensure that all communities can fulfil their responsibilities effectively. Despite the successes, there is an ongoing need for continued dialogue on governance tiers, competence classification, and addressing issues stemming from the Russian Federation's war of aggression against Ukraine, such as the temporary establishment of military administrations. Overall, Ukraine's reform since 2014 has laid the groundwork for a more empowered, efficient, and responsive multilevel governance system, although future adjustments will be needed to fully realise the reform's potential.

### **Pending issues**

16. Despite substantial progress a number of problems remain relevant today, most of which were identified in the 2014 Concept. Among them can be listed:

- i. No executive bodies have been created for self-governments at *oblast* and *rayon* levels. Amendments to the Constitution of Ukraine were foreseen to enable establishment of executive bodies of *oblast* and *rayon* councils and division of competences between them and between them and Heads of local state administrations. The changes were scheduled for the first stage of implementation of the Concept (2015-2017), but this has not happened and the revision of the Constitution is not possible as long as the martial law is in force.
- ii. The role of sub-regional governance (*rayons*) is still unclear. Since 2020, debates around their role and competences have intensified, as many of their responsibilities and resources have been transferred to basic-level local authorities. This issue remains unresolved in light of recent structural changes and decentralisation efforts. This is a fundamental issue, on which the question of the division of competences depends heavily. Intermediate regional authorities are not uniform in Europe and many different systems exist; however, this is a very political issue which cannot be solved but only inspired by technical expertise.
- iii. There is still limited fiscal local autonomy. While fiscal decentralisation has vastly improved after 2014 the trend has recently been stopped and even slightly reversed. The proportion of local revenues relative to the national budget and GDP has very substantially increased but remains relatively limited, the percentage of own revenue (whose level can be decided and altered by local and regional authorities themselves) is low and a large part of state transfers is earmarked.
- iv. There has been a substantial deterioration of infrastructure. The issue of deteriorating engineering and communal networks continues, with an increased risk of man-made disasters due to aging infrastructure compounded by recent war-related damage.
- v. Incomplete legal framework for land management. While land reform has transferred significant land control to local governments, gaps remain in the legal framework for enforcing land use regulations. Local governments currently lack the legal authority to oversee land use compliance fully.

- vi. Demographic challenges. A difficult demographic situation persists, with worsening conditions due to population losses from migration, low birth rates, and casualties among civilians and military personnel as a result of the Russian Federation's war of aggression against Ukraine.
- vii. Decline in professionalism and shortage of personnel. The professionalism of local government officials remains a concern, now deepened by a quantitative shortage of skilled personnel caused by migration, military drafts, and uncertain career prospects.
- viii. Lack of transparency and corruption. Public authorities' lack of transparency and corruption are still problematic, affecting the efficient use of resources and reducing investment attractiveness in various regions.
- ix. Inconsistency in sectoral reforms: The legal and institutional inconsistencies in reforms across various sectors remain unresolved, complicating the alignment of the "reform of local self-government and territorial organisation of power" with other sectoral reforms.

17. On top of these legacy issues, Ukraine encountered new, large-scale challenges after the 2022 Russian Federation's war of aggression against Ukraine. In response to security concerns, in 2015 Ukraine established 20 military-civilian administrations (MCAs) by a presidential decree, including two regional MCAs in Donetsk and Luhansk and 18 at community level. Following the imposition of martial law in February 2022, MCAs transitioned into military administrations (MAs) under the law "On the Legal Regime of Martial Law". This led to the formation of *oblast* and *rayon* MAs and, by July 2024, a total of 192 community-level MAs. As a result, varying governance models exist depending on territorial status, security, and the functionality of local self-government: (a) some communities operate fully under local authorities; (b) in others, MAs assist local authorities with selected competences; (c) certain MAs assume all local self-government functions; (d) in temporarily occupied areas, neither MAs nor local authorities function; (e) four MCAs remain in Donetsk region. This re-centralisation, driven by the Russian Federation's war of aggression against Ukraine, deviates from the European Charter of Local Self-Government but is deemed necessary under martial law. However, these centralising measures should be based on law in order to ensure legal predictability, should be proportional with the legitimate objectives pursued, be clearly limited in time and lifted as soon as the situation allows for it and must not create a "culture of subordination" between locally elected authorities and the territorial representation of the state, be they military or civilian.

18. The Russian Federation's war of aggression against Ukraine has severely undermined the progress of financial decentralisation, destabilising local budgets due to volatile tax legislation and additional unplanned expenses. Communities face multiple financial challenges, including reduced revenues, instability in budget planning, unfunded transferred responsibilities, voluntary military support, and population migration. Monitoring data from the Ministry of Regional Development reveals a sharp decline in local financial capacity: the share of own revenues (general fund without transfers) of sub-national (local, regional and sub-regional) budgets in GDP fell from 7.7% in 2022 to 6.8% in 2023, and their share in consolidated national budget was at a historic low of 17.8%. The share of sub-national budget expenditures in the consolidated budget of Ukraine have decreased to 14.3%, also significantly lower than previous years. These figures had considerably increased since 2014 during the financial decentralisation part of the reform and their decrease during the war is not a big surprise per se; however, for reference in unitary OECD countries the proportion of sub-national spending is on average around 9% of GDP and 28% of public expenditure. Consequently, local authorities lack the resources to fulfil their legal duties, a problem intensified by ongoing tax policy changes, such as the shift to the central budget of a so-called "military personal income tax". Furthermore, unresolved issues in tax administration, investment policy, transparency, budget efficiency continue to hinder effective financial governance.



19. For a full transition to decentralised multilevel governance, Ukraine must amend its constitution to formally establish the legal foundation for local self-government and state sub-national structures. Such amendments would clearly define the division of powers between local authorities and state authorities, but such changes will have to wait until martial law is lifted. The principle of “accountability of local authorities to state executive authorities regarding respect of the Constitution and laws of Ukraine” has not yet been implemented, despite several legislative initiatives. More details can be found in the Council of Europe’s opinion on the draft law “On Amendments to the Law of Ukraine ‘On Local State Administrations’ and Other Legislative Acts of Ukraine on Reforming Territorial Organisation of Executive Power in Ukraine” ([CEGG/LEX\(2024\)1](#)). Overall, the relations between locally elected bodies and state administrations remains insufficiently defined at all levels. There is a need for a mechanism that enables local state administrations to conduct legality supervision as well as monitoring of the quality of public service delivery, within a system which is protective of both citizens’ interests and local self-government itself. Current practices vary across the territory, resulting in inconsistent results. Additionally, achieving sustainable territorial development, as outlined in the reform principles, remains challenging and currently unrealistic under martial law.

20. Furthermore, Ukraine has no legislative framework for local referendums, and martial law prohibits all types of elections, referendums, strikes, mass gatherings, and other citizen-led political protests.

### III. Conclusions and recommendations

21. The commitment of Ukrainian authorities to complete the decentralisation process seems strong, in line with the four major objectives set in 2014 and mindful of the new challenges arising from the Russian Federation’s war of aggression against Ukraine, it is recommended to update the Concept of the reform of local self-government and territorial organisation of power in Ukraine. The new document should emerge from an extensive consultation process, engaging state and local authorities, independent experts, and civil society, if so required with support from the Council of Europe. While the updated Concept would largely follow the structure of the 2014 version – retaining the broad vision of reform and horizontal principles of transparency, subsidiarity, legality, accountability, and social dialogue – it should refocus on current challenges and areas where reforms remain incomplete. A number of points for consideration are outlined below.

22. Clarify the roles and responsibilities of *rayons* and *oblasts*. Given the current ambiguity in the role of rayons, a clear and formalised distribution of powers across all tiers is essential. This restructuring should consider recent territorial reforms and focus on how *rayons* contribute to regional development, specifically in light of their downsized administrative reach. The status of and division of functions between *rayon*, *oblast*, and *hromada* authorities subsidiarity should be clear, based on the principles of good democratic governance and on broad consensus of the Ukrainian stakeholders and society as a whole. Moreover, the general principles for the division of responsibilities and relation between state and local authorities should be, as far as possible, unified in line with the European Charter of Local Self-Government for all tiers and for all administrative and territorial units.

23. The legal framework for local self-governance should be improved. To create a sustainable foundation for decentralised governance, Ukraine should establish a legal base for regional executive bodies in *oblast* and *rayon* councils, if they are not discontinued as a tier. This would create a clear division of authority between local and central governments, solidifying local governments’ autonomy. In particular *oblasts*, which are likely to be Ukraine’s future NUTS 2

regions, will have extensive responsibilities in EU funds programming and implementation; a strong administrative capacity is required to manage these tasks effectively.

24. Update legality supervision over local authorities' activities, to establish a single specialised mechanism, aligned with the European Charter of Local Self-Government and other standards of the Council of Europe. Based on the Council of Europe standards and on models from EU countries, the prefectural role should be balanced to prevent excessive control while providing adequate supervision and consultation. Preparations should include refining the supervisory role and drafting legislation. In addition, until the Constitution is amended there should be a clear distinction between: (i) units of local state administrations responsible for coordinating territorial divisions of central executive bodies, (ii) units responsible for legality supervision, and (iii) units tasked with implementing specific local government functions. This separation of functions will facilitate a smoother transition in the future towards a prefecture-type administrative body.

25. While the constitutional amendments necessary for some changes mentioned in the previous paragraphs must wait until martial law is lifted, preparatory consultations and legislative drafts could be developed to streamline their post-war implementation.

26. Strengthen the mechanisms for inter-municipal (IMC) and international co-operation, by expanding the legislative and financial support for such initiatives; co-operation in metropolitan zones as a sub-category of IMCs is of particular importance. By pooling resources, neighbouring municipalities can tackle issues like waste management, water supply, and road maintenance more effectively. In parallel, encourage partnerships between Ukrainian communities and international municipalities to exchange best practices, attract investment, and build resilience. Fostering these relationships could provide local authorities with technical assistance and financial resources.

27. Specific attention should be given to the issue of governance of large metropolitan areas, typically composed of several municipalities, with little to no co-operation on important urban development issues like urban planning, services and infrastructure integration. Several systems of metropolitan governance exist in Europe and the Congress' Centre of Expertise has already supported the creation of common visions and associations of municipalities in Kyiv and Lviv; this can inspire further governance and legal reform.

28. Strengthen the financial autonomy and stability of local authorities. Implementing stable, predictable tax policies is crucial to ensuring the reliability of local revenue sources. Establishing clear rules for tax collection and administration, alongside a commitment to avoiding abrupt policy shifts (such as the recent centralisation of the personal income tax paid by military personnel), would create a more secure financial environment for local authorities. Direct fiscal relations with the state budget should be preserved and expanded, enabling communities to budget effectively without relying excessively on transfers. Additionally, central government transfers should be timely and clearly regulated to support local fiscal autonomy. While it is understandable that full financial predictability at the local level is not achievable during the ongoing Russian Federation's war of aggression against Ukraine, it would still be beneficial to begin negotiating a stronger framework for the post-war period.

29. Align the revised Concept explicitly with the EU accession process, reflecting the significantly changed context compared to ten years ago. This should incorporate observations from the European Commission's annual country reports and recommendations from documents like the 2023 EU Regulation on establishing the Ukraine Facility instrument.

30. Address human resource and professionalism challenges in local authorities by providing ongoing training and professional development opportunities for local public officials. Programmes

in public administration, budget management, and service delivery could enhance the skill levels of officials, especially in smaller communities that may lack experienced staff. To address the shortage of qualified personnel, particularly in conflict-affected areas, incentives may be considered such as competitive salaries, career growth opportunities, and relocation assistance. This would encourage skilled professionals to enter or return to local administration, improving service delivery. Clearer career pathways, competitive compensation, and support mechanisms would help retain talent within the local governance sector.

31. Further develop and implement legal framework for direct democracy and community participation, for instance through local referenda, allowing communities to take part directly in significant local decisions. Promote self-organisation at community level, creating neighbourhood associations or advisory councils to represent residents' needs. A formal process to recognise and collaborate with these organisations would strengthen the government-community relations.

32. Plan for a gradual but predictable (based on law on clear criteria and decision-making mechanisms) and orderly transition from military to civil administration by making sure that military administrations' powers are clearly limited, temporary, and focused on security and essential functions. The local authorities should progressively regain their full powers as soon as conditions in their area permit. A phased reintegration plan for local authorities in areas currently under military administration should be considered. This plan should include provisions for restoring civilian governance, rebuilding public trust, and addressing any service gaps that occurred during military administration. It should also be made clear that the exceptional centralisation measures are limited to the period of martial law, avoiding any practices that might foster a "culture of subordination" between locally elected authorities and the territorial representation of the state, be they military or civilian.

33. When revising the objectives and tasks of the Concept, it would be helpful to incorporate a timeline that clearly sequences the implementation steps. This should distinguish which measures are feasible while the war is ongoing and which can only be enacted after the end of the martial law regime. Additionally, modernising some of the politico-administrative terminology would be beneficial. It would also enhance the national legal framework to incorporate gender-sensitive language.

**List of participants in the online consultations  
October 2024**

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6. Ms Natalia CHUKOVA, Head of Department on Co-operation with Local Authorities of Donetsk Regional State (Military) Administration
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8. Mr Yuriy HANUSHCHAK, Director of the NGO “Institute for Territories Development”
9. Ms Yanina KAZIUK, Independent Expert
10. Mr Oleksandr KORINNYI, Novoukrainka City Mayor (Kirovohrad region), President of the Association of Amalgamated Territorial Communities
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14. Mr Vasyl KUYBIDA, Advisor to the Parliamentary Committee on Organisation of State Power, Local Self-Government, Regional Development and Urban Planning, Minister of Regional Development and Construction of Ukraine in 2007-2010
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16. Ms Khrystyna MARCHUK, Deputy Director of Directorate for Regional Development – Head of Division of Strategic Planning of Chernivtsi Regional State (Military) Administration
17. Mr Dmytro MYKYSHA, Member of the Parliament of Ukraine, Member of the Parliamentary Committee on Organisation of State Power, Local Self-Government, Regional Development and Urban Planning

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21. Ms Oksana PRODAN, Advisor to the President of the Association of Ukrainian Cities
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33. Ms Tetiana YEGOROVA-LUTSENKO, Chair of Kharkiv Regional Council, President of the Ukrainian Association of Rayon and Oblast Councils
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