



Polaris

Supporting Multilevel
Governance in Ukraine



LOCAL EUROPE IN UKRAINE

Overview of the impact of EU integration
on local authorities



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LIST OF ABBREVIATIONS

AAATC	All-Ukrainian Association of Amalgamated Territorial Communities
ASC	Administrative Service Centre
AUAC	All-Ukrainian Association of Communities
AUC	Association of Ukrainian Cities
CERV	Citizens, Equality, Rights and Values (EU programme)
CoR	EU Committee of the Regions
CSO	Civil Society Organisation
DPM	Deputy Prime Minister
EBRD	European Bank for Reconstruction and Development
EC	European Communities
EIA	Environmental Impact Assessment
GDP	Gross Domestic Product
JCC	Joint Consultative Committee
LAG	Local Action Group
LEADER	Links between the rural economy and development actions (in French)
LGA	Local Government Association
MDCT	Ministry for Development of Communities and Territories of Ukraine
MEEA	Ministry of Economy, Environment and Agriculture
NDICI	Neighbourhood, Development and International Cooperation Instrument
NGO	Non-Governmental Organisation
NUTS	Nomenclature of Territorial Units for Statistics (in French)
OECD	Organisation for Economic Cooperation and Development
PAR	Public Administration Reform
PIM	Public Investment Management

SALAR	Swedish Association of Local Authorities and Regions
SCTM	Standing Conference of Towns and Municipalities (Serbia)
SEA	Strategic Environmental Assessment
SECAP	Sustainable Energy and Climate Action Plan
SFRD	State Fund for Regional Development
SGEI	Services of General Economic Interest
SME	Small and Medium-sized Enterprise
UAROR	Ukrainian Association of District and Regional Councils
UAH	Ukrainian hryvnia (currency)
UNDP	United Nations Development Programme
VAT	Value Added Tax

EXECUTIVE SUMMARY

This report considers how EU accession is likely to affect local authorities in Ukraine based on experience in other candidate countries and recently acceded member states, and an overview of alignment with EU legislation in Ukraine. While not a fully-fledged impact assessment (this would require more detailed examination of EU requirements and implementation on the ground in municipalities), it suggests several general conclusions:

- EU accession has a profound impact on local authorities. The EU's Committee of the Regions estimates that over 70 per cent of EU legislation is implemented at the local and regional level, and indeed the analysis here shows that **over half of the 35 chapters of the EU 'acquis'** raise concrete issues for local authorities.
- However, in the past local authorities have **not been sufficiently engaged** in the process. There is a risk that mayors 'wake up too late' to find that they are ill-equipped to meet commitments that have been made on their behalf and to take full advantage of funding opportunities. This can lead to problems for the country as a whole.
- Local authorities need to **build capacity** – both human and financial – to play their part in moving towards EU standards. If they lack capacity, there is a risk that accession could lead to **unintended recentralisation**, where certain functions shift back to central government or its territorial branches.

In the present candidate countries, there is greater awareness of the challenges and opportunities that EU integration brings. **Local government associations (LGAs)** have a vital role as organisations with the foresight both to represent local interests with central government and to help prepare their members, who have many other day-to-day priorities to contend with.

The following examples (among many more in section 3 of the report) give a flavour of the types of impact that may be anticipated.

- Municipal clusters will need to invest in 200 **waste management** facilities (at a cost of over EUR 40 million each), while 6,000 **municipal landfills** need to be closed and recultivated. Modern **water treatment plants** are needed to rectify today's situation where only half of wastewater undergoes full biological treatment and a third is discharged untreated into water bodies. Ukraine will negotiate transition periods in these areas, but should still take care to avoid emulating some recent EU members, who received **substantial fines** from the EU Court after missing extended deadlines.
- LGAs should be more involved in the **inclusive partnership that decides on the use of EU funds**, including the substantial regional, social and cohesion funds post-accession. The commitment to allocate over EUR 1 billion of grants under the Ukraine Facility to the sub-national level is welcome, but it will be a missed opportunity if the government distributes this through earmarked grants rather than project-based support, for example through the State Fund for Regional Development.
- Ukraine is a long way behind its neighbour Moldova when it comes to creating Local Action Groups that can benefit from parts of EU **rural development funding**. Most amalgamated municipalities contain rural areas, and local authorities could foster the formation of such groups together with business and civil society representatives. Some recent EU members had to negotiate down the amount of funding available for these groups because not enough were ready.

- With important responsibilities in **social protection and social services**, municipalities in Ukraine will need the administrative capacity to implement a new system for procurement of these services in line with EU standards. Mistakes in **procedures** can lead to unnecessary delays and legal costs. LGAs should also ensure that the state does not make procedures more complex than the EU actually requires.
- Local leaders should be aware of the EU rules on **state aids**. Careful preparation is needed to ensure, for example, that tax breaks for industrial parks or subsidies to local public utility companies are compliant. Otherwise, the day after accession, a complaint to the EU Commission can trigger serious consequences, including disruption of services and even insolvency of recipients of aid found to be illegal.
- **Decarbonisation of energy and transport** in line with EU climate goals entails significant costs for municipalities to modernise vehicles, shift towards renewable fuels in district heating, improve energy efficiency of buildings, etc. But as Ukrainian municipalities 'build back better', they have chance to lead the agenda with plans for sustainable energy and climate action and sustainable urban mobility, involving citizens through measures ranging from cycle lanes to support for home insulation.
- Municipalities face significant costs in **healthcare, public transport** and other areas to make services accessible to people with disabilities, in line with EU standards on non-discrimination. On the other hand, this is one clear example among many of how local action to meet EU standards can improve quality of life.

Ukraine's situation is **unique among the candidate countries**, owing not only to the war but also to the rapidity of the accession process so far, the high degree of decentralisation following the post-2014 reforms, and the strong support from the EU for the continuation of these reforms. This raises the stakes for municipalities and makes the role of LGAs if anything even more important.

Some of the preconditions for strong local engagement in the accession process would seem to be fulfilled, even if involvement thus far has been somewhat focused on regional policy – an important area, but far from the only one. Section 5 of the report makes several suggestions for further improvement, among which:

- The four all-Ukrainian LGAs, while their interests are not wholly aligned on all matters, would benefit from **speaking with one voice on EU integration**. They could for example advocate for more seats on working groups underlying the accession negotiations (e.g. on environment or rural development) and for greater involvement in prioritising and monitoring the use of EU funds.
- Continued **dialogue with the EU institutions** is highly recommended to press the case for fulfilment of the Ukraine Plan indicators on decentralisation (including e.g. amendments to sectoral legislation to clarify the division of powers) and perhaps to open up future project opportunities. LGAs should also deepen their understanding of forthcoming changes in the **post-2027 EU financial framework**.
- There are various ways for **donor projects to support the LGAs** on EU accession – for example, deeper impact assessments on key chapters of the acquis or local functions such as urban planning, funding of EU officers to coordinate networking activities, or training and information materials targeted at local officials.
- Projects could also consider support to the newly appointed **Deputy Heads for EU integration** in the regional military administrations, provided that this involves genuine engagement of local self-government, not merely supervision.

1. INTRODUCTION

This report provides an overview of how EU accession may be expected to affect local authorities in Ukraine. It is based partly on the experience of other candidate countries and recently acceded member states, and partly on an overview of Ukraine's progress to date on alignment with EU legislation and implementation of EU standards at local level. It does not set out to be comprehensive – this would require a more in-depth examination of EU and national legislation in different sectors, further study (ideally involving some fieldwork) of implementation on the ground, and a much longer report.

Thus, the aim is not to predict the impact of accession or to list every challenge and opportunity for local authorities. It is rather to demonstrate the significance of EU accession for the local level, and how the costs and benefits will depend on the quality of preparation by both central and sub-national authorities. While broad, such an overview may also help local representatives to identify topics that merit deeper investigation.

Ukraine's situation as compared with other candidate countries

When it comes to local preparations for EU accession, Ukraine differs from the other candidate countries in several important respects. First, local self-government in wartime faces different and more urgent challenges. Besides the loss of life and large-scale destruction of infrastructure, local authorities have had to cope with organising territorial defence and support to the armed forces, evacuating residents or receiving millions of internally displaced persons, acute shortages of skilled staff, reduced funding due to other imperatives, and wholesale reorientation of local development goals towards short-term recovery. Their response is widely seen as part of the explanation for Ukraine's extraordinary resilience, and as validation of the post-2014 decentralisation reforms.¹

It may seem difficult in present circumstances to turn attention to some of the technical issues raised in this report. However, the EU's role in Ukraine is also conditioned by the war, and looking ahead, local representatives have an interest in making the most of the opportunities that EU integration may offer to accelerate recovery and reconstruction.

A second difference is that Ukraine's **accession process has been unusually rapid** thus far – from formal application (February 2022) to completed screening (September 2025) in two and a half years. Local authorities and associations have had much less time than their counterparts in the Western Balkans to appreciate the changes that alignment with EU standards will bring.

Thirdly, Ukraine is still **in the midst of a major decentralisation reform**. While some aspects are on hold due to the war, the EU has strongly backed the continuation of this reform. In particular:

- The EU Commission's 2025 report on Ukraine underlines that decentralisation 'should remain a central element of Ukraine's efforts to fulfil the requirements of EU accession'.²
- The Ukraine Plan (which details agreed reforms and indicators of progress required to disburse funding from the EUR 50 billion Ukraine Facility) includes a chapter on decentralisation. Among the agreed reforms are advancing decentralisation, involving citizens in local-level decision-making and strengthening the development and implementation of regional policy.³
- At least 20 per cent of the grants under Pillar I of the Facility (over EUR 1 billion) are to be 'allocated to the recovery, reconstruction and modernisation needs of Ukraine's sub-national authorities, in particular local self-government'.⁴

¹ See e.g. Maryna Rabinovych et al, Explaining Ukraine's resilience to Russia's invasion: The role of local governance, Governance, Vol. 37, Issue4 (October 2024) pp. 1121–1140.

² Commission Staff Working Document, Ukraine 2025 Report (accompanying the 2025 Communication on EU enlargement policy), SWD(2025) 759 final, 4 November, p. 23.

³ Ukraine Plan 2024 – 2027, pp. 184–194.

⁴ Article 16 of the Ukraine Facility Regulation.

- The Roadmap for Public Administration Reform also contains measures relating to local governments and EU accession. Besides the legislative measures needed to fulfil the Ukraine Plan indicators, this mentions training for local officials to strengthen their capacity to meet EU requirements.⁵

On the face of it, this puts **local authorities in a stronger position than their counterparts in the other candidate countries** when it comes to engagement in the accession process. However, a few caveats must also be mentioned.

- Decentralisation remains incomplete, especially at the district and regional levels. Constitutional changes, impossible in wartime, are needed to complete the process. Meanwhile, district councils have very limited functions and resources, and neither district nor regional levels have executive bodies.
- Related to this, the territorial branches of the state at regional and district level continue to play a relatively significant role. This is partly the result of the inevitable centralising pressures of wartime, with the state administrations restructured into regional and district military administrations under martial law. But even on non-military matters, the state assumes functions that might otherwise fall at least partly to regional or district councils – the recruitment of Deputy Heads of the regional administrations to coordinate preparations for EU accession is one example.
- Even before the full-scale Russian invasion, some tendencies towards recentralisation were observed. In social protection, for example, the Ministry of Social Protection was already working on a central platform for delivering social support, and transfer of some powers from municipalities to the Pension Fund of Ukraine occurred in 2022 and 2025.
- While the EU's encouragement for decentralisation is welcome, it is not clear how rigorously the benchmarks in the Ukraine Plan will be applied. For example, one indicator (with a deadline of Q1 2026) concerns a clearer delimitation of powers among municipalities, districts and regions and between local and regional self-government and the state. A draft law on the general concept of this delimitation is in preparation, but the sectoral amendments needed to clarify powers for example on management of land, forest and water resources seem to be on hold.
- Likewise, while the commitment to allocate 20 per cent of Ukraine Facility Pillar I grants (over EUR 1 billion) to sub-national authorities is without parallel in the other candidate countries, it is unclear how much additional funding this will mean, or how much say local authorities will have over its use.

These topics and more will be explored in more detail in section 3 and 4. Suffice it to say for now that, although the preconditions for local engagement in EU accession appear favourable at first sight, local representatives may still need to insist on their place in the process.

Key aspects of local and regional self-government

A fourth difference is that, despite the unfinished business of decentralisation, at the municipal level Ukraine is already **more decentralised** than most if not all of the other candidate countries and indeed many EU member states.

Administrative-territorial reform from 2015 to 2020 reduced the number of first-tier units from 11,694 to 1,469 amalgamated municipalities (hromadas) and the number of second-tier districts (rayons) from 490 to 136. There are 24 regions (oblasts, excluding the autonomous republic of Crimea and two cities with special status, Kyiv and Sevastopol). Municipalities received additional functions (including most of those of the districts) and resources. With an average population of around 27,000, municipalities are larger than those in, for example, Norway or Poland, so that size is no obstacle to providing a wide range of services.

⁵ Roadmap for Public Administration Reform (in Ukrainian).

Municipal competences include healthcare (some municipal hospitals being more advanced than state ones), management of pre-schools, schools and vocational schools, social services (including veteran care, care for families of soldiers, etc. and thus under increased workload), civil protection, environment (waste management, water management, mitigation of climate change, etc.), consumer protection, and more.⁶

Despite these extensive responsibilities, sub-national government expenditure before the war, at 11.3 per cent of GDP, was significantly below the OECD average (17.1 per cent in 2020).⁷ The war has led to a large increase in the state budget, financed in part by increased taxes and the transfer of some revenues (in particular, tax on personal income from military personnel) from local budgets to the state budget. While the state budget grew by 41.1 per cent in 2024, local budgets grew by 2.1 per cent, well below the rate of inflation. Unlike the state budget, however, local budgets have on average remained balanced, even recording a small surplus (UAH 7.7 billion) in 2024.⁸

Taxation (primarily a share of personal income tax, the 'single tax' on small businesses, and property tax) accounted for 62 per cent of local revenues in 2024 – a relatively high share, which would normally suggest considerable fiscal autonomy. However, state grants for delegated functions do not fully cover costs – over 40 per cent of the cost of education (the largest expenditure item) must be covered by own revenues. Furthermore, own revenues in most communities, especially smaller and medium-sized ones, have declined sharply due to the war. The important point for present purposes is that there is very little margin in local budgets, still less in the state budget, to cover any additional costs that preparing for EU accession may bring for local authorities. A key question for local government representatives will be the extent to which funding from the EU and other international partners can be used to help build capacity at local level.

Ukraine has four **local and regional government associations** with nationwide coverage: the Ukrainian Association of District and Regional Councils (UAROR), the Association of Ukrainian Cities (AUC), the All-Ukrainian Association of Amalgamated Territorial Communities (AAATC), and the All-Ukrainian Association of Communities (AUAC). For brevity we will use the term **local government associations (LGAs)** to refer to these.

Within central government, the **Ministry for Development of Communities and Territories of Ukraine (MDCT)** has responsibility for local and regional self-government and for regional policy, including the future arrangements for EU structural and cohesion funds. Other line ministries such as the recently merged **Ministry of Economy, Environment and Agriculture (MEEA)** oversee preparations in other EU-related policy areas of high relevance to local authorities. Another key actor in the context of EU accession is the **Office of the Deputy Prime Minister (DPM) for European and Euro-Atlantic Integration**, with responsibility for coordinating the negotiation process.

⁶ Based on the [Law on Local Self-Government in Ukraine](#).

⁷ [World Observatory on Subnational Government Finance and Investment](#). For the EU, the comparable figure would be 18.1 per cent of GDP (11.6 per cent local plus 6.5 per cent state).

⁸ Ihor Onyshchuk, [Analysis of the implementation of local budgets for 2024](#) for the Polaris project

2. HOW HAS EU ACCESSION AFFECTED LOCAL AUTHORITIES ELSEWHERE?

2.1. OVERVIEW

In the EU, it is up to each Member State to decide how to organise local and regional self-government. This is stated in the Treaty on European Union and is obvious from the wide diversity of systems among (and even within) Member States.⁹ Nevertheless, local and regional self-government is (since the Lisbon Treaty, in force from 2009) recognised in the Treaty, and local and regional representatives have had since 1994 a significant advisory role in the legislative process through the EU Committee of the Regions (CoR).

According to the CoR, 'the local and regional level is responsible for implementing more than 70 % of EU legislative acts', a figure that is regularly cited by representatives of EU institutions.¹⁰ Studies of local council agendas in decentralised Member States typically show that around half the agenda items are influenced by EU legislation and policy.¹¹



EU accession means taking on a large and essentially non-negotiable body of treaties, legislation, case law, etc. known as the EU 'acquis'.¹² Some of this applies directly (e.g. the General Data Protection Regulation), some through national legislation that implements EU directives (e.g. the Energy Efficiency Directive). Again, it is up to each Member State to decide how much responsibility to place on local authorities, but in decentralised systems, the 'competent authorities' mentioned in EU laws (e.g. for issuing permits under the Services Directive or registering food providers under food safety regulations) are very often municipalities.

It may not always be obvious that changes in national legislation are due to alignment with the acquis, and following this process is easier said than done given the large volume of EU acts that must be transposed and/or implemented. Nevertheless, it is useful for LGAs to anticipate forthcoming changes and to try and influence the process of alignment, since it is at this stage that there is **some flexibility in determining exactly how EU standards are implemented**. To give one example, in some countries appeals against municipal procurement decisions (purchases of goods, services and works) are handled solely through the courts while in others they first come before an independent review board, which may have implications for the cost and duration of appeals.

Thus, before we even mention EU funding, it is clear that local authorities in a country joining the EU have a great deal to prepare for. This is confirmed by numerous assessments, both ex ante and ex post, of the impact of EU accession on local governments (see the Bibliography).

In addition, especially in countries where national income is below the EU average, local authorities can expect to benefit from substantial financial assistance, aimed partly at helping to meet EU standards.

⁹ Article 4 of the Treaty states that the EU shall respect its members' 'national identities, inherent in their fundamental structures, political and constitutional, inclusive of regional and local self-government.'

¹⁰ Committee of the Regions (2006), Opinion of the Committee of the Regions on Guidelines for the application and monitoring of the subsidiarity and proportionality principles (2006/C 115/08).

¹¹ See e.g. SALAR, The EU in Local Politics: A Study of Agendas from Municipalities, County Councils and Regions (2020) for one such study and references to others.

¹² From the French *acquis communautaire*, meaning that which has been acquired by the Communities, now Union.



In Croatia in the early years after accession, EU funds accounted for nearly 80 percent of local public investment.¹³

Some of these funds may be managed by line ministries or agencies at central or regional level, but it remains a vital local interest to understand how resources are allocated and programmed, and what local authorities can do to help make effective use of them.

Another aspect, perhaps more relevant to the present candidate countries than in previous enlargements, is that local representatives and administrations are often **trusted sources of information**. At a time of pervasive disinformation campaigns, they can play a valuable role in explaining to citizens the reality (both opportunities and obligations) of EU integration.

Looking at the experience of previous accessions, we may observe several different **types of impact** on local authorities (or on local authorities' ability to serve their citizens), including:

- Direct financial benefits from EU-funded projects.
- Quality-of-life benefits from upgraded (e.g. environmental) standards.
- Potential cost reductions through larger market access or increased transparency in use of public funds.
- Greater openness to international contacts and partnerships.
- Substantial investment costs to upgrade infrastructure and services.
- Compliance costs (and administrative challenges) of meeting new requirements.
- Legal problems (ultimately fines) in case of compliance failures (usually for the state, though local authorities or related bodies may be subject to damages and/or sanctions in some areas).
- Potential delays and/or disruption of services (e.g. where illegal state aid granted or where tender procedures appealed against).

A successful accession from the local perspective would be one that maximises the benefits and minimises the costs outlined above. The next sub-section will cover specific policy areas and chapters of the EU acquis, while section 4.1 will consider what LGAs can do to help their members to prepare. Meanwhile, experience to date suggests several general themes.

First, **early preparation** is advisable, at least at the level of LGAs. If local representatives wait until a date for accession is known, it will be too late to influence alignment of national legislation with the EU acquis, and arrangements for distribution of EU funding may already be in place. In some of the countries that joined the EU from 2004, mayors arguably 'woke up too late' to find (for example) that their town of a few thousand inhabitants would need a new water treatment plant, but that plans and funding for this were not in place.

LGAs may need to insist on being involved in the process. Experience suggests that the default position of national negotiators (who have enough work coordinating input from different parts of central government) is not to involve local representatives, or to put them in the same bracket as business, labour, academia and civil society organisations, perhaps in some parallel consultation process. LGAs need to underline the message that local government – with responsibility for implementing large parts of the EU acquis – is **more than just a stakeholder**.

¹³ Marko Ercegović, 'Experience from Croatia,' ch. 7 in A. Duman et al., The impact of EU accession on local authorities in Bosnia and Herzegovina (draft report for SALAR International, 2019).

Basic awareness among the local leadership is one useful objective for LGAs, which may help to anticipate potential problems and call on expert advice where needed. Examples here include non-transparent subsidies or other economic advantages to local companies (including municipal-owned ones). Mayors or municipal directors do not need to be experts in the voluminous case law on state aids, but they need to be aware that decisions such as favourable property transactions or below-cost access to local services could be problematic if not carefully prepared.

Over-implementation or ‘gold-plating’ of EU standards is sometimes an issue – that is, where national implementation of EU acts (usually directives) goes further than what the EU requires, which can lead to additional costs for local authorities. Examples here include energy-saving targets or procurement procedures for lower-value contracts. This is another reason why local representatives should aim to be consulted on legislative alignment.

Compliance failures at local level often have **legal consequences for the state** – a helpful argument when advocating for local capacity to implement EU requirements. To take a couple of examples from the environmental field, it was Sweden that found itself in the EU Court when some municipalities failed (partly due to unclear instructions from the national authorities) to meet commitments to monitor the quality of bathing water.¹⁴



Likewise, it was Romania, not municipalities, that received a fine of EUR 1.5 million plus EUR 600 per day for each of 31 unauthorised municipal landfills that it had failed to close, despite an earlier EU Court judgment and a temporary derogation of over 10 years from the requirements of the Landfill Directive.¹⁵

In some cases, local authorities themselves may face consequences. For example, mistakes in procurement procedures may expose a municipality to claims for damages from bidders who believe they were unfairly treated. Or if a municipality grants illegal state aid to a local enterprise, that enterprise will be liable to repay the amount received plus interest – which may be positive for the local budget, but potentially devastating for the enterprise and any local services it provides. Local authorities should also be aware of the principle of **direct effect** in EU law, which means that individuals or interest groups can appeal on EU legal grounds in the national courts. Thus, even if national authorities do not rigorously implement EU legislation, it may still be (and often is) enforced by the judiciary. Examples here include failure to take action to meet air quality targets¹⁶ and a local tax on alcoholic beverages which turned out not be compliant with the EU directive on excise duty.¹⁷

It will be seen from these examples that the timing of the impact may vary. Infringement proceedings and court cases can take several years to reach a conclusion. But there is also potential for **‘day one impact’** in some areas. An example here is state aid, where the EU Commission may decide to launch an investigation on its own initiative or based on a complaint from an interested party (e.g. a competitor to the operator receiving aid).¹⁸

The accession process creates huge **demand for capacity at all levels of government.**

¹⁴ Case C-368/00 Commission v Sweden.

¹⁵ Case C-109/22 Commission v Romania.

¹⁶ Case C-752/18 Deutsche Umwelthilfe eV v Freistaat Bayern (here the question even arose of whether a regional politician could be jailed by a national court for failure to meet EU requirements).

¹⁷ Case C-437/97 EKW and Wein & Co.

¹⁸ An interesting case here is *Komunala Izola*, where two private marina operators complained that the public utility company operating the municipal marina was receiving unfair advantages. In brief, the decision favoured the municipality, but for rather specific reasons. It might be a useful exercise for all local public utility companies to consider possible outcomes if their arrangements with the municipality came under similar scrutiny.



Moldova's recently adopted programme for EU accession, for example, covers some 3,000 EU acts that need to be transposed and/or implemented.¹⁹

The tendency for central government to prioritise capacity-building of national civil servants is perhaps understandable.

The most important issue for LGAs is **how to ensure local authorities have the necessary capacity, both human and financial** to implement aspects that fall under their responsibility, from local cooling and heating plans to environmental impact assessments, from energy-efficient buildings to rural development strategies – and many more examples in the sections to follow.

Part of the answer lies in making good use of EU funding opportunities, but the experience of recently acceded countries has been that **EU funding is often more difficult than expected for local authorities to access**.

This is partly because line ministries, central agencies and regional branches of the state will happily assume control of these resources, and partly due to difficulties in preparing, co-financing and managing projects at the local level. Naturally, it is important for the country as a whole to find the most efficient ways to absorb EU funding. But a key interest for LGAs to advance early in the accession process is local involvement in the **inclusive partnership** that is supposed to prioritise how EU funds are used and monitored.

Finally, what impact might the EU accession process have on **decentralisation**? Judging by the regular 'enlargement package' reports, the EU adopts a differentiated approach, explicitly encouraging decentralisation where this is a national objective (e.g. Ukraine) while saying little on the subject in countries where further decentralisation is not on the agenda (e.g. Bosnia and Herzegovina).

Joining the EU entails in essence a transfer of sovereignty from national to EU level, which could in some instances strengthen local autonomy, especially if additional EU funding is available.²⁰



Some local representatives in Sweden said that joining the EU had made them 'less dependent on Stockholm'.²¹

Given constraints on central government capacity, local authorities could gain new competences – e.g. in food safety inspections or monitoring of environmental data – along with accession.

On the other hand, there is also a risk that accession could lead to **unintended recentralisation** if lack of capacity at local level to meet EU standards leads to functions being shifted to regional or central government.

There are arguably signs of this in some of the candidate countries in areas such as environmental inspections or waste and water utility services. Thus, safeguarding local autonomy is another reason for LGAs to be engaged in the accession process.

¹⁹ National Programme for the Accession of the Republic of Moldova to the EU 2025–29.

²⁰ Consider for example a city suffering from air pollution, where national requirements before accession were undemanding and resources to address the problem insufficient. Accession will bring stricter standards and a more enforceable requirement to develop air quality plan. But it will also bring additional resources, and the measures in the plan will be locally decided.

²¹ Sex år i EU, p. 13.

2.2. RELEVANT CHAPTERS AND AREAS OF THE EU ACQUIS

Figure 1 shows the chapters and areas of the EU acquis. Those generally seen as relevant or important to local authorities are highlighted, based mainly on whether local government associations in the current candidate countries have conducted impact assessments and/or been involved in working groups or similar underlying the accession negotiations. A disclaimer is needed here: there are issues of relevance to local governments in most chapters, and depending on local competences and country-specific factors, there might be issues that are more important in Ukraine than elsewhere. Thus, this figure and the following table are intended as no more than a broad guide based on experience to date.

FIGURE 1: CHAPTERS AND AREAS OF THE EU ACQUIS – RELEVANCE FOR LOCAL AUTHORITIES



Source: Based on the EU Commission's overview of acquis chapters and survey responses from LGAs from 7 out of 9 candidate countries for the Platform 'EU-EaP Local Leaders Seminar: Strengthening Local Government Capacities for EU Engagement in the EaP Region', Brussels, November 2024. For chapters shaded in yellow (orange, red), at least one (two, three) LGAs have conducted an impact assessment or taken part in working groups underlying the accession negotiations.

Chapters 34 (Institutions) and 35 (Other issues) are not shown in the diagram; these are not part of the clusters but are addressed at the end of the negotiations, though chapter 34 also raises issues for local authorities. 'Public administration reform' and 'Functioning of democratic institutions' are also highlighted (in green) as significant for local authorities in the authors' opinion.

Table 1 gives a succinct overview of the types of issues that may arise. Chapters and areas of the acquis are given in very approximate order of priority (based, as noted above, on recent experience and the authors' opinion, with the same disclaimer). Again, the aim here is not to be comprehensive, but to highlight key reasons why **most chapters in the acquis concern local as well as national authorities**. Long reports have been written on some of the rows in the table, with detailed lists of implications for local governments (see Bibliography).

Relevance here means not merely that the issues in question will affect local communities, but that local government representatives have some scope to affect the impact, whether through influence at national level on how EU standards are implemented, or through own capacity building. In rare cases, there might be scope for influence at EU level, for example if LGAs could provide data to help negotiators justify requests for transition periods. But in general, the margin for adjusting EU rules to suit candidate countries is almost negligible. Inclusion in the table below is thus not meant to suggest that local authorities need to be 'at the table in Brussels' or arguing for special treatment, although participation in discussions underlying the accession negotiations in some of these areas may still be helpful (we will return to this point in section 4.1).

TABLE 1: CHAPTERS OF THE EU ACQUIS – KEY ISSUES FOR LOCAL AUTHORITIES

Chapter	Selected key issues identified
27. Environment & Climate Change	Direct relevance for core municipal responsibilities in waste management, water and sanitation, air quality, noise, environmental inspections, nature protection and more. Substantial investment costs to upgrade municipal infrastructure, but also administrative requirements – e.g. environmental information, environmental impact assessments (EIAs). Long transition periods likely for key EU targets in e.g. waste and water, but municipalities should aim to ensure realistic commitments and sufficient capacity and resources. Potential problems include lack of capacity to carry out measurements (e.g. water quality), lack of awareness on need for EIAs, infringements (and ultimately fines) for (e.g.) failure to meet deadlines for closing landfills or upgrading wastewater treatment.
22. Regional policy & coordination of structural instruments	Defines the framework for EU structural and cohesion funding, part of which is allocated on a regional basis. National responsibility, but local reps should have a say in institutional arrangements and ensure inclusion in the 'partnership' responsible for programming and monitoring. LGAs should also help members to build capacity by participating in projects funded by pre-accession assistance. Potential problems include difficulties in accessing EU funds managed at central or regional level, failure for the country as a whole to maximise absorption, and recovery of funds due to project management errors.
5. Public procurement	EU rules to ensure public purchases are open to companies throughout the EU. Applied through national legislation, but sometimes 'over-implemented' (e.g. making appeals procedures for lower-value contracts more onerous than EU rules require). Benefits from increased competition and transparency, but less flexibility, and significant administrative capacity (or joint procurement) needed to ensure correct procedures. Potential problems include delays to services and legal costs/damages in the event of appeals.

11. Agriculture & rural development	Rules on agricultural markets etc. mostly for national authorities, but parts of EU rural development funding are relevant for municipalities. For example, funds can be used for local infrastructure, for municipal-owned forests, or for LEADER, whereby Local Action Groups (LAGs) of public, private and civil society stakeholders implement local development strategies. The question is how well-prepared local authorities are to make use of such opportunities. Croatia (among others) had to negotiate down the amount reserved for LEADER because not enough LAGs were ready.
19. Social policy and employment	EU rules on working time, temporary contracts, health and safety, etc. directly affect local authorities as employers. Where local authority associations are recognised as employers' associations, they can be involved in shaping legislation through the EU social dialogue. In addition, local authorities often play an important role in social protection, and input into non-binding EU policy coordination could be a channel for local influence at national level. Opportunities for funding from the European Social Fund.
8. Competition policy	Local authorities must comply with the EU treaty rules on state aid (briefly, subsidies or other advantages to economic undertakings that may distort competition and trade). No scope for changing the rules, but awareness and preparation are essential. Aid found to be illegal must be repaid, which could lead to disruption of services and insolvency of recipients, including (e.g.) public utilities, municipal housing companies or local transport providers. Problems can often be avoided by ensuring that conditions for exemptions are fulfilled, or by carefully defining public service obligations and putting contracts out to tender.
23. Judiciary & fundamental rights	Fundamental rights include most EU rules on gender equality, non-discrimination, personal data protection and access to information of public importance, with direct relevance for sub-national governments as employers, service providers and public authorities. Political influence over local media is an issue in some countries. Potential problems include fines for breaches of anti-discrimination or data protection legislation (though there is national flexibility as to whether sanctions apply to public bodies). Also positive potential for municipalities to lead the agenda, e.g. as ' <u>human rights cities</u> '.
28. Consumer & health protection	Municipal service providers must comply with EU rules on consumer protection, while local authorities often have a role in inspections, enforcement, information, dispute resolution, etc. Depending on local competences in healthcare, local authorities may also be affected by binding rules on e.g. cross-border patients' rights or serious health threats as well as non-binding policy coordination on public health. They may also benefit from funding opportunities such as the EU4 Health programme.
13. Fisheries	As for rural development, part of EU funding in this area supports community-led local development and Fisheries Local Action Groups. Coastal municipalities can help to form such groups and enable their communities to access this funding.
20. Enterprise & industrial policy	Mostly non-binding (though rules on late payments should be noted). Local authorities can help businesses to access EU funds for entrepreneurship and industrial development, e.g. the Single Market Programme (with due regard to the rules on state aid – cf. chapter 8 above).

34. Institutions	Discussed last and not part of the clusters, but concerns representation of the new member state in the EU's institutions and other bodies. The key question here for the local level is representation in the CoR. This includes all levels of sub-national government, but it is up to each country to decide on the balance between (e.g.) regions and municipalities. LGAs usually have a role in selecting and preparing members and often serve as the secretariat, also for the Joint Consultative Committee (JCC) established prior to accession. Potential issues include coordination among different LGAs or levels of sub-national government, or lack of resources for JCC members to participate in meetings in Brussels.
3. Right of establishment and freedom to provide services	Municipalities may need to review licences, authorisations, local regulations, etc. to ensure these are non-discriminatory (between providers from EU member states), necessary (justified by a genuine policy objective) and proportionate (not going beyond what is necessary to achieve the objective). Possible role (e.g. in Serbia) in registering and monitoring of craft qualifications.
15. Energy	Directives on energy efficiency, energy performance of buildings and use of renewables directly affect local authorities as energy suppliers and major consumers (buildings, street lighting, etc.). Implications also for planning and support to private households on energy efficiency. Notable requirements include consumption-based billing, phasing out of fossil fuels in e.g. district heating systems, and (for municipalities with over 45,000 inhabitants) local cooling and heating plans.
14. Transport policy	Limited relevance in air and maritime, but many implications for local authorities with responsibility for local roads, public transport and urban planning. Urban nodes must have Sustainable Urban Mobility Plans and submit data on urban mobility. There are regulations on passenger rights for bus and rail transport, numerous measures on road safety, and requirements on energy efficiency and emissions of vehicles, to give a few examples. Also significant EU funding available e.g. through the Connecting Europe Facility.
12. Food safety, veterinary & phytosanitary policy	Mainly for national authorities at the policy level, but local/regional authorities often implement food safety regulations, including official inspections of food-preparing facilities (restaurants, catering, etc.) and sometimes farms, feed, veterinary control and animal welfare. Numerous EU directives and regulations in these areas.
10. Information society & media	Telecoms and media regulation mainly for central authorities, but local authorities affected by requirements for digitalised services and standards for interoperability, cybersecurity and accessibility (including e.g. for disabled users). Possible role in digital literacy and inclusion initiatives or in enabling roll-out of infrastructure (e.g. in rural areas). EU rules on audiovisual media also relevant if local authorities provide or fund local broadcasting. Some EU funding available e.g. through the Creative Europe programme.
16. Taxation	Generally concerns national authorities but could be highly relevant to local authorities if local taxes and fees are incompatible with the acquis (as happened e.g. in Austria with a local tax on alcoholic drinks). Adjustments to the VAT system may be needed (as e.g. in Sweden) to compensate local authorities for tax paid on inputs for tax-exempt activities.

32. Financial control	The main issue for local administrations (and utility companies, etc.) is sufficient administrative capacity to implement accepted international standards for public internal financial control. Local reps should ensure sufficient clarity in national regulations and budget systems, and that capacity-building efforts (training, manuals, etc.) consider the needs of local budget users.
18. Statistics	Mainly for national agencies, though local authorities are an important source of data (e.g. on waste management, pre-school education, building permits and more). Questions such as the definition of NUTS regions (relevant for the distribution of EU regional funds) also of interest to local/regional reps.
24. Justice, Freedom & Security	Mostly for national authorities, though possible relevance for municipal police forces in some countries, or to local initiatives related e.g. to migration, human trafficking or drugs.
4. Free movement of capital	Mostly for national authorities, though potential implications for local/regional governments if they have powers to approve land transactions (as e.g. in Slovenia regarding agricultural land). In general, provisions must be non-discriminatory and allow free movement of capital, but some new Member States negotiated transition periods before fully lifting restrictions on foreign purchases.
Other chapters	Several other chapters not highlighted in the figure above may also be relevant. For example, under '17. Economic and monetary policy', policies on government debt, including local borrowing, may be scrutinised. Or under '26. Education and culture', EU policy coordination might be relevant for municipalities active in e.g. pre-school education. Or municipalities, together with local academic institutions, might have an interest in '25. Science and research', which covers the Horizon Europe funding programme. Thus, absence of a particular chapter above should not be taken to mean irrelevance, merely that LGAs have not yet (to our knowledge) sought to assess the local impact of the EU acquis in more detail or taken part in negotiation working groups.

Also highlighted in the figure above are the areas 'Functioning of democratic institutions' and 'Public administration reform' (part of the 'Fundamentals' cluster). Although (to our knowledge) LGAs have not conducted impact assessments or been involved in working groups in these areas, they are also significant for local government. For example, serious problems with local elections might be an obstacle under the first area. The (Council of Europe) European Charter of Local Self-Government and the monitoring missions of the Congress of Local and Regional Authorities are relevant to the EU's assessments here. This is sometimes referred to as '**soft acquis**', with which Ukraine (having ratified the Charter in 1997) and other candidate countries have been aligning themselves long before the start of accession negotiations.²²

On public administration reform (PAR), the EU and candidate countries pursue a dialogue through 'PAR Special Groups' in the framework of the Stabilisation and Association Agreements. Beyond specific requirements of the EU acquis, discussions here concern good governance more generally, including reforms relevant to public administration at all levels for example in human resources, digitalisation of services, and public financial management.²³ However, local government representatives have generally not been included in these discussions.

²² The term 'soft acquis' also has other meanings, one being EU policy coordination in areas such as employment policy and education, based on peer review and recommendations rather than binding legislation. Another sense is the broader assimilation of good practices from EU countries, for example on public administration or urban planning.

²³ Guided in part by the SIGMA Principles of Public Administration. SIGMA is a joint initiative of the OECD and the EU which aims to strengthen governance in candidate and neighbourhood countries.

Rather than chapters of the *acquis*, one could also evaluate the impact of EU accession by **local government functions** or areas of responsibility. Urban or spatial planning is an interesting example here, since planning is not an area of EU competence and there is limited *acquis* in this specific area.²⁴ And yet the work of local planning departments is profoundly affected by many EU-related measures in environment, energy, transport, procurement, state aids, cohesion policy, rural development, public administration reform and more. Other such areas might include administrative service centres, local finance departments or public utility companies.

²⁴ Planning is not mentioned under the shared competences of the EU and member states (Art 4 TFEU), nor as an area where the EU supports, coordinates or supplements member state actions (Art 6 TFEU), although several other areas with relevance to planning are mentioned in these articles. 'Town and country planning' is in fact mentioned in Art 192 (under Environment) as an area (along with other sensitive areas such as fiscal matters, land use, etc.) where Council unanimity is required instead of the usual qualified majority. The most significant item in the EU *acquis* is the European Spatial Development Perspective, a document approved by an informal Council of Ministers responsible for spatial planning in 1999. This aspires to be 'a suitable policy framework for the sectoral policies of the Community and the Member States that have spatial impacts, as well as for regional and local authorities, aimed as it is at achieving a balanced and sustainable development of the European territory', but underlines that it does not create new responsibilities at Community level.

3. HOW WILL EU ACCESSION AFFECT LOCAL AUTHORITIES IN UKRAINE?

3.1 INTRODUCTION

Ukraine was granted candidate status in June 2022, and by November 2025 had completed the screening of all 33 (active) negotiation chapters. In May 2025 the Ministry of Justice started to prepare the National Programme for Adapting Legislation to EU Law, though this has yet to be approved by the Cabinet of Ministers and Parliament.²⁵ It was also decided that the programme would be updated throughout the process of screening.

The **Ukraine Plan** – linked to the Ukraine Facility, the EU’s financial assistance programme for Ukraine – covers a wide range of reforms agreed between the government and the EU. Financial support is in part conditional on progress with these reforms, which can therefore also be said to be EU-related, even though some go beyond the strict requirements of the *acquis*. Among the areas covered are public administration reform, management of public assets, green transition, digital transformation, human capital, energy, transport, and decentralisation.²⁶

The government’s stated aim is for the country to be a member of the EU by 2030, which raises the dilemma of ‘going fast versus going far’ in the negotiation process – the faster the process, the greater the risk may be of not involving local authorities properly. However, as noted earlier, Ukraine is more decentralised than most other EU candidate countries and indeed many member states. Therefore, the impact of EU integration at local level may be expected, if anything, to be greater than elsewhere, and involving local representatives in the process would seem to be even more important.

Since the full-scale invasion, local budgets have shown relative stability compared with the growing deficit of the state budget.²⁷ In 2024 local budgets registered a surplus of UAH 7.7 billion, which allowed municipalities to exercise their powers properly, although without the resources needed for recovery and development in line with EU standards. At the same time, with a rising deficit due to military expenditure, the state is constantly looking for opportunities to cover the gap, and local revenues are one potential source. On the other hand, the EU Commission in its annual reports on Ukraine has stressed the need to strengthen the financial base of local self-government. In response, the government has set the goal of improving the mechanism for horizontal equalisation of the tax base of local budgets.²⁸

Decentralisation reform in Ukraine has not yet reached the regional level, which is why regional councils have very limited powers. Most executive power is held by the heads of the regional administrations, who are appointed by the President of Ukraine. The constitutional changes required to complete the decentralisation reform, including issues related to executive powers at the regional level and the role of district councils, are not feasible under wartime conditions.

Another important factor with a bearing on the impact of EU integration at local level is the overlap of powers between local self-governments and executive bodies, as well as between different levels of local self-government. In accordance with the Ukraine Facility indicator 9.3, Ukraine shall ‘*adopt legislation to ensure optimal separation of powers between local self-government bodies and executive authorities.*’ The concept for a **draft law on separation and division of powers** is currently being developed by a working group under MCDT; Chapter 1 is expected to be registered as a draft law, with work on Chapter 2 having only started.

²⁵ Ministry of Justice on the launch of the National Programme (in Ukrainian).

²⁶ Ukraine Facility website.

²⁷ See the *analytical review* by Ihor Onyshchuk for the Polaris programme.

²⁸ *National action plan* to implement the recommendations of the Ukraine Report 2024.

Although the EU Commission's 2025 report praises Ukraine's progress on delineation of powers, stakeholders interviewed for this report noted that the law does not cover the so-called 'resource powers' (regarding the use of certain types of forests, water resources, etc.) which should be delineated and transferred to local governance.

The difference in capacities between municipalities across the country poses another challenge in defining the powers of LGs in Ukraine. Some observers note that around 120 municipalities would be capable of assuming most of the sectoral functions provided by the state, while others are hardly able to cope with the suggested minimum, and that an asymmetric delegation of powers might be one option to consider.

On the other hand, small municipalities face particular challenges in most decentralised systems, and non-uniformity of local government responsibilities may raise other issues in terms of citizens' rights and representation of local interests.

3.2. ALIGNMENT OF NATIONAL LEGISLATION AND POLICY WITH THE EU ACQUIS

Ukraine started to align with EU legislation back in 2014, when the Association Agreement between Ukraine and the EU was signed. Also, given the positive attitude towards European practices and the long-standing presence of international development projects in Ukraine, many European policies were effectively implemented in municipalities without the need for legislation, through application of the (Council of Europe) European Charter on Local Self-Government or good practice from EU member states. Therefore, much work on approximation of legislation had been done before Ukraine received EU candidate status.

According to a report from the government, between 2014 and 2024, 81 per cent of EU legislation prescribed in the Association Agreement was implemented. In total the Association Agreement required the implementation of around 350 EU legal acts relating to the establishment of a free trade zone between Ukraine and the EU.²⁹

However, approximation with the full EU acquis is a much larger task, requiring the implementation of around 2,800 acts according to the government's self-screening.

According to the EU Commission's 2025 report, Ukraine shows a moderate level of preparedness only in certain areas such as digital transformation and media and areas linked to implementation of the Free Trade Agreement, including free movement of goods, free movement of capital, consumer and health protection, food safety, veterinary and phytosanitary policy, economic and monetary policy, enterprise and industrial policy, and foreign security and defence policy.

Although the EU Commission acknowledges good progress of Ukraine with regard to some important reforms, for example in public administration and education, in most areas – including key ones for local government such as *regional policy, environment or public procurement* – Ukraine has reached only some level of preparedness. In some areas such as agriculture and rural development, Ukraine has a low level of preparedness. This means that **most important local governance changes are still to come.**

The lack of progress in aligning with the EU acquis in certain areas, which can be seen when comparing the reports of the EU Commission over the past few years, is linked not purely to a lack of political will, but also to difficulties with implementation – whether due to war conditions, lack of financial resources or risks for national stakeholders.

Thus, the further Ukraine progresses with implementation of the acquis, the more challenging the remaining items may be.

²⁹ Report on the implementation of the Association Agreement between the European Union and Ukraine, 2024 (in Ukrainian).

3.3. KEY CHALLENGES FOR LOCAL AUTHORITIES FROM DIFFERENT CHAPTERS OF THE EU ACQUIS

In general, the EU Commission's reports clearly recognise the role of Ukrainian local governance in the EU accession process. The 2025 report states that local governance *'should remain a central element of Ukraine's efforts to fulfil the requirements of EU accession, including those requirements set out in the Ukraine Plan and PAR Roadmap, and in line with the European Charter of Local Self-Government.'* Also, the report highlights not only the need for legislative amendments but practical implementation of policies as well as monitoring capacity. Given that most policies are implemented locally, this demands extensive work at local level to accumulate resources, enhance capacities and evaluate tangible timeframes for delivering policies which are in line with Ukraine's EU accession goals.

This section outlines selected known challenges for local authorities under the different clusters of the enlargement methodology (see Figure 1 above). It is based on analysis of limited available information on the approximation of Ukrainian legislation with the EU acquis, mainly the EU Commission's Communications on Enlargement in 2025 and 2024, the Ukraine Plan, and governmental implementation plans, complemented by interviews with stakeholders and experience from Cities4Cities training on EU integration for municipalities, as well as analysis undertaken for the Polaris programme. As noted in the general introduction, it does not purport to be comprehensive, and many more issues will emerge than can be listed here. At this stage, the point is simply to show that there are significant local issues and capacity needs in the Ukrainian context under many if not most areas of the acquis. Deeper analysis of at least some of these areas is recommended for a more comprehensive picture.

CLUSTER 1: THE FUNDAMENTALS OF THE ACCESSION PROCESS

Public administration reform (PAR)

Among the most relevant issues for local governance in this area is practical implementation of the **Law on administrative procedure** as amended in 2023, which regulates the relations of local governments and their Administrative Service Centres (ASCs) with individuals and legal entities regarding the resolution of administrative cases.³⁰ Local authorities will need to increase their capacities for service provision in line with the law.

In general, the EU Commission acknowledges the important role of municipalities in providing offline services through a broad network of municipal ASCs, especially to people with disabilities and reduced mobility. The share of centres accessible to people with disabilities and reduced mobility reached 74 per cent in 2025, compared to 72 per cent in 2024. A law on administrative fees should also be adopted, which will strengthen the financial base of ASCs and improve their further development.³¹

Also under the area of PAR is public financial management. A key issue here for local authorities in the reform of the public investment management (PIM) framework in line with the PIM roadmap and action plan for 2024–2028. This is linked to efficient absorption of EU funds (see also chapter 22 below). Core to the new system is the creation of single project pipelines at the central, regional and local levels, which rely on transparent prioritisation, appraisal and selection mechanisms to form portfolios of public investment projects.

The new system is being introduced for the 2026 fiscal year starting in January. This means that for their 2026 budgets municipalities were required to review their strategies against the new state regional development strategy and any other state strategies, form local investment councils, then approve local pipelines of projects, prepare pre-feasibility studies and upload projects into the national DREAM system – a single digital portal for managing public investment projects.³²

³⁰ [Law on administrative procedure](#) (official source in Ukrainian).

³¹ [Draft bill](#) on the Parliament's website (in Ukrainian).

³² [DREAM](#) website.

In 2025, communities faced a significant challenge to implement the reform – to organise their investment activities locally and align them with strategic and budgetary planning, in order to secure recovery and development projects in 2026. The Resolution of the Cabinet of Ministers No. 527, which laid out the logic for preparing, evaluating, and selecting public investment projects, was only published in May 2025. By August 2025, amendments had already been introduced.

At the same time, the digital platform DREAM was under development, and communities were not able to enter their projects into the system during the upgrade.

At the same time, local authorities have demonstrated extraordinary progress in PIM reform despite the short time frame.

By January 2026, 1,037 municipalities out of 1469, had established local investment councils. In addition, 753 communities have already approved their own Medium-Term Public Investment Plans, and another 127 are working on their development.³³

Challenges in implementation include:

- The financial scheme to ensure the implementation of the PIM system is unclear – the necessary infrastructure at state level is not in place, but the new system still entails significant obligations for municipalities.
- Municipalities have no oversight of the process of allocating funds – here the introduction of a monitoring committee including representatives of local authorities might be beneficial, similar to those for Interreg programmes, but with real presence of local governance through the LGAs.
- LGAs were not properly consulted on the legislation relating to PIM because of time constraints due to Ukraine's obligations under the Ukraine Plan.
- The allocation of 20% of Ukraine Facility Pillar I grants, which should have been transferred to the subnational level in line with the PIM system, has not taken place so far, except for UAH 1 billion distributed through State Fund for Regional Development. It would be crucial for future preparedness of local governments for EU cohesion policy that the system is well tested in 2026–2027 through dedicated calls for proposals rather than subventions.
- Municipalities lack engineers and money to prepare high quality feasibility studies and technical specifications. It is difficult to devote local resources to this when there is little chance at present of receiving funding through DREAM.
- Those municipalities which were not able to cope with the reform on time (over 432 municipalities across the country) could face serious penalties, imposed by the state.
- Given the extraordinary pace of reform, the quality of projects and local procedures to form a pipeline of projects might reveal serious drawbacks in future as public investments are allocated.

Chapter 23: Judiciary and fundamental rights

Under this chapter an important issue for local authorities concerns Ukraine's obligations to develop an inclusive environment in view of proposed legislation on the rehabilitation of persons with disabilities.³⁴ Municipalities in Ukraine continue to struggle to provide inclusive social, medical and other services, which requires increased capacity especially in wartime given growth in the number of people with disabilities.

Increased efforts are still required to ensure the accessibility of buildings and other types of infrastructure on a local level, especially in the context of reconstruction efforts.

³³ [Communication by the Ministry of territorial development](#), dated 06/01/2026

³⁴ [Draft bill](#) on the Parliament's website (in Ukrainian).

Chapter 5: Public procurement

Ukraine must harmonise and adapt its domestic legislation in the field of public procurement in accordance with the provisions of several EU directives which aim to ensure a level playing field for public purchases within the EU's internal market. Ukraine has some level of preparation in this area, having reached over 91% of requirements under the Free Trade Agreement as far as state procurements are concerned.

The war has slowed reforms in this area, with certain types of procurement simplified and others prohibited during martial law. The number of procurements conducted through the electronic system has decreased dramatically. Thus, the recommendations of the EU Commission include restoring the level of transparency that existed before the war and harmonising the PROZORRO electronic procurement system with the European public procurement portal, TED.³⁵

In response to the Commission's 2024 recommendations, the government prepared a draft law on public procurement and adopted a Strategy for Reforming the Public Procurement System for 2024–2025.³⁶

Further planned harmonisation measures include a list of exceptions to the application of the Law when purchasing goods, works and services, the introduction of a competitive procedure with negotiations, dynamic procurement systems, an innovation partnership procedure, project competitions, and qualification systems.

These requirements will demand increased capacities of local governments to ensure that procedures are correctly implemented and to work with contractors across the EU (capacity to accept tenders in the English language may be an advantage here). One lesson from previous accessions is that, even if there is limited competition from other EU countries, unsuccessful domestic bidders can appeal against decisions, which can lead to costs and delays for municipalities if procedures have not been rigorously applied.

At the same time, an inflexible procurement system based on the lowest price criterion without other qualitative factors can cause issues with practical implementation of projects on the ground. For example, Lviv has started to use the practice of architectural competitions not only for buildings but also for roads to ensure the minimum quality of works under the contract.

This issue is reflected in the state strategy, which calls for methods to allow widespread use of non-price criteria for more effective procurement of technologically complex items.

Also, many municipalities own utility companies providing services in housing, water supply, sewage, waste management, heat supply, local transportation; some even own co-generation equipment and sell electricity to consumers. While Ukraine has liberalised electricity and gas markets, this has not yet touched services provided by municipalities. It would be important to trace how implementation of EU legislation may impact the provision of such services by municipal companies. Without going into details, the relevant point for this chapter is that in some cases it may be advisable for municipalities to openly procure services from their utility companies in order to avoid potential problems with state aids (see chapter 8 below).

Chapter 32: Financial control

Under this chapter local authorities will need to improve the quality of their internal audit structures by applying the new Global Internal Audit Standards, which will allow conducting of audits, evaluation of procurements and improved management of financial resources. While more capable Ukrainian municipalities have established separate units within local government structures to conduct internal control and audit, many municipalities, especially rural ones, still lack the capacity to take this step.

At the same time, this would be an important requirement to be able to access EU funding after Ukraine becomes an EU member.

³⁵ [TED](#) website.

³⁶ [Draft bill](#) on the Parliament's website and [Strategy](#) on the Council of Ministers website (in Ukrainian).

CLUSTER 2: INTERNAL MARKET

Chapter 8: Competition policy

Ukraine needs to amend the law on **State aid** to align it with the EU acquis, which seeks to prevent unfair advantages for economic operators in the internal market. Learning the rules of state aid according to EU standards is closely related to the ability of local governance to manage projects, especially those funded with EU financial resources.

EU state aid rules may also have implications for tax incentives to attract investment and stimulate local economic development. For example, the following special tax conditions apply to residents of **industrial parks**: cancellation of income tax for 10 years; exemption from VAT and import duty on imported equipment; and preferential rates from local authorities in particular for land tax. These incentives are also considered state aid and should comply with EU guidelines.

Also, Ukraine needs to pursue further steps towards alignment with the EU acquis on **Services of General Economic Interest (SGEIs)**, also following the relevant commitments in the Ukraine Plan.

Many SGEIs are delivered by **local utility companies** owned by local authorities, including provision of electricity and heat, waste management, water management, public transport networks, social services including social housing, healthcare, and public service broadcasting, education. Therefore, managing these companies according to EU standards will require additional capacity. In brief, public funding of SGEIs may continue under certain conditions, but compliance with these needs to be rigorously verified.

State aid is a complex area with many exemptions and different rules for different sectors, but compliance is essential, since the consequences of illegal aid for recipients (and associated local services) can be devastating. Moreover, problems can arise immediately upon accession, since the EU Commission can launch an investigation into illegal aid following a complaint from an interested party.

Chapter 28: Consumer and health protection

Under the Law 'On Consumer Rights Protection', local authorities have a range of powers and the right to create structural subdivisions for consumer rights protection within their executive bodies. The EU Commission's recommendations from 2024 and 2025 on consumer protection include alignment with the General Product Safety Regulation, which might influence the work of local authorities.

At the same time, two-thirds of local self-government bodies in Ukraine do not have consumer rights protection departments at all.

Municipal hospitals and outpatient clinics are central to building a resilient state healthcare system. EU accession requires alignment of the Ukrainian e-healthcare system with the European Health Data Space and common risk assessment system for cross-border disease threats. Several other local-level impacts may be highlighted based on national plans, including:³⁷

- Risk assessments regarding corruption in all healthcare institutions. The list of healthcare sector employees required to submit yearly income declarations will also be broadened.
- Continuous review of the list of the capable network of healthcare institutions. This might affect municipal hospitals in smaller municipalities, which are crucial for the local population but may not fit into a capable network.
- Exclusion of social services institutions such as elderly care facilities, or psychoneurological dispensaries from the list of health care institutions to avoid discrimination in health care service provision. Patients of such facilities will need to conclude declarations with family doctors, which will increase the workload of municipal outpatient clinics.

³⁷ See the [National Healthcare Development strategy to 2030](#) and the associated [operational plan](#).

- Formation of a network of healthcare institutions for integrated primary health care, aimed at concentrating medical resources and services in order to ensure access to quality medical care at the level of territorial communities.
- Increased accessibility to healthcare services for people with disabilities.

CLUSTER 3: COMPETITIVENESS AND INCLUSIVE GROWTH

Chapter 10: Digital transformation and media

According to the EU Commission's assessment, Ukraine is between a moderate and a good level of preparation in this area, with many services provided at the local level already digitalised. However, Ukraine needs to further align with the EU Directive on the security of network and information systems, in line with Ukraine Plan commitments, which will entail additional **cybersecurity, risk management, and incident reporting** measures.

Chapter 16: Taxation

To ensure fair competition in the internal market, the EU sets minimum rates and common rules for **excise duties on alcohol, tobacco, and energy products** to ensure fair competition, which might impact local budgets.

As of 2025, **13.44% of excise duties on fuels are directed to local budgets** in Ukraine. Since the average cost of fuels (EUR 1.25 per litre of E95 petrol) is below the EU average, minimum fuel duties may have the effect of raising local revenues. At the same time, with the state budget in deficit as noted earlier, the government might well seek to claw back some of this windfall. (This has happened recently for other local revenues, including the share of personal income tax paid by military servicemen.)

Chapter 19: Social policy and employment

According to the EU Commission's assessment, Ukraine remains at an early stage of preparation in this field. Some progress was achieved with the adoption of a resolution on the procurement of social services for children with disabilities and the adoption of the strategy for the de-institutionalisation of alternative care for children. Ukraine needs to continue aligning with EU acquis on non-discrimination, including gender equality.

The national implementation plan for Ukraine Report 2024 includes a number of EU-related measures that will impact the obligations of local authorities towards their employees. These include development of the draft Labour Code of Ukraine for submission to the Cabinet of Ministers and consideration by Parliament of the draft Law 'On Safety and Health of Workers at Work'.

Local government in Ukraine, in particular through social protection bodies, plays a key role in providing social services to vulnerable groups, including children, orphans, elderly, veterans, etc. through home care, palliative care, counselling, in-kind assistance, transportation services, advocacy, information, etc. These activities may be affected by the introduction of a new system of procurement of social services in line with the EU acquis (see also chapter 5 above).

The social benefit system in Ukraine relies heavily on **ASCs**, which are formed at the local level, but also arrange the delivery of other state services to citizens. At the same time, their potential is not exploited to the full. Some observers point to the need for further decentralisation of powers in providing administrative services, since extraterritorial provision of services by state bodies (an anti-corruption measure) is leading to reduced quality and availability. For example, in 2022 the Pension Fund of Ukraine took over provision of most social benefits previously provided by local state social service offices, including temporary disability benefits, payments to IDPs, etc. This has led to inferior communications (regarding for example mistakes, missing documents or need to provide extra evidence) and subsequently delays in service provision, which might have been avoided if the services were provided by local authorities.

Chapter 25: Science and research

The EU Commission's 2025 report notes good progress in this area, notably through opportunities provided by Horizon Europe and the design of regional smart specialisation strategies.

In the coming period, municipalities will have to align their local development strategies with regional strategies, which are to be updated based on the smart specialisation principle. Active participation of local authorities, businesses and NGOs in the updating of regional strategies is needed to ensure that strategies are based on accurate data and fully reflect the economic potential of municipalities in the region.

The Ukraine Report 2024 also mentions the need to facilitate the participation of Ukrainian stakeholders in the **Horizon Europe programme**, aimed at boosting research and innovation. Ukraine has opened a programme office in Kyiv, but this mainly supports the participation of universities and research institutions. Local governments, however, also often benefit from Horizon Europe projects, implementing innovative solutions in real life. This potential, especially as regards the **New European Bauhaus initiative** in view of the need for green and inclusive recovery of Ukraine, needs to be strengthened.

Chapter 26: Education and culture

Although the EU acquis in this chapter is mostly non-binding, adherence to EU standards in education and culture as well as developing international cooperation and exchange of good practices can help to resolve many issues currently faced at the local level with regard to education.

The Commission acknowledges good progress made in adopting legislation on **preschool and vocational education in 2025**. It would be crucial, therefore, to ensure the implementation of the adopted legislation on a local level.

At the same time the national implementation plan for Ukraine report 2024 includes **monitoring by local governments of the network of general secondary education** institutions to ensure its optimisation. This could raise difficult issues for smaller rural municipalities.

The government has also developed methodological recommendations for village, settlement, and city mayors on an **inclusive educational environment** in territorial communities.³⁸ Municipalities are expected to conduct regular public hearings on this, which is closely related to EU approximation on human rights (chapter 24).

CLUSTER 4: THE GREEN AGENDA AND SUSTAINABLE CONNECTIVITY

Chapter 14: Transport policy

As mentioned by the EU Commission in both 2024 and 2025, Ukraine should adopt the social and market rules for road transport, strengthen administrative capacities and compliance with the haulage market rules and traffic safety measures, and establish inspection and investigation bodies for rail, road and inland waterways.

As part of the government's implementation plan, a draft law on publicly important passenger transportation services by road and urban electric transport has been developed.³⁹ This gives local executive bodies and local self-government bodies responsibility for providing such services in view of their impact on social, environmental and regional development.

The costliest requirement of the law concerns norms on accessibility for those with disabilities and other low-mobility groups (including e.g. wheelchair access and visual and audio aids for passengers with visual and hearing impairments). According to monitoring conducted by MDCT, the level of accessibility of transport and transport infrastructure in Ukraine remains insufficient and requires systemic support.⁴⁰

³⁸ [Methodological recommendations](#) on the Ministry of Education and Science's website (in Ukrainian).

³⁹ [Draft law](#) 'On Amendments to Certain Laws of Ukraine Regarding Publicly Important Passenger Transportation Services by Road and Urban Electric Transport' (in Ukrainian).

⁴⁰ [Analysis](#) of the results of monitoring the availability of transport and transport infrastructure facilities to determine priority areas that require support on MDCT's website (in Ukrainian).

Another important aspect of transport policy with regard to EU integration is decarbonisation of public transport, which is mentioned in the national transport strategy.⁴¹

This recognises the need for **local plans for sustainable urban mobility** with a strong focus on the development of green transport and micromobility (cycle paths, walking routes, etc.). At the same time, according to an assessment by urban mobility activists, the strategy lacks clarity about the implementation of concrete activities to resolve the systemic problems with urban transport.⁴² This will place most of burden of renovating public transport on local authorities.

Chapter 15: Energy

Local authorities in Ukraine are both consumers and providers of energy. With Russian assaults on Ukrainian energy facilities, many municipalities have looked into developing alternative energy sources to secure functioning of critical infrastructure.

Thus, many own co-generation equipment which produces both electricity and heat, often from renewable energy sources. In this area, the EU Commission recognises the good level of preparedness and progress of Ukraine, which has to some extent been stimulated by war challenges.

The EU Commission's 2025 report mentions several aspects of energy policy of relevance to local authorities. In particular, Ukraine, in line with the Ukraine Plan, should adopt legislation to improve permitting and efficiency for use of renewables in district heating, cancel the moratorium on raising heat and hot water tariffs, adopt a programme to modernise heat generating enterprises, and set minimum energy efficiency performance levels for buildings.

Draft amendments to the tax code to stimulate green transition will establish a zero tax rate for CO2 emissions from combustion of biofuels, which will be an incentive for municipalities to shift towards renewables.⁴³

Ending the current moratorium on raising heat and hot water tariffs should help to boost the development of local utility companies.

Bigger cities provide billions of UAH yearly in subsidies to their utility companies, which limits the funds available for modernisation of infrastructure and further development of services.

Another important topic for local authorities in this chapter is **energy efficiency**. The government plans several actions to align with the EU acquis that may have a local impact:

- Launching a National Database of Energy and Operational Characteristics of Buildings.
- Promoting sectoral state energy efficiency programmes in centralised heating, water supply and wastewater treatment modernisation, which are often provided by municipal companies.
- Introducing a system of monitoring of the implementation of the National Plan of Energy and Climate.⁴⁴

Developing **Sustainable Energy and Climate Action Plans (SECAPs)** is one way for local authorities to build capacity and align local actions with the EU's energy and climate targets.⁴⁵

These are comprehensive local plans designed to help municipalities and regions achieve climate neutrality by reducing greenhouse gas emissions (mitigation) and preparing for the impacts of climate change (adaptation). One big challenge here is the lack of relevant data on emissions produced in municipalities, which may limit the credibility of such plans.

⁴¹ [National Transport Strategy](#) of Ukraine for the period until 2030 and approval of the operational plan of measures for its implementation in 2025-2027 (in Ukrainian).

⁴² Vision Zero, [Analysis](#) of the new National Transport Strategy of Ukraine on public transport and urban mobility.

⁴³ Draft Law of Ukraine 'On Amendments to the Tax Code of Ukraine Regarding the Establishment of a Zero UAH Environmental Tax Rate for Carbon Dioxide Emissions for Installations That Generate Such Emissions as a Result of Biofuel Combustion' (Registration Number 9596).

⁴⁴ [National Plan of Energy and Climate](#) on MEEA's website (in Ukrainian).

⁴⁵ The EU [Covenant of Mayors](#) provides guidance to support the development of SECAPs.

Chapter 27: Environment and climate change

The EU Commission's 2025 report recognises good progress under this chapter. Advancements on climate include the resumption of compulsory monitoring, reporting and verification of greenhouse gas emissions, the adoption of the action plan for setting up a national emissions trading system, and the framework law on climate policy, which aligns with the EU's long-term target of climate neutrality by 2050. Ukraine also adopted a national waste management plan, legislation on the prevention, reduction and control of industrial pollution, river basin management plans, and an environmental control reform strategy. For local authorities, implementation of this legislation is a crucial challenge.

Municipalities are already required to conduct **environmental impact assessments (EIA) and strategic environmental assessment (SEA)** on all plans, programmes and projects, including those relating to reconstruction.⁴⁶ However, municipalities raise the issue that there are not enough certified engineers to conduct assessments, the quality of which is often low.

As for waste management, the powers of local authorities in this area are quite broad.⁴⁷ Alignment with and implementation of the EU acquis in this area requires much more than investments in waste management facilities and equipment. In brief, it will be impossible to meet EU targets for recycling, reduced landfilling, etc. unless municipalities can play their part in waste management planning, organisation of services, setting tariffs, informing and educating the public, and so on.

In practice, the law is not yet operational. The state plan for waste management involves dividing Ukrainian municipalities into 200 clusters, where waste management facilities will be organised. Municipalities will have to form partnerships to build these facilities, which is rather complicated. The experience of the city of Lviv is that it takes EUR 48 million and over seven years to build a waste management facility according to EU standards, even when the municipality is able to take loans from international financial institutions such as EBRD.⁴⁸ The estimated cost of building a waste management facility in Khmelnytskyi is EUR 36 million.

In the next year the government also plans to develop and approve rules for the technical operation, termination of **operation, reclamation and care of landfills**, which concerns local authority powers. According to the (former) Ministry of Environmental Protection, there are over 6,000 official landfills and landfills for household waste in Ukraine, with a total area of about 9,000 hectares. These figures indicate a large-scale problem of garbage accumulation in the country, as 90 per cent of all household waste is sent to such facilities. The **issue is also related to the issue of tariffs for waste management** for the population, whose reluctance to pay more for waste management can become a political issue at local level.

On **water management**, the government plans to develop a state programme for technical modernisation of water disposal and wastewater treatment enterprises, including those under municipal ownership.⁴⁹ A concept note has already been developed. Water management according to EU standards is yet another challenge for Ukrainian municipalities. According to the concept note, the centralised wastewater system of Ukraine consists of 35.3 thousand kilometres of networks, 2.8 thousand pumping stations and 700 treatment facilities. Still, **less than half of the country's population has access to centralised wastewater systems**. Moreover, large parts of the existing system are in need of renovation or reconstruction. Currently, only half of wastewater undergoes a full cycle of biological treatment, while a third of wastewater is discharged into water bodies without treatment.

⁴⁶ These requirements are set out in the [Law on environmental impact assessment](#) (in Ukrainian).

⁴⁷ As defined by Article 26 of the 2023 [Law on waste management](#) (in Ukrainian). Local councils and/or executive bodies are expected (inter alia) to participate in developing regional waste management plans, approve local waste management plans, resolve issues regarding the placement of waste processing facilities on their territories, provide separate collection points for household waste, organise the management of household, construction and demolition waste, ensure the implementation of target indicators for preparation for reuse and recycling of household waste, ensure the elimination of unauthorised landfills within their settlements, transfer waste whose owner has not been identified to waste management entities for processing, provide information and carry out explanatory and educational work among the population on waste management, approve investment programmes of business entities in the field of household waste management, set tariffs for waste management services, and conclude agreements with extended producer responsibility organisations (responsible for separate collection of packaging, electronics and other specific types).

⁴⁸ 'The cost of building a garbage processing plant in Lviv is 48 million euros: the city needs a loan', 1 August 2024, [dyvys.info](#).

⁴⁹ [State Targeted Environmental Programme for Technical Modernization of Water Disposal and Wastewater Treatment Enterprises in State or Municipal Ownership for the Period Until 2034](#) (in accordance with the Law 'On Water Disposal and Wastewater Treatment') (in Ukrainian).

CLUSTER 5: RESOURCES, AGRICULTURE AND COHESION

Chapter 11: Agriculture and rural development

This chapter is relevant for most Ukrainian municipalities, since after the decentralisation reform the majority of amalgamated municipalities include rural territories. At the same time, Ukraine's agriculture is mainly dependent on the functioning of agroholdings as opposed to SMEs (family farms). The degree of implementation of the EU acquis in this area is among the lowest.

The 2025 recommendations of the EU Commission include implementing the strategy for agriculture and rural development up to 2030, and strengthening the administrative capacity for its implementation, as well as establishing the paying agency for common agriculture policy funds.

Of greatest relevance to local authorities is the rural development part of this chapter. In the current budgetary period, 5 per cent of EU rural development funding should be allocated to measures based on the **LEADER / Community-Led Local Development approach** (which is expected to be maintained post-2027). Unlike Moldova, Ukraine does not have a functioning network of LEADER Local Action Groups. There are several pilot projects across the country which aim to form such groups, but no systemic approach has yet been taken.

Chapter 22: Regional policy and coordination of structural instruments

Ukraine has some level of preparation under this chapter. In 2025, the EU Commission's recommendations for Ukraine include:

- reporting on the implementation of the State Regional Development Strategy and finalising the updated regional and local development strategies to prioritise investments for all regional and local stakeholders, and operationalising the State Fund for Regional Development.
- fully implementing the law on the principles of state regional policy by clarifying the content and structure of local strategic planning documents, facilitating their digitalisation, and linking them to adequate financial resources; strengthen the capacities of regional and local administrations on project development.
- ensuring the systematic and inclusive engagement of regional and local stakeholders at all the stages of the programming cycle in the coordination and institutional framework.

In Ukraine, there is a three-level system of documents for strategic planning of regional development:

- National level: State Strategy for Regional Development and Action Plan for its implementation.
- Regional level: development strategy of each region and action plan.
- Territorial communities: community development strategy and corresponding implementation plan.

Before the start of the full-scale war, one of the key mechanisms was **the State Fund for Regional Development (SFRD)**, where funds were deposited from the State Budget. In 2022–2024, under martial law, financing of the SFRD was paused, so local development strategies were financed mainly from other sources and international development funds. In 2025, the state allocates funds from the SFRD for projects that help develop regions and communities. A resolution of the Cabinet of Ministers determines how these funds are to be distributed and used.⁵⁰ The main requirements for projects are:

- below UAH 50 million (slightly above EUR 1 million)
- registered on DREAM platform
- technical documentation ready
- at least 10 % co-financing from the local budget.

⁵⁰ Resolution of the Cabinet of Ministers of Ukraine No. 971 of August 13, 2025.

Local authorities face several issues with the implementation of regional policy, including:

- Insufficient funds. In 2025 the state allocated only UAH 1 billion (c. EUR 20.6 million) to SFRD, which is far from enough to realise the state regional strategy. According to **the Budget Declaration for 2026–2028, starting next year, the SFRD** would be allocated UAH 30 billion (c. EUR 619 million) per year over the next three years.⁵¹ However, the budget adopted for 2026 includes only UAH 2 billion for SFRD, with a further 9.4 billion to municipal infrastructure and services through subventions (earmarked grants) and additional subventions for education and healthcare under the heading of public investments.⁵²
- Little time to prepare projects. Communities had a very narrow window in which to apply – 1–10 September following an announcement on August 13 – which puts enormous pressure on local authorities to prepare projects and update technical documentation. Although it was known before that funds would be allocated in 2025, the mechanisms and priorities remained unclear up till August.
- The procedure for selecting projects through the DREAM digital tool, though claimed to be transparent, is not fully clear to municipalities. It was stated that the same procedure as for an earlier project (Programme of Ukraine Recovery III, supported by the European Investment Bank) would be followed. At the same time, the DREAM platform is being constantly upgraded and municipalities must follow the updates to be able to successfully upload their projects into the system.

The government relies on state regional administrations to prepare local authorities for EU cohesion policy. For that reason, deputy heads of regional administrations on EU integration have been appointed, but their offices and the associated Regional Development Agencies have struggled to function properly due to a lack of knowledgeable staff.

Thus far they have tended to focus on regional centres rather than smaller municipalities.

3.4. ACCESS TO EU FUNDING

Table 2 below gives an overview of selected Interreg and EU thematic programmes currently accessible to municipalities in Ukraine.

Interreg programmes are a good opportunity for Ukrainian municipalities to prepare for practical implementation of EU policies (such as green and digital transformations, support to SMEs, improving services, etc).

However, most regions in the North-East of the country, affected by war, are excluded from the Interreg Next programmes that can finance hard infrastructure projects, being eligible only for projects that develop policies.

Management of Interreg programmes is disconnected from the state regional policy, being operated not by MDCT but rather by the Department of International Development Projects in Ukraine (now part of the Governmental Office on EU Integration) in the Cabinet of Ministers.

Thus, many challenges of implementing projects on the ground and many strategic priorities are not taken into account in programme planning, which remains rather technical. Also, at the state level the office dealing with Interreg programmes is very small and lacks staff.

Ukraine also has access to many of the EU's **thematic programmes**, which might also be instrumental in strengthening local economic development.

⁵¹ [Budget Declaration for 2026–2028](#).

⁵² Ministry of Finance [news article](#), 'The Verkhovna Rada approved the State Budget of Ukraine for 2026'; December 3.

TABLE 2: OVERVIEW OF INTERREG AND EU THEMATIC PROGRAMMES OF PARTICULAR INTEREST TO MUNICIPALITIES

Programme	Eligibility	Topics
Interreg Programmes		
<u>Poland–Ukraine Next Programme</u> Cross-border cooperation. Large-scale and small-scale project funds, can finance both soft and infrastructure projects. 10% co-financing expected.	Polish voivodeships: Podlaskie, Masovian (Ostrołęka & Siedlce subregions only), Lublin, Podkarpackie Ukrainian oblasts: Volyn, Lviv, Zakarpattia, Rivne, Ternopil and Ivano-Frankivsk	• Environment • Health • Tourism • Cooperation • Borders • Accessibility
<u>Romania–Ukraine Next Programme</u> Cross-border cooperation. Large-scale and small-scale project funds, can finance both soft and infrastructure projects. 10% co-financing expected.	Romanian counties: Suceava, Botoşani, Satu Mare, Maramureş, Tulcea Ukrainian oblasts: Zakarpattia, Ivano-Frankivsk, Odesa, Chernivtsi	• Environment (climate change, disaster prevention, protection of biodiversity) • Social development (Healthcare, Education, Culture) • Border cooperation
<u>Hungary–Slovakia–Romania–Ukraine Next Programme</u> Cross-border cooperation. Large-scale and small-scale project funds, can finance both soft and infrastructure projects. 10% co-financing expected.	Slovak regions: Košice, Prešov Hungarian regions: Szabolcs-Szatmár-Bereg, Borsod-Abaúj-Zemplén Romanian counties: Maramureş, Satu Mare, Suceava Ukrainian oblasts: Zakarpattia, Ivano-Frankivsk, Chernivtsi	• Sustainable & green border regions • Healthcare, tourism, culture • Security and cross-border cooperation
<u>Black Sea Basin Next Programme</u> Transnational cooperation. Mainly research and cooperation projects. Some funding available for equipment, but not infrastructure. 10% co-financing expected.	Coastal areas of Romania, Bulgaria, Greece, Turkey, Ukraine (the whole country during the war, but proved relevance for Black Sea region), Republic of Moldova, Georgia, Armenia	• Blue and smart (research and innovation, blue economy, digital tech) • Clean and green (climate change, disaster prevention, biodiversity) • Competent and resilient (governance, cross border cooperation)

<u>Danube Regional Programme</u> Transnational cooperation. Mainly research and cooperation projects. Some funding available for equipment, but not infrastructure. 20% co-financing expected.	14 countries including 9 EU member states (Austria, German regions of Baden-Württemberg and Bavaria, Czech Republic, Slovakia, Slovenia, Croatia, Hungary, Romania, Bulgaria) and 5 other countries (Bosnia and Herzegovina, Montenegro, Moldova, Serbia Ukraine (all of Ukraine in times of war, but proved relevance for Danube region)	• Competitive and smart (innovation, smart specialisation) • Green transformation & carbon reduction (biodiversity, green tech, water purification, disaster resilience) • Social (education, labour market access, culture, tourism, heritage protection) • Better governance & cooperation
<u>Interreg Europe</u> (opened for Ukraine in 2024) Inter-regional policy development, linked to cohesion policy priorities. It allows both soft projects, typically without costs for infrastructure or equipment and peer reviews, working with dedicated experts on a certain local challenge. 20% co-financing.	All EU member states, most candidate countries, Norway and Switzerland. Partners from four parts of Europe required (West, East, North, South).	• Smarter Europe (innovation, digitalisation, support for small and medium-sized enterprises. • Greener, low-carbon Europe (transition to net-zero, promoting resilience) • Connected Europe: (mobility and infrastructure) • Social and inclusive Europe (employment, skills, education, and social inclusion) • Europe closer to citizens: (integrated development in all types of territories)
<u>URBACT</u> (opened for Ukraine in 2024) Inter-regional programme creating thematic networks of European cities that work on implementing certain policies or overcoming certain local development challenges that are common to the entire EU. 5% co-financing for Ukrainian applicants.	Urban and suburban areas from all EU member states, most candidate countries, Norway and Switzerland. Partners from four parts of Europe required (West, East, North, South)	• Policy development projects related to EU Agenda for cities

EU Thematic Programmes		
<u>Citizens, Equality, Rights and Values (CERV)</u> Calls for proposals for municipalities that develop international partnerships in two formats: Twinning projects and Networks of Towns.	Ukrainian municipalities need to have at least 1 partner in the EU that is a legal entity. At least 25 participants in the activities of the proposed project.	• Increasing citizens' engagement • Work with minorities (linguistic and ethnic) • Citizens' participation in political life (voting rights, open democratic governance) • Climate change and energy supply issues
<u>Erasmus+</u> International cooperation of the EU with other countries in the field of education, youth and sport. Calls open annually in autumn with a deadline in winter-spring. Has <u>an office in Ukraine</u>.	Opportunities for: individuals who will be able to spend a period of mobility abroad and receive language training, and organisations to collaborate on projects in the fields of academic and vocational training, schools, adult and youth education and European sporting events.	• Youth participation in European democracy • Adult learning, especially new and in-demand skills • Reducing unemployment, especially youth • Innovation, collaboration and reform • Reducing early school leaving • Cooperation and mobility with EU partner countries • European dimension in sport, including grassroots sport
<u>LIFE Programme</u> Main tool for implementing the European Green Deal, under which Europe is to become the first climate-neutral continent by 2050. Closely integrated with the <u>Covenant of Mayors</u> initiative.	A consortium of partners shall be formed to apply for the project, depending on concrete calls. Usually applicable for research institutions, municipalities usually are beneficiaries of the project, who practically implement solutions developed within the project.	• Nature and Biodiversity • Circular Economy and Quality of Life • Climate Action

<u>Horizon Europe</u> Framework Programme for Research and Innovation with a focus on achievement of sustainable development goals, overcoming the challenges of climate change, creating a competitive economy, developing basic research and nurturing scientific talent. Has an office in Ukraine and a structure of <u>contact points</u> for different thematic areas. The programme goals are achieved by creating missions.	A consortium of partners shall be formed to apply for the project, depending on concrete calls. Usually applicable for research institutions, but municipalities who practically implement innovations developed are often beneficiaries.	• <u>Health</u> • <u>Culture, Creativity and Inclusive Society</u> • <u>Civilian Security for Society</u> • <u>Digital Technology, Industry and Space</u> • <u>Climate, Energy and Mobility</u> – one of the most relevant for municipalities • <u>Food, Bioeconomy, Natural Resources, Agriculture and Environment</u>
<u>Creative Europe</u> Since 2014, Creative Europe has been supporting projects to foster cultural diversity, promote artistic expression, and boost the economic potential of the creative industries.	Organisations working in the field of culture to disseminate the European cultural product and develop cross-border cooperation in the creation of cultural products. A consortium of partners shall be formed to apply for the project, depending on concrete calls.	• Culture • Media • Cross-sector cooperation
<u>EU4Health</u> Adopted as a response to the COVID-19 pandemic, this programme reinforces crisis preparedness in the EU with regard to global health challenges.	Public authorities, including national, regional, or local government bodies and public advisory bodies. Health organizations and private medical institutions, including hospitals and public health institutions. Also NGOs, academic and educational establishments, private sector, international organizations, expert networks.	• Response to COVID-19 and reinforcing the resilience to cross-border health threats • Europe's Beating Cancer Plan • Pharmaceutical Strategy for Europe • Digitalisation of health systems • Reducing antimicrobial-resistant infections • Improving vaccination rates
<u>Single Market Programme</u> finances activities supporting a well-functioning, sustainable internal market.	Civil society organizations, SMEs, public authorities (local, regional, and national), educational institutions.	• Food safety • Consumer protection • More effective single market • High quality statistics • Effective EU standards

Among the **difficulties faced by municipalities** wishing to participate in Interreg and Union programmes are:

- Lack of existing partnerships with EU municipalities – often a requirement, especially in programmes which require a consortium of partners in different countries.
- Lack of project managers and English-speaking staff (this concerns almost half of the municipalities that Cities4Cities works with). This issue is also related to the low salary rate in local government as compared to other sectors of the economy where such specialists are needed. Also, immense migration of skilled workers, mainly women, due to the war worsens the situation.
- Lack of disposable financial resources to co-finance and smoothly run projects, due to the war and reduced municipal incomes. (In general, project beneficiaries receive a ‘pre-financing’ tranche on commencement of a project, but must fund most activities from their own budgets until final reimbursement once project reports are approved. A ‘revolving fund’ or similar to help with this cashflow problem has been discussed in MDCT, but not implemented thus far.)
- Slow and ineffective state system of project monitoring. Many applicants face difficulties and delays in receiving tranches of funding, which also places additional burdens on local government.
- Lack of established offices or contact points on the side of beneficiaries. Most programmes are managed by the Cabinet of Ministers office for international technical assistance programmes, but the work here focuses mainly on administration, with limited capacity to communicate with potential programme beneficiaries. In many EU countries by contrast, the contact points for programmes are representatives of potential beneficiaries such as universities, think tanks or LGAs (e.g. URBACT in Poland).

Discussion of local government participation in EU-funded projects often focuses on territorial cooperation (Interreg) programmes since municipalities – at least those in areas bordering EU Member States or other candidate countries – are directly eligible for these.

However, they represent a small proportion of the total budget for assistance to enlargement and neighbourhood countries.⁵³

An important question for local authorities is how to improve access to (or at least influence over) the much larger ‘bilateral’ support to each country – in Ukraine’s case through the Neighbourhood, Development and International Cooperation Instrument (NDICI) and now the Ukraine Facility.

As shown in Table 3 below, the EU provides grants and technical assistance aimed partly at the local level in Ukraine through various projects.

An issue for LGAs to consider is whether further projects of this nature, also looking ahead to the post-2027 period, are needed to help build local capacity to implement the EU acquis.

⁵³ Interreg NEXT is funded partly by the European Regional Development Fund (for EU countries), the Instrument for Pre-Accession Assistance (for countries who were already candidates in 2021) and NDICI. The total budget is EUR 1.1 billion, as compared to EUR 79.5 billion for the whole of NDICI. For pre-accession countries, 3 per cent of the financial envelope is dedicated to territorial cooperation (cross-border and transnational).

TABLE 3: EU GRANTS AND TECHNICAL ASSISTANCE OF RELEVANCE TO THE LOCAL LEVEL IN UKRAINE

Programme / project	Eligibility	Topics
<u>U-LEAD with Europe</u> Implemented by GIZ, focused on developing multilevel governance in Ukraine with specific focus on strengthening local governance. Regional offices in all regions of Ukraine.	Government Local and regional authorities	• Support in preparing reconstruction projects and plans (Project Preparation Facility for municipalities) • International municipal partnerships (Bridges of Trust) • Capacity building (U-LEARN platform) • Analytical reports
<u>TIPS4UA</u> Training and internship programme, implemented jointly by Committee of regions and U-LEAD.	Local and regional authorities	• Capacity building • Cooperation with EU municipalities
<u>International Renaissance Foundation</u> Calls to support the preparation of municipalities for EU accession through civil society activities.	Civil Society Organisations (CSOs)	• Raising awareness and capacity for EU integration at local level • Assisting in strategic development planning and applying EU standards, • Support for participation in EU programmes
<u>EU4Recovery</u> Implemented by UNDP, supports the strengthened resilience and early recovery of war-affected communities in selected target areas of Ukraine.	Local authorities, CSOs in Donetsk, Dnipro and Poltava regions	Access to social services, healthcare, administrative and other services with focus on recovery projects, support to internally displaced persons / veterans, gender equality and public safety, countering gender-based violence / conflict-related sexual violence, inclusion.
<u>EU4Reconstruction</u>	Government, State agency for restoration and infrastructure development, municipalities	• Help municipalities plan, finance and deliver infrastructure projects to EU standards • Ensure transparent management of public investment projects

<u>Mayors for economic growth</u> Innovative economic and urban development in Ukraine and other EaP countries. Urban Learning Centre offers free online courses on relevant topics.	Local authorities (around 50 targeted frontrunner municipalities)	• Inclusive, green, and innovative economic revival • Systemic local economic planning • Access to finance • Future-ready capabilities • Local, regional, and global networks.
<u>East Europe Foundation</u> Institutional partner of EU delegation to Ukraine to enhance the role of CSOs in the EU integration process. <u>Phoenix Project: Power of Communities</u> aims to strengthen the role of CSOs in EU integration at local level.	CSOs	• Informing about EU integration • Cooperation between CSOs and local authorities on recovery projects • Enhancing access to EU funding
<u>ISAR Edannia</u> Institutional partner of EU delegation to Ukraine to enhance the role of CSOs in the EU integration process. <u>Unity4Community Project</u> focuses on improved cooperation between local authorities and CSOs in the EU integration process. Sub-granting to three strategic partners and 18 organisations.	CSOs, local authorities	• Social recovery and community cohesion • Local development strategies • Citizen engagement in decision-making processes • Collaboration between CSOs and local authorities • Implementing European standards and practices for effective community recovery
<u>Institute for Economic Research and Policy Consulting</u> Institutional partner of EU delegation to Ukraine, managing <u>seed-funding</u> for CSOs for monitoring of recovery and EU integration processes.	CSOs	Economic and social research, policy consulting.

<u>Network 100 Percent Life Rivne</u> Institutional partner of EU delegation to Ukraine to enhance the role of CSOs in the EU integration process.	CSOs	Social and medical services for vulnerable groups including day care, palliative care at home, support to people with certain conditions, preventive measures, legal support humanitarian assistance.
<u>House of Europe</u> Implemented by <u>Goethe-Institut Ukraine</u> fostering professional and creative exchange between Ukrainians and their colleagues in EU countries and the UK.	CSOs	• Culture and creative industries • Education and youth work • Social entrepreneurship • Media • Supporting national minorities • Revitalisation of cultural infrastructure • Support to culture events
<u>State Regional Development Fund funds from Ukraine Facility</u> Main channel proposed for 20 % of Ukraine Facility Pillar I grants to sub-national level.	Local and regional authorities	• Municipal infrastructure and services: water supply, sewage and heat supply facilities. • Education: general, secondary and preschool educational institutions. • Healthcare: hospitals, outpatient clinics, etc. • Civil protection: general structures, educational, healthcare and social protection institutions • Security centres and warning systems. • Public services: ASCs, buildings and premises of local authorities, etc.

4. HOW ENGAGED ARE LOCAL AUTHORITIES IN THE ACCESSION PROCESS IN UKRAINE?

4.1. OVERVIEW OF LOCAL ENGAGEMENT IN OTHER CANDIDATE COUNTRIES

Historically, local authority representatives have had little involvement in the EU accession process. In the first enlargements (1973, 1981 and 1986) there were fewer issues of concern for local governments. With the completion of the single market in the early 1990s and the expansion of competences in areas such as environment and cohesion policy, the EU gained relevance for many more items on local council agendas.

The accession of Austria, Finland and Sweden in 1995, along with the Swedish municipal association's analysis of the consequences for municipalities and counties, marks a milestone.⁵⁴ Still, LGA involvement in the accession process and in formal consultations on EU-related questions remained less than satisfactory.⁵⁵ Local representatives from the countries that joined the EU in 2004, 2007 and 2013 are more or less unanimous in saying that, with the benefit of hindsight, they should have been better prepared.⁵⁶ In the current candidates, there is much greater awareness of the implications of EU accession for local authorities, and although addressing the monolithic topic of EU integration remains a challenge, LGAs are clearly better prepared. The box below summarises the main measures taken.

Overview of measures taken by LGAs to promote local engagement in EU integration

- Conduct own impact assessments of how accession will affect local authorities.
- Take part in consultations on legislative amendments arising from approximation with EU acquis.
- Participate in working groups underlying the accession negotiations.
- Create networks of designated EU officers in municipalities to share experience. (But also 'mainstream' EU questions in other technical networks, e.g. on environment.)
- Provide training in specific areas (e.g. public procurement, data protection) and advocate for national institutions to include the local level in their training programmes.
- General awareness-raising (brochures, newsletters, videos, media articles, etc.).
- Various measures to improve access to EU-funded projects:
 - Information to members on available funds, upcoming calls, etc.
 - Coaching/advice on project applications.
 - Participate in sector working groups, monitoring committees, etc. with a bearing on programming.
 - Advocate for (centrally funded) financial mechanisms to facilitate pre-financing and/or co-financing of EU-funded projects.

Not all LGAs have undertaken all these measures, and the emphasis varies between countries.

⁵⁴ Svenska kommunförbundet, *Kommunala konsekvenser av medlemskap i EG* (Kommentus Förlag, 1992). [Swedish Association of Municipalities, *Municipal consequences of EC membership*].

⁵⁵ When Sweden joined, a consultation group between the government and the local and county associations was established. Six years later this had been disbanded, having in the associations' view become more about information than consultation (Sex år i EU [Six years in the EU], 2001, p. 17).

⁵⁶ See Marko Ercegović, 'Experience from Croatia,' ch. 7 in A. Duman et al., *The impact of EU accession on local authorities in Bosnia and Herzegovina* (draft report for SALAR International, 2019) for an account of the most recent experience.

In Montenegro, for example, local representatives (both Union of Municipalities staff and municipal experts) have taken part in 11 negotiation working groups, while elsewhere they have struggled to be invited.

In Serbia, the Standing Conference of Towns and Municipalities has produced over 20 impact assessments on different areas of the EU acquis (see Bibliography).

An important point here is the central role of LGAs. National negotiators, themselves facing resource constraints and competing claims from numerous stakeholders, are unlikely to prioritise local issues unless these risk blocking the process.

On the other hand, individual local authorities have many other day-to-day priorities and (except perhaps for the largest cities) scarcely the capacity to anticipate how EU membership will affect them in several years' time. If LGAs do not perform this function, no one else will.

In the Ukrainian context, given aspirations to a strong European model of decentralised governance, it should be underlined that competent and professional municipal and regional associations are part of this model.

4.2. BASELINE ASSESSMENT FOR UKRAINE

Table 4 provides a snapshot of the current level of local engagement in the accession process, based mainly on interviews with Polaris programme experts and representatives of LGAs, central government and other partner projects.⁵⁷

TABLE 4: GENERAL INDICATORS RELATING TO LOCAL ENGAGEMENT IN THE EU ACCESSION PROCESS

Indicator	Evaluation for Ukraine
Do local representatives participate in consultations on alignment of legislation/ policy with the EU acquis?	Yes, to some extent. LGAs involved on items related to the Ukraine Plan indicators (delineation of powers, regional policy, etc.), including through (parliamentary) 'line committees'. Active in advocacy in many areas (e.g. municipal property rights) and sometimes consulted (e.g. on waste regulations), though not systematically involved in all EU-related sectors.
Are local representatives included in high-level dialogue on the accession process?	No, not included in e.g. inter-ministerial working group on the negotiation process or inter-agency working group to prepare the Ukraine Plan (though some consultations with regional state administrations, city and district councils).
Do local representatives participate in accession negotiation working groups?	To a limited extent, mainly on ch. 22. For this chapter, the President of UAROR has taken part in the negotiation group / screening meetings, while other experts associated with LGAs (though not representing them as such) have been involved in the parallel expert group. LGAs consulted in some other areas (e.g. rural development) and have sent written contributions on some other chapters. They were also invited on the same footing as NGOs and business associations to open calls for the expert groups, but did not enrol.

⁵⁷ See the acknowledgements for a list of those consulted. We were unable to interview AUC, and the scope of this exercise could usefully be expanded to cover regional state administrations and certain other ministries such as MEEU and the Ministry of Finance. The evaluation given is thus preliminary, and in the opinion of the authors, not necessarily those consulted.

Are there EU officers in municipalities and/or EU-related networks of municipal staff?	Not EU networks as such. AATC has a thematic platform on international relations. UAROR shares consultations with members. Lviv has a bureau of European integration as part of the city administration, but most municipalities do not have dedicated staff to work on EU affairs.
Are there technical networks (e.g. on environment) that deal with EU-related aspects?	Yes, numerous thematic platforms and committees covering (e.g.) rural development, spatial planning, social cohesion, gender equality.
Do the LGAs arrange training for members on EU-related matters?	Training available through various international donor projects (U-LEAD, Polaris, etc.) but not under LGAs as such.
Are there any impact assessments or screenings of how EU accession will affect local authorities?	No. Some analyses of preparations for accession in e.g. ch. 22, but nothing to our knowledge assessing impact on local authorities. East Europe Foundation has analysed the role of NGOs in the EU integration process, which also impacts local preparedness for EU integration, especially as regards communication with citizens.
Does the central government recognise the importance of engaging the local level in the accession process?	Yes, clear recognition from the Office of the DPM for European and Euro-Atlantic Integration and from MDCT. Further assessment needed for other ministries, but initial impression is they may see local engagement as something to be channelled through the Office for EU Integration and/or MDCT.
Do state institutions involve municipalities in capacity-building efforts?	Yes, to some extent. Deputy Heads of Regional Military Administrations for EU integration appointed to coordinate EU-related efforts, including liaison with regional, district and local councils. However, unclear what resources will be assigned to these roles, and how far they will be supervisory as opposed to inclusive. Training initiatives are mostly through donor projects. Some local reps see capacity-building as prioritising national-level officials.
Do municipalities participate in cross-border, transnational and inter-regional cooperation projects?	Yes, although predominantly in the west of the country (programmes with Poland, Slovakia, Hungary and Romania). (See section 3.3.)
Do local self-government representatives participate in programming and monitoring of EU funds?	No. As a rule, regional state administrations represented on the monitoring committees of cross-border projects etc. The Ukraine Facility Plan does not specify detailed arrangements for monitoring (leaving it up to the Government to approve a procedure developed by the Ministry of Economy).
Are there other EU-funded projects helping with municipal-level preparations for accession?	Yes, substantial assistance under Pillar 3 of the Ukraine Facility (in particular through U-LEAD). (See also section 3.3.)

Are there funds or mechanisms to help municipalities with pre-financing and/or co-financing of EU-funded projects?	Not yet, although some openness to the idea at the Office for European and Euro-Atlantic Integration and at MDCT. There is a legal basis for the state to co-finance cross-border projects, though further amendments to the Budgetary Code are needed.
Are local representatives involved in discussions on future EU funding mechanisms?	Some involvement in ch. 22 as noted, but attention seems mainly focused on 2021–27 programmes and the Ukraine Facility. Some involvement of LGA reps in discussions here, but others stress considerable uncertainty and lack of local input on allocation of the 20% of Pillar I grants meant for the sub-national level. Little awareness of EU discussions on post-2027 framework and possible implications for Ukraine.
Are local representatives engaged in dialogue etc. with EU institutions and bodies?	Yes, LGA reps often involved in seminars etc. with EU Commission and Delegation representatives. Office space available in Brussels through the CoR, which also provides training for municipalities through the TIPS4UA programme. EU Delegation works with AUC and AAATC (through smaller grants via partners) and seems open to further support through projects.

Overall, the table suggests a mixed assessment. On the positive side, strong EU support for decentralisation should in principle make engagement in the accession process easier for LGAs in Ukraine compared with their counterparts in some of the other candidate countries.

Also positive is clear recognition by key parts of the central government of the stakes for local authorities even at a relatively early stage in the process. Again, this is something that LGAs in some of the other candidate countries have had to struggle for. Significant EU and other donor support for projects aiming to build local-level capacity is another positive factor.

Less positive perhaps is that local engagement seems to be largely channelled through the areas highlighted in the ‘Decentralisation’ part of the Ukraine Facility. Thus, the LGAs are active in discussions on distribution of powers, they are involved to a certain extent in negotiation working and expert groups on chapter 22, and they cooperate well with MDCT. This is all positive in itself.

But chapter 22, while important, is far from the only relevant area, and most of the others fall outside MDCT’s competence. Further investigation would be needed to confirm this picture, but initial discussions for example with MEEA – which leads on several critical EU-related areas for the local level – indicated that LGAs should approach the Office of the DPM and/or work through MDCT if they wish to be involved for example on chapter 27.

Further, even in chapter 22, engagement of local self-government appears limited. To our knowledge, only one LGA has taken part in the working group on the negotiations (see the box below). It is the regional state administrations, not local or regional self-governing authorities, who are represented in monitoring committees for the Interreg programmes.

For the Ukraine Facility, there are no plans yet for a monitoring committee, and LGA representatives confirm that they have little direct influence over plans for the State Fund for Regional Development.⁵⁸

⁵⁸ The Interdepartmental Coordination Commission on Regional Development is the central coordinating body and again, besides line ministries, it is the Heads of regional and Kyiv city military administrations who are (or may be) represented here, not local/district/regional councils.

Local involvement (or lack thereof) in preparing the accession negotiations

In August 2025 the Government established the [Interministerial Working Group](#) on ensuring the negotiation process on Ukraine's accession to the European Union and adapting Ukrainian legislation to European Union law. Working groups to prepare Ukraine's negotiating position on each acquis chapter were formed. Besides public officials, these comprise representatives of business associations, civil society and academia. However, neither individual local representatives nor LGAs were included.

In October 2025 the Cabinet of Ministers [updated](#) the personal composition of the Interministerial Working Group, but the local government perspective is still not reflected in the composition of most of the updated working groups. On chapter 22, LGAs were invited to respond to the EU's questionnaire, and one of the four all-Ukrainian LGAs is represented in the working group for this chapter (UAROR in the person of its President, Tetiana Yehorova-Lutsenko).

The LGAs are consulted on certain draft laws which align Ukrainian legislation with EU acquis, such as the Law on delineation of powers or the Law on legality and accountability of local governance, in line with Law of Ukraine on public consultations. However, consultation on EU-related legislative alignment in general is far from systematic.

The commitment to allocate 20% of the Pillar I grants under the Ukraine Facility to sub-national authorities ('in particular local self-government') is of course welcome, and without parallel in the other candidate countries. However, as the first year of the Ukraine Plan draws to a close, it is still uncertain how this will be implemented.

The EU's vision, shared by MDCT, is for this to be used for project-based support, e.g. through the State Fund, with projects selected using the DREAM system. However, amounts allocated so far are limited (as noted in section 3.3) and local representatives see slim prospects for projects without a clear security dimension. Looking further ahead, they expect large infrastructure projects to be prioritised, with less scope for local capacity-building.

Furthermore, some interlocutors note an alternative vision, said to be favoured by the Ministry of Finance, whereby the 20% would take the form of subventions, perhaps even covering existing subventions for health and education. While it seems unlikely that the condition could be assessed as fulfilled unless sub-national authorities receive additional resources, it must be said that the requirement in the Ukraine Plan is not very specific.⁵⁹ Would resources to rebuild a school or a hospital, for example, be counted as part of the 20% even if decision-making took place entirely at national and/or regional state level?

Under chapter 22, the European Commission's latest Ukraine report calls (among other things) for 'the systematic and inclusive engagement of regional and local stakeholders at all the stages of the programming cycle.'⁶⁰ Inclusive partnership between stakeholders is one of the key principles of EU cohesion policy, but LGAs need to insist on their rightful place in this partnership.

In EU member states, particularly larger ones such as Poland or France, where large parts of cohesion funding are allocated and managed regionally, we may observe similar tension between regional branches of the state and regional/local self-government in deciding how funds are used.⁶¹

⁵⁹ 'Report proving that at least 20% of the non-repayable financing support under Pillar I of the Ukraine Facility have been allocated to the recovery, reconstruction and modernisation needs of Ukraine's sub-national authorities, in particular local self-government.' The methodology for this proof is not specified. The Ukraine Plan (p. 190) specifies that corresponding investments are planned in human capital, transport, energy and other sectors. Such investments, however they are decided on, will of course bring benefits for economic and social development at local level, but the aim is to promote decentralisation then additionality of these resources and involvement of local self-government in decision-making would seem to be important criteria.

⁶⁰ European Commission, op cit (2025), p. 20.

⁶¹ See the [Commission proposals](#) from July 2025 (with links to the legal texts at the bottom of the page).

In any event, the present situation appears less than satisfactory from the perspective of Ukrainian LGAs – but also from the EU's perspective if it is serious about promoting compliance with the *acquis* (including the Code of Conduct on partnership⁶²) and decentralisation.⁶³

This must also be seen in the context of the European Commission's proposals for the post-2027 EU financial framework. Some observers detect moves to 'renationalise' cohesion policy, with funds allocated on a national basis, although regional and local authorities would still be included in the partnership that decides how funds are used. More generally, plans for cohesion policy and pre-accession funding appear to be moving in the direction of the Ukraine Facility (and similar facilities for Moldova and the Western Balkans), with greater focus on large investment projects and payments to national budgets conditional on progress with agreed reforms. Thus, the question of how exactly the Ukraine Facility works today (in particular the commitment to allocate part of the grants to sub-national authorities) has resonance for the future. In this and other areas, LGAs need to take account of the fact that the EU *acquis* is a moving target.

In interviews with LGA representatives, the main problem highlighted when it comes to preparedness for EU accession is lack of capacity, both within association staff and in local administrations. In particular, hromadas lack specialists with English language skills who are familiar with EU legislation and/or requirements for EU-funded projects. This is a problem for all levels of government in all candidate countries, to which there is no magic solution beyond making best use of the scarce resources that are available. One insight is that LGA staff cannot do everything themselves, but need to pool their members' expertise, for example when taking part in working groups underlying the negotiations or responding to consultations on alignment of domestic legislation to the EU *acquis*. Another insight from other candidate countries is that central government, faced with its own resource constraints, is likely to prioritise training of central government officials, and that LGAs will need to make the case – both with line ministries and with the EU Delegation and other partners – for involving their members in capacity-building efforts.

The four all-Ukrainian LGAs appear to be working largely independently on EU integration, which in view of capacity constraints stands out as a clear weakness. Better coordination might facilitate knowledge-sharing and perhaps a division of labour on different EU-related topics. Self-evidently, speaking with four different voices also weakens the collective position of local and regional self-government vis-à-vis central authorities and the EU. While the LGAs have different interests and views on certain key topics (e.g. whether personal income should be taxed at place of residence or place of work), there are also substantial areas of common ground. The next section will outline several issues on which better coordination among the LGAs could help to improve Ukraine's preparations for accession.

One such issue concerns the establishment of Ukraine's Joint Consultative Committee (JCC) with the EU Committee of the Regions, expected soon following discussions at the EU-Ukraine Association Council in April 2025.⁶⁴ However, LGAs, which according to EU practice should play an important role in selecting members of the JCC, do not (at the time of writing, following interviews in October 2025) seem to have been involved in these discussions.

A further point that should be underlined here is the degree of urgency. Ukraine is on the point of commencing accession negotiations and drafting of the National Programme for the Adoption of the *Acquis* is well-advanced.

⁶² Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1). Note that this still applies and is referenced in the post-2027 proposals.

⁶³ The Ukraine Facility Regulation, Article 4(6), specifies: 'In line with the principle of inclusive partnership, the Commission shall strive to ensure, as appropriate, democratic scrutiny in the form of consultation by the Ukrainian government of the Verkhovna Rada in accordance with the constitutional order of Ukraine, as well as of relevant stakeholders, including local and regional authorities, social partners and civil society, including vulnerable groups, so as to allow them to participate in shaping the design and implementation of activities eligible for funding under the Facility and in the related monitoring, scrutiny and evaluation processes, as relevant.' The Ukraine Plan does not say much about partnership, but tasks the Coordinator (Ministry of Economy) with monitoring, including parliamentary hearings. A strategy for advocacy here would include asking the Ministry how it proposes to implement the requirement to involve local and regional authorities in design, implementation, monitoring, scrutiny and evaluation, and asking the EU Commission how it will strive to ensure this.

⁶⁴ Council of the EU, [Joint press release](#) following the 10th meeting of the EU-Ukraine Association Council.

In other words, alignment with EU legislation is happening now, and questions concerning local responsibilities and implementation capacity need to be addressed now. In this context, the country can hardly afford to wait for constitutional changes to clarify the roles of the district and regional levels. For the time being, responsibilities for implementing EU standards must be assigned either to hromadas or to the national government (including its territorial branches), and it is perhaps here that the main risk of recentralisation lies.

5. SCOPE FOR IMPROVEMENT

This final section focuses on concrete steps that local representatives, potentially with the support of donor projects, could take to improve preparations for EU accession and thus ameliorate the impact.

As regards timeframe, it will be difficult in current circumstances for most individual mayoralities to prioritise technical EU-related questions. Beyond day-to-day resilience, they are focused on elaborating local development strategies and coming to terms with the DREAM system. There may be more receptiveness in the western part of the country, where many communities have developed international partnerships and gained experience with Interreg projects. **Information materials** (e.g. a brochure based on Table 1 in section 2.1 above, complemented with specific issues identified for Ukraine in section 3) could be used to raise basic awareness of the stakes for local authorities.

On matters that require foresight, such as alignment with EU standards and future funding arrangements, the role of the LGAs seems even more important than in the other candidate countries. Since the LGAs themselves face significant capacity constraints, there would (as noted above) be much to gain from **increased cooperation on EU-related matters**. Possible topics of common interest include:

- **Participation in negotiation working groups and/or associated expert groups** on key chapters of the acquis. Could LGAs agree on a division of labour and on some coordination of positions in advance of meetings? At present, attention seems focused on chapter 22 and only UAROR is formally represented, but there is no reason in principle why, for example, AUAC should not be involved on rural development. Chapter 27 (Environment and climate change) stands out as a key area for the local level where the LGAs together could advocate for involvement, perhaps of representatives from AAATC and/or AUC.
- **Preparation of Ukraine's delegation to the CoR JCC**. There seems to have been little discussion of this between the LGAs thus far, but the delegation will have to be balanced and representative of all levels and types of local and regional authorities, and there is a common interest in ensuring that members are well-prepared and have the necessary resources to take part in meetings in Brussels. Could the LGAs develop a joint position on this and share the administrative burden of providing the secretariat?
- Advocacy on greater local involvement in determining priorities for the use of EU funds. One option would be to lobby for some form of **monitoring committee for the Ukraine Facility**, in which LGAs (among others) would be represented. This requires careful consideration, since such structures can become unwieldy and consume resources without having real influence. But **local involvement in the partnership** is an important point of principle on which LGAs need to insist. Another option might be to lobby for seats in the Interdepartmental Coordination Commission on Regional Development, which has some influence over selection of projects for the State Fund for Regional Development. If this Fund is to be used to allocate the 20 per cent, it would appear reasonable for local self-government representatives to have a voice here.
- Advocacy for a **mechanism to assist with pre-financing and/or co-financing** of EU-funded projects. Cash flow is reported to be an obstacle to participation even in small projects (since costs need to be partly covered from local budgets pending reimbursement on approval of results). Experience from other candidate countries may be useful to share here, both on advocacy strategy (engaging ministers responsible for EU questions in order to pre-empt likely resistance from other quarters) and on the mechanism itself (which should be simple to apply for and not entail additional costs or administrative burden).

More generally, **analytical work on local government access to EU-funded projects** might provide useful support to the LGAs' efforts. This could consider the experience of larger EU Member States with regionally managed funds and raise awareness of the implications of ongoing discussions on the post-2027 financial framework.

While U-LEAD is supporting preparations for the chapter 22 negotiations, it may be in the interest of the LGAs to sharpen the focus on the **partnership principle** and how the above-mentioned Code of Conduct should be implemented. This is not only about access to funds, but rather how the pre-accession period in Ukraine can best be used to build local-level capacity to implement the EU acquis, and it is essential for the LGAs to ensure that this aspect is not forgotten in plans for the post-2027 framework.

EU networks and/or committees of local government representatives and/or practitioners with an interest in EU-related questions have been formed in some of the other candidate countries (e.g. Albania, Bosnia and Herzegovina, Montenegro, Serbia) as a way to share knowledge among members and to pool expertise. There are various ways for projects to support this. In BiH, for example, a SALAR project has helped to fund EU officers, whose responsibilities include network coordination, in the two LGAs. Further, joint network and committee meetings have been held despite some differences in views between the two associations. Could a similar approach be contemplated in Ukraine? Or if it is too early to promote the idea of joint networks, could joint events focused on the types of issues outlined above be considered as a first step?

A further possible avenue for support in Ukraine would be the newly appointed **Deputy Heads of Regional Military Administrations for EU integration**. Their terms of reference include coordinating accession-related reforms on the ground, establishing the links between local development priorities and national objectives, engaging communities, and preparing for the future management of the EU cohesion and rural development funds. Thus, they are highly relevant to the issues outlined above regarding partnership but also have a broader role in preparing for implementation of EU standards at local level, presumably including areas such as public procurement and environmental protection. Further investigation would be needed here, but at present these positions are clearly under-resourced. Project support might help to ensure genuine engagement both of local self-government and other parts of central government responsible for key areas of the acquis.

Donor projects could also support **more in-depth impact analyses** of particular chapters of the EU acquis or areas of local responsibility such as urban and spatial planning. That would entail a more comprehensive (though still perhaps not exhaustive) account of the relevant EU acquis and ongoing alignment of national legislation and policy, and a more in-depth assessment – ideally involving fieldwork in a sample of municipalities – to assess awareness of recent and pending changes, the extent to which EU standards are effectively (or may be expected to be) implemented on the ground, and the need for capacity-building to fill implementation gaps. To this might be added ex post accounts of how EU membership has affected local authorities in recently acceded Member States, including lessons learned and pitfalls that could with hindsight have been avoided.

Maintaining dialogue between LGAs and EU institutions is highly recommended. Keeping EU representatives informed of some of the problematic issues faced by local authorities could help to resolve these issues given the EU's willingness to encourage the national authorities to complete decentralisation. In addition, if the EU perceives LGAs as constructive actors in the accession process, this could help to pave the way for future EU-funded projects aimed at the local level.

One or preferably several LGAs might consider an approach to the EU Delegation in Kyiv with **a concept for an 'EU for Municipalities' action** to be agreed with the government for inclusion in Ukraine's next reform agenda (if not under the current Ukraine Plan). This could include sub-grants (or similar) for activities and small investments to improve capacity to implement the EU acquis and Ukraine Plan reforms. Inter-municipal cooperation within Ukraine, having in mind that large parts of the country are ineligible for most of the Interreg programmes, would be one possible focus, while the analysis in sections 2 and 3 suggests no shortage of potential themes.

Another avenue worth pursuing is **direct contacts between the LGAs and the EU institutions** in Brussels (e.g. the EU Commission's Directorate-General for Regional and Urban Policy). EU officials currently face restrictions on travel to Ukraine but may have scope to provide technical assistance to candidate countries.

For example, the Polaris programme in cooperation with EU institutions has been able to finance participation of Ukrainian local representatives in several capacity-building visits and conferences in Brussels. LGAs could explore whether this could be extended to technical assistance in Ukraine, for example for groups of municipalities to prepare joint capacity-building projects. Additional Interreg programmes, including Moldova–Ukraine cross-border cooperation and potentially links with the Nordic–Baltic region, would be another issue for discussion, whether in the current programme period or post-2027.

Beyond the short-term perspective, once martial law comes to an end, local elections will be held and constitutional amendments to complete the decentralisation process should be on the agenda, and Ukraine may have made significant progress in the accession negotiations. This would be a **critical juncture at which to intensify preparation of new local authorities** for implementation of EU standards, effective use of EU funds and dialogue with citizens on what EU integration means in practice.

Among the points mentioned by LGA representatives as useful steps that could be taken with project support:

- An overview for new heads of communities to raise awareness of the implications at local level of Ukraine becoming an EU Member State.
- A centralised system of training for local officials responsible for compliance with and implementation of EU standards. LGAs could play a role here in identifying target groups and potentially in hosting a training platform.
- Training and exchange of experience on EU funding opportunities, as arrangements for the post-2027 system of pre-accession assistance become clearer.

More generally, **continued support for strong LGAs and a concerted effort to engage the local level in the EU accession agenda** will be needed. This can help to improve the quality of Ukraine's preparations for EU membership, to avoid some of the problems that often emerge in the early years, and to increase the country's capacity to absorb EU funds efficiently. It may also reduce the risk of unintended recentralisation in situations where the state may be inclined to take over if local authorities are seen as lacking the capacity to implement EU standards.

Where the types of measures outlined above are supported by donor projects, this should naturally be coordinated among donors. While a full mapping was outside the scope of the present assignment, several initiatives (besides the POLARIS project, under which this assignment falls) are worth highlighting in this context:

- U-LEAD, while not providing training to local authorities on EU accession as such, intends to integrate this aspect into all programmes as of next year (thus an event on financial audit, for example, would consider the EU acquis on this topic). As noted, U-LEAD has also done substantial analytical work on chapter 22 preparations; any further work e.g. on the partnership principle as outlined above should seek to avoid overlap.⁶⁵
- The East Europe Foundation, in particular its project 'Phoenix: The Power of Communities', is working on engagement of CSOs in European integration. The first analytical work from this project provides a useful overview of the accession process, including some experience from other countries on involvement of other stakeholders.⁶⁶ While this does not directly concern local authorities, there are parallels. For example, one typical CSO activity is the production of 'shadow reports' on implementation of the EU acquis. These can be helpful also to local authorities in highlighting implementation gaps and capacity-building needs.⁶⁷

⁶⁵ U-LEAD [Analytics](#).

⁶⁶ East Europe Foundation, [European Integration. The Role and Engagement of CSOs](#).

⁶⁷ See e.g. in North Macedonia, Platform 27, [Shadow Report on Chapter 27](#) and similar [Coalition 27 reports](#) for Serbia.

- The RELEVE project, implemented by Expertise France, supports Ukraine's resilience, reconstruction and integration into the EU, including political and legal advice on decentralisation reform and strengthening municipalities' skills in managing public investment projects. While representatives of RELEVE were not interviewed for the present assignment, these activities are obviously relevant to the issues outlined above.

In the interviews conducted for the present assignment, representatives of other projects were sympathetic to some of the points raised above, for example on the importance of the partnership principle for EU funding and on the need for LGAs to speak with one voice on EU integration. Thus, there would seem to be good potential for cooperation.

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