



REFORMS DELIVERY OFFICE
CABINET OF MINISTERS OF UKRAINE



UKRAINE RECOVERY DIGEST №192

**Weekly overview of media,
legislative acts and statements
on Ukraine Recovery**

NOVEMBER 15 – 21, 2025

TABLE OF CONTENTS:

1. INTERNATIONAL ASSISTANCE	3
2. RECOVERY PLANS – OFFICIAL	5
3. PROCESS OF RECOVERY	9
4. RECOVERY – INTERVIEWS AND AUTHOR MATERIALS	11



If you want to receive a digest - write to us at:
rdo@kmu.gov.ua

The Ukraine Recovery and Reform Architecture is a comprehensive technical assistance programme deployed by the European Bank for Reconstruction and Development (EBRD), in partnership with the European Union, to support critical recovery and reform processes in Ukraine. URA is implemented with the financial assistance of the EBRD-Ukraine Stabilisation and Sustainable Growth Multi-Donor Account (MDA), contributors to which are Austria, Denmark, Finland, France, Germany, Italy, Japan, Latvia, the Netherlands, Norway, Poland, Slovenia, Sweden, Switzerland, the United Kingdom, the United States, and the European Union.

1. INTERNATIONAL ASSISTANCE

EU'S VON DER LEYEN SAYS THREE OPTIONS OR COMBINATION COULD FINANCE UKRAINE

European Commission President Ursula von der Leyen said in a letter to European Union governments on Monday that there are three options for meeting Ukraine's financing needs, including a loan using frozen Russian assets, but a combination of them is also possible.

EU leaders agreed last month to meet Ukraine's «pressing financial needs» for the next two years but stopped short of endorsing a plan to use frozen Russian assets to fund a giant loan to Kyiv, due to concerns raised by Belgium.

«We have identified three main options, i.e., support to be financed by Member States via grants, a limited recourse loan funded by the Union borrowing on the financial markets, or a limited recourse loan linked to the cash balances of immobilised assets,» von der Leyen said in the letter, seen by Reuters.

In an options paper attached to the letter, von der Leyen added that «the three options are not mutually exclusive. They can be combined or sequenced».

«Given the urgency of the situation, varying complexity of the options, and the need to start disbursements by the second quarter of 2026, any selected option could be designed as transitional and time-limited,» she said in the paper.

[Source](#)

THE IMF MISSION WORKS WITH THE GOVERNMENT TO LAUNCH THE EXTENDED FUND FACILITY (EFF)

Structural reforms, capital mobilization, and corporate governance were among the topics discussed by Ukraine's Minister of Economy, Environment, and Agriculture Oleksii Sobolev, on November 17 during a meeting with representatives of the International Monetary Fund mission led by Gavin Gray.

«The International Monetary Fund, together with the Government, is launching a new Extended Fund Facility (EFF) for Ukraine. The programme aims to implement structural reforms in tax policy, corporate governance, procurement, and other areas of the economy. We focused on these key issues during the meeting with the IMF Mission,» said Oleksii Sobolev.

In particular, the parties discussed capital mobilization, renewal of corporate governance in state-owned companies against the backdrop of the situation with Energoatom, centralizing some of the functions of supervisory boards, which should be the next step in corporate governance reform. The importance of financial reporting and independent auditing, even during wartime, was also highlighted.

[Source](#)

mof.gov.ua



IMF MISSION AND UKRAINIAN AUTHORITIES STARTED POLICY DISCUSSIONS ON A NEW FINANCIAL COOPERATION PROGRAM

On November 17, the leadership of the Ministry of Finance of Ukraine, the National Bank of Ukraine, and staff from the International Monetary Fund (IMF) started policy discussions on a new financial cooperation program.

The talks will focus on the government's economic policy objectives, with an emphasis on fiscal and monetary policies to ensure

stability, as well as on structural measures to strengthen governance, combat corruption, and support economic growth.

“We expect a week of productive discussions with IMF staff. The new program will help meet Ukraine’s budgetary needs in the medium term and support the implementation of structural reforms aimed at economic recovery and European integration. I am grateful to the IMF for its continued support and expertise, which help strengthen Ukraine’s economic and financial resilience,” said Minister of Finance of Ukraine Sergii Marchenko.

[Source](#)

SWITZERLAND PROVIDES GRANT SUPPORT FOR THE RESTORATION OF UKRAINE’S MEDICAL INFRASTRUCTURE

The Swiss Agency for Development and Cooperation has made a grant contribution of nearly USD 12 million to the Ukraine Relief, Recovery, Reconstruction and Reform Trust Fund (URTF) established by the World Bank. The funds will be directed towards the implementation of the HEAL Ukraine project (“Strengthening the Health System and Saving Lives”).

The project’s main objectives are to restore and improve access to essential healthcare services, address new and urgent medical needs, and ensure financial protection in emergency situations.

In addition, this support includes allocating further resources for the reconstruction and modernisation of damaged and destroyed medical facilities. Priority will be given to hospitals operating under increased pressure and providing services to large numbers of internally displaced persons.

The additional financing will cover both preparatory and core works related to construction, reconstruction and major repairs, as well as upgrades to material and technical capacity – including the procurement and delivery of modern medical and laboratory equipment required to ensure uninterrupted operation of healthcare facilities.

[Ukrainian source](#)

LITHUANIAN OPERATOR LITGRID PROVIDES UKRAINE WITH A SUPPORT PACKAGE FOR ITS ENERGY INFRASTRUCTURE

The Lithuanian electricity transmission system operator Litgrid has transferred another support package to Ukraine, which will strengthen the country’s power supply and help restore damaged energy infrastructure. The aid package includes more than seven thousand glass insulators used on power transmission lines and substations.

“While modernising Lithuania’s transmission network, we have the opportunity to pass on to our colleagues in Ukraine part of the equipment and materials that remain in excellent working condition but are no longer used in our infrastructure. We collected this equipment from different parts of Lithuania, and it has now been successfully delivered to Ukraine. We are confident it will help speed up the restoration of the energy system,” said Litgrid CEO Rokas Masiulis.

According to the company, the insulators provided to Ukraine are essential for ensuring the operation, safety, and reliability of the power grid.

[Ukrainian source](#)

2. RECOVERY PLANS – OFFICIAL

COMMUNITIES WILL BE ABLE TO MAKE INDEPENDENT DECISIONS ON RESTORING DAMAGED HOUSING – GOVERNMENT DECISION

The decision concerns the restoration of damaged apartment blocks and dormitories within the framework of the experimental project.

The Cabinet of Ministers of Ukraine has adopted a decision that allows communities to launch independently the process of restoring damaged apartment blocks and dormitories within the framework of the experimental project. The relevant amendments to Resolution No. 934 were developed by the Ministry for Communities and Territories Development.

The experimental mechanism for rapid restoration, introduced in the summer, enables communities to work under a new model where technical inspection and preparation for the start of repair works take place simultaneously.

Previously, the decision to apply this restoration mechanism was made by the Regional Military Administration. This slowed the start of works and limited the ability of communities to respond promptly to residents' needs. Now communities will be able to launch this process locally: independently determining priority buildings for repair, forming lists, and starting restoration more quickly. Expanding their powers makes the mechanism more flexible and reduces the time required to carry out the works.

Previously, the decision to apply this restoration mechanism had to be approved by regional military administrations (RMAs). This slowed the start of works and limited communities' ability to respond quickly to residents' needs. Now communities will be able to initiate the process on the ground: independently identify priority buildings for repair, form lists, and begin restoration more rapidly. Expanding their powers makes the mechanism more flexible and shortens project timelines.

[Source](#)

FRONTLINE REGIONS REMAIN A PRIORITY FOR THE COORDINATION HEADQUARTERS ON PHYSICAL PROTECTION OF INFRASTRUCTURE – OLEKSIY KULEBA

On 18 November, another meeting of the Coordination Headquarters on the physical protection of critical infrastructure took place.

Since mid-October, the Restoration Agency has been coordinating the construction of protective structures at more than 100 critical infrastructure sites, with frontline regions being the top priority.

During the meeting, participants reported on the results of the past month. Together with military engineers of the Armed Forces of Ukraine and the Ministry of Defence, 16 standard engineering solutions for the protection of critical infrastructure facilities have already been developed and approved. These designs can be used by all asset holders, taking into account the location and availability of material suppliers nearby.

“Work on building protective structures is already underway across the regions. The joint efforts



mfa.gov.ua

of the state, communities and the military are strengthening the resilience of critical infrastructure. Transparency is crucial to us. That is why the Restoration Agency has developed a reporting system for the public and partners. Today, during the Headquarters meeting, we approved the creation of an information dashboard that will show all data related to the procurement of materials for protective structures. We will publicly present this dashboard in the coming days,” emphasised the Vice Prime Minister for Ukraine’s Recovery – Minister for Communities and Territories Development Oleksiy Kuleba.

[Ukrainian source](#)



WE ARE LAUNCHING THE RDNA5 ASSESSMENT TOGETHER WITH THE WORLD BANK, THE EU AND THE UN.

Oleksii Kuleba

Vice Prime Minister for Ukraine’s Reconstruction and Minister for Communities and Territories Development of Ukraine Oleksii Kuleba announced the launch of work by the World Bank Group, the Government of Ukraine, the European Commission, the United Nations and other partners on the Fifth Rapid Damage and Needs Assessment (RDNA5) for Ukraine.

As a result of Russia’s aggression, the scale of destruction continues to grow every day. Russia systematically targets and destroys Ukraine’s energy, transport and social infrastructure, blocks export routes and creates threats to global food security.

Frontline regions suffer the most, accounting for 82% of all documented damage. The housing sector alone has lost around 13% of its stock, with more than 236,000 buildings destroyed or damaged. Strategic sectors are also experiencing systemic destruction: in 2025, the number of damaged energy facilities increased by 70%, while the railway infrastructure was attacked over 800 times this year.

RDNA5 will update the damage and losses caused by Russia’s aggression for the period from 24 February 2022 to 31 December 2025. The results of RDNA5 will be presented in February 2026. The new assessment will be based on the principle of comprehensive reconstruction and will take into account the priority recovery needs and the State Project Portfolio for 2026 (SPP-2026).

[Source](#)

EVIDNOVLENNIA: OWNERS OF DESTROYED HOUSING IN TEMPORARILY OCCUPIED TERRITORIES WILL BE ABLE TO RECEIVE COMPENSATION

The Government has approved a decision to provide compensation for destroyed housing located in temporarily occupied territory.

Vice Prime Minister for Ukraine’s Recovery – Minister for Communities and Territories Development Oleksiy Kuleba announced this during his speech at the National Forum on Resilience and Good Governance.

According to the Vice Prime Minister, today the Government adopted an experimental resolution that launches a mechanism for paying compensation to people who lost their property in the temporarily occupied territory.

“This is an extremely important and truly groundbreaking decision. It is about justice. At the first stage, compensation will be provided to combatants and persons with disabilities of groups I and II. They will be able to receive compensation for their lost property and invest it exclusively in housing programmes within our country,” Kuleba said.

He emphasised that compensation will be available to those Ukrainians who have not left the country. Later, this opportunity will also be extended to other categories of citizens.

[Ukrainian source](#)

THE MINISTRY FOR DEVELOPMENT OF COMMUNITIES AND TERRITORIES AND UNICEF STRENGTHEN COOPERATION IN THE AREAS OF WATER SUPPLY AND DECENTRALISED HEATING SYSTEMS

Vice Prime Minister for Ukraine's Reconstruction – Minister for Communities and Territories Development Oleksiy Kuleba, met with UNICEF Representative in Ukraine Munir Mammadzade. The meeting focused on the ongoing heating season and on enhancing cooperation in drinking water, water supply, and wastewater management, particularly in frontline regions.

An additional focus of the discussion was support for decentralisation, reform of public investment management, and community reconstruction, all key components of sustainable regional development.

The parties discussed preparations for the 2025/2026 heating season amid ongoing Russian attacks on critical infrastructure. The discussion focused on the supply of equipment and materials needed to ensure the operation of water supply systems under crisis conditions, as well as the urgent needs of district heating companies that have suffered significant damage from Russian strikes.

A separate focus was placed on the decentralisation of heating systems, providing water supply and wastewater utilities with alternative power sources, and ensuring rapid response to challenges under the constant threat posed by Russia. The conversation also addressed support for people – especially children and young people – in frontline communities. The parties additionally discussed further assistance for communities in planning, preparing and implementing public investment projects, which is critically important for high-quality reconstruction.

[Source](#)



mindex.gov.ua

MINISTRY FOR COMMUNITIES AND TERRITORIES DEVELOPMENT AND BMZ DISCUSS STRENGTHENING TRANSPARENCY IN THE RECOVERY SECTOR

A working meeting on enhancing transparency mechanisms and preventing corruption within the recovery architecture took place at the Ministry for Communities and Territories Development of Ukraine.

The German side emphasised the importance of a preventive approach to combating corruption, particularly given the limited financial resources available for recovery. The parties discussed a new potential project by the German Agency for International Cooperation (GIZ), developed in close cooperation with the EU and EUACI, which will complement existing programmes and aim to ensure that investments are used as efficiently and purposefully as possible.

[Ukrainian source](#)



mindex.gov.ua

THE MINISTRY FOR COMMUNITIES AND TERRITORIES DEVELOPMENT PRESENTED PILOT INVESTMENT PROJECTS FOR AFFORDABLE RENTAL HOUSING FOR IDPS FROM BAKHMUT AND MARIUPOL

The Ministry for Communities and Territories Development, together with Deloitte, the Polish Development Fund, and the German Marshall Fund, discussed preparing investment

reconstruction projects for Ukrainian cities. The meeting took place on the sidelines of the international conference “ReBuild Ukraine: Construction & Energy”.

Participants also included representatives of the European Commission, the World Bank, the Council of Europe Development Bank, the European Investment Bank, the European Bank for Reconstruction and Development, KfW, other financial and donor organisations, international business associations and investment companies, as well as representatives of Ukrainian cities and communities.

During the meeting, Natalia Kozlovska, Deputy Minister for Communities and Territories Development of Ukraine, presented two pilot investment projects aimed at creating affordable rental housing for internally displaced persons from temporarily occupied territories:

- “Mariupol – Bila Tserkva” – a project to create 1,000 apartments for 3,000 displaced persons from Mariupol in the city of Bila Tserkva. The first stage envisages the construction of 500 apartments. The buildings will be constructed with full accessibility, shelters, and energy efficiency. The ground floors will house social and administrative services – a CNAP (Administrative Services Centre), an outpatient clinic, children’s spaces, and coworking areas. Rental payments will not exceed 30% of a family’s income. The project also envisages the creation of a revolving fund and an option to purchase apartments in the future. The first stage is estimated at approximately EUR 28 million, to be covered by the Mariupol City Council budget. Funding sources for the second stage are currently being sought, including potential credit-grant financing from international partners.
- “Bakhmut – Hoshcha” – a project that envisages the construction of 570 apartments for around 1,200 internally displaced persons from Bakhmut. The housing will be built in the settlement of Hoshcha in Rivne oblast. The apartments will be offered for rent at below-market rates. Rental payments are expected to form a revolving fund to cover housing maintenance. At least 10% of the apartments will be reserved for persons with disabilities, large families, older people, and orphans. The project includes the construction of 4–5-storey buildings with shelters and service infrastructure on the ground floors. In addition, a road map will be developed to help IDPs integrate into the community through employment, education, social services, and engagement with local businesses. The project is currently preparing a feasibility study and finalising its concept.

Participants had the opportunity to discuss the presented projects in more detail and their next preparation stages. Among those who joined the conversation were Vadym Boichenko, Mayor of Mariupol, and Oleksandr Marchenko, Deputy Head of the Bakhmut Municipal Military Administration. The discussion enabled participants to explore possible formats for partner support and cooperation.

[Ukrainian source](#)

3. PROCESS OF RECOVERY

GOVERNMENT EXPANDS ACCESS TO PSYCHOSOCIAL SUPPORT

On 19 November, the Government adopted a resolution launching an experimental project on providing a comprehensive social service aimed at building resilience in territorial communities. The initiative was put forward by the Ministry of Social Policy, Family and Unity of Ukraine.

The experiment will run until 30 June 2026 within the framework of the nationwide mental health programme “How Are You?”.

The primary goal of the project is to improve the delivery of a comprehensive social service that strengthens resilience, supports mental health, builds stress-management skills, and enhances family bonds and social cohesion within territorial communities.

[Ukrainian source](#)

THE MINISTRY OF ECONOMY APPROVES 37 NEW GRANT APPLICATIONS FOR PROCESSING ENTERPRISES

The Ministry of Economy, Environment and Agriculture of Ukraine has approved 37 new applications totalling UAH 217.2 million under the “Grants for Processing Enterprises” programme. The programme is part of the Government’s Made in Ukraine industrial development policy and allows enterprises to receive funding to upgrade equipment or expand production capacity on a co-financing basis.

In addition to recovery grants, the Ministry of Economy also approved 36 applications for financing the development of existing or newly established production facilities. Applicants include printing houses, producers of food and beverages, UAVs, construction materials, paints, furniture, clothing, plastic and wood products, and metalworking enterprises.

[Ukrainian source](#)

WINTER SUPPORT: UNICEF TO ALLOCATE ADDITIONAL FUNDING FOR MORE THAN 6,000 CHILDREN WITH DISABILITIES IN FRONTLINE AREAS

The United Nations Children’s Fund (UNICEF) will allocate additional funding to support more than 6,000 children with disabilities (Group A) during the winter period.

This was announced on 20 November by the Minister of Social Policy, Family and Unity of Ukraine, Denys Ulyutin, together with the UNICEF Representative in Ukraine, Munir Mammadzade, during the inaugural “Family for Every Child. Better Care Awards” ceremony.

UNICEF is joining the Government’s comprehensive “Winter Support” programme initiated by the President of Ukraine. One of the key components of the programme is a one-time payment of UAH 6,500 for the most vulnerable categories of Ukrainians. This assistance is aimed, in particular, at supporting children from low-income families, children with disabilities living in foster families and family-type children’s homes (FTCH), as well as internally displaced children who are eligible for payments.

The support will be provided to families residing in the Dnipropetrovsk, Donetsk, Zaporizhzhia, Mykolaiv, Sumy, Kharkiv, Kherson, Chernihiv, and Odesa regions.

[Ukrainian source](#)



“NOVA SYNERGY” INCLUDED IN THE REGISTER OF INDUSTRIAL PARKS

On 19 November, the Cabinet of Ministers of Ukraine approved the inclusion of the industrial park “NOVA SYNERGY” in the Register of Industrial Parks. The park is established for a period of 30 years within the territory of the Novoushytsia settlement territorial community, Kamianets-Podilskyi district, Khmelnytskyi region. The initiator of the project is the Novoushytsia Settlement Council.

The total area of the industrial park is 11 hectares. The establishment of “NOVA SYNERGY” is expected to create approximately 550 new jobs in the processing industry.

Within the territory of “NOVA SYNERGY”, it is planned to locate enterprises in the following sectors:
processing of agricultural products;

- production of food products;
- warehousing and logistics;
- manufacturing of machinery and equipment for agriculture and forestry;
- other types of fruit and vegetable processing and preservation;
- scientific and technical activities and laboratory operations, including independent verification of raw materials and finished products;
- other related industries, depending on the needs of the community.

[Ukrainian source](#)

4. RECOVERY – INTERVIEWS AND AUTHOR MATERIALS

**ILONA HAVRONSKA, DEPUTY
MINISTER OF SOCIAL POLICY,
FAMILY AND UNITY: EVERY
UKRAINIAN, WHEREVER THEY ARE,
MATTERS TO US**

*Interview
Ukrinform
Viktoriia Shevchenko, correspondent*

In the interview, Ilona Havronska explains the logic behind creating the Unity Network – a new infrastructure designed to support Ukrainians abroad. The initiative is not only about opening new Unity Centres, but about a “network of networks” that will combine both newly established hubs and existing initiatives of Ukrainian communities. These centres are meant to serve as spaces for cultural, educational, and social activities, as well as for consultations and access to reliable information. They are intended to become a single source of trustworthy guidance for Ukrainians who are considering whether to return, stay, or change their legal status. “Our task is to make sure that everyone knows about one another,” Havronska emphasises.

The first Unity Centres will appear in Spain (Torrevieja), Germany (Berlin), and the Czech Republic (Prague) – the countries whose governments were the first to provide premises and support Ukraine’s initiative. In Torrevieja, where a significant proportion of Ukrainians under temporary protection reside, the centre is already prepared for a “soft opening”: it will host Ukrainian-language educational classes for children, activities to maintain the connection with Ukrainian education, consular and document services, a “Ukrainian Bookshelf,” as well as the presence of international organisations (IOM, UNHCR, Red Cross, IRC, ICMPD). The working model minimises the burden on Ukraine’s state budget: the government provides the framework and trains Ukrainian organisations, while services are expected to be funded largely through grants and EU-based instruments, such as AMIF, in member states.

A significant part of the conversation focuses on the end of the EU Temporary Protection Directive, which has been extended for Ukrainians until March 2027. Havronska explains that once the regime ends, people will need to transition to national mechanisms (residence permits, social protection, labour market access) or use voluntary return programmes (such as the Voluntary Return Program). According to her, around 7 million Ukrainians are currently abroad, of whom 4.6 million are under temporary protection in the EU, while surveys show that over 60–64% express readiness to return once the war ends. At the same time, Ukraine is already allocating resources to support those who return: the 2026 state budget foresees 52.7 billion UAH for family and child support, and, together with European partners, the government is preparing measures to strengthen the capacity of communities that will receive returning residents.

In a broader context of national recovery, Havronska stresses that the Unity Network is not just a wartime tool but a long-term mechanism. Through the centres and a digital map of Ukrainian communities, the state aims to maintain contact with an estimated 25 million Ukrainians across different migration waves, including those who changed citizenship long ago. Special focus is placed



ukrinform.ua

on children and youth: from registering children born abroad in Ukrainian registries to preserving Ukrainian-language education and cultural identity, in cooperation with the Ministry of Justice, Ministry of Education, Ministry of Youth and Sports, and the Ministry of Culture. Research cited by Havronka shows that young people engaged in Ukrainian volunteer, youth, or community initiatives abroad are several times more likely to envision their future in Ukraine. The Unity Network is therefore seen as a key platform for both future large-scale returns and for mobilising the diaspora's human capital for Ukraine's reconstruction: "Every Ukrainian, wherever they are, matters to us."

[Ukrainian source](#)

THE FUTURE OF THE UKRAINIAN VILLAGE: HOW TO REBUILD IT AFTER DESTRUCTION

Column

Ekonomichna Pravda

Oleksandr Kolesnichenko, Deputy Editor-in-Chief

In the column, Oleksandr Kolesnichenko reflects on Ukraine's first state-led experiment in the comprehensive reconstruction of villages destroyed by Russia and outlines the key lessons learned. He emphasises that reconstruction is not merely about architecture or construction – it is primarily about restoring the meaning of community life. The project curator in Posad-Pokrovske, architect and rural researcher Oleksandr Stolovyi, stresses: "People need to have not just a house returned to them, but the feeling of home."

Kolesnichenko highlights three structural problems in the state's approach: a lack of communication, the tendency to impose urban models on rural areas, and a limited understanding of the social logic of village life. The reconstruction of Posad-Pokrovske showed that residents often do not understand the processes and do not feel like partners of the state in rebuilding their homes. This slows contract signing and undermines trust. As Stolovyi notes, "People genuinely believe that the state does not need them... we heard this constantly."

The column goes deeper into the fundamental differences between urban and rural structures. The author and Stolovyi explain that the Ukrainian village is based on micro-communities – "kutky" of 150–200 people with their own internal rules, a vygon as a natural public space, and traditional village assemblies (skhodky) as a form of self-organisation. Ignoring this structure, the experts argue, makes state projects unviable. "This is a completely different logic of life, which the state has systematically ignored," Stolovyi emphasises.

In a broader context, the author underscores that the future of Ukrainian rural areas lies in a model that draws on local culture, horizontal ties, and the creative economy. Using Koziivka as an example, Stolovyi shows how small crafts can generate high added value: "Mykola used to sell brooms for 50 hryvnias, and now he makes lampshades for 2,000 euros." This approach creates jobs, restores people's self-respect, and establishes new growth points for the community.

Kolesnichenko concludes that successful reconstruction of Ukrainian villages is impossible without respect for local identity and the engagement of residents as co-creators of the process. Recovery must not replicate urban solutions but instead develop a renewed, yet authentic, model of community life. Only such an approach can restore people's confidence in the future and give real hope for revival after destruction.

[Ukrainian source](#)

INVESTMENT SCREENING: FIVE CRITICAL TAKEAWAYS

Column

Ekonomichna Pravda

Yaroslav Hrehirchak, Former Deputy Business Ombudsman

In his column, Yaroslav Hrehirchak analyses Ukraine's draft law on screening foreign direct investment (FDI) in the context of the OECD FDI Regulatory Restrictiveness Index. He stresses that the proposed thresholds of 25% and 50% make Ukraine's regime relatively liberal compared to neighbouring

countries, many of which apply significantly lower thresholds. He estimates that the Ukrainian model could fall within the 0.137–0.157 range on the OECD index, compared to the current 0.117.

Hrehirchak notes that the draft law aligns with the European trend that followed the adoption of EU Regulation 2019/452, which triggered a wave of FDI screening mechanisms across the EU. As he writes, “in 2017 only 41% of EU countries had screening mechanisms; today 89% do.” Introducing such a system now, he argues, positions Ukraine favourably for EU integration by establishing an expected institutional framework.

The author details the institutional design: the Ministry of Economy will play the central decision-making role, while the involvement of the Security Service, Foreign Intelligence Service, and other bodies reflects established international practice. He also reminds readers that effective systems – such as the U.S. CFIUS or European regimes – approve over 90% of transactions, relying on risk-based assessment rather than broad prohibitions. At the same time, Hrehirchak cautions that Ukraine is introducing screening in wartime, and the key challenge will not be the composition of the commission but its ability to operate at the level of the world’s best-performing systems.

A separate section focuses on timelines and the approval procedure. The proposed 90-day review period is “moderate”, but the sequential process – first the Ministry of Economy, then the Antimonopoly Committee – may extend transactions to four or five months. This, he warns, “diverges from EU standards of procedural efficiency,” where submissions are typically processed in parallel.

Hrehirchak emphasizes that currency controls currently have a far greater impact on investment than screening. He recalls that due to restrictions on capital repatriation, “64–75% of Ukraine’s FDI consists of reinvested earnings,” and liquidity constraints limit new investment decisions. He directly links this to reconstruction: according to the World Bank, Ukraine’s recovery needs over the next decade amount to USD 524 billion, and private investment could cover up to one-third of costs – but only if Ukraine liberalises currency controls and deepens integration with the EU. For that future moment, he argues, a screening mechanism will be essential to manage security risks once capital flows are liberalised.

In conclusion, Hrehirchak formulates three key takeaways.

First, the proposed regime is moderate by EU standards and not excessively restrictive: high approval rates worldwide challenge the notion that screening “scares off” investors.

Second, the draft law’s references to international practice are generally accurate, but the Ukrainian proposal places greater emphasis on security and introduces sequential procedures less typical of the EU.

Third, the effectiveness of the system will depend not on the law’s text, but on institutional capacity and operational culture: “the challenge for Ukraine is to build departmental capacity and an operational culture.”

[Ukrainian source](#)

WHEN WILL FROZEN RUSSIAN ASSETS BE TURNED INTO SUPPORT FOR UKRAINE?

Column

LB

Illia Kotov, PhD in Public Administration, Public Policy Expert

In his column, Illia Kotov explains how the global discussion on the fate of frozen Russian assets is unfolding and when these funds may finally begin working for Ukraine. The author recalls that after the start of the full-scale invasion, more than €260–300 billion of the Russian Central Bank’s reserves were frozen, along with another €60–80 billion belonging to companies and oligarchs, for a total of over €350 billion. Two-thirds of these funds are held in Europe, primarily at the Belgian depository Euroclear (about €190 billion), making Brussels the key decision-making centre and, at the same time, the jurisdiction facing the highest financial and legal risks.

Kotov describes the debate within the EU in detail: previously, the European Commission leaned toward using only the profits generated by the frozen assets, but this is clearly insufficient for long-term support of Ukraine. Direct confiscation faces obstacles, including sovereign immunity over state funds and Europe’s concern for maintaining its financial reputation. As a result, a hybrid model

is now under consideration – the creation of an international fund or credit mechanism in which the assets formally remain Russia’s property but are used for Ukraine without Russia’s consent. Most EU countries cautiously support this approach, while Hungary and Slovakia remain traditional opponents. Belgium, as the largest holder of Russian assets, insists on shared responsibility across the entire EU, particularly from Germany and France.

The author also highlights the role of partners outside the EU. Norway, which holds no frozen Russian reserves of its own, has signalled its readiness to assume the risks through its sovereign fund – a move Kotov interprets as a signal from the United States and the Trump administration: Russia is being pushed either toward negotiations or toward losing billions. The United Kingdom is promoting a loan model backed by Russian assets, similar to mechanisms once applied to Libya and Iraq. As a result, a broad coalition in favour of using frozen Russian funds is emerging, and the question, according to Kotov, is no longer “if” but “when.”

In the broader reconstruction context, Kotov emphasises that even mobilising half of the frozen reserves (approximately €150 billion) would allow stable, years-long financial support for Ukraine without forcing the EU to cut social programmes. This concerns not only macro-financial stability but also defence modernisation, strengthening air protection, and long-term reconstruction. Using Russian assets, he argues, would become a new element of international law and a deterrent to future aggressors: “to contain an aggressor on the battlefield using its own money” is not only economically sound but also just. For the EU, it is a test of its ability to make strategic decisions and become the “financial architect of a new security order.” For Ukraine, it represents a chance to turn frozen billions into real resources for victory and recovery.

[Ukrainian source](#)