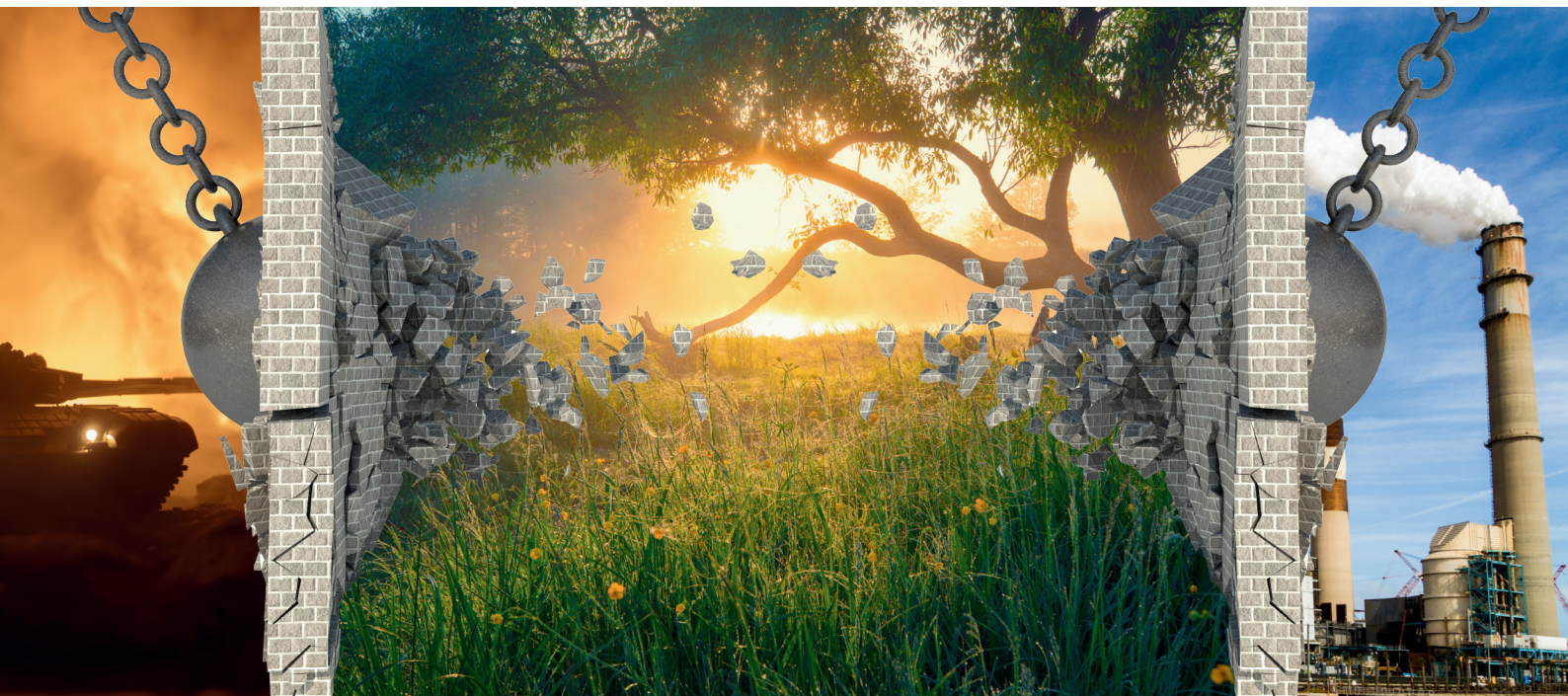


Resolution of the conference

# **MODERN ENVIRONMENTAL policy of UKRAINE: TRANSPARENCY, efficiency AND SECURITY IN CONDITIONS of A MILITARY AGGRESSION**

November 4-5, 2025 | Kyiv



*We, participants of the international conference “Modern environmental policy of Ukraine: transparency, efficiency and security in conditions of the military aggression”, member organizations of the consortium of environmental, human rights and anti-corruption non-governmental organizations, the Ministry of Economy, Environment and Agriculture of Ukraine, members of the Parliament and representatives of civil society working in the field of implementing environmental reforms, provisions of the Aarhus Convention and other instruments for protection of environmental rights and the environment,*

*emphasizing the solidarity of democratic forces in promoting environmental democracy in Ukraine during and after the full-scale war,*

*having discussed on November 4-5, 2025 in the city of Kyiv the problems and achievements in the areas of access to environmental information, public participation in environmental decision-making under martial law, overcoming corruption factors in the environmental sphere and promoting key environmental reforms for post-war green recovery,*

*call on the Parliament and government of Ukraine to take the following urgent measures:*

**Access to environmental information and public participation as components of environmental democracy**

1. Under martial law, Ukraine must make every effort to fully guarantee the public's procedural environmental rights at the level ensured by the Aarhus Convention. The application of any restrictions on the grounds of national security must be justified, proportionate, and such that it least limits the rights guaranteed by the Convention.
2. In order to regulate the definition of the term “environmental information”, amend Section II “Final Provisions” of the Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine on the State System of Environmental Monitoring, Information on the State of the Environment (Environmental Information) and Information Support for Environmental Management” dated March 20, 2023 No. 2973-IX, which establish that this law shall enter into force on January 1, 2026.
3. Ukraine must continue to expand public access to environmental information by supplementing the list of types of environmental information that are collected, stored, and published electronically.
4. Ensuring proper access to environmental information and data in times of war is a key challenge. It is digital electronic resources that should become a tool that guarantees the constitutional human right to access to environmental information.
5. It is necessary to cancel the temporarily introduced “moratorium,” established at the beginning of the full-scale invasion, on the submission by operators of reports on pollutant and waste emissions and transfers to the Pollutant Release and Transfer Register.
6. Continue expanding opportunities for public participation in environmental decision-making processes by enlarging the list of state planning documents (strategies, plans, programs) and permitting procedures that require public involvement.
7. Prevent reduction of public participation opportunities in the environmental impact assessment (EIA) procedure by narrowing the list of types of activities and objects subject to EIA.



8. Consider the possibility to apply a mixed format for conducting public hearings, at least in relatively safe regions of Ukraine regarding the procedures of SEA, EIA, the issuance of integrated environmental permits, and other procedures that require public hearings.

9. Strengthen the institutional capacity and technical capabilities of environmental information holders.

### **Institutional reforms as the basis of anti-corruption environmental policy**

1. Effective anti-corruption environmental policy requires a modern architecture of environmental governance, based on horizontal reforms: environmental control, monitoring, and legal responsibility. These elements must form the foundation for enhancing transparency, accountability, and resilience of the state's environmental policy.

2. Any institutional changes, including the reorganization of central executive authorities in the environmental sphere, must aim not at weakening but at strengthening the state's environmental function and ensuring its independence from political or economic influence.

3. The development of environmental governance must take place through strengthening the institutional capacity of authorities at all levels - from central to local - with a clear distribution of powers, transparency of decisions, and public access to information.

4. Each Regional Military Administration (RMA) and each city, village, and settlement council must have separate structural units responsible for environmental issues. It is unacceptable to combine environmental functions with housing and utilities, transport, agricultural, or economic ones, as this endangers the prioritization of environmental policy.

5. Decentralization in the environmental field must be accompanied by the creation of effective mechanisms for coordination, expert support, and control to prevent the dispersion of responsibility and deterioration in the quality of management.

6. It is important to ensure professional human resources, systematic training of specialists, adoption of the necessary strategic documents, and proper monitoring and reporting on the implementation of environmental policy decisions.

7. Initiate the development and implementation of national and regional training programs for environmental specialists of local communities, as such programs currently do not exist, and communities lack access to systematic staff training.

8. Ensure that socio-economic development programs cease to be merely formal documents and instead include a distinct environmental component integrated with regional and national development plans, with responsible persons, resources, and monitoring mechanisms specified.

9. Ensure systematic maintenance, updating, and meaningful content of official community websites with environmental information—including programs, activities, budget expenditures, and implementation results; in a format suitable for processing and analysis.

10. Establish mechanisms for consultative, expert, and methodological support for communities that lack sufficient institutional and human capacity in the environmental field, including inter-municipal cooperation models and support from the regional level.

11. Ensure control over the implementation of environmental protection measures throughout all levels of government, which requires the training of qualified personnel and the restoration of the Ministry of Environmental Protection and Natural Resources of Ukraine.

12. Establish the Agency of Protected Natural Areas of Ukraine.

13. Strengthen institutional capacity of central authorities in the area of waste management through establishment of a separate authority to deal with implementation of state policy in the waste management sector.

### **Improving legislation in the field of subsoil use and environmental protection from the harmful effects of the mining industry as a condition for the industry's competitiveness at the international level**

1. To hold the procedure of environmental impact assessment (EIA) and issue an EIA conclusion at the stage preceding the auction of a subsoil plot and during the stage of preparing production sharing agreements.

2. Prohibit subsoil use on all categories of land on the basis of land easements in conditions where such subsoil use makes it impossible to use the plot for its main purpose (forest land).

3. Strengthen the role of local governments in making decisions related to the development of minerals in the territories of communities.

4. Introduce a mechanism for disclosing information on the terms of production sharing agreements.

5. Introduce legislative changes to ensure the principle of payment for the use of natural resources and the "polluter pays" principle when extracting on the basis of production sharing agreements (land fee, environmental tax, rental fee for special water use).

### **Effective waste management as the foundation of circular economy**

1. Adopt the Strategy for the Development of the Circular Economy of Ukraine until 2035 and develop an action plan for its implementation; introduce economic incentives for businesses to implement elements of the circular economy.

2. Intensify the work of the Parliament in supporting laws that will enable the launch of an Extended Producer Responsibility (EPR) system for various types of waste, as well as provide a regulatory framework for managing waste from the mining industry.

3. Enhance the system of state environmental control over waste operations through the reform of state environmental oversight and the creation of a new environmental inspection body.

4. Abandon the practice of simplifying permitting procedures and introducing experimental projects in the field of waste management, especially for hazardous waste; and improve the quality of licensing activities and the institutional capacity of the Ministry of Economy.

5. The Ministry of Communities, Territories and Infrastructure Development should amend the Methodology for Separate Collection of Household Waste to improve the requirements for the collection of biowaste, the placement of separate waste collection points, and the introduction of an alternative system of symbols and markings for different types of household waste.





## **Conservation of biodiversity during the full-scale war**

1. Ensure the collection and documentation of information on losses of populations of species listed in the Red Book of Ukraine, plant communities, and biotopes in order to assess biodiversity losses at all levels of existence.
2. Improve and implement a methodology for assessing ecosystem services to calculate the inflicted damage, taking into account the costs of restoring ecosystems to their native state.
3. Ensure monitoring of the condition of damaged and destroyed ecosystems to develop forecasts and implement measures for their restoration (primarily in the Kakhovka Reservoir area).
4. Within the framework of the reconstruction of territories affected by hostilities, develop and approve requirements and standards for the decontamination of areas from chemical pollution and for recognizing them as suitable for use.
5. Ensure the operation of chemical laboratories with sufficient capacity to conduct comprehensive studies of soil, water, and air pollution resulting from hostilities.
6. Ensure the functioning of specialized landfills for the environmentally safe storage and disposal of demolition waste.
7. Establish an information database of natural ecosystems (biotopes), carry out their mapping, and include them in the State Geocadaastre of Ukraine with the aim of integrating them into the Integrated Geospatial Information Framework (IGIF) and INSPIRE System, and ensure the protection and management of Emerald Network sites.
8. Urgently take measures to introduce monitoring and control of plowed areas, particularly to stop the plowing of protected areas, water fund lands, and steppe plots.
9. Introduce measures to reduce and control the use of pesticides, herbicides, and chemical fertilizers, and to expand areas under organic farming. Conduct an inventory of all water bodies of Ukraine.
10. Approve lists and control measures for invasive species that cause transformation and threaten the functioning of natural ecosystems in order to prevent negative consequences.
11. Approve regulatory and planning documents aimed at preventing fires in natural ecosystems, including peatlands.
12. Introduce a unified, standardized biodiversity monitoring system.
13. Simplify the procedure for creating new or expanding existing protected areas (PAs), protection zones around them, and conservation areas for biodiversity in forests and for the preservation of objects listed in the Red Book of Ukraine, particularly regarding the approval procedures of Regional and District State Administrations.
14. Consider the creation of compensatory areas and protected objects to replace those that were damaged or destroyed by military actions.

15. Resume progress toward Ukraine achieving the target of 30% of the country's territory under protection.
16. Support the initiative of Tuzlivski Lymany National Nature Park to create a marine reserve in Ukraine's territorial waters in the northwestern part of the Black Sea, including it within the park's boundaries for the restoration and preservation of Black Sea cetacean populations.
17. To restore and assist Black Sea cetaceans that are illegally kept in dolphinariums or stranded on shore, establish a rehabilitation (re-adaptation) center within Tuzlivski Lymany National Nature Park for cetaceans removed from illegal captivity or stranded ashore.
18. Amend the Law of Ukraine "On Alternative Energy" to introduce mechanisms for protecting important natural conservation areas from the impact of industrial wind farms.
19. Develop and approve the "Atlas of Territories of Ukraine Suitable and Unsuitable for the Construction of Industrial Wind Energy Facilities."
20. Adopt a moratorium on the construction of wind power plants in the mountain ranges of the Ukrainian Carpathians.

*Kyiv 2025*

