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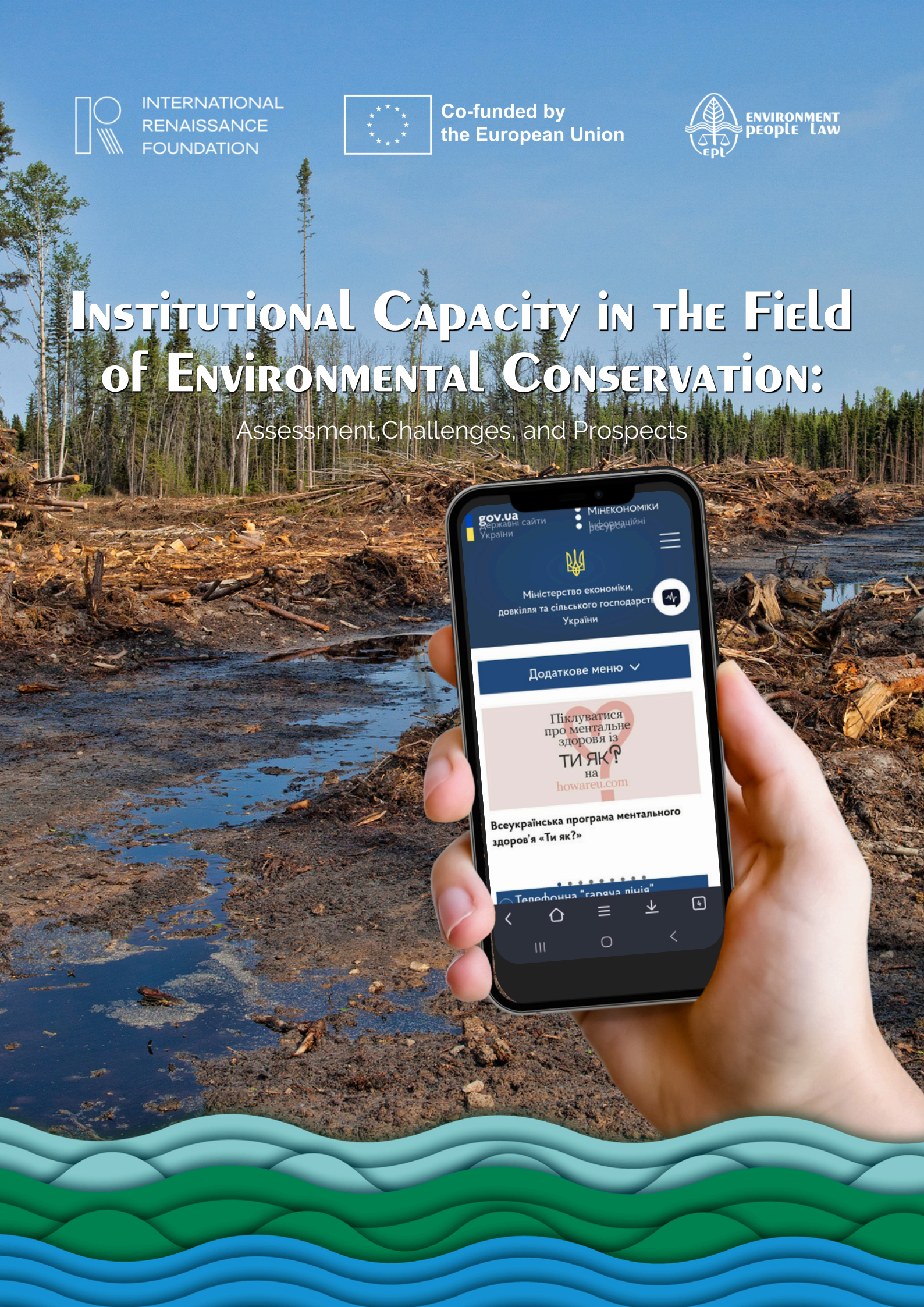
Institutional Capacity in the Field of Environmental Conservation:

Assessment,Challenges, and Prospects



Institutional Capacity in the Field of Environmental Conservation: Assessment, Challenges, and Prospects

Analytical Brief

Draft

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Executive Summary

This analytical document is devoted to the assessment of the institutional capacity of the public authorities of Ukraine in the field of environmental conservation at the central, regional and local levels in the context of the ongoing war, the reform of the system of executive authorities, and the State's European integration obligations.

The study demonstrated that the current model of environmental governance remains rather fragmented, weakened in staffing terms, and strategically inconsistent. The liquidation of a separate environmental ministry creates risks of the loss of the independence of environmental policy, the weakening of expert potential, and the reduction of the weight of environmental decisions in the process of public administration. The establishment of the Ministry of Economy, Environment and Agriculture of Ukraine (hereinafter, the Ministry, the Ministry of Economy) did not facilitate the introduction of the principle of mainstreaming environmental policy. Instead, it marginalized such policy and removed it from the agenda of the key reforms of the Government of Ukraine.

The problems of staff shortages, imbalances in financing, low coordination among environmental central executive authorities, and the absence of a coherent environmental strategy create risks of institutional incapacity of the system to perform its key functions.

A certain inconsistency is observed between the planning of the activities of executive authorities, first and foremost the Ministry of Economy, Environment and Agriculture of Ukraine, which is responsible for the formulation of the State environmental policy, and the parliamentary support for the relevant reforms. In particular, interaction with the Committee on Environmental Policy and Nature Management of the Verkhovna Rada of Ukraine (hereinafter, the Eco-Committee) could be more systematic and coordinated.

At the oblast and local levels, Oblast Military Administrations and local self-government bodies face a shortage of specialists, limited financing, and weak links with the central level, which complicates the implementation of environmental protection policy and control over the use of natural resources.

The analytical document outlines the need for a structural reset of the environmental conservation governance system. The overall conclusion of the study emphasizes that, without professional, accountable, and financially capable environmental governance, Ukraine will not be able effectively to guarantee citizens' right to a safe environment or to fulfil its international obligations, including those related to European integration.

Introduction

Ukraine has chosen the course of European and Euro-Atlantic integration, which is enshrined in The Constitution of Ukraine and other strategic public policy documents One of the key obligations within this course is the alignment of national legislation with the law of the European Union (*acquis communautaire*), including environmental law. At the same time, the implementation of the European *acquis* requires not only the adaptation of legislative norms, but also the development of effective institutional capacity of the State for the practical implementation of those norms.

However, the current environmental protection governance system in Ukraine is characterized by the absence of a vision, the absence of a strategy of non-deterioration of the state of the environment under a balanced approach to taking into account the interests of stakeholders, the absence of mainstreaming of environmental policy, fragmentation, duplication of functions, low coordination among authorities, and limited accountability, as

well as opaque post-Soviet control over the state of the environment and compliance with environmental legislation. A significant part of environmental functions is dispersed among central executive authorities, oblast state (military) administrations, and local self-government bodies. At the same time, there is no single strategic framework defining responsibility for the achievement of environmental goals. The absence of a separate line ministry, the shortage of qualified personnel, and limited financing also weaken the capacity of the system.

The existing architecture of environmental governance is significantly weakened by the absence of European institutions of legal liability, as well as of the inevitability and adequacy of punishment for environmental degradation and violations of environmental legislation.

The full-scale war launched by the Russian Federation has further exacerbated the structural problems of environmental governance. The destruction of ecosystems, the shifting of public policy priorities, the physical destruction of infrastructure, and the loss of personnel at the local level all create new challenges for environmental governance. At the same time, the war has made more urgent the need to rebuild the system on new foundations: transparency, accountability, sustainability, adaptation to climate change, and integration with EU policy in general and the European Green Deal in particular.

In the light of the above, we believe that the **mission** of environmental governance in Ukraine should be to ensure a balance between the interests of the community, business, and the environment. Its **purpose** is to ensure the conservation and post-war restoration of the environment for future generations and the sustainable development of Ukraine.

The **principles** of environmental governance should include:

1) “Build back greener than before” – taking into account decarbonization issues and the achievement of climate neutrality in the reconstruction process, which will contribute to improving people’s quality of life in a safe environment;

2) the principle of “European integration” – adaptation of Ukrainian legislation and policy to the EU acquis and its effective implementation;

3) the principles of the New European Bauhaus: sustainability, aesthetics, and community-building for the achievement of the goals of the European Green Deal;

4) the principles of good governance – ensuring transparency, accountability, and effectiveness, including ensuring effective public participation at all stages of the post-war reconstruction and recovery of Ukraine;

5) transparency and accountability of the decision-making process on matters relating to the environment should be ensured through a fair balance between security considerations and the transparency of processes and accountability of authorities under wartime conditions. It is important not to allow the weakening of the already existing horizontal legislation adopted in fulfilment of European integration requirements, in particular in the field of environmental impact assessment and strategic environmental assessment, and also to provide access to / disclose the existing plans for reforming and improving environmental policy.

The practical implementation of the purpose and mission of environmental governance, as well as ensuring compliance with its principles, is impossible without proper institutional capacity in this field.

In connection with the above, this analytical document **is aimed** at assessing the current institutional architecture in the field of environmental conservation in Ukraine, identifying key gaps and barriers, formulating practical recommendations and scenarios for strengthening institutional capacity, taking into account European approaches to environmental governance, for the purpose of practically implementing the mission, purpose, and principles of proper environmental governance.

Methodological Approach

To assess institutional capacity, we used the approach developed by the SIGMA Programme (a joint initiative of the European Union and the Organisation for Economic Co-operation and Development, OECD). This approach makes it possible to comprehensively analyse the organizational preconditions for the functioning of institutions (the existence of specialized structures, staffing potential, established rules and procedures), the practical implementation of policies, and the achievement of specific results.

Data are collected from various sources: analysis of regulatory documents and reports, interviews with representatives of authorities and the public, review of examples of documents and decisions, analysis of statistics, observation of the practices of public authorities, and surveys of the population, businesses, and public institutions. All information is verified and cross-checked in order to ensure the objectivity of the conclusions.

The results of the analysis are assessed on a scale ranging from the absence of the necessary foundations to a high level of organizational capacity and policy implementation effectiveness. The proposed system makes it possible to identify both strengths and problem areas in the activities of authorities, which contributes to the development of specific recommendations for their improvement.

The SIGMA methodological framework is a recognized tool in Europe for assessing public administration capacity and is widely used for comparative analysis both within individual countries and across states.

For the purposes of the study, the key executive authorities vested with powers in the environmental field were selected; city councils of cities serving as regional centres were selected as those that create a nationwide trend.

I. Analysis of the Current Situation, Key Problems, and Recommendations Concerning Central Executive Authorities

1. Ministry of Economy, Environment and Agriculture of Ukraine as the body responsible for the formulation and implementation of state policy in the field of environmental conservation

The analysis of the institutional capacity of the Ministry of Economy, Environment and Agriculture of Ukraine should begin with the general goals and ambitions of the Government. Thus, a review of the Programme of Activities of the Cabinet of Ministers of Ukraine shows that environmental policy has remained fragmented therein and subordinated to economic and sectoral priorities, without being defined as a separate strategic direction. Environment and climate are not included among the four basic areas of reform: security, economy, dignity, and recovery. This programme does not contain systemic solutions with regard to monitoring land degradation, restoring water ecosystems, controlling ambient air quality, or strengthening environmental authorities institutionally. Such an approach threatens the marginalization of the environmental component, undermines Ukraine's European integration obligations, and contradicts the Constitution, which guarantees the right to a safe environment, as well as international sustainable development standards. The absence of clear mechanisms, financing, and public participation creates risks of reproducing old economic models that deplete natural resources instead of transitioning to climate-neutral and sustainable development.

For its part, within the framework of implementing the Government Action Programme, the Ministry of Economy, Environment and Agriculture of Ukraine formally pursues eight priority operational objectives, combining economic development, EU integration, and basic aspects of environmental policy. However, the environmental component is presented in the

Programme in a fragmented manner: the main attention is paid to economic, industrial, and agricultural priorities, while there is virtually no systemic vision of nature conservation, climate change adaptation, biodiversity conservation, or sustainable resource use. Tasks in the environmental field are reduced to general declarations on the prudent use of resources, reform of environmental control, and the launch of a waste processing market, without clear mechanisms for monitoring, financing, or institutional support. This is particularly important because the structure of the Government and the relevant ministries is formed in accordance with the vision of the Prime Minister, the Minister, and their teams, and in such a context environmental priorities risk remaining secondary, which is also reflected in the Regulation on the Ministry.

Thus the Regulation approved by Resolution of the Cabinet of Ministers of Ukraine No. 903 of 21 July 2025, defines the legal status, main tasks, powers, and organizational principles of the Ministry of Economy, Environment and Agriculture of Ukraine. The newly established Ministry is the successor to the functions of three separate ministries: the Ministry of Economy of Ukraine, the Ministry of Environmental Protection and Natural Resources of Ukraine, and the Ministry of Agrarian Policy and Food of Ukraine.

The consolidation of such broad and substantively different areas of activity within a single executive authority raises a number of systemic questions regarding the Ministry's capacity to ensure proper governance in the field of environmental protection.

A. General organizational capacity

Within the structure of this Ministry [source: EPL archive], after a number of changes, separate units responsible for the key areas of environmental protection are ultimately provided for: the Department of Environmental Assessment, the Department of Protected Areas and Biodiversity, the Division for Policy Formulation and Protection of Forest Resources, the Administration for the Regulation of Fisheries, Land Reclamation, Water Resources and Marine Ecosystems, the Administration for Climate Change, the Administration for Environmental Protection, Prevention and Control of Industrial Pollution, the Department of State Policy in the Field of Sanitary and Phytosanitary Measures and Food Safety, the Administration for the Regulation of Land Relations, Development of State Cadastres and Soil Fertility, the Administration for Natural Resources and Subsoil Use, and the Administration for Waste Management.

At the same time, the environmental block is dispersed among numerous departments, administrations, and divisions. Such fragmentation may complicate coordination, create risks of duplication, and reduce the strategic coherence of environmental policy.

In addition, despite the establishment of environmental structural units, the Ministry's structure reveals the dominance of economic and agricultural functions, which may lead to environmental tasks remaining secondary.

Particularly problematic appears to be the coverage of certain environmental components. For example, the area of ambient air protection is not reflected in the structure as a separate field, and no separate structural unit of the Ministry is provided for it. Presumably, certain measures within this block will be implemented as part of industrial pollution reduction measures and climate policy, but not as an independent policy as such. In the vast majority of European states, the field of ambient air protection is dealt with by a separate structural unit of the relevant ministry. For example, the Ministry of the Environment of the Czech Republic has a Department of Air Protection, which includes the Air Quality Unit, the Combustion Sources and Fuels Unit, and the Technological Sources Unit [source: EPL archive].

The absence of such a separate structural unit within the Ukrainian Ministry may have a direct negative impact on the transposition and implementation of EU environmental

directives and regulations. For example, this concerns Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe, Council Directive 1999/30/EC of 22 April 1999 relating to limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air, Directive 2000/69/EC of the European Parliament and of the Council of 16 November 2000 relating to limit values for benzene and carbon monoxide in ambient air, Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants, etc. Without a separate department and responsible officials, issues of ambient air protection risk remaining outside the Ministry's focus.

Some of the Ministry's key environmental functions are performed through departments (for example, the Department of Protected Areas and Biodiversity, the Department of Environmental Assessment), while others are carried out as administrations or divisions (for example, the Division for Policy Formulation and Protection of Forest Resources and the Administration for Waste Management). This artificial lowering of the status of important areas objectively weakens their weight in the decision-making process and reduces their resource support.

The institutional effectiveness of such a structure will depend on the political weight of the environmental block within the Ministry, the level of coordination between units, and the Government's willingness to treat environmental protection as an equal priority alongside economic and agricultural development, which gives rise to serious doubts.

B. Overburdening of the Ministry with incompatible functions

The Ministry has been entrusted with the functions of formulating and implementing state policy simultaneously in the areas of economic development, macroeconomic forecasting; regulatory policy and entrepreneurship; agriculture and fisheries; environmental conservation, conservation and rational use of natural resources; technical regulation, foreign trade, and investment; as well as state policy in the field of climate, water resources, forests, subsoil, etc.

The consolidation under "one roof" of such diverse sectors as macroeconomics, labour, investment, foreign trade, public procurement, geology, and environmental protection appears inefficient and destructive from the point of view of public administration.

The professional culture of environmental policy requires specialized approaches that are difficult to ensure within a mega-ministry. The environmental field operates with its own scientific methods, regulatory standards, and international obligations, which often involve conflicts of interest or at least differ from the interests of economic and agricultural policy. There is a risk that a competition of priorities will arise within the Ministry, in which economic growth and support for the agricultural sector will have a more tangible political effect and therefore prevail over the long-term but less "visible" objectives of environmental protection. As a result, environmental policy risks being transformed into an auxiliary instrument for economic goals, losing its independence, strategic coherence, and capacity to implement independent, well-grounded decisions.

In the context of the functioning of the triune Ministry, the need becomes particularly relevant to ensure such a level of leadership under which proper representation and priority of environmental interests will be guaranteed at the level of the Ministry's leadership. This is especially relevant in conditions of conflict between different areas of state policy.

In addition, the Regulation on this Ministry defines neither sufficient mechanisms nor proper organizational instruments for ensuring intersectoral balance and the integration of environmental considerations into decision-making in the field of the economy or agricultural policy.

Under such conditions, there are risks of undermining the environmental governance vertical and of shaping approaches to environmental protection as a “peripheral function” that can easily be ignored.

C. Staffing

The total approved staff establishment of the Ministry is 1,249 persons [source: EPL archive]. At the same time, the maximum number of employees of the Ministry of Economy, approved by Resolution of the Cabinet of Ministers of Ukraine No. 85 of 5 April 2014 “Certain Issues of Approving the Maximum Number of Employees of the Apparatus and Territorial Bodies of Central Executive Authorities and Other State Bodies” (as amended) , amounts to 1,399 positions. This means that around 11% of potentially existing vacancies remain “unused”.

Staffing table of the Ministry of Economy, Environment and Agriculture of Ukraine		
1249	Total approved staffing level of the Ministry, persons	
	Maximum number of employees of the Ministry of Economy approved by the Resolution of the Cabinet of Ministers of Ukraine	1399
798	As of October 2025, the number of vacant positions in the Ministry of Economy	
	Number of vacant positions related to the implementation of environmental powers	81
64%	Approximate share of vacant positions in the total staffing level of the Ministry of Economy	
	Share of vacant positions that are environmental	10%
Footnote: **Resolution of the Cabinet of Ministers of Ukraine of April 5, 2014 No. 85 “Certain issues of approving the maximum number of employees of the apparatus and territorial bodies of central executive authorities and other state bodies” (as amended).*		

Figure No. 1. Staffing Table of the Ministry of Economy

In addition, as of 08 October 2025, there were 798 vacant positions in the Ministry of Economy, of which 81 positions involved the exercise of environmental powers [source: EPL archive]. Thus, approximately 64% of the total staff establishment of the Ministry of Economy consisted of vacant positions. Of these vacant positions, approximately 10% were environmental.

The above data indicate a critical deficit in the staffing capacity of the Ministry of Economy, which calls into question its ability effectively to perform even its basic functions, not to mention the new powers in the field of environmental protection that previously belonged to a separate environmental ministry.

Staffing level of environmental units of the Ministry of Economy*	
17	Department of Environmental Assessment
21	Department of Protected Areas and Biodiversity
5	Division of Policy Development and Forest Resources Protection
15	Administration for Regulation of Fisheries, Land Reclamation, Water Resources and Marine Ecosystems
11	Administration for Climate Change Issues
15	Administration for Environmental Protection, Prevention and Control of Industrial Pollution
44	Department of State Policy in the Field of Sanitary and Phytosanitary Measures and Food Safety
15	Administration for Regulation of Land Relations, Development of State Cadastres and Soil Fertility
9	Administration of Natural Resources and Subsoil Use
15	Administration for Waste Management
Footnote: As of 8 October 2025, number of staff.	

Figure No. 2. Staff Establishment of the Environmental Units of the Ministry of Economy

Thus, the total number of staff positions provided for the environmental component of the Ministry is 167. At the same time, almost 50% of these positions were vacant as of 08 October 2025.

Such a distribution of staff appears unjustified. Thus, it remains an open question why the staff establishment of the Department of State Policy in the Field of Sanitary and Phytosanitary Measures and Food Safety is nine times higher than that of the division responsible for the forestry sector and five times higher than that of the Administration for Natural Resources and Subsoil Use. This imbalance is particularly controversial against the backdrop of the intensification of

Ukraine's international arrangements in the field of critical raw materials, in particular the conclusion of the Agreement with the United States on strategic partnership in the minerals sector, which requires the strengthening of the institutional capacity of the State in the field of subsoil use, environmental safety, and control over the use of natural resources. Under the current staffing configuration, it appears that the Ministry of Economy remains unprepared to ensure an adequate level of governance and transparency in the implementation of such international initiatives.

The deficit is not limited to the above-mentioned areas. Thus, the procedures for issuing EIA conclusions and integrated environmental permits, industrial control, and strategic environmental assessment are extremely complex and require a significant number of specialists. The Ministry issues on average 350-400 EIA conclusions while oblast state administrations issue up to 600. For the proper implementation of the Law of Ukraine "On Environmental Impact Assessment" and the Law of Ukraine "On Strategic Environmental Assessment" the Department should have at least 30 specialists, whereas its staff establishment is only 17 persons. Accordingly, implementation of the Law of Ukraine "On Integrated Prevention and Control of Industrial Pollution" for 3,000 installations requires around 70 specialists, while only 3 are provided for.

Overburdening of the Department of Environmental Assessment as a factor of superficial analysis and erroneous conclusions

The EIA procedure requires significant resources, as some EIA reports amount to around 3,000 pages and contain a substantial volume of highly detailed information, scientific studies, and calculations that must be analysed in order to prepare an Environmental Impact Assessment Conclusion, which itself may also consist of twenty or more pages. Such a workload results in a superficial analysis of the EIA report and other documents. For example, in the case concerning the construction of thirty wind power plants on the Runa mountain meadow, staff of the Department of Environmental Assessment of the relevant ministry failed to notice that the formula in the EIA report used to determine annual bird mortality indicators from wind power units applied incorrect parameters of the planned activity: the height of the wind power units was indicated as 210 m, whereas the planned activity for the placement of wind power units on the Runa mountain meadow provides for the placement of wind power units up to 100 m in height. Thus, the developers of the EIA report selected incorrect indicators of the planned activity, and therefore their calculations of bird mortality are also incorrect. The Department likewise failed to notice the error and drew an unfounded conclusion regarding the acceptability of the impact of the planned activity on the environment, and on birds in particular.

An analysis of the staffing table of the Department of Protected Areas and Biodiversity shows that 21 specialists are expected to manage the entire policy in the field of biodiversity conservation and the nature reserve fund throughout the territory of Ukraine.

Management of protected areas and biodiversity	
21	specialists in the central apparatus of the Ministry of Economy are responsible for managing policy in the field of biodiversity conservation and the nature reserve fund across the territory of Ukraine
120	specialists work in the regions
141	specialists (total)

!

Total area of Ukraine	603,700 km²
Number of rivers and lakes	63,119
Categories of protected areas	11
Number of nature reserve fund sites	9,001
Total area of nature reserve fund	45,000 km²

Figure No. 3. Management of Protected Areas and Biodiversity

For comparison, in the Czech Republic, whose territory is eight times smaller, 90 specialists work at the central level across 4 departments, while the total number of specialists dealing with biodiversity reaches 840-1,000 persons.. In Ukraine, by contrast, there are 21 specialists at the central level and around 120 in the regions, that is, approximately seven times fewer specialists per an area eight times larger.

Such a staffing situation demonstrates that, in the current format of the merged Ministry, it is impossible to effectively formulate and implement environmental policy in a high-quality manner. This situation underscores the critical need to restore a separate Ministry of Environmental Protection and to create an effective institutional architecture of environmental governance at the central level.

In addition, an analysis of the staffing table of the Ministry of Economy, Environment and Agriculture of Ukraine [source: EPL archive] shows a pronounced disproportionality in the level of official salaries between environmental units and other structural units of the Ministry.

The official salaries of managers and specialists in the environmental area (in particular, divisions responsible for environmental protection, monitoring, subsoil use, climate policy, or biodiversity) in most cases amount to UAH 29,000-49,000 [source: EPL archive]. By contrast, in units focused on economic, financial, digital, or industrial matters, salaries for managerial positions range from UAH 60,000 to 70,000 [source: EPL archive], while the average level of remuneration for leading specialists in such departments exceeds that in the environmental sector by nearly 30-40%.

This creates a systemic disproportionality in the motivation and status of environmental units, which remain less competitive in terms of staff recruitment despite the strategic importance of environmental policy in the context of wartime challenges and Ukraine's European integration obligations.

At the current level of remuneration, the Ministry objectively cannot attract and retain highly qualified specialists in the environmental field, which calls into question the effectiveness of the implementation of its environmental functions.

In a situation where half of environmental positions remain unfilled, while the salaries of specialists are significantly lower than in related fields, the Ministry is effectively losing the staffing motivation and expert potential necessary to perform the tasks assigned to it. Such a state of affairs calls into question Ukraine's capacity to fulfil its international environmental obligations, in particular with regard to the management of natural resources and critical raw materials within the framework of the partnership with the United States, and also risks leading to the formalization of environmental policy without real substance or impact.

D. Financial capacity in the field of environmental conservation

The Ministry of Economy, Environment and Agriculture of Ukraine reports that the financing of environmental policy in 2025 was carried out “within the limits of expenditures envisaged for state bodies that are being renamed or liquidated” [source: EPL archive]. This means that the budget appropriations previously assigned to a separate environmental ministry (the Ministry of Environmental Protection and Natural Resources of Ukraine) were formally transferred to the newly established Ministry. At the same time, questions arise regarding the structure of financing of environmental functions under the new organizational and managerial arrangements; the implementation of budget programmes through which state environmental policy is carried out; and which specific structural units of the Ministry are the main spending units for environmental areas. The lack of information on targeted financing for new (or reorganized) functions may create a risk of a “dispersion of funds,” loss of control over their use, and a decline in the quality of the implementation of environmental policy.

For its part, the State Budget of Ukraine for 2026 provides for total expenditures for the Ministry of Economy, Environment and Agriculture in the overall amount of UAH 50,725,281.1 thousand. Of this amount, UAH 40,702,015.5 thousand is allocated for the apparatus of the Ministry of Economy, Environment and Agriculture of Ukraine (approximately 80.24% of the Ministry’s total expenditures).

Expenditure level of the Ministry of Economy, Environment and Agriculture*	
50,725,281.1 thousand UAH	Planned total expenditures for the Ministry of Economy, Environment and Agriculture in 2026
40,702,015.5 thousand UAH	Expenditures for the central apparatus of the Ministry
9,521,316.6 thousand UAH	Allocated financial support for agricultural producers
1,171,290.4 thousand UAH	Allocated expenditures for the conservation of the nature reserve fund
	Financial support for agricultural producers is 8.1 times higher than expenditures for the conservation of nature reserve fund sites

Footnote *:

According to the State Budget of Ukraine for 2026.

Figure No. 4. Amount of Expenditures for the Ministry of Economy, Environment and Agriculture of Ukraine

The Ministry’s budget demonstrates a clear dominance of economic and agricultural areas over environmental protection: in a situation where the overwhelming majority of expenditures are concentrated in the apparatus of the Ministry, while support for agricultural producers exceeds financing for the conservation of the nature reserve fund by more than eight times, the environmental component is effectively marginalized. Such a model creates

a threat of further weakening the institutional capacity of the State in the field of environmental protection and contradicts the declared commitments regarding the priority of environmental policy and the conservation of natural heritage.

A separate issue is the Ministry's attraction and use of international technical assistance and material and technical assistance. Thus, the Ministry's official website contains a number of publications devoted to this issue, but such publications either contain outdated information (dating back to 2012 and 2017), or are selective in nature and do not cover the full range of such assistance, including the part relating to the environment. This indicates an urgent need to create a register of all projects of material and technical assistance provided to the Ministry, with sections on key tasks, narrative reports, and financial reports.

E. Coordinated central executive authorities

The Ministry coordinates a number of central executive authorities, including those in the environmental protection field. For example, in accordance with the legislation in force as of August 2025, this includes, inter alia, the State Environmental Inspectorate, the State Water Resources Agency of Ukraine, the State Service of Geology and Subsoil of Ukraine, and the State Forest Resources Agency of Ukraine. But these bodies, even after the establishment of the triune Ministry, continue to face the same problems that existed during the functioning of the specialized environmental ministry: duplication of powers in various areas, for example in the field of biodiversity conservation (Figure No. 5) and state environmental supervision (control) (Table No. 1), lack of autonomy, and corruption risks. The current Ministry does not provide a clear vision of how to resolve these problems.

Figure No. 5. Distribution of functions among public authorities with regard to state policy in the field of biodiversity conservation and environmental monitoring.

[ВЕРХ]

Formation and implementation of state policy in the field of biodiversity conservation and natural habitats				
Approval of species lists included in the Red Data Book, protection of particularly protected species within the territory. Organization of protected areas, establishment of protection regimes within them	Implementation of state policy in the field of management, use and reproduction of surface water resources	Implementation of state policy in the field of protection, use and reproduction of aquatic bioresources	Resolution of issues related to land use, natural resources, and environmental protection within the oblast	Implementation of state policy in the field of agriculture

[НИЗ]

Formation and implementation of state policy in the field of environmental monitoring				
Forest monitoring	In case of environmental emergencies, monitoring of environmental conditions is carried out	Monitoring of aquatic bioresources	State water monitoring	Monitoring of implementation of climate change mitigation measures and adaptation

[ПРАВИЙ БІК]

Ministry of Economy
State Forest Resources Agency
Local administrations
State Environmental Inspectorate
State Agency of Fisheries
State Water Resources Agency
Local self-government bodies

The current situation indicates a number of systemic problems that substantiate the need to create a separate Biodiversity Conservation Agency.. At present, the functions of protection of species and protected natural areas are dispersed among various public authorities, which leads to duplication of powers, “grey zones,” lack of responsibility, inconsistency of actions, and low effectiveness of measures. The absence of such a body makes it impossible to ensure operational monitoring of the state of biodiversity, a systematic assessment of environmental risks, and timely response to violations. In addition, the limited staffing and technical capacity of the authorized bodies, the shortage of specialists in ecology and biodiversity, and weak interaction with the public and scientific institutions significantly reduce the State’s ability to implement comprehensive programmes for the conservation of species and natural complexes. These factors create the need for a centralized agency with a clear structure and a presence at the regional level, which would make it possible to effectively coordinate efforts at all levels of governance.

Table No. 1. On the powers of certain central executive authorities in the field of environmental supervision (control) that duplicate those of the single central executive authority implementing state policy on state environmental control

Name of central executive authority	Duplicated function
State Service of Geology and Subsoil of Ukraine	carrying out state control over the rational use and protection of subsoil and groundwater
State Forest Resources Agency of Ukraine	carrying out state control over the protection, safeguarding, use and reproduction of forests; carrying out state control in the field of hunting management and hunting
State Service of Ukraine for Geodesy, Cartography and Cadastre	carrying out state control over the use and protection of land
State Service of Maritime and Inland Water Transport and Shipping of Ukraine	carrying out state supervision over compliance, on board Ukrainian vessels and in shipping companies regardless of ownership, with the requirements of the legislation and international treaties of Ukraine, as well as over the compliance of foreign vessels, regardless of flag, entering the seaports of Ukraine, with the requirements for the prevention of pollution of the natural environment from ships established by the international treaties of Ukraine

Summarizing the above, the absence on the part of the Ministry of a clear strategic vision regarding the coordination, accountability and reform of these bodies, taking into account the priority of environmental protection, effectively preserves an outdated governance model, without creating the preconditions for systemic changes and the real strengthening of environmental protection.

F. Uncertainty of priorities in the field of environmental conservation

In the text of the Regulation, issues of environmental conservation are presented on a par with other areas, without any emphasis on their priority or specificity. In particular, there is no mention of the ecosystem approach, the mainstreaming of environmental policy across all sectors of the economy, or the principles of balanced development; there are no references to environmental risks caused by the armed aggression of the Russian Federation; and no strategic documents to be developed in the environmental field are identified. In addition, it is worth noting the absence of the principles of “build back greener than before,” European integration, the New European Bauhaus, good governance, transparency and accountability.

Given Ukraine’s international obligations (more than 20 international environmental agreements), such an approach is insufficient and does not ensure the integration of environmental issues into state policy. By contrast, in European states, in particular the Czech Republic, Sweden and Poland, nature conservation issues are a priority.

Review of the Institutional Capacity of the Ministry of the Environment of the Czech Republic

[source: EPL archive]

I. General Characteristics of the Ministry of the Environment of the Czech Republic

The Ministry of the Environment of the Czech Republic is the central public authority responsible for the formulation and implementation of the country's environmental policy.

As of 1 July 2025, the total number of employees amounted to 725 persons, including both staff of the central office and subordinate structures. At the same time, independent units are not directly subordinate to the Ministry of the Environment of the Czech Republic in matters of staffing policy and function as separate obliged entities in the field of access to information.

II. Organizational Structure and Staffing System

The Ministry of the Environment of the Czech Republic has a clearly structured organizational model. Such a model provides for a distribution of powers among departments, divisions and sections, which ensures effective management of functional areas.

The internal processes of staff management and the systematization of functions fall within the competence of specialized units of the Ministry of the Environment of the Czech Republic, in particular:

1. The Personnel Division, which is engaged in the development, updating and coordination of the systematization of positions.
2. The Organizational Structure Division, which develops internal regulations, provisions and maintains the institutional register.
3. Separate specialists are also responsible for labour accounting, planning of payroll expenditures, and ensuring responses to requests in accordance with legislation on free access to information.

III. Functional Capacity

The Ministry has adequate functional capacity due to the following elements:

1. A developed system of internal human resources management, including organizational systematization, maintenance of information systems (ISoSS, OKbase), and control over payroll expenditures.
2. The existence of institutional mechanisms for responding to crisis situations, including coordination of access to classified information.
3. Methodological support and control over the implementation of state programmes in the field of environmental governance, which indicates strategic capacity.
4. Integration of institutional knowledge through digital infrastructure (web portal), where regulatory and organizational changes are published.

IV. Internal Regulations and Accountability

An important feature of the Ministry's functioning is the high level of formalization of management processes, which is manifested in the following:

1. The description of each job function is detailed and covers administrative, analytical, planning, legal and communication duties.
2. Internal documents are approved in the form of official job descriptions, which undergo an approval procedure between different levels of management.
3. There is a transparent mechanism for interaction with the public and the media (through responses to requests regarding structure and salaries), which increases the

openness and accountability of the institution.

V. Conclusions

The Ministry of the Environment of the Czech Republic has a high level of institutional capacity for the implementation of environmental policy. This is confirmed by: sufficient staffing; the existence of internal procedures for systematization, planning and reporting; a clear division of competences and a high level of administrative culture; and institutional flexibility and the ability to adapt to change.

Such a level of organization can serve as an example for Ukraine in the context of reforming the environmental governance system and building an effective environmental administration.

Despite the fact that the Czech Republic is nearly 8 times smaller than Ukraine, it maintains:

1. 725 employees in the Ministry of the Environment (as of 01.07.2025) at the level of the central office alone, without taking into account subordinate institutions.
2. A well-established human resources management system, information systems (ISoSS, OKbase), standardized job instructions, and organizational procedures.
3. An extensive administrative structure in which responsibilities are clearly delineated, including legal, budgetary, staffing, information and crisis-response areas.
4. Regular analytics, methodological support, internal control and public accountability.

Institutional Capacity of Environmental Authorities in Sweden Through the Prism of Environmental Control
(brief overview) [source: EPL archive]

The institutional model of governance and control in the environmental field in Sweden is based on a decentralized system of environmental supervision combined with a strong national methodological and coordination centre. A key role in ensuring the integrity of the system is played by the Swedish Environmental Protection Agency (Swedish EPA).

Direct environmental control is exercised by approximately 245 local independent inspectorates and 21 regional administrative boards. Their powers cover supervision across a broad range of areas: water protection, nature protection, industrial installations, and environmental health factors. The advantage of this model lies in its deep knowledge of local conditions and direct interaction with operators and communities; at the same time, differences in priorities and the limited specialization of inspectors, who are mostly generalists, remain a challenge.

Environmental control is carried out on the basis of risk assessment. Inspection practice includes systemic inspections (with an emphasis on self-monitoring and compliance with permit conditions) and detailed on-site inspections. For minor violations, administrative fines are applied, while in cases of suspected offences under Chapter 29 of the Swedish Environmental Code, materials are referred to the police.

To ensure uniformity of enforcement, the Swedish EPA develops multi-annual national inspection strategies, provides written guidance (more than 40 thematic web resources), expert support, and inspection methodology. Regional administrations assess the work of local inspectorates, while the Swedish EPA evaluates the regional and local levels and reports annually to the Government.

Swedish practice demonstrates that high institutional capacity in the environmental field is achieved through a combination of decentralized implementation, risk-based supervision, and systematic national methodological guidance.

Institutional Model for Ensuring the Functioning of the Natura 2000 Network in Poland

In Poland, the functioning of the Natura 2000 network is ensured through a multi-level institutional model with a clear division of political, administrative, scientific, and regional functions. The formulation of state policy in the field of nature conservation is carried out by the Ministry of Climate and Environment of Poland, in particular through the Nature Conservation Department, which is responsible for policy development, regulatory oversight, and supervision of subordinate structures.

Operational management and coordination of Natura 2000 at the central level are carried out by the General Directorate for Environmental Protection. Within its structure, the Department of Natural Resources Management is responsible for the coordination of Natura 2000, database maintenance, reporting to the European Commission, methodological support for the monitoring of wild fauna and flora species and natural habitats, as well as issues of species protection and invasive species.

Scientific support for the environmental protection system is provided by the Institute of Nature Conservation, Polish Academy of Sciences, which conducts research on the state of biodiversity and develops the scientific foundations for area management.

At the regional level, there operate voivodeship directorates for environmental protection, which develop management plans for Natura 2000 sites and ensure the implementation of conservation measures. This model combines centralized coordination with decentralized implementation.

G. Staffing Capacity as the Key to Effective Environmental Policy: Lessons from the Czech Republic for Ukraine

By analogy with the Czech Republic, Ukraine should have at least 5,000-6,000 specialists working in the central office of the ministry alone (the ministry should be a specialized one) and in its structures in order to achieve a comparable coverage of territory, diversity of problems, and range of needs. These calculations are based on a direct proportion by population size (the Czech Republic and Ukraine), adjusted for the complexity, size, and diversity of environmental problems in Ukraine.

By contrast, Ukraine is experiencing a shortage of personnel, frequent lack of structural integrity, blurred powers, weak coordination between departments, and the absence of up-to-date systematized instructions at many levels.

Ukraine, having a much larger territory and greater environmental diversity, requires deeper institutional strengthening, in particular following the example of the clearly organized system of the Czech Ministry of the Environment.

H. Comparison with the abolished Ministry of Environmental Protection: staffing

A comparison of the staffing capacity of the former Ministry of Environmental Protection and Natural Resources of Ukraine (241 staff positions) and the newly established Ministry of

Economy, Environment and Agriculture of Ukraine (1,249 staff positions) demonstrates a sharp increase in overall staffing levels. Indeed, the level of staffing that existed in the former Ministry was clearly insufficient to fulfil its broad mandate, which covered biodiversity conservation, climate change, waste management, and other environmental areas, as well as the implementation of international environmental obligations.

Formally, the larger staff of the new Ministry creates the potential for more comprehensive coverage of policy areas, including environmental ones. However, an increase in staff does not automatically guarantee strengthening of the environmental component; the key issue is how these resources are distributed.

The new structure encompasses three large-scale areas: economic, agricultural, and environmental. At the same time, according to preliminary analysis, staffing priorities are skewed toward the economic and agricultural blocks. Even with a significantly larger total staff, the environmental block has received fewer human resources than were available under the former Ministry: 167 positions now compared to 241 under the former Ministry.

The former Ministry, even with a smaller staff, was a specialized body focused on implementing environmental conservation policy, which ensured a higher concentration of expertise and a faster response to environmental challenges. In the new format, this concentration is diluted: environmental specialists are integrated into a multi-profile Ministry where environmental issues are secondary to economic tasks.

Where previously specialized knowledge and experience were concentrated, fragmentation now prevails, and the environmental agenda gives way to economic and agricultural priorities.

3. Comparison with the abolished Ministry of Environmental Protection: functions

The Ministry of Environmental Protection and Natural Resources of Ukraine had more than 170 functions, which is significantly more than many other ministries (for example, the Ministry of Justice or the Ministry of Foreign Affairs - approximately 110 each). At the same time, the Ministry's functions differed both in nature (strategic and operational) and in level of complexity. The Ministry simultaneously formulated and implemented policy in the field of environmental protection, which contradicted the basic principles of public administration and complicated oversight and effectiveness.

The new Ministry of Economy, Environment and Agriculture of Ukraine has been assigned more than 570 functions, covering an extremely wide range of areas: from economic development, investment, and foreign trade to agricultural policy, fisheries, forests, subsoil, and environmental protection. Such a "mega-ministry" format combines areas with different objectives, methods, regulatory logic, and inherent conflicts of interest. The concentration of such a large number of functions and sectors within a single body leads to competition of priorities, where economic growth and support for the agricultural sector are politically more significant and "visible" than the long-term objectives of environmental protection. As a result, environmental policy is reduced to an auxiliary role in servicing economic interests, losing its autonomy and scientifically grounded strategic orientation.

Moreover, according to Ecosystem data, the former Ministry was responsible for maintaining approximately 18 different environmental registers. Following the abolition of the Ministry, responsibility for their administration has been transferred to the Ministry of Economy. Data from these registers are essential for environmental policy-making, planning and monitoring, as well as for transparent interaction with the public and business. Without proper analysis and integration of this information, there is a risk of duplication of tasks and reduced effectiveness in the use of such data for decision-making and for fulfilling obligations under

national and European legislation.

Although the Ministry of Economy continues to maintain these registers, there are significant risks regarding their functioning and accessibility. In particular, some registers are partially inaccessible to the public. In addition, the absence of a clear system for assessing data quality and ensuring consistency across registers complicates analytical work both for public authorities and for independent actors, including civil society organizations. In this context, the fragmentation of register administration may lead to an incomplete picture of the state of the environment and creates risks for evidence-based policymaking, monitoring, and control, including in the field of reporting and compliance with international obligations.

In addition, the approach under which such a merged ministry has been created in Ukraine does not align with the practice of European Union countries. As of 2026, twelve out of twenty-seven EU Member States have separate ministries responsible for environmental protection: Bulgaria, Estonia, Italy, Lithuania, Germany, Poland, Romania, Slovakia, Slovenia, Finland, the Czech Republic, and Sweden.

In Estonia, Poland, and Sweden, these ministries also cover areas such as climate, energy, or entrepreneurship; however, environmental policy remains independent, prioritized, and does not lose its weight. In these countries, the combination of environment with energy or other sectors is carried out primarily within the framework of climate policy. At the same time, environmental powers are not reduced; on the contrary, they are integrated into other sectors with the aim of their greening.

Another fifteen countries have ministries in which environment is combined with other areas: sustainable development, climate change, energy, spatial planning, transport, or even agriculture. At the same time, an analysis of the functions and policy programmes of these bodies shows that the environmental component remains cross-cutting and prioritized. These include, in particular, Austria, Belgium, Denmark, Ireland, Spain, Cyprus, Latvia, Luxembourg, Malta, the Netherlands, Portugal, France, Croatia, and Greece. The only country in the European Union where environment is combined with agriculture with a clear priority in favour of agriculture is Hungary.

In Ukraine, however, the institutional changes introduced not only failed to eliminate the key problems that existed in the Ministry of Environmental Protection (an excessive number of functions, blurred roles, the combination of policy formulation and policy implementation functions, the implementation of policy together with economic functions and service provision), but also added new risks. These include a significant increase in the scale of the managerial workload (from around 170 to more than 570 functions), increased bureaucratic complexity, and the loss of specialized environmental expertise, that knowledge base and groundwork that the Ministry of Environmental Protection had. In the new structure, environmental issues are even more diluted among economic and agricultural tasks.

Summary regarding the current institutional capacity of the Ministry of Economy, Environment and Agriculture of Ukraine in the field of environmental protection

As of March 2026, the Ministry of Economy, Environment and Agriculture of Ukraine is not institutionally capable of effectively performing functions in the field of environmental conservation. The structure of the apparatus requires changes, the staffing and financial resources are not commensurate with the scale of the challenges, and the “mega-ministry” model creates real risks of marginalization of environmental policy. The lack of a specialized structure, the absence of clear coordination and accountability procedures, the lack of clarity of the budget mechanism, and the insufficient level of detail of environmental functions lead to the Ministry’s institutional inability to perform the powers entrusted to it in the field of environmental conservation.

Recommendations

Option A. Subject to retaining the merged ministry

1. It is advisable to ensure uninterrupted communication between its structural units performing functions in the areas of environmental assessment, climate, industrial pollution, biodiversity, water, subsoil, ambient air, forests, and waste.
2. It is necessary to develop internal rules of procedure for the approval of ministerial decisions, which would require assessment of the environmental impact of all economic, investment, and agricultural initiatives.
3. Vacant positions in the environmental area should be filled urgently, especially in the following fields: environmental monitoring, industrial pollution, subsoil management, environmental impact assessment, and biodiversity. In parallel, an independent audit of the staffing structure should be conducted in order to determine the actual need for specialists by area.
4. Proper and stable financing of environmental protection measures at the state level must be ensured, including within the budget of the relevant ministry. This includes the allocation of sufficient resources for the implementation of strategic programmes on environmental protection, monitoring of the state of natural resources, restoration and conservation of ecosystems, as well as support for innovative environmental initiatives.
5. The level of remuneration should be unified. Parity in official salaries should be established between environmental and economic units in order to preserve staff motivation.
6. The Regulation on the Ministry should be updated taking into account the ecosystem approach. The document should enshrine the principles of the cross-cutting nature of environmental policy, climate change adaptation, and the integration of environmental protection aspects into all areas of public administration.
7. A practice of regularly publishing reports on the staffing, financial, and policy status of the environmental block should be introduced; public discussion of such reports should be ensured.
8. A centralized register of all material and technical assistance projects aimed at supporting the Ministry should be created, with structured sections for: the key tasks and objectives of each project; narrative reports on the implementation of activities and results; financial reports and the use of funds. The register should ensure transparency, avoidance of duplication of tasks across projects, and effective planning of the Ministry's resources.
9. A separate Biodiversity Conservation Agency of Ukraine should be established, with the possibility of implementing part of its functions at the regional level through the relevant structural units of Oblast Military Administrations.
10. Interaction with subordinate central executive authorities, as well as with Oblast Military Administrations and local self-government bodies, should be improved.

Option B. Restoration of a separate environmental ministry – recommended option

1. Restore a separate Ministry of Environmental Protection of Ukraine. Given the incompatibility of environmental functions with macroeconomic and agricultural ones, the appropriate solution is to separate the formulation of environmental policy into an independent ministry.
2. Strengthen staffing: ensure a sufficient number of specialists in the ministry to cover all key areas of environmental conservation.
3. Establish the priority of financing environmental protection measures: increase the budget for environmental protection within the total expenditures of the ministry; separately earmark expenditures for the nature reserve fund, waste management, and industrial control; create a transparent system for the allocation and monitoring of the use of funds.

4. Develop job descriptions for ministry staff based on the principle of narrow specialization, ensuring that functional duties do not include tasks requiring simultaneous deep knowledge in fundamentally different fields, in order to ensure professional quality, effective decision-making, and institutional capacity of the body.
5. Centralize the administration of environmental registers and information systems, and ensure their accessibility for the public and public authorities.
6. All decisions concerning the environment should be taken with priority given to environmental safety rather than economic or agricultural growth, taking into account Ukraine's international obligations.
7. Establish a separate Biodiversity Conservation Agency of Ukraine with regional offices at the oblast level.
8. Establish a clear structure of the ministry. Proposals for such a structure are set out below.

Proposed structure of the restored Ministry of Environmental Protection of Ukraine:

I. LEADERSHIP OF THE MINISTRY (9)

1. Minister – 1
2. State Secretary – 1
3. First Deputy Minister – 1
4. Deputy Minister for Strategic Planning, European Integration, International Obligations and Horizontal Reforms – 1
5. Deputy Minister for Protected Areas, Biodiversity Conservation and Environmental Assessments – 1
6. Deputy Minister for Conservation and Sustainable Use of Natural Resources – 1
7. Deputy Minister for Industrial Pollution, Climate and Waste – 1
8. Deputy Minister for Environmental Safety, War Impacts on the Environment and Post-War Environmental Recovery – 1
9. Deputy Minister for Digitalization – 1

II. OFFICE OF THE STATE SECRETARY

Department of Patronage Service and Organizational Support – 8

III. DEPARTMENTS, DIVISIONS AND UNITS OF THE MINISTRY

Department of Strategic Planning and Environmental Policy – 16

Director of the Department – 1

Division of Strategic Planning, Evaluation of Environmental Policy Effectiveness and Reporting – 6

Division of Integration of Environmental Policy into Sectoral Policies – 4

Division of Science, Education and Innovation – 5

Department of European Integration and International Cooperation – 31

Director of the Department – 1

Division for Implementation of the EU acquis in the environmental field – 10

Division of International Treaties of Ukraine – 15

Division of Programme and Technical Cooperation – 5

Department of Environmental Control, Monitoring and Liability – 27

Director of the Department – 1

Division of State Environmental Control – 9

Division of State Environmental Monitoring – 9

Division of Legal Liability for Environmental Damage – 8

Department of Environmental Assessments – 29

Director of the Department – 1

Division of Environmental Impact Assessment (EIA) – 12

Division of Strategic Environmental Assessment (SEA) – 8

Division of Post-Project Monitoring – 8

Department of Protected Areas and Biodiversity Conservation – 53

Director of the Department – 1

Division of Monitoring and Cadastre of Protected Areas – 5

Division of Establishment and Development of the Protected Areas Network – 8

Division of Conservation of Wild Flora and Fauna Species – 8

Division of Development and Operation of Protected Area Institutions – 15

Division of Ecosystem Services and Permitting Activities – 10

Unit of Biosafety, GMOs and Invasive Species – 6

Department of Water Policy – 13 (1 Director)

Division of Surface Waters – 4

Division of Groundwater – 4

Division of Marine Waters – 4

Department of Conservation and Sustainable Management of Subsoil – 16 (1 Director)

Division for Ensuring Rational Use of Subsoil – 5

Division of Subsoil Protection and Environmental Requirements – 5

Division of Accounting, Reserves Balance and Analytics – 5

Department of Land Policy – 12 (1 Director)

Division of Land Policy Formulation – 4

Division of Monitoring and Assessment of Soil Condition – 3

Division of Prevention of Land Degradation and Land Restoration – 4

Department of Forest Conservation – 13 (1 Director)

Division of Forest Protection and Safeguarding – 4

Division of Forest Restoration and Sustainable Management – 4

Division of Forest Ecosystem Services – 4

Department of Industrial Pollution Prevention – 27

Director of the Department – 1

Division of Integrated Environmental Permits – 8

Division of State Policy on Industrial Emissions Prevention and Introduction of BAT – 6

Division of Ambient Air (PRTR) – 12

Department for Climate Change – 19

Director of the Department – 1

Division of Climate Policy Formulation and Climate Change Adaptation – 8

Division of Carbon Pricing – 4

Division of Ozone-Depleting Substances – 4

Unit of Climate Reporting – 2

Department of Waste Management – 25

Director of the Department – 1

Division of State Waste Management Policy – 6

Division of Permitting and Licensing in Waste Management – 9

Division of Demolition Waste Management – 4

Division of Control (Licensing Inspections) – 5

Department for Assessment of Environmental Damage Caused by Hostilities and Environmental Recovery – 24

Director of the Department – 1

Division of Methodology for Documentation and Evidence of Environmental Damage – 6

Division of Damage Registers and IT Systems – 5

Division of Ecosystem Restoration – 7

Unit of International Compensation and Reparations – 5

Department of Environmental Data, Registers and Digital Transformation – 12 (1 Director)

Legal Department – 10 (1 Director)

Department of Internal Control and Corruption Prevention – 5 (1 Director)

Financial and Economic Department – 7 (1 Director)

Department of Human Resources and Civil Service – 6 (1 Director)

Department of Document Management and Communications – 9 (1 Director)

Department for Citizens' Appeals and Access to Information – 9 (1 Director)

Department of Administrative Support and IT Services – 10 (1 Director)

Total indicative staff: approximately 390 positions

2. State Environmental Inspectorate: (in)effectiveness of environmental control

The State Environmental Inspectorate of Ukraine (hereinafter, the Inspectorate), in accordance with the Regulation approved by the Cabinet of Ministers of Ukraine, is vested with broad powers in the field of environmental protection and the use of natural resources. Its tasks include, inter alia, control over the condition of ambient air, land, water, forests, biodiversity, the nature reserve fund, waste management, hazardous substances and pesticides, as well as the conduct of laboratory control, representation of the interests of the State in courts, and the calculation of environmental damage. However, an analysis of its staffing structure and organizational activities indicates significant limitations in its institutional capacity.

As of September 2025, the total number of staff positions in the central office of the State Environmental Inspectorate of Ukraine amounted to 89 positions [source: EPL archive]. At the same time, 15 positions remain vacant, which corresponds to a staffing deficit of more than 16%. For such a small institution, this number of unfilled positions is critical, as it significantly reduces the body's ability to perform its functions.

The structure of the apparatus appears fragmented and consists of departments, administrations, divisions, and units, most of which are staffed with a minimal number of employees. For example, the division of state environmental supervision (control) of forests, flora and fauna, and biological resources employs only seven persons, while the unit of instrumental and laboratory control employs three persons [source: EPL archive]. This is a low figure given the volume of tasks assigned to these structural units. Laboratory control and control over biological resources are an important component of documenting environmental violations; however, in practice, the Inspectorate does not have sufficient staffing capacity to carry out systematic inspections.

A similar situation is observed in other areas. The Administration of Organizational Activities consists of ten persons, including the division for documentation of control and the division for interaction with the media, which appears insufficient under modern requirements for public communication and environmental challenges. The Administration of Legal Support consists of ten employees and is divided into the division for representation of interests in courts and law enforcement bodies and the division for regulatory and expert work. Each of these divisions has only 4–5 employees, which is insufficient for proper representation of the State in courts and legal support of the Inspectorate's activities.

Certain units, such as the internal audit unit, the unit for prevention and detection of corruption, the unit of state market surveillance, the unit for digitalization, and the unit for international cooperation, consist of only two persons. This means that important and specialized areas of work are ensured by a minimal number of specialists, which may render their activities more formal than genuinely effective.

In 2025, following the abolition of the Ministry of Environmental Protection and the establishment of the Ministry of Economy, Environment and Agriculture of Ukraine, the structure of the central office formally remained unchanged. At the same time, adjustments were made to the staffing table in connection with the new classification of civil service positions approved by Resolution of the Cabinet of Ministers of Ukraine No. 369 of 1 April 2025. This resulted in the abolition of certain positions and the introduction of others with higher official salaries. However, the overall number of staff did not increase, and the staffing deficit was not resolved. Thus, the changes were largely technical in nature and did not affect the actual institutional capacity of the Inspectorate.

In view of the above, several conclusions can be drawn. First, there is a significant imbalance between the tasks assigned to the State Environmental Inspectorate of Ukraine and its staffing and material resources. The body formally covers all areas of environmental control but does not have a sufficient number of employees to perform these tasks. Second, the structure of the central office is excessively fragmented. Many units have only two or three employees, which does not allow them to operate effectively. Third, the high level of vacant positions limits the activities even of those units that have relatively larger staff.

In addition to the above problems, it should be taken into account that the environmental control reform initiated in 2014 has remained unfinished. Its main objectives - changing the purpose of control to a preventive one, creating an independent body with an adequate material and technical base, revising inspection procedures, introducing a system of environmental liability and management of funds received from compensation for environmental damage - have been implemented only partially or formally. Failure to implement these tasks has led to a number of systemic risks for the effectiveness of the State Environmental Inspectorate.

First, the absence of law enforcement status and the limitations of powers under the Law of Ukraine “On the Basic Principles of State Supervision (Control) in the Sphere of Economic Activity” reduce the effectiveness of the Inspectorate’s activities. The body cannot respond promptly to violations or carry out systematic patrols or raids, which makes control fragmented and formal.

Second, the absence of district offices and institutions for operational response to calls makes it impossible to react quickly to environmental offences in the oblasts. This reduces the potential for preventive control and makes the recording of violations delayed, which is particularly critical in the context of hostilities and environmental challenges.

Third, the absence of an institution of legal liability of legal entities for environmental degradation and violations of environmental legislation creates a legal vacuum: large business entities may avoid punishment, while liability is effectively imposed on natural persons, which reduces the effectiveness of environmental control.

The absence of integration of these elements with the material and technical base, staffing potential, and environmental monitoring systems leads to a situation where a significant part of the damage is not recorded, analysed, or taken into account in national and international judicial proceedings. The consequence of this is the impossibility of implementing the preventive function of state environmental control, a violation of citizens’ right to a clean

environment, as well as the risk of non-compliance by Ukraine with its obligations under national and European legislation.

Ineffective control during the war may deprive the State of the evidentiary basis for recovering compensation for environmental damage and significantly reduce the chances for the country's green recovery.

Thus, without completing the reform of environmental control, granting the Inspectorate law enforcement status, creating regional subdivisions, and introducing a system of liability of legal entities, Ukraine risks leaving a significant part of environmental problems outside control, which will lead to catastrophic consequences for the environment and the population.

Recommendations

Option A. Interim strengthening

1. Increase the number of specialists and renew the staffing composition of the bodies of the State Environmental Inspectorate. First and foremost in the areas of industrial pollution, water monitoring, waste management, and assessment of environmental damage caused by the war.
2. Lift the restrictions on inspections by the Inspectorate introduced in connection with the imposition of martial law in Ukraine.
3. Create modern laboratories at the central and regional levels with certified equipment capable of ensuring an appropriate level of measurements in accordance with European standards.
4. Increase the level of remuneration and social guarantees for the Inspectorate's specialists. Establish competitive remuneration corresponding to the level of responsibility of an inspector, and also introduce a system of bonuses for risks and performance results.
5. Introduce a system for transparent maintenance of registers and reporting on the results of environmental control measures, which will allow the integration of data for decision-making and ensure public and business access to information.

Option B. Systemic reform of state environmental control - recommended option

1. Adopt draft law No. 3091 "On State Environmental Control".
2. Carry out a systemic reform of state environmental control, changing its purpose from control over business entities to control over compliance with environmental standards and prevention of environmental damage. Provide for the implementation of operational control measures without permission from any public authority. Ensure the independence of the state environmental control body and provide it with a modern material and technical base: transport, laboratories, and equipment for sampling and analysis.
3. Shift from a punitive to a preventive model of work. Focus activities on the prevention of violations, raising the environmental awareness of businesses and communities, and advising business entities on compliance with legislation.
4. Move from a system of small units to the establishment of strong departments by key areas: industrial pollution, waste, water resources, forests, subsoil, and assessment of environmental damage caused by the war.
5. Increase the level of remuneration and social guarantees. Establish competitive remuneration corresponding to the level of responsibility of an inspector, and also introduce a system of bonuses for risks and performance results.

6. Create modern laboratories at the central and regional levels with certified equipment capable of ensuring an appropriate level of measurements in accordance with European standards.
7. Update the Regulation on the State Environmental Inspectorate. Enshrine in it a new functional model of work, clear accountability, procedures for interaction with other public authorities, and independence in decision-making.
8. Grant the State Environmental Inspectorate law enforcement status, which will allow it to carry out patrols, raids, and prompt response to violations without additional approvals.
9. Create district offices and institutions for operational response capable of quickly recording violations on the ground and ensuring preventive control in all regions.
10. Introduce a system of legal liability for legal entities for environmental degradation and violations of environmental legislation in order to avoid impunity of business entities.
11. Ensure regular patrols and raids, and also create a system for prompt response to citizens' calls in order to increase the speed of detection and recording of violations.
12. Introduce a system for transparent maintenance of registers and reporting on the results of environmental control measures, which will allow the integration of data for decision-making and ensure public and business access to information.

3. State Forest Resources Agency of Ukraine: the (im)balance between economic activity and the conservation of forest ecosystems

The State Forest Resources Agency of Ukraine (hereinafter, the State Forest Resources Agency, the Agency) is a central executive authority whose activities are directed and coordinated by the Cabinet of Ministers of Ukraine through the Ministry of Economy, Environment and Agriculture (prior to its establishment, through the Ministry of Environmental Protection and Natural Resources of Ukraine).

The Agency implements state policy in the field of forestry and hunting, and the protection, use and reproduction of forests.

The main tasks and functions of the Agency are defined by the Regulation on the State Forest Resources Agency of Ukraine, approved by Resolution of the Cabinet of Ministers of Ukraine No. 521 of 8 October 2014.

The functions of the State Forest Resources Agency cover an extremely broad range, from rule-making and analytical work to management, control and economic activity. The Agency summarizes the practice of applying legislation in the field of forestry and hunting, prepares proposals for improving legislative acts and sector development programmes, and participates in the formulation of state policy on the protection, use and reproduction of forests.

The body exercises state management of the forest fund and the territories of the nature reserve fund that are under the use of enterprises within its sphere of management. The Agency's competence includes maintaining the state forest cadastre, forest inventory planning, monitoring, determining forest categories, approving the age of maturity of forest stands, issuing special permits for the use of forest resources, and monitoring compliance with the requirements of forest legislation.

A separate area of activity is international cooperation, in particular participation in the implementation of international agreements in the field of sustainable forest management, preparation of proposals for interdepartmental international treaties, and representation of Ukraine in international organizations.

Thus, rule-making, analytical, managerial, control, and economic functions are combined within a single body. This was supposed to ensure a comprehensive approach to forest management, but at the same time creates a conflict of interest.

The combination of economic and control functions within the system of the State Forest Resources Agency particularly aggravates the above-mentioned conflict of interest. The institutions that designate fellings and monitor their correctness (the Ukrainian State Forest Inventory Association and forest protection stations (state specialized forest protection enterprises)) are under the management of the State Forest Resources Agency and are financially dependent on state forestry enterprises. This leads to situations where inappropriate sanitary or forest regeneration fellings are designated under the guise of economically justified measures, since this corresponds to the interests of the State Forest Resources Agency and its economic model. Such actions bear signs of bias and potential corruption risks, which causes public outrage and undermines trust in forest governance.

The lack of transparency and openness in the work of the State Forest Resources Agency deepens the problem. Only under public pressure did the Agency begin to publish maps of forestry enterprises and a register of completed fellings. However, this is insufficient: forestry enterprises possess vector maps of all forestry enterprises of Ukraine, which are a key tool for verifying fellings, but even law enforcement agencies do not have proper access to them. This significantly complicates the establishment of violations and reduces the effectiveness of control, leaving a significant share of forest-related offences unpunished.

Formally, the Agency's activities are intended to ensure a balance between the use and conservation of forests; however, in practice, priorities remain predominantly economic, which creates an imbalance between economic interests and environmental obligations.

The State Forest Resources Agency coordinates the activities of state forestry enterprises, in particular State Enterprise "Forests of Ukraine", which manages more than 6.6 million hectares of state forests and ensures its own financing predominantly through timber sales. Such a model creates a financial dependence of the sector on the volume of fellings and stimulates increased economic activity even in environmentally valuable territories.

There are repeated cases of fellings carried out without environmental impact assessment procedures under the guise of "sanitary" fellings. This leads to degradation of natural complexes, loss of biodiversity, and increased erosion risks. Such practices cause direct damage to the State and undermine the potential for restoration of forest ecosystems.

Despite the outlined problems, recent years have been marked by the digital transformation of the forest sector. The "Forests of Ukraine" geo-information portal has been created, providing public access to cartographic data on forests, planning, and the history of forestry activities, including the calculation of areas and printing of plans of plots designated for felling, fire monitoring, monitoring of forest pest and disease outbreaks, information on the nature reserve fund, the state forest cadastre, and maps of recreation and leisure sites. An electronic timber accounting system has been introduced, the national forest inventory is being developed, and geo-analytical tools are being introduced to monitor illegal logging.

However, these initiatives are predominantly technical in nature and have not yet transformed the governance model of the sector. The lack of proper integration of digital data into strategic planning and control processes preserves the gap between the declared

principles of sustainable development and the actual practice of forest use.

The staffing level of the central office of the Agency amounts to 65 positions, which is extremely limited for an institution coordinating the management of the State's forest fund. The positions are distributed between the Administration of Forestry and Forest Reproduction and 4 main divisions: 1) hunting management and hunting (7 positions); 2) economics (7 positions); 3) use of forest resources and technical policy (6 positions); 4) forest protection and safeguarding (5 positions). Other positions are distributed among support divisions and units: accounting and reporting, legal, human resources, analytical, control and citizens' appeals, and the unit for international relations, science, and public relations [source: EPL archive].

It is evident that the staffing structure is economically oriented, while the areas of environmental policy, environmental monitoring, climate change adaptation, and cooperation with the public remain unrepresented or are limited to a few specialists.

There are no separate positions responsible, for example, for recording losses or restoration of degraded areas. This creates a gap between economic functions and the State's environmental obligations. The staffing structure does not ensure transparency and openness of governance. The existing units are focused predominantly on the performance of administrative and economic functions rather than communication with the public or institutional openness.

The lack of specialists in ecology, digital analytics, and biodiversity conservation control leads to a situation where the decision-making system remains predominantly administrative and commercial in nature. Such an imbalance reduces the effectiveness of environmental monitoring, weakens the analytical basis for managerial decision-making, and contributes to the preservation of outdated practices.

The institutional model of forest governance is characterized by an imbalance between economic management and environmental functions, preserving a resource-commercial approach to forests as a source of raw materials.

The main problems regarding the Agency's institutional capacity include: the combination of regulatory, economic, and control functions within a single structure; weak environmental and analytical capacity; underestimation of damage caused by fellings and the absence of mechanisms for its compensation; low transparency of data on the condition of forests; and staffing and financial dependence on economic performance indicators.

Recommendations

Option A. Improvement of the existing model (insufficient)

1. Separate the functions of regulation, control, and economic activity within the current forest sector governance system, in particular by institutionally separating forest fund management functions from the commercial use of resources.
2. Strengthen the environmental component within the structure of existing bodies by providing for separate units and positions responsible for environmental impact assessment, biodiversity conservation, restoration of forest ecosystems, and monitoring of climate risks.
3. Modify the financial model of the forest sector by reducing dependence on revenues

from fellings and introducing additional sources of financing, including mechanisms for payment for ecosystem services.

4. Increase the transparency of the activities of forest management bodies by ensuring open access to data on forest use, felling plans, inventory results, and the condition of forest ecosystems, as well as introducing regular public reporting.
5. Develop staffing capacity, in particular by expanding the number of specialists in ecology, geographic information systems, and environmental monitoring, and by creating a system for professional development.
6. Integrate forest policy into the State's climate policy by ensuring consideration of Ukraine's international obligations and European approaches to sustainable forest management.
7. Strengthen public participation by expanding mechanisms for consultation and involving civil society organizations in planning, monitoring, and environmental impact assessment.

Option B. Institutional reform with priority given to environmental protection (recommended)

1. Ensure full institutional separation of the functions of policy formulation, state control, and economic activity in the forest sector. The combination of these functions within a single body should be discontinued as it creates a systemic conflict of interest.
2. Enshrine at the level of state policy the priority of the environmental function of forests, defining biodiversity conservation, climate stability, and ecosystem services as the primary objective of forest management, rather than a by-product of economic activity.
3. Fundamentally change the financing model of the sector by reducing dependence on fellings as the key source of income. The environmental functions of forests should be financed from the state budget and special mechanisms (ecosystem services, climate instruments), rather than through incentives for timber harvesting.
4. Introduce mandatory full transparency in the forest sector, including open data on all stages of forest use, environmental impact, and restoration results. The lack of openness of information should be treated as a risk factor for corruption and ineffective management.
5. Establish a specialized staffing system that excludes the practice of combining incompatible functions and provides for a sufficient number of specialists, competitive remuneration, and systematic professional training.
6. Integrate forest policy into the State's climate and European integration policy not declaratively, but through concrete instruments for planning, monitoring, and accountability, in line with Ukraine's obligations to the EU and under international conventions.
7. Guarantee real public participation in decision-making by making public consultations, access to information, and public oversight mandatory elements of forest governance rather than formal procedures.

4. State Service of Geology and Subsoil of Ukraine: fragmentation of subsoil governance and environmental approaches

The State Service of Geology and Subsoil of Ukraine (hereinafter, the State Service of Geology and Subsoil) is a central executive authority whose activities are coordinated through the relevant minister. Its main purpose is to implement state policy in the field of geological exploration and rational use of subsoil, as well as to perform the functions of the authorized body on production sharing agreements. This body effectively combines technical, regulatory, and control functions, acting as one of the key institutions in the country's natural resource management system.

The mandate of the State Service of Geology and Subsoil covers a wide range of tasks: maintaining state cadastres and registers of deposits and reserves, monitoring the mineral resource base and groundwater, administering the electronic geo-information system for subsoil use, issuing special permits for subsoil use, as well as their amendment or cancellation. In addition, the Service has the authority to conduct scheduled and unscheduled inspections of subsoil users, impose administrative penalties, apply to courts to terminate unlawful subsoil use, and file claims for compensation for damage caused to the State. Thus, the State Service of Geology and Subsoil possesses real regulatory and enforcement instruments that allow it not only to maintain records and conduct research, but also to ensure compliance with the rules of subsoil use.

An important step in recent years has been the introduction of digital tools. The creation of a unified state geo-information system for subsoil use, a state repository of geological information, and interaction with the land cadastre open up opportunities for more transparent data management and reduction of corruption risks. This brings Ukraine closer to international standards in the field of natural resource management, where openness and accessibility of information are critically important for public and investor trust.

At the same time, the institutional capacity of the Service has a number of limitations. The total staffing level of the body is 122 positions [source: EPL archive], however, as of September 2025, 17 positions remain vacant [source: EPL archive]. Thus, the actual number of engaged specialists is somewhat lower (by about 14%) than provided for in the structure. For a central executive authority responsible for managing the country's vast mineral resource base, this is an extremely limited staffing resource. No staffing reinforcement of this Service took place after the abolition of the Ministry of Environmental Protection and Natural Resources of Ukraine, which would have been logical, given that there is no longer a specialized environmental ministry and a larger share of work related to environmental protection is now assigned to authorized services, agencies, inspectorates, etc. Staff overload inevitably affects the quality of monitoring, the speed of response to violations, and the overall effectiveness of mandate implementation. Young specialists often do not remain in the Service due to low motivation, lack of prospects, and relatively low salaries. This creates a situation where a body with a key mandate effectively lacks sufficient intellectual capacity to properly perform its strategic functions.

Additional constraints include high corruption risks that have traditionally accompanied the area of granting special permits for subsoil use. Despite the introduction of electronic services, the level of trust of businesses and the public in the transparency of these procedures remains low. The political factor also plays a role: the State Service of Geology and Subsoil is a central executive authority, but its activities are directed and coordinated through the minister, which may reduce its autonomy in making technical decisions. Historically, decisions on licenses have often been accompanied by accusations of lack of transparency, selective treatment of applicants, and outright lobbying of the interests of certain business groups. In public perception, the State Service of Geology and Subsoil is often associated with the "distribution of subsoil resources" in a closed manner. Despite statements about the introduction of electronic auctions and open data, trust in these processes remains low.

There are also questions regarding the priorities of its activities. Although the Regulation of the Service clearly sets out tasks related to the rational use of subsoil and environmental protection, in practice preference is given to purely economic interests. The Regulation on the State Service of Geology and Subsoil defines its main tasks as maintaining records,

issuing permits, and exercising control over subsoil use. The field of environmental protection is mentioned in this document only incidentally, mainly in the form of the general principle of “rational use.” This means that the structure of the Service effectively lacks institutionally formalized functions of environmental monitoring or ensuring the restoration of territories after the completion of extraction activities. Thus, an imbalance arises: a body that is formally positioned as nature-oriented in practice operates within the paradigm of an administrator of access to natural resources. In other words, the main focus remains on issuing permits and administering subsoil use, while issues of environmental safety or real control over compliance with standards are relegated to the background.

This imbalance is reinforced by the fragmentation of powers and duplication of functions with related bodies. In particular, control over subsoil protection and monitoring of groundwater, assigned to the State Service of Geology and Subsoil, overlaps with the competences of the State Environmental Inspectorate and the State Water Resources Agency. The absence of a clear delineation of areas of responsibility leads to institutional conflicts and creates “grey zones,” where either control is duplicated or, conversely, critically important aspects fall outside oversight, such as the assessment of the impact of extraction activities on ecosystems.

Another problem is the weak integration of the State Service of Geology and Subsoil into the strategic energy and climate context. The Regulation on the Service contains no mention of its role in achieving climate targets, transitioning to renewable energy sources, or reducing Ukraine’s dependence on fossil resources. The absence of a link between resource policy and climate commitments indicates the persistence of an outdated “resource paradigm” focused on extraction while ignoring global trends in sustainable development.

It is also indicative that the structure of the Service is oriented predominantly toward operational functions: issuing permits, exercising control, and maintaining cadastres. At the same time, there is no institutional obligation to prepare annual public reports on the state of subsoil resources, to forecast their use, or to develop scenarios for the development of the mineral resource base taking into account environmental impacts. Such a lack of transparency makes proper public oversight impossible and renders subsoil policy closed and unaccountable to society.

Particularly critical is the absence within the Service’s functional mandate of systematic attention to issues of reclamation and “post-use.” The Regulation does not establish a task to ensure the proper condition of territories after the completion of extraction activities. As a result, significant areas of degraded land, technogenic dumps, and other hazardous sites remain without proper supervision and management. Responsibility is effectively diffused among various bodies, while the State Service of Geology and Subsoil, as the central coordinator in the field of subsoil use, distances itself from this issue.

Overall, this institutional design reflects a contradiction between a declared environmental orientation and the actual practice of the Service’s work. It highlights that the core of the State Service of Geology and Subsoil’s activities remains the administration of resources, while issues of environmental safety, environmental restoration, and compliance with international climate policy obligations remain outside its focus.

Recommendations

Option A. Improvement of the existing model (insufficient)

1. Improve the delineation of functions between the State Service of Geology and Subsoil, the State Environmental Inspectorate, and the State Water Resources Agency by reducing duplication of powers and clarifying the areas of responsibility of each body, in particular with regard to controlling the environmental impact of extraction and land reclamation.
2. Strengthen the staffing capacity of the State Service of Geology and Subsoil, in particular by increasing the number of specialists in ecology, geology, environmental impact assessment, and natural resource monitoring.
3. Increase the transparency of procedures for granting special permits by ensuring the functioning of open registers, electronic auctions, and access to information on subsoil use.
4. Integrate activities in the field of subsoil use into the State's climate and energy policy, ensuring consistency with sustainable development goals, Ukraine's international obligations, and European approaches.

Option B. Institutional reform of the subsoil management system (recommended)

1. Carry out a full functional reset of the subsoil management system, clearly separating the functions of policy formulation, permitting and administration, and environmental control.
2. Eliminate duplication of powers between the State Service of Geology and Subsoil, the State Environmental Inspectorate, and the State Water Resources Agency at the regulatory level.
3. Establish responsibility for the environmental consequences of subsoil use, including control over the environmental impact of extraction and mandatory land reclamation, with a clearly designated body endowed with appropriate powers and resources.
4. Significantly strengthen the staffing capacity of the system by ensuring a sufficient number of specialized professionals in geology, ecology, monitoring, and environmental impact assessment, as well as a competitive level of remuneration.
5. Introduce full transparency in the field of subsoil use, including mandatory open registers, digital permitting procedures, electronic auctions, and public access to information on all stages of subsoil use.
6. Integrate subsoil policy into the State's climate and energy policy as a mandatory condition for decision-making, ensuring compliance with the European Green Deal, sustainable development goals, and Ukraine's international obligations.

5. State Water Resources Agency of Ukraine: an outdated model of water resources management

The State Water Resources Agency of Ukraine (hereinafter, the State Water Resources Agency) is a central executive authority whose activities are coordinated by the Cabinet of Ministers of Ukraine through the Minister of Economy, Environment and Agriculture. The legal basis for the Agency's activities is the Regulation approved by Resolution of the Cabinet of Ministers of Ukraine No. 393 of 20 August 2014. The maximum number of employees of the apparatus and territorial units is determined by Resolution of the Cabinet of Ministers of Ukraine No. 85 of 5 April 2014 and amounts to 128 persons. As of 24 October 2025, the Agency had 26 vacant positions [source: EPL archive], which indicates a staffing gap of about 20%.

Functionally, the State Water Resources Agency performs a wide range of tasks, from regulatory and coordination functions to managerial and executive ones. It has been delegated powers in the field of management of state-owned property used for water management needs, organization of monitoring of the condition of water bodies, implementation of permitting procedures in the field of special water use, maintenance of water resources records, and coordination of measures for water protection and prevention

of harmful impacts on waters. Such a mandate gives the Agency a key role in the State's water governance system, but at the same time requires a combination of analytical capacities and real technical capabilities for prompt response to existing challenges.

The structure of the Agency's apparatus, approved in November 2024, provides for a number of administrations and divisions covering the areas of strategic planning, monitoring, international cooperation, accounting, legal support, IT support, human resources work, and interaction with regional bodies [source: EPL archive]. Such a format creates risks of excessive "office-based" concentration of functions alongside a shortage of "field" units.

The structure of the State Water Resources Agency lacks a sufficient number of narrow-profile specialists: hydraulic engineers, hydrologists, ecology monitoring specialists, specialists in GIS, and specialists in digital water resources management. The lack of the Agency's own operational capacity increases dependence on contractors and donor projects, which creates the risk of fragmented responsibility and uneven quality of implementation. The absence of clear protocols for interaction with the Ministry of Internal Affairs, the State Environmental Inspectorate, and local self-government bodies in crisis situations slows decision-making and reduces the effectiveness of response.

These limitations result in the State Water Resources Agency often performing predominantly a coordination and analytical function, with weak performance in the field of operational implementation of tasks. This is reflected in: low speed of response to emergencies or environmental incidents; irregular monitoring and gaps in databases; difficulties in controlling compliance with water use regimes; and risks of poor-quality implementation of permitting and supervisory procedures.

Institutional model of water resources management in Italy

The Italian water resources management system is characterized by a multi-level structure in which strategic decisions are taken at the national and river basin levels, while operational management of services is carried out at the local level. A key feature is the role of an independent regulator that ensures stable conditions for the functioning of the economy.

At the national level, the leading role is played by the Ministry of the Environment and Energy Security (Ministero dell'Ambiente e della Sicurezza Energetica, MASE). It is responsible for the development of the overall strategy, coordination of the activities of district basin authorities, and implementation of European directives. Within the structure of the Ministry there are units dealing with water quality, resource management, and monitoring of climate risks. Technical and scientific support is provided by ISPRA (the Institute for Environmental Protection and Research), which manages the national database on the condition of water bodies and prepares annual reports on the hydrogeological stability of the country.

A unique institution in the Italian model is ARERA (the Italian Regulatory Authority for Energy, Networks and Environment - Autorità di Regolazione per Energia Reti e Ambiente). Since 2011, this independent body has taken over the functions of regulating the integrated water service. ARERA is not directly subordinate to the Government in its decisions, which makes it possible to exclude political influence on tariff-setting. The regulator establishes national standards of service quality, determines the methodology for tariff calculation, and approves the investment plans of operators.

According to the Environmental Code, the territory of Italy is divided into 8 District Basin Authorities (Autorità di Bacino Distrettuale): the Po River District, the Eastern Alps District,

the Northern Apennines District, the Central Apennines District, the Southern Apennines District, the Sardinia District, the Sicily District, and the Eastern Adriatic Basins District.

Each district authority develops a River Basin Management Plan, which is updated every 6 years. These plans define measures for achieving good ecological status of water bodies and establish limits on water abstraction. In addition, within each district Permanent Observatories on Water Uses (Osservatorio Permanente sugli utilizzi idrici) have been established, which are technical and operational bodies for monitoring the hydrological balance and coordinating actions during droughts.

At the local level, management is organized through local Area Governance Bodies (Enti di Governo dell'Ambito, EGA), which represent municipalities within a given Optimal Territorial Area. EGAs choose the form of management (public company, private company, or mixed model), appoint the operator, and monitor contract implementation.

A separate segment is formed by the Land Reclamation Consortia (Consorzi di Bonifica) - public legal entities governed by landowners and responsible for irrigation, drainage, and flood protection on agricultural land. They are subordinate to regional authorities but operate in close coordination with the basin authorities.

Recommendations

Option A. Improvement of the existing model (insufficient)

1. Strengthen staffing by identifying a list of key technical positions (hydrologists, IT analysts, inspectors) and ensuring that they are filled through simplified and accelerated competitive recruitment procedures.
2. Establish regional mobile teams equipped with the necessary equipment for monitoring the condition of water resources, responding to emergencies, and supervising compliance with water legislation.
3. Introduce an integrated GIS-based water resources monitoring system, ensuring the collection, processing, and partially open access to data in a near real-time mode.
4. Expand staffing flexibility, in particular through the engagement of specialists under contractual arrangements, the development of internships, and professional development programmes.
5. Improve coordination of emergency response by developing joint response algorithms involving the relevant public authorities and local self-government bodies.
6. Increase the accountability of the Agency's activities by introducing regular public reporting and certain elements of external audit.
7. Optimize the structure of the body by ensuring a more balanced distribution of resources between analytical and field units.

Option B. Institutional strengthening of the water resources management system (recommended)

1. Build a full-fledged staffing foundation for the system by identifying critical technical positions (hydrology, IT) as priorities and ensuring their prompt filling through special recruitment procedures, including contractual mechanisms.
2. Establish permanent regional mobile units equipped with modern equipment, with a clear mandate for field monitoring, inspections, and emergency response, while strengthening the role of the regional level as the key level in the water resources management system.
3. Introduce a single national real-time digital water resources monitoring system integrated with other state registers, with full open access to data as a basic principle

of transparency and accountability.

4. Institutionalize flexible mechanisms for engaging expertise by providing for the systematic use of short-term contracts, internship programmes, and continuous professional training as an integral part of the functioning of the body.
5. Establish mandatory uniform emergency response protocols developed jointly with all relevant bodies, including law enforcement and supervisory authorities, with a clear distribution of responsibilities and coordination mechanisms.
6. Introduce systemic accountability and independent oversight, including mandatory annual public reports, regular external audits, and mechanisms for independent monitoring of project implementation.
7. Reconfigure the organizational model in favour of operational capacity, ensuring priority financing and development of field units over administrative and analytical ones, as key elements for real control over the condition of water resources.

6. State Agency of Ukraine on Exclusion Zone Management: functioning under conditions of restricted access and new security risks

The Regulation on the State Agency of Ukraine on Exclusion Zone Management formulates a complex of tasks: management of the exclusion zone and the zone of unconditional resettlement; implementation of radioecological monitoring; coordination of works on the collection, processing, transportation, storage, and disposal of radioactive waste; organization of measures for the decommissioning of the Chornobyl Nuclear Power Plant and the transformation of the Shelter into an environmentally safe system; participation in international cooperation; management of state-owned property in the zone, etc. This list simultaneously provides the Agency with regulatory, managerial, and executive functions.

The State Agency of Ukraine on Exclusion Zone Management also has special powers: issuance, suspension, and cancellation of special permits within the exclusion zone (construction, removal of materials, presence of persons), functions of the main spending unit of the State Radioactive Waste Management Fund, organization of the state inventory of waste and storage facilities, and the right to take decisions on the conservation/closure of storage facilities upon agreement with the State Nuclear Regulatory Inspectorate. Thus, formally, the Agency has a broad “toolkit” of governance and resource powers.

The structure of the apparatus is multi-sectional and includes administrations/divisions for radiation monitoring, waste management, legal support, finance, international cooperation, human resources work, etc., which formally covers the key areas [source: EPL archive]. However, staff and coordination units predominate, while organizational resources for the actual performance of works are less represented.

The Head of the State Agency of Ukraine on Exclusion Zone Management is appointed by the Cabinet of Ministers of Ukraine and works in coordination with the relevant ministry; many staffing decisions and the procedure for information exchange are determined in interaction with the relevant minister. It is important to note that in the event of accidents, the need for rapid interventions, or large-scale dismantling works, internal capacities for prompt response are limited, and coordination with other institutions may slow down the necessary actions.

The 2025 staffing table records only 56 staff positions in the apparatus of the State Agency of Ukraine on Exclusion Zone Management [source: EPL archive]. That is, 56 positions for an apparatus that is expected to perform complex technical, regulatory, monitoring, international, and economic functions. At the same time, the staffing table includes leadership positions and positions of heads of administrations, chief/leading specialists, and units with different levels of salary funds [source: EPL archive]. However, the formal existence of such positions does not yet guarantee the presence of narrow-profile specialists

(nuclear engineers, radiation chemists, engineers for waste removal/processing, physical protection inspectors, etc.), while such employees are necessary for the implementation of the Agency's core programme tasks.

The existing number of staff positions effectively means that one staff position covers a huge array of functions (administration of funds, planning, monitoring, international relations, coordination of large-scale technical works). This creates systemic staffing risks: the work acquires an "administrative-coordination" character instead of deep technical expertise and the actual implementation of the necessary measures in practice.

The Regulation grants the State Agency of Ukraine on Exclusion Zone Management the status of the main spending unit of the State Radioactive Waste Management Fund (that is, formally the Agency may administer targeted funds) and assigns to it responsibilities for planning and financial work and control over the use of resources. At the same time, the staffing table of the apparatus and the procedure for approval of the cost estimate create a process in which any increase in the apparatus or resources requires multiple approvals and changes at a higher level. This restrains the flexibility of expanding the Agency's operational capacities.

Thus, even in the presence of a targeted fund and international financing programmes, the apparatus of the State Agency of Ukraine on Exclusion Zone Management remains dependent on procedures and budget cycles; resources may be provided for projects, but they do not necessarily create internal institutional capacity (field teams, analytical groups, long-term contracts with specialists).

The Regulation on the State Agency of Ukraine on Exclusion Zone Management provides for broad powers of interaction with central executive authorities, local self-government bodies, international organizations, and enterprises. However, in practice, key technical and regulatory decisions on nuclear safety and waste management require constant coordination with the State Nuclear Regulatory Inspectorate, the Ministry of Defence (with regard to radiation-sensitive issues), the Ministry of Internal Affairs (regime control), the Ministry of Finance (funding), international donors, and project implementers. Since the Agency has both a coordination and an executive component, without a clearly distributed operational structure and sufficient resources, the risk of "shifting" responsibility to contractors or subordinate enterprises increases.

The Regulation on the State Agency of Ukraine on Exclusion Zone Management grants this body the right to issue and revoke permits within the zone, but its actual capacity to monitor compliance with their conditions in practice (inspector shifts, raid systems, continuous monitoring) is limited. This creates a risk of illegal harvesting/removal of materials and gross violations of the exclusion zone regime.

Recommendations

Option A. Improvement of the existing model (insufficient)

1. Strengthen the staffing capacity of the body by increasing staff numbers and expanding human resources potential, in particular for the establishment of a monitoring network, technical teams, and inspection groups.
2. Improve staffing policy by providing for the use of contractual mechanisms for narrow-profile specialists, a system of allowances and bonuses, as well as professional training programmes.
3. Establish mobile laboratories and inspection teams capable of promptly responding to violations and carrying out field control.

4. Optimize interaction with the relevant ministry and other bodies, in particular through the development of standardized decision-making procedures regarding permits, facility management, and response to crisis situations.
5. Develop digital infrastructure, including the creation of accounting databases, cartographic services, and monitoring systems.
6. Strengthen internal control and accountability, in particular through the introduction of regular public reporting and certain elements of external audit.

Option B. Institutional strengthening of the system of management of the State Agency of Ukraine on Exclusion Zone Management (recommended)

1. Build a full-fledged staffing system providing for an increase in staff, clear specialization of functions, and priority recruitment of narrow-profile specialists through contractual mechanisms, competitive remuneration, and systematic training programmes.
2. Establish a permanent operational infrastructure, including mobile laboratories and inspection teams subordinate to the body and capable of ensuring continuous field monitoring and prompt response.
3. Establish mandatory standardized protocols of interaction with the relevant ministry and specialized regulators, in particular with regard to permit issuance, management of high-risk facilities, and response to crisis situations.
4. Ensure full digitalization of management by creating an integrated accounting, monitoring, and alert system including registers, geo-information services, and analytical tools with open access to data.
5. Institutionalize independent control and anti-corruption mechanisms, including mandatory external audits, regular public reporting, and external oversight mechanisms.

7. Environmental Protection Fund: systemic inefficiency of environmental finance

Environmental Protection Funds (hereinafter, the Environmental Protection Funds) are a key financial instrument for the implementation of state and local environmental policy. The legal basis for the functioning of such funds is the Law of Ukraine “On Environmental Protection” and budget legislation, which establish the targeted nature of the use of funds formed, inter alia, from the environmental tax and other payments for environmental damage. By their nature, the Environmental Protection Funds (state, Autonomous Republic of Crimea, and local) are intended to ensure implementation of the “polluter pays” principle and to channel financial resources toward the prevention, reduction, and elimination of negative impacts on the environment.

Institutionally, the system of Environmental Protection Funds is fragmented. Ukraine has state and local environmental protection funds, which formally belong to the special funds of budgets at the respective level. At the same time, they are not separate legal entities or institutionally separated funds, but effectively exist as budgetary “baskets” without their own management apparatus, strategic mandate, or mechanisms of responsibility for the achievement or non-achievement of environmental results. Such a design creates a gap between the accumulation of funds and the achievement of a real environmental protection

effect.

The key problem is the absence of a single centre of responsibility for the environmental effectiveness of the use of Environmental Protection Fund resources. Various actors participate in decision-making on the allocation of funds (the Cabinet of Ministers of Ukraine, central executive authorities, local councils, executive bodies of local self-government) without uniform standards, priority criteria, or a mandatory link to the actual state of the environment in the respective territories. As a result, financing is often situational, politically motivated, or formal in nature.

A significant limitation is the outdated and overly broad regulatory definition of "environmental protection measures." The current subordinate legislation allows activities to be classified as such even where they do not ensure a measurable positive impact on the environment or have only an indirect, declarative character. This creates legal grounds for financing from Environmental Protection Fund resources projects that in practice substitute environmental policy with improvement works, infrastructure maintenance, or the performance of the current functions of public authorities.

The absence of mandatory environmental planning is another systemic shortcoming. The formation of lists of measures financed from Environmental Protection Fund resources is often not based on environmental strategies, environmental management plans, or systematic monitoring data. In most cases, neither the baseline state of the environment nor the expected quantitative or qualitative indicators of its improvement are defined. This means that even formally "environmental protection" projects in many cases do not have a clear objective from the standpoint of environmental results.

The absence of post-project evaluation mechanisms is particularly problematic. The legislation does not contain a requirement for mandatory analysis of the effectiveness of the use of Environmental Protection Fund resources after the completion of financing of measures. In practice, neither the State nor local self-government bodies are obliged to answer the question whether the funds spent led to reduced pollution, restoration of ecosystems, or reduction of risks to public health. Such a financing model is oriented toward the absorption of funds rather than toward achieving an environmental result. For example, as early as 2018-2020, the Accounting Chamber of Ukraine noted that "the environmental tax on emissions currently does not perform a stimulating or fiscal function"; that "expenditures on atmospheric air protection exceeded revenues from the environmental tax on emissions to the consolidated budget by more than two times in 2018-2020"; and that "the system of collection of the environmental tax has not become an instrument of state influence in the protection of the natural environment of Ukraine and does not encourage business entities to reduce emissions of pollutants into ambient air and discharges into water bodies, or to comply with their standards and limits." In addition, during the period of martial law the environmental tax was reduced, and many enterprises were fully exempted from paying it.

The lack of transparency in the procedures for selecting measures and the limited participation of the public increase the risks of inefficient use of funds. Decision-making processes regarding the allocation of financing are often closed, while information on selection criteria, alternative options, or rejected projects is inaccessible. This contradicts international standards of environmental governance and Ukraine's obligations to ensure access to information and public participation in decision-making in the environmental field.

Another systemic flaw is the short-term horizon of budget planning. Environmental Protection Funds operate within an annual budget cycle, which complicates the implementation of multi-year, capital-intensive environmental protection projects, in particular the modernization of treatment facilities, reclamation of contaminated territories, and restoration of water ecosystems. As a result, preference is given to small-scale measures that are quick to implement but are unable to resolve systemic environmental problems.

The absence of integration of the Environmental Protection Funds into the State's climate, industrial, and regional policy indicates the persistence of a fragmented approach to environmental finance. Funds that by their nature should compensate for environmental damage are not used as an instrument of structural change, decarbonization, or transition to sustainable development models, which is a particularly significant problem in the conditions of war and post-war reconstruction. This highlights the gap between declared environmental objectives and actual budgetary practice.

Overall, the current model of operation of the Environmental Protection Funds does not ensure the fulfilment of their core purpose. It reproduces the logic of formal redistribution of funds without environmental responsibility, accountability, or orientation toward a long-term result. In the absence of deep institutional reform, the Environmental Protection Funds remain more a financial appendix to the budget system than an effective instrument of environmental protection.

Recommendations

Option A. Improvement of the existing model (insufficient)

1. Improve the institutional status of the Environmental Protection Funds by clarifying their mandate, objectives, and responsibility for the results of the use of funds.
2. Review the regulatory definition of environmental protection measures, narrowing it and limiting the financing of measures that do not have a direct environmental effect.
3. Introduce elements of environmental planning oriented toward monitoring data and strategic documents in the environmental field.
4. Strengthen the evaluation of project effectiveness by providing for pre-project analysis and separate procedures for assessing results after implementation.
5. Increase the transparency of the use of funds by ensuring openness of information and expanding public participation in the project selection process.
6. Consider the possibility of multi-year financing for certain projects, in particular those of strategic importance.
7. Integrate financing of environmental protection measures into the broader context of state policy, including climate and regional policy.

Option B. Reform of the system of environmental funds (recommended)

1. Institutionally separate the Environmental Protection Funds as a specialized mechanism of environmental finance with a clearly defined mandate, objectives, functions, and responsibility for the achievement of measurable environmental results.
2. Narrow by law the list of environmental protection measures, excluding the financing of activities that do not have a direct, measurable, and proven positive impact on the environment.

3. Introduce mandatory environmental planning for the use of funds based on monitoring data, assessment of the main sources of pollution, and the strategic documents of the State.
4. Establish a mandatory system for evaluating project effectiveness, including pre-project and post-project evaluation, as a condition for financing.
5. Ensure full transparency and accountability in the use of funds, including open project registers, public access to information on financing, and mandatory public participation in decision-making.
6. Introduce mechanisms for multi-year financing that will make it possible to implement strategic environmental protection projects rather than being limited to short-term measures.
7. Integrate environmental funds into the State's climate, industrial, and regional policy as a key financial instrument for achieving sustainable development goals and fulfilling Ukraine's international environmental obligations.

II. Analysis of the current situation, key problems, and recommendations concerning Oblast Military Administrations

1. Staffing capacity of the structural units of Oblast Military Administrations responsible for the implementation of environmental policy

General trends

For the purposes of this analysis, the institutional capacity of all existing oblast military (state) administrations in Ukraine (24) was analysed. In view of the temporary occupation of the Autonomous Republic of Crimea, environmental governance there was not analysed. More detailed information on the organization of environmental governance at the regional level can be found in Annex No. 1.

Analysing the data on the staffing capacity of the structural units of Oblast Military Administrations responsible for the implementation of environmental policy (see Annex No. 1), the following conclusions may be drawn:

1. The number of staff positions ranges from 13 to 64 persons, which indicates considerable variation in staffing levels.
2. The largest units in terms of staffing tables are found in Donetsk (64), Dnipropetrovsk (48), Luhansk (48), Kyiv (36), and Zaporizhzhia (33) oblasts.
3. The smallest number of staff positions is in Vinnytsia oblast - 13 staff positions, where environmental functions are dispersed among several divisions within the Administration for Territorial Development and Infrastructure.

At the same time, an analysis of the results of the study of regional environmental protection programmes (see Annex No. 3) indicates fragmentation and unevenness in the development and implementation of regional environmental programmes in Ukraine. As of 2025, comprehensive programmes are in place in most oblasts; however, on the official websites of certain Oblast Military Administrations, such documents could not be found, which indicates, at a minimum, a lack of orientation of these administrations toward dialogue with the public.

Among the existing programmes, a number of common features can be identified:

1. Formal compliance with the legislative framework: most documents are formally aligned with the Law of Ukraine "On Environmental Protection" and the State

Environmental Policy Strategy until 2030. However, it should be noted that the State Environmental Policy Strategy itself does not correspond to the challenges faced by Ukraine in light of the full-scale Russian-Ukrainian war and obligations to the EU.
2. Infrastructure orientation: the emphasis is placed on the construction and reconstruction of treatment facilities, landfills, hydraulic structures, and land reclamation.
3. Insufficiency of systemic mechanisms: there is a lack of regional environmental policy strategies that take into account the State Environmental Strategy and regional environmental problems.
4. Weak transparency mechanisms: information and reporting are provided for, but there are insufficient instruments for prompt and meaningful public participation and independent monitoring of the state of the environment, in particular water quality, ambient air quality, waste management, etc.
5. Absence of quantitative indicators: most programmes do not contain clear performance indicators, which makes it impossible to assess their effectiveness.

At the same time, certain oblasts (Kyiv, Kirovohrad, Mykolaiv, Kherson, Chernihiv) have taken steps toward integrating modern priorities: climate change adaptation, post-war environmental recovery, and the development of renewable energy. However, these components remain insufficiently detailed.

Thus, regional programmes currently perform, to a greater extent, the role of declarative documents and “lists of projects” rather than instruments for implementing modern environmental policy. They require substantial strengthening in terms of systemic approach, integration with national strategic documents, ensuring accountability and transparency, as well as embedding clear mechanisms for financing and performance evaluation.

As can be seen from the official websites of Oblast Military Administrations, regional waste management plans have either already been adopted (for example, in Vinnytsia oblast until 2030) or are being developed. For instance: Zaporizhzhia oblast is updating its plan until 2035; Lviv oblast is aligning its structure with the Ministry’s methodological recommendations; Rivne oblast has already introduced a cluster approach to organizing collection and sorting; Kherson oblast will conduct public consultations with environmental assessment; Ternopil and Volyn oblasts are involving businesses, experts, and international partners in the development process. However, the developed documents often lack clear indicators, transparent monitoring, and integration with national strategic documents, which constrains effective implementation.

An assessment of the fulfilment by Oblast Military Administrations of the obligation to prepare and publish Regional Reports on the State of the Environment, based on data from official websites, indicates significant unevenness. Some oblasts (Ivano-Frankivsk, Chernivtsi, Dnipropetrovsk, Rivne) systematically prepare and publish such documents annually in open access, ensuring transparency and public awareness. At the same time, in many other oblasts, the practice is sporadic: reports are published with delays, are absent for certain years, or are published only via the Ministry’s website (formerly the website of the Ministry of Environmental Protection).

An analysis of official webpages of Oblast Military Administrations and their environmental units shows that requirements for openness and proper quality of information disclosure are only partially fulfilled. In a number of oblasts (in particular Ivano-Frankivsk, Dnipropetrovsk, Rivne), dedicated sections function where environmental programmes, reports, and regional environmental reports are regularly updated. However, on the pages of many other administrations or their environmental units, information is presented fragmentarily, without proper systematization or archiving for previous years, and sometimes is absent altogether. Websites often do not provide convenient navigation and search for documents, which significantly limits public access to up-to-date environmental data.

Actual staffing levels

For some Oblast Military Administrations, data were provided not only on the approved staffing levels but also on the actual number of personnel, which allows for a more accurate assessment of staffing capacity.

Table No. 2. Staffing levels of structural units responsible for environmental issues within certain Oblast Military Administrations [source: EPL archive]

Oblast	Approved staffing	Actual staffing	Staffing level
Khmelnytskyi	22	16	73%
Rivne	28	26	93 %
Kyiv	36	26	72 %
Lviv	33	27	82 %
Luhansk	48	22	46 %
Poltava	32	29	91 %

The analysis of the above data shows that among the reviewed Oblast Military Administrations, the environmental units of Rivne and Poltava oblasts are the most fully staffed. By contrast, the most critical situation is in Luhansk oblast, where only 46% of positions are actually filled, while the “utility” of such staffing remains an open question given the war and partial occupation of the region.

In Khmelnytskyi, Kherson, and Kyiv oblasts, the number of actually employed specialists is 25-50% lower than the approved staffing levels. Given the wide range of powers (conducting EIA, permitting activities, approval of documents, environmental monitoring, interaction with the public, etc.), this indicates significant staffing depletion or a systemic shortage of personnel, which substantially limits real governance capacity in the environmental field. In Kherson oblast, problems related to pesticides, fires, and land degradation remain acute, but the lack of specialists does not allow for the development of an effective agro-environmental policy or the establishment of sustainable monitoring.

Density of staffing

The level of staffing of environmental units of Oblast Military Administrations varies significantly depending on the size of the region, the availability of natural resources, the degree of urbanization, and the relevance of environmental challenges. The density of staffing capacity, that is, the number of employees per 1,000 km², is one of the key indicators of the institutional capacity of the State to ensure proper environmental governance at the regional level.

Table No. 3. Density of staffing capacity of structural units of Oblast Military Administrations responsible for the environment [source: EPL archive]

No.	Oblast	Area (km²)	Approved staffing	Actual staffing	Approved density (staff per 1,000 km²)	Actual density (staff per 1,000 km²)
1	Vinnytsia	26513	13		0.49	
2	Volyn	20144	21		1.04	
3	Dnipropetrovsk	31974	48		1.50	
4	Donetsk	26517	64		2.41	
5	Zhytomyr	29834	29		0.97	
6	Zakarpattia	12772	23		1.80	

7	Zaporizhzhia	27183	33		1.21	
8	Ivano-Frankivsk	13928	27		1.94	
9	Kyiv	28131	36	26	1.28	0.92
10	Kirovohrad	24596	24		0.98	
11	Luhansk	26684	48	22	1.80	0.82
12	Lviv	21833	33	27	1.51	1.24
13	Mykolaiv	24599	26		1.06	
14	Odesa	33314	29		0.87	
15	Poltava	28748	32	29	1.11	1.01
16	Rivne	20051	28	26	1.40	1.30
17	Sumy	23834	23		0.97	
18	Ternopil	13824	20		1.45	
19	Kharkiv	31418	30		0.95	
20	Kherson	28461	23	21	0.81	0.74
21	Khmelnytskyi	20629	22	16	1.07	0.78
22	Cherkasy	20900	15		0.72	
23	Chernivtsi	8097	16		1.98	
24	Chernihiv	31903	31		0.97	

An analysis of the ratio of the number of environmental structural units of Oblast Military Administrations to the area of the respective regions (calculated per 1,000 km²) indicates significant regional differentiation in the staffing capacity of public administration in the environmental field. On average across the country, the density of approved staffing is about 1.3 employees per 1,000 km²; however, the indicators vary within a wide range: from less than 0.5 to more than 2.4. The highest density is recorded in Donetsk oblast, which is explained both by the environmental complexity of the region (high level of industrialization, presence of mining and metallurgical enterprises) and by the specific conditions of wartime. Elevated indicators are also observed in a number of western regions, in particular Chernivtsi, Ivano-Frankivsk, Zakarpattia, and Lviv oblasts. These oblasts, despite their relatively small territories, maintain a high staffing density, which suggests that environmental policy at the local level is treated as more of a priority, especially given the presence of valuable protected natural areas of the Carpathian region.

At the same time, in a number of regions, staffing density indicators remain extremely low. In particular, the lowest indicator is recorded in Vinnytsia oblast, which may indicate a low priority of environmental policy in the region. This is especially noticeable given that no separate department has been established there to address environmental issues. A similar situation is observed in Cherkasy, Kherson, and Luhansk oblasts, where the actual staffing presence is significantly lower than the approved staffing (for example, Luhansk oblast, where the actual density is 0.82 compared to 1.80 approved). Such an imbalance indicates either a lack of qualified personnel or low capacity of territorial bodies to fill positions in wartime conditions, especially in frontline areas.

Another important aspect is the absence of correlation between the size of an oblast and the number of personnel. For example, large oblasts with significant agricultural pressure, such as Vinnytsia, Poltava, and Cherkasy, have relatively low staffing density despite the obvious need for professional supervision of natural resource use, water resources, soils, and ambient air. At the same time, smaller oblasts demonstrate a higher level of staffing provision.

Thus, the density of staffing of environmental units in Oblast Military Administrations not only reflects their capacity to perform assigned environmental functions, but also indicates significant unevenness in the distribution of resources. This points to the need to reconsider how the State distributes staffing resources among regions and to ensure a more balanced

and sustainable presence of environmental units in each oblast.

At the same time, it is important to recognize that the effective performance of a wide range of functions requires a sufficient number of qualified specialists. Without adequate staffing, it is difficult to expect high-quality environmental governance and a real impact on improving the environmental situation in the regions.

Structure of environmental units (see Annex No. 1)

Most structural units of Oblast Military Administrations responsible for the implementation of environmental policy consist of 5-7 subdivisions (divisions, administrations, sectors). Certain departments, such as those in Donetsk, Dnipropetrovsk, Zaporizhzhia, and Odesa oblasts, have a significantly more complex structure, which indicates an attempt to cover a wide range of environmental tasks (EIA, SEA, waste management, biodiversity protection, ecological network, permitting procedures in economic activity, monitoring, economics of natural resource use, etc.).

At the same time, in a number of oblasts, staffing is minimal and limited to several areas, which complicates, if not makes impossible, the performance of the full scope of powers in the environmental field (for example, Vinnytsia, Cherkasy, Chernivtsi).

Such a contrast in the structural organization of environmental units of Oblast Military Administrations indicates uneven institutional capacity of regions in the field of environmental protection. Where a more developed internal structure has been established, it is possible to speak of potential for comprehensive environmental policy management and proper performance of the relevant functions. Conversely, limited staffing and structural capacity in other oblasts creates risks of narrowing the range of implemented powers, gaps in environmental control, planning, and response. This indicates the need not only for formal expansion of staffing levels, but also for a strategic approach to shaping the internal structure oriented toward the full functional cycle of environmental governance.

2. Functional capacity of structural units of Oblast Military Administrations responsible for the implementation of environmental policy (see Annex No. 1)

Depending on the oblast, the structural units of Oblast Military Administrations responsible for the implementation of environmental policy are established either in the form of separate environmental departments (16), or as separate environmental administrations (6), or as divisions or administrations within departments (or administrations) with a rather mixed set of functions (2).

Regarding separate environmental departments

The analysis of the functional capacity of structural units of Oblast Military Administrations responsible for the implementation of environmental policy should begin with separate environmental departments. The analysis is based on the review of the regulations of such departments in Sumy, Kirovohrad, Lviv, Kherson, Poltava, Khmelnytskyi, Kharkiv, Rivne, Odesa, Kyiv, Zaporizhzhia, Zakarpattia, Zhytomyr, Donetsk, Dnipropetrovsk, and Chernihiv oblasts.

The respective departments of Oblast Military Administrations generally demonstrate a defined functional basis for the implementation of state policy in the field of environmental protection. In most cases, they are full-fledged legal entities under public law, which ensures a certain level of legal autonomy and the possibility of independent activity. Subordination to regional and state leadership creates a vertical system of governance and control.

The structure of these departments covers practically all key areas of environmental policy, which indicates their broad responsibility. This includes the rational use, reproduction and

protection of natural resources (land, subsoil, waters, ambient air, forests, fauna and flora), waste management (except radioactive waste), nature conservation, the formation and use of the ecological network, as well as environmental impact assessment (EIA) and strategic environmental assessment (SEA). The departments are authorized to issue permitting documentation, including EIA conclusions.

An important aspect is their participation in rule-making activity and strategic planning. The departments participate in the drafting of orders of the heads of Oblast Military Administrations, targeted programmes, as well as in the preparation of proposals for draft nationwide programmes.

It is these departments that are expected to organize regional environmental monitoring (despite questions regarding the effectiveness of such measures and the fact that there is no general environmental monitoring system at the national level, in particular significant concerns regarding the monitoring of biodiversity and water bodies), to maintain records of environmental and radiation safety indicators, and to prepare annual reports on the state of the environment. They are also expected to inform the population about the state of the natural environment and environmental safety, as well as to involve representatives of the public and establish advisory bodies. The departments have their own balance sheet, treasury accounts, seal, and official letterheads.

At the same time, attention should be drawn to the shortcomings of the functional workload and wording in the regulations governing such departments.

The regulations of many departments contain a significant number of clauses that are typical for any state body and duplicate the provisions of the Constitution and other laws of Ukraine (for example, “organizes the implementation of the Constitution and laws of Ukraine”). This makes the documents cumbersome and may distract attention from specific environmental tasks. General phrases such as “exercises other powers provided for by law” are often used, which complicates a full and clear understanding of the scope of the department’s responsibility without additional reference to other normative documents.

Most regulations do not define any measurable indicators or separate mandatory documents by which the effectiveness of the department’s work could be objectively assessed (for example, target indicators for reducing emissions, volumes of processed waste, or the number of successfully implemented environmental projects). This complicates objective monitoring and evaluation of their activities.

The departments are responsible for a wide range of environmental issues, covering practically all aspects of environmental protection and natural resource use. Such a volume of tasks, especially under conditions of limited staffing and financing, may lead to dispersion of efforts and reduced effectiveness in the performance of certain critical functions.

Although the departments coordinate the activities of various bodies at the local level (from local self-government bodies to territorial units of the State Environmental Inspectorate), the specific mechanisms, formats, and frequency of such interaction are often not detailed, which may complicate effective interagency cooperation. As budgetary institutions, the departments depend on state budget financing, which limits their financial flexibility and possibilities for implementing large-scale initiatives.

The departments of ecology and natural resources of Oblast Military Administrations possess a solid foundation and significant potential for effective implementation of state environmental policy. However, in order to increase their operational effectiveness and transparency, the regulations governing their activities require improvement. This concerns,

in particular, the optimization and specification of functions, elimination of duplication, and clear definition of unique environmental tasks taking into account regional specifics.

In addition, it is important to ensure unambiguous wording, especially regarding references to “other powers,” and to introduce measurable performance indicators for objective evaluation of effectiveness. Detailed regulation of interagency cooperation mechanisms is also key to ensuring effective coordination and strengthening the capacity of these departments.

Regarding separate environmental administrations

In the course of assessing the functional capacity of the structural units of Oblast Military Administrations responsible for the implementation of environmental policy, it is advisable to examine separate administrations in the field of environmental protection. In this context, the regulations governing the respective administrations in the following oblasts are examined: Chernivtsi, Cherkasy, Mykolaiv, Ivano-Frankivsk, Volyn, and Ternopil.

Based on the analysis of the functional capacity of the administrations of ecology and natural resources of the Chernivtsi, Ivano-Frankivsk, Cherkasy, Mykolaiv, Volyn, and Ternopil oblast state (military) administrations, common features, strengths, and systemic limitations characteristic of these regional environmental bodies may be identified.

Common strengths:

1. All of the administrations reviewed have an extremely broad range of powers, covering practically all key areas of environmental policy. This includes environmental protection, rational use and reproduction of natural resources (land, subsoil, water, air, forests, fauna and flora), waste management (except radioactive waste), powers in the field of nature conservation, formation of the ecological network, environmental and radiation safety, as well as powers relating to EIA and SEA. This should make it possible to apply an integrated approach to environmental problems.

2. The administrations are actively involved in the issuance of permits. For example, issuance on behalf of Oblast Military Administrations of permits for operations in the field of waste management (except hazardous waste) and registration of waste declarations of business entities, emissions of pollutants into ambient air from stationary sources (except Group 1 facilities), special use of natural resources within territories and objects of the nature reserve fund of national importance on the basis of limits approved by the Ministry, selective and diagnostic shooting of hunting animals for veterinary and sanitary examination within territories and objects of the nature reserve fund, and the shooting and trapping of predatory and harmful animals outside the hunting season or in places prohibited for hunting within territories and objects of the nature reserve fund.

3. All administrations are structural units of oblast state (military) administrations, subordinate to their heads, and are also accountable to the relevant central executive authority responsible for environmental matters. This creates a fairly clear vertical system of governance and higher-level control.

4. The administrations have specific responsibilities in EIA and SEA procedures at the oblast level. This is a key instrument for preventing negative environmental impacts at early stages.

5. Most regulations provide for an obligation to inform the population about the state of

the environment and to promote environmental education and awareness-raising of citizens. The involvement of the public in environmental protection and environmental education activities is also declared, which increases transparency and the potential effectiveness of their work.

6. All administrations are legal entities under public law, have their own balance sheet, treasury accounts, and seal, which gives them a certain institutional capacity to perform their tasks.

Common weaknesses and risks:

1. Dependence on the political will and financing of the oblast state (military) administration. Key decisions regarding establishment, reorganization, staffing levels, payroll fund, and financing are taken by the head of the oblast state (military) administration within the limits of the relevant budget appropriations. This makes the administrations vulnerable to political conditions and limits staffing capacity and development.

2. Potential bureaucratization and overloading with powers. A wide range of permitting procedures, approvals, and the significant volume of functions may lead to bureaucratic delays, formalism, and the risk of fragmented implementation of tasks. Prioritization of functions is often absent, which may lead to a focus on “operational” tasks at the expense of systemic ones.

3. Insufficiently clear mechanisms of direct accountability to the public. Although informing and interaction with the public are declared, the mechanisms for public participation in decision-making, consultations, or oversight are often unclear, voluntary, or left to the discretion of the management.

4. Limited analytical and scientific capacity. Despite reporting and analytical functions, the regulations often do not support these with obligations regarding the use of scientific approaches, independent assessments, or regular external expert review. The possibility of establishing scientific and advisory bodies is optional (“may be established”), which creates a risk that such bodies will not exist in practice.

5. Absence of guarantees regarding staffing capacity. The regulations usually do not contain minimum requirements for the number or qualifications of personnel. The structure and staffing levels are approved by the head of the oblast state (military) administration, which may create risks of understaffing or reduction of key positions.

6. Additional incompatible functions. Some administrations may be responsible for functions that are not always directly related to their main environmental tasks (for example, occupational safety, civil protection). This diverts resources and potentially reduces the effectiveness of the performance of their core functions.

Incompatible functions performed by certain environmental structural units at the level of Oblast Military Administrations

using the examples of Ivano-Frankivsk and Rivne Oblast Military Administrations

Example of an administration

An analysis of the Regulation on the Administration of Ecology and Natural Resources of the Ivano-Frankivsk Oblast State Administration indicates the presence, in the list of

powers of the administration, of functions that do not have a direct sectoral connection with the implementation of state policy in the field of environmental protection and rational use of natural resources.

In particular, such functions include:

1. ensuring the performance of mobilization preparedness tasks and compliance with occupational safety legislation (para. 4.19);
2. organizing and maintaining records management and archiving, ensuring protection of information with restricted access and personal data (paras. 4.20-4.23);
3. organizing and conducting public procurement procedures (para. 4.6);
4. participation in the implementation of a number of general organizational and interagency tasks that do not have clearly defined environmental content (paras. 4.7, 4.10, 5.33).

By their legal nature, these powers are typical administrative-managerial or support functions inherent in the apparatus of executive authorities in general and do not require specialized environmental competence.

The excessive combination of specialized environmental tasks with general administrative functions may lead to the dispersion of the administration's staffing and organizational resources, a reduction in the level of specialization, and, as a consequence, may negatively affect the effectiveness of the implementation of its core powers in the field of environmental protection.

Example of a department

An analysis of the Regulation on the Department of Ecology and Natural Resources of the Rivne Oblast State Administration indicates an expansion of the department's powers through functions which, by their legal nature, are not directly related to the implementation of state environmental policy and primarily require general administrative, organizational, or staffing and economic competence.

In particular, such functions include:

1. ensuring the performance of mobilization preparedness tasks, civil protection of the population, compliance with occupational safety and fire safety legislation (para. 5.22);
2. organizing work on the completion, storage, accounting, and use of archival materials (para. 5.23);
3. implementation of state policy regarding the protection of information with restricted access and ensuring the protection of personal data (paras. 5.24, 5.26);
4. participation in the settlement of collective labour disputes (conflicts) (para. 5.25);
5. carrying out general financial and budgetary-administrative functions related to ensuring the efficient and targeted use of budget funds (para. 5.27).

These powers are typical of the apparatus of executive authorities of a general nature and do not require specialized environmental expertise. Their assignment to a department of ecology, alongside the performance of complex regulatory, permitting, and control

functions in the field of environmental protection, creates a risk of dispersion of managerial, staffing, and time resources.

In addition, a significant concentration of general organizational and support functions in a specialized department may negatively affect the level of specialization of the structural unit, complicate its focus on the strategic tasks of environmental policy, and reduce the effectiveness of the performance of its core powers in the field of environmental conservation.

Overall, the oblast administrations of ecology and natural resources in Ukraine have potential functional capacity ensured by a broad mandate, clear permitting mechanisms, and vertical integration into the system of public administration. However, their actual effectiveness largely depends on external factors, such as the political will of the leadership of oblast administrations, sufficient and stable financing, actual staffing, as well as effective coordination and control mechanisms. Without a systemic approach to resource provision and improvement of interaction mechanisms, especially with the public and scientific institutions, the activities of these administrations risk remaining declarative and being limited to the performance of support and permitting functions only, without strategic impact on the state of the environment in the oblast.

Regarding divisions or administrations within departments (or administrations) with a rather mixed set of functions

It is also worth examining the institutional capacity of divisions or administrations within departments (or administrations) with a rather mixed set of functions. Examples of such an organizational structure include the Administration for Land, Water and Natural Resources and the Administration of Ecology and Natural Resources within the Department of Communal Property, Land, Property Relations, Ecology and Natural Resources of the Luhansk Oblast Military Administration, as well as the Division of Permitting Activities and Waste Management, the Division of Environmental Impact Assessment and Strategic Environmental Assessment, and the Division of Land Protection, Forestry and Nature Conservation within the Administration for Territorial and Infrastructure Development of the Vinnytsia Oblast Military Administration.

The institutional capacity of structural units integrated into larger departments or administrations with a broad set of functions extending beyond exclusively environmental issues constitutes an interesting subject for analysis. Considering the examples of the Luhansk and Vinnytsia oblast state administrations, we can see that such an organizational structure, although it may have potential advantages, entails significant risks for the effectiveness of environmental governance.

In the Luhansk Oblast Administration, environmental issues are distributed between two administrations within the Department of Communal Property, Land, Property Relations, Ecology and Natural Resources: the Administration for Land, Water and Natural Resources and the Administration of Ecology and Natural Resources. The former combines management of land, water, and general natural resources, which in theory makes it possible to apply a more integrated approach to their use and protection. However, being embedded in a structure that is also responsible for communal property and property relations, there is a risk of dilution of environmental priorities and a risk of conflict of interest. Environmental issues may be pushed into the background by economic or property-related matters, and their influence on the Department's overall policy may be limited. The Administration of Ecology and Natural Resources has a broad range of functions, including

waste, biodiversity, the nature reserve fund, EIA/SEA, and permitting activities, which makes it possible to develop specialized expertise. However, here too there are risks of conflicts of interest if the Department has territorial development tasks, while the additional level of hierarchy may slow down decision-making.

In 2023-2025, the activities of the Department of Communal Property, Land, Property Relations, Ecology and Natural Resources of the Luhansk Oblast State Administration were focused primarily on the procedural instruments of environmental policy - strategic environmental assessment (SEA) and environmental impact assessment. The Department's website regularly publishes SEA reports for territorial community development programmes and regional documents, as well as proposals for state strategies. Due to limited control over the territory and constant shelling, the implementation of practical environmental protection measures is almost impossible, and therefore the emphasis is placed on compliance with legal procedures and monitoring. In this context, the staffing level may appear excessive, but its preservation is important for maintaining institutional capacity and readiness for post-war recovery. This staff may partially be used for the creation of new territories and objects of the nature reserve fund in the oblast, remote study of the impact of hostilities on the environment, cooperation with the Specialized Environmental Prosecutor's Office, and preparation of claims regarding the damage and losses caused by the Russian Federation to the environment as a result of hostilities.

In the Vinnytsia Oblast Administration, environmental functions are fragmented among three separate divisions within the Administration for Territorial and Infrastructure Development. Each of these divisions has a clear specialization, which should make it possible to develop deep expertise in its particular field. For example, the Division of Land Protection, Forestry and Nature Conservation focuses on the conservation of key natural components. However, such fragmentation may complicate integrated environmental planning, since, for example, waste management issues are closely linked to soil and water pollution, which may fall within the competence of other divisions. In addition, the inclusion of these divisions within an Administration responsible for "territorial and infrastructure development" creates a pronounced conflict of interest. There is a risk that the division responsible for EIA and SEA will be detached from the subsequent implementation of environmental protection measures provided for in EIA conclusions. There are also staffing challenges in ensuring expertise in such heterogeneous areas within a single division.

A critical but objective view of the institutional capacity of divisions and administrations operating within larger departments with a "mixed" set of powers reveals significant challenges for effective environmental governance. Although, from a theoretical perspective, the integration of environmental functions into broad structures that also cover property, land, or infrastructure issues may appear logical for ensuring a comprehensive approach and optimizing resources, in practice this often leads to a weakening of environmental priority. The main risk lies in the systemic "dilution" of environmental protection tasks, when they inevitably recede into the background behind areas of activity of the department that are more economically or politically advantageous, such as infrastructure development or attracting investment. This creates an internal conflict of interest, where environmental safety may be compromised in favour of other, more "visible" or short-term objectives.

In addition, such an organizational model often objectively creates bureaucratic obstacles. The presence of additional levels of hierarchy above specialized environmental divisions leads to slower decision-making processes, an increase in the number of required approvals, and reduced promptness in responding to critical environmental challenges. Fragmentation of environmental functions among different divisions, as observed in the Vinnytsia Oblast State Administration (waste separately, EIA separately, land/forests/nature reserve fund separately), may disrupt the coherence of environmental policy and create

difficulties for coordination and unified strategic planning. Each division, despite its specialization, risks operating in isolation, which hinders the formation of a comprehensive picture of the state of the environment and the development of effective, integrated solutions.

No less important is the issue of staffing and its impact on independence. Dependence of staffing levels and payroll funds on the overall budget and priorities of the larger department may limit the possibilities for attracting and retaining highly qualified environmental specialists and experts with interdisciplinary knowledge. Moreover, the placement of divisions responsible for EIA and SEA within structures oriented toward infrastructure development creates an obvious conflict of interest and affects the objectivity of their conclusions, thereby undermining the preventive function of these instruments. Thus, although such a structure may be the result of an effort to optimize, it may objectively entail serious systemic risks for the effective and independent performance of environmental protection functions.

General conclusion regarding the optimal model for implementing environmental policy in Oblast Military Administrations

The analysis of the institutional capacity of the structural units of Oblast Military Administrations responsible for environmental policy shows that a separate environmental department is the more effective form. Such a structure ensures the greatest institutional weight, legal independence, and a broad mandate of powers, making it possible to address environmental issues comprehensively and systematically. Unlike separate administrations, departments have a higher status and less dependence on the leadership of the Oblast Military Administration in making key decisions. The least optimal proved to be divisions or administrations integrated into departments with mixed functions, since such a model creates conflicts of interest, leads to dispersion of environmental priorities, and increases bureaucratic barriers.

The most effective solution for the formulation and implementation of regional environmental policy consistent with the State Environmental Strategy is the restoration in the oblasts of principal territorial administrations of the central executive authority that formulates and implements environmental protection policy. Such administrations should have a uniform structure, clearly unified functions in the field of environmental protection, clearly unified staffing tables, and clear subordination. Principal territorial administrations would also not have the conflicts of interest that exist in the mixed administrations of oblast state (military) administrations, nor would they be subject to the direct pressure of heads of administrations in the preparation of EIA conclusions or the issuance of permitting documents.

Thus, in order to achieve effective implementation of a coherent, transparent, and independent environmental policy, it is critically important to consolidate all environmental functions within single, strong principal territorial administrations of the central executive authority that formulates and implements policy in the field of environmental protection. Such an element of the architecture of environmental governance is critically important and logical in view of the number of environmental protection functions at the central and regional levels.

3. Environmental Protection Funds at the local level and problems of their functioning

As of 2026, local environmental protection funds (eco-funds) remain the main instrument for financing environmental protection measures at the level of oblasts and communities. They are financed mainly from the environmental tax paid by polluting enterprises, and the funds are credited to the special funds of local budgets. The amount of revenues differs significantly between regions: industrial oblasts with a high concentration of metallurgy,

energy production, and extractive industry accumulate hundreds of millions of hryvnias annually, while the funds of agricultural or low-industrialized regions are often unable to finance even basic environmental measures. Such financial asymmetry is not compensated by national equalization mechanisms and directly affects the ability of communities to respond to environmental risks.

The practice of using local eco-fund resources demonstrates a persistent orientation toward formally permissible but only limitedly effective measures. A significant part of financing is directed toward “greening” and landscaping of settlements, where the main expenditures in practice go to the repair of parks, squares, pathways, and small architectural forms rather than to the restoration of green spaces or ecosystems. Similarly, information campaigns, festivals, and other one-off events with minimal direct impact on the state of the environment are financed. By contrast, systemic projects, for example modernization of treatment facilities, reduction of industrial emissions, management of hazardous waste, are either underfunded or implemented fragmentarily because of their high cost and the need for multi-year financing.

The institutional reasons for this situation are the absence of unified environmental criteria for project selection and a vague list of environmental protection measures, which allows projects with questionable environmental effect to be included for financing. Selection criteria are often focused on the formal “readiness” of the project or the availability of co-financing, which creates advantages for small and quickly implementable measures over strategically important but complex projects. An additional problem is the absence of mandatory pre-project and post-project monitoring: in most cases, it is not measured whether the funds spent actually led to improvements in air quality, water quality, or land condition.

Procedural aspects of managing local eco-funds also remain a weak point. The processes of selecting and approving measures differ significantly between regions, the level of publicity and public access to information is uneven, and the actual receipt of funds often occurs at the end of the budget year. This limits the possibility of implementing seasonal or long-term environmental protection measures and encourages the selection of “quick” projects with low environmental effect. Taken together, these factors indicate that, as of 2026, local eco-funds in Ukraine have significant financial potential but remain an instrument with low effectiveness due to problems of strategic planning, transparency, and orientation toward measurable environmental results.

Recommendations for increasing the effectiveness of local eco-funds

1. Unify the list of environmental protection measures, excluding landscaping and image-building projects; priority should be given to measures with direct environmental effect (air, water, waste, ecosystems).

2. Introduce environmental selection criteria and a project passport recording the state of the environment before and after implementation and the expected result.

3. Mandatory pre-project and post-project monitoring with public access to data, in order to assess the effectiveness of measures.

4. Transparency of financing through an online platform with open applications, commission minutes, and expenditure reports.

5. Mechanisms for multi-year financing of strategic projects in order to avoid fragmentation and ensure the implementation of comprehensive environmental protection measures.

4. Conclusions and recommendations on strengthening the institutional capacity of environmental structural units of Oblast Military Administrations.

As regards the conclusions, the following should be noted:

1. The results of the analysis of the organization, staffing, and functional content of the structural units of Oblast Military Administrations responsible for the implementation of environmental policy indicate the existence of significant structural heterogeneity and fragmentation of the institutional model of environmental governance at the regional level.

2. In certain oblasts, environmental departments have been established with a clearly defined organizational form, the status of a legal entity, their own balance sheet, accounts, and a broad mandate of powers. In such cases, a systemic approach to the implementation of environmental policy can be observed, covering all key areas of state regulation (EIA, SEA, waste management, permitting activities, protection of the nature reserve fund, etc.), as well as the existence of institutional preconditions for interagency coordination, strategic planning, and public participation.

3. In most oblasts, the situation differs substantially. Some Oblast Military Administrations implement environmental powers through separate administrations, which usually have a lower organizational status and are more dependent on regional leadership in staffing, financial, and administrative decisions.

4. The most vulnerable administrations in terms of institutional capacity are those where environmental functions are integrated into departments with mixed powers (for example, departments of territorial development, infrastructure, communal property, etc.). In such cases, environmental protection tasks risk losing priority, which leads to blurred responsibility, the absence of a coherent vision of environmental policy, and potential conflicts of interest in decision-making.

5. In many Oblast Military Administrations, the actual number of employees is significantly lower than the approved staffing level, sometimes less than 50%. The situation is especially difficult in frontline and de-occupied oblasts, where staffing shortages are combined with high environmental risks.

6. Even where staffing levels are formally sufficient, a functional imbalance is observed: due to the small number of specialists, certain areas are either not covered or are performed only fragmentarily. The absence of qualification requirements, minimum staffing standards, or mechanisms for supporting sustainable staffing capacity further weakens governance capacity.

7. A separate challenge is the uncertainty and excessive generality of the functional provisions. Most normative acts regulating the activities of environmental structures within Oblast Military Administrations contain declarative wording or duplicate general provisions of the Constitution and laws. This complicates the clear delineation of responsibility, makes effective assessment of performance impossible, and weakens accountability.

8. The regulations often lack quantitative indicators, or any obligation to approve such indicators in other documents, performance benchmarks, or obligations to involve the public or scientific expertise.

9. Despite the fact that most administrations and departments are structurally subordinate both to the heads of Oblast Military Administrations and to the relevant ministry, the centralized nature of staffing and financial policy within the administrations creates real limitations for the institutional independence of environmental bodies.

10. The practical implementation of environmental powers often depends not so much on formal functions as on the political will of regional leadership and access to resources. As a result, considerable regional inequality in the quality of environmental governance is observed.

11. At present, the institutional capacity of Oblast Military Administrations in the field of environmental protection remains potential rather than guaranteed. Its realization is significantly limited by staffing shortages, unclear procedures, fragmented organizational structures, and the absence of a system of strategic management.

12. Restoring in the oblasts the activities of principal territorial administrations of the central executive authority for environmental protection, with a unified structure, clearly defined functions, and staffing tables directly subordinate to the central body, would ensure more effective implementation of regional environmental policy in accordance with the State Environmental Strategy, eliminate conflicts of interest in mixed departments of oblast state (military) administrations, and guarantee independence in decision-making regarding EIA conclusions and the issuance of permitting documents from pressure by regional authorities.

13. As of 2026, local eco-funds have significant financial potential; however, the effectiveness of their use is limited by the low institutional capacity of the structural units of Oblast Military Administrations in the environmental field. The absence of unified project selection criteria, fragmented planning procedures, and insufficient transparency of financing lead to the predominant implementation of short-term and low-effectiveness measures instead of systemic environmental protection initiatives. This reduces the ability of Oblast Military Administrations to respond effectively to environmental risks in the territories of communities.

14. Preservation of this situation threatens the marginalization of environmental policy at the regional level and reduces the capacity of the State to respond to new environmental challenges, in particular those arising as a result of the war.

Based on the analysis of the organization, staffing, and functional content of the structural units of Oblast Military Administrations responsible for the implementation of environmental policy, the following recommendations are proposed:

Option A. Improvement of the system through restoration at the oblast level of principal territorial administrations of the central executive authority that formulates and implements state environmental policy (the ministry) – recommended

1. *Restoration at the oblast level of principal territorial administrations of the central executive authority that formulates and implements state environmental policy*

It is recommended to restore in the oblasts the activities of principal territorial administrations of the central executive authority that formulates and implements environmental policy, with a unified structure, clearly defined functions, and staffing tables directly subordinate to the central body that formulates state environmental policy; this will ensure effective implementation of regional environmental policy, eliminate conflicts of interest in mixed departments of oblast state (military) administrations, and guarantee independence in decision-making regarding EIA conclusions and the issuance of permitting documents from pressure by regional authorities.

2. *Unification of the internal structure of the newly restored administrations*

A model organizational structure of the administration should be defined (for example, 5-7 divisions by main areas: permitting activities, monitoring, waste management, nature reserve fund, EIA/SEA, water resources, soil management), with adaptation to the specific features of each region, its natural resource potential, and environmental challenges.

3. *Increasing institutional autonomy*

Amendments to subordinate legislation should be initiated regarding the staffing autonomy of the administrations (approval of structure, staffing tables, work plans) and decision-making powers, in order to minimize political influence and ensure the stability of the organizational form.

Option B. Improvement of the system through strengthening the institutional capacity of Oblast Military Administrations with regard to the exercise of environmental powers (insufficient)

1. *Consolidation of powers within separate environmental departments*

Ensure the establishment of separate environmental protection departments in all Oblast Military Administrations where the relevant functions are dispersed or integrated into departments with mixed powers. This will make it possible to concentrate managerial resources, avoid conflicts of interest, and guarantee the priority of environmental policy at the oblast level.

2. *Optimization of regulations on structural units*

Conduct a review of the existing regulations on departments and administrations in order to avoid declarative wording, eliminate duplication of legislative provisions, clarify the functional division, and include mandatory specialized tasks focused on environmental protection (or provide for the mandatory adoption of a separate document dedicated to these issues).

3. *Unification of the internal structure of environmental departments*

Define a model organizational structure for the department (for example, 5-7 divisions by main areas: permitting activities, monitoring, waste management, nature reserve fund, EIA/SEA, water resources, soil management, etc.), with adaptation to the specifics of each region.

4. *Strengthening institutional independence*

Initiate amendments to subordinate legislation regarding the staffing autonomy of departments of ecology within Oblast Military Administrations (with regard to approval of structure, staffing tables, work plans, etc.) in order to minimize political influence and ensure the stability of the organizational form.

Recommendations applicable to both options

1. *Establishment of staffing standards*

Introduce minimum staffing standards for environmental structures depending on the area of the oblast, level of urbanization, natural resource potential, and environmental challenges. Establish norms for the density of environmental personnel (calculated per 1,000 km²).

2. *Overcoming staffing shortages*

Develop mechanisms of state support for oblasts with the worst staffing indicators, in particular frontline territories, through targeted programmes for attracting, training, and retaining qualified specialists in environmental structures.

3. *Introduction of a performance evaluation system (KPI)*

Provide in internal documents for a mandatory system of quantitative performance indicators (for example, the level of implementation of environmental protection programmes, indicators of pollution reduction, etc.) and carry out annual public reporting on that basis.

4. *Strengthening interagency coordination*

Establish permanent and effective coordination mechanisms between the relevant structural units of Oblast Military Administrations / principal territorial administrations of the central executive authority that formulates and implements state environmental policy, territorial units of the State Environmental Inspectorate, the State Water Resources Agency, oblast councils, and local self-government bodies, etc.

5. *Guaranteeing the participation of the public and the scientific community*

Enshrine at the regulatory level the obligation to establish, under the structural units of Oblast Military Administrations / principal territorial administrations of the central executive authority that formulates and implements state environmental policy, advisory bodies with the participation of representatives of the public, scientists, and business; provide for procedures for public consultations and involvement of independent expertise.

6. *Reform of local environmental protection funds*

It is recommended to introduce unified environmental criteria for project selection together with a project passport recording the state of the environment before and after implementation; to ensure mandatory pre-project and post-project monitoring with public access to the results; to create an online platform for transparent review of applications, commission minutes, and expenditure reports; to introduce mechanisms for multi-year financing of strategic environmental protection measures; and to conduct regular trainings for staff of authorized bodies on assessment of environmental risks and financial management.

7. *Introduction of a state programme for supporting the institutional capacity of oblast-level environmental governance*

Develop a national programme with targeted financing, technical assistance, and training for the environmental structures of Oblast Military Administrations and principal territorial administrations of the central executive authority that formulates and implements state environmental policy, aimed at overcoming disparities between regions, especially in wartime and recovery conditions.

III. Analysis of the current situation, key problems, and recommendations concerning local self-government bodies

1. *Organizational model of the structural units of local self-government bodies responsible for addressing environmental issues*

The institutional capacity of local self-government bodies (hereinafter also referred to as local self-government bodies) in the field of environmental protection is determined by their ability to ensure the environmental component of their activities and to comply with legislative requirements. This concerns, first and foremost, the resolution of those issues that concern residents on a daily basis: air quality, access to drinking water, effective waste management, and the conservation and maintenance of green areas.

It is precisely these areas that demonstrate whether environmental protection issues are treated as a priority and whether they become the subject of systematic and consistent work by local authorities.

In this context, we analysed 22 local self-government bodies (Annex No. 2) that are the administrative centres of the oblasts of Ukraine.

The choice of these particular local self-government bodies is due to the fact that they concentrate the greatest organizational and financial potential for resolving environmental issues, shape governance practice in their regions, and set benchmarks for other territorial communities.

Unlike Oblast Military Administrations, whose structure is more uniform, city councils demonstrate diversity of organizational models. In some local councils, separate departments or administrations have been established (Kyiv, Odesa, Khmelnytskyi). In others, environmental units function within multi-profile departments, as in Lviv (Administration of Ecology and Natural Resources within the Department of Urban Planning), Chernivtsi, Chernihiv, or Cherkasy. In some cases, there is no specialized unit at all, and the relevant powers are distributed among several units (Poltava, Rivne). Such heterogeneity of structure directly affects staffing and influences the ability of local councils to systematically implement environmental policy.

For the assessment of institutional capacity, no less important is the compliance of the activities of local councils with national framework documents in the field of environmental policy and recovery: the Law of Ukraine “On the Basic Principles (Strategy) of the State Environmental Policy of Ukraine for the Period until 2030” No. 2697-VIII of 28 February 2019, the State Regional Development Strategy for the Period until 2027, the Sustainable Development Goals of Ukraine until 2030, and the National Recovery Plan of Ukraine adopted after the beginning of the full-scale war.

All these documents define nationwide benchmarks that should be reflected in local programmes. At the same time, in practice, the interconnection of local environmental programmes and programmes of social and economic development of the community with the above-mentioned documents is often rather selective, declarative, and unsupported by real measures and other implementation mechanisms, which creates a risk of their declarative and formal nature. A comparative analysis of the compliance of local programmes with state documents is presented in Annex No. 4.

Particularly illustrative are the results of the analysis of communities located in frontline regions (Kharkiv, Sumy, Kramatorsk, Mykolaiv, Kherson, Zaporizhzhia), where environmental challenges are combined with urgent infrastructure recovery needs. Here, environmental aspects often remain fragmented or pushed into the background, which creates a risk of losing a systemic approach to policy formulation.

Based on the study of the organizational structures of city councils, three common models of institutional arrangement for the implementation of environmental protection functions at the local level may be outlined (see the figure below). The choice of one or another model directly affects the ability of cities to formulate a coherent policy and coordinate actions in the environmental field.

Organizational models of local self-government bodies in the environmental field		
Separate department or administration	Division / unit within a multi-profile department	Fragmentation of functions across different units
Kyiv, Odesa, Khmelnytskyi	Lviv, Kharkiv, Chernivtsi, Chernihiv	Poltava
1	2	3

Figure 6. Organizational models of local self-government bodies in the environmental field

A. Independent structural unit (department or administration)

Under this model, environmental functions are implemented through a separate administrative unit that has its own status within the structure of the city council and is not part of other departments. This approach ensures greater visibility of environmental tasks and makes it possible to consolidate staff and resources. This model operates in Kyiv, where the Department of Environmental Protection and Climate Change Adaptation has been established. In Odesa, a Department of Ecology and Development of Recreational Areas has been created. In Khmelnytskyi, there is an Administration for Environmental Issues and Control of Urban Improvement.

B. Division or administration within a multi-profile department

This is the most common model among city councils. Environmental powers are integrated into the structure of a multi-profile department (most often housing and communal services, urban improvement, or infrastructure). Within such departments, separate divisions or sectors of an environmental nature operate, implementing tasks as part of a broader management block.

For example, in Lviv there is an Administration of Ecology and Natural Resources within the Department of Urban Planning; in Chernivtsi - an Environmental Division within the Housing and Communal Services Administration; in Chernihiv - an Environmental Division within the Department of Road Transport Infrastructure and Ecology.

A distinct approach is applied in Kharkiv, where environmental functions are not concentrated in a single central unit of the executive bodies of the city council but are implemented through housing and/or communal services administrations operating within district administrations (Saltivskyi, Kyivskyi, Industrialnyi, Novobavarskyi, etc.). Each of them includes relevant staff positions responsible for environmental tasks.

C. Absence of a separate structural unit; fragmentation of environmental functions

Under this model, the structure of the city council does not provide for a separate division, administration, or other specialized unit responsible for implementing powers in the environmental field. The relevant tasks are integrated into the functions of other structural units, in particular housing and communal services administrations, architecture, urban improvement, civil protection, etc.

This approach is observed, for example, in Poltava, where the environmental function is performed by several different units without a single responsible body. The relevant tasks are distributed among the Housing and Communal Services Administration, the Department of Land and Water Resources and Land Cadastre, the Urban Improvement Inspectorate, as well as representatives of starosta's circuits.

In Kramatorsk, environmental powers are formally assigned to a chief specialist within the Housing and Communal Services Administration; however, this position is currently vacant, which indicates the absence of actual staffing for the function.

2. Staffing capacity of local self-government bodies in the environmental field

The presence of a separate structural unit is only an initial condition for ensuring institutional capacity in the field of environmental protection. The level of staffing, the number of personnel, their professional qualifications, and the nature of their powers are decisive for the ability of city councils not only to perform basic functions but also to formulate a sustainable environmental policy and ensure its cross-cutting integration into local governance.

The analysis of data obtained from city councils in 2025 indicates significant variability in the number of staff positions involved in the implementation of environmental functions. For

example, in Kyiv, where a specialized Department of Environmental Protection and Climate Change Adaptation operates, the staffing level reaches 49 persons. The department's structure includes separate administrations and divisions, in particular those responsible for the nature reserve fund, environmental monitoring, and rational use of natural resources. The units include heads of administrations, heads of divisions, their deputies, and chief specialists (Annex No. 5).

At the same time, the existence of a structural unit does not guarantee effective activity; the key factor is the staffing resource.

Thus, in Kyiv, despite a formally strong organizational model, several high-profile conflicts in recent years have demonstrated the institutional incapacity of local authorities.

One of the most illustrative examples is the situation around the Osokorky Ecopark. This territory, with its unique meadows, lakes, and young forest, performs a critically important environmental function for the Darnytskyi district, reducing the impact of industrial facilities such as the "Energia" waste incineration plant, the "Pozniaky" heat supply station, and the Bortnychi aeration station. Despite numerous demands from the community, the Kyiv City Council did not grant this territory the status of a nature reserve fund object. Instead, since the early 2000s, the land had been allocated for high-rise development, which laid the foundation for a prolonged conflict.

In 2024–2025, the confrontation escalated: the developer began preparatory works, filled in channels between lakes, and restricted public access by installing a barrier. In spring 2025, the court of first instance declared the construction permit unlawful; however, already in summer, the appellate court allowed the works to continue, arguing that the ecopark did not have a formally established protected status. Environmental civil society organizations intend to challenge this decision in cassation; however, in practice, local authorities left the community alone with the developer, effectively adopting a passive stance.

Another illustrative example is the situation with Protasiv Yar. This green ravine in the centre of the capital was for a long time under threat of development: the Kyiv City Council adopted decisions to allocate land for construction projects despite public protests. The struggle of residents and civil society organizations lasted for years and was accompanied by court proceedings and protest actions. Only in 2022, under public pressure and due to an active advocacy campaign, was the Kyiv City Council forced to change course and adopt a decision on the establishment of the Roman Ratushnyi landscape reserve.

This underscores the inconsistency of environmental policy in Kyiv: protection of nature here is not the result of systematic institutional work, but rather a forced concession to public pressure.

In Odesa, the situation formally appears to be more institutionally ordered. The city has a Department of Ecology and Development of Recreational Areas, with 18 staff positions: director, first deputy, deputy, heads of divisions and sectors, and chief specialists. However, the mere existence of a specialized department has not become a guarantee of effective environmental protection. The most acute conflicts in the city arise precisely around coastal protection strips and coastal slopes, where local self-government bodies have repeatedly supported development projects, contrary to the position of the community and environmental restrictions.

At the same time, analysis of the Odesa situation cannot be limited only to the activities of the Department of Ecology. Actual management of coastal territories is shaped through the interaction of several municipal structures. This institutional configuration includes the Department of Ecology and Development of Recreational Areas, the Department of Engineering Protection of the Territory and Coastal Development, and the municipal enterprise "Odesa Coast". It is precisely through the interaction of these structures that management decisions are formed regarding the use of coastal territories: the environmental

component is often reduced to formal approval, while issues of development or so-called “slope stabilization” are implemented through the engineering and economic units of the city authorities. As a result, responsibility for the con

servation of coastal territories is blurred among different bodies, which creates conditions for the systematic advancement of development projects.

The key problem also lies in the fact that Odesa’s coastal slopes are often regarded in public discussion only as a natural landscape or recreational zone. In reality, a significant part of the Odesa slopes is an element of a complex engineering coastal protection system created in the 1970s-1990s. This system includes graded slopes, a network of drainage channels for diverting surface water, underground drainage galleries for lowering groundwater levels, as well as hydraulic engineering structures on the beaches - groynes, breakwaters, and artificial beaches that protect the foot of the slopes from destruction by the sea. The functioning of this engineering system is critically important for coastal stability and the safety of adjacent urban territories.

In this context, particular significance attaches to the territory of Yuvileinyi Park, which stretches along the coast from Shevchenko Park to Cape Velykyi Fontan. In 2013, the Odesa City Council adopted a decision to establish this park with an approximate area of about 480 hectares. However, its boundaries have still not been demarcated in situ and properly fixed in urban planning documentation. This situation creates opportunities for fragmentation of the territory through detailed territorial plans, which makes it possible gradually to remove individual plots from the integral engineering and recreational complex for development.

Illustrative is the situation with the slopes of Velykyi Fontan, one of the most valuable recreational zones of the city. Despite the environmental and engineering significance of this territory, the developer obtained urban planning conditions for the construction of a residential complex within the coastal protection strip, less than 100 metres from the waterline. The project provided not only for residential development, but also for the construction of a road and engineering works to “stabilize the slopes,” which could have led to disruption of the stability of the coastal protection system.

After a prolonged public conflict, the case was challenged in court. In November 2020, the Fifth Administrative Court of Appeal prohibited construction works, recognizing them as violating the regime of the coastal protection strip. In practice, it was precisely the court decision and the activity of civil society organizations that became the key mechanism for protecting the territory.

This case demonstrates a systemic problem: even where a specialized environmental department exists, local governance mechanisms do not perform the preventive function of environmental protection. Moreover, management decisions may contribute to the legalization of development on territories that perform the function of engineering protection of the city.

Thus, Odesa’s problem cannot be explained solely by an insufficient number of specialists or the institutional weakness of the department. It concerns a much broader governance context in which coastal territories - including elements of coastal protection infrastructure - are gradually integrated into urban planning processes and become objects of development.

Alongside this, unlike Kyiv and Odesa, where separate departments with fairly numerous staff exist but their work proves ineffective in conflict situations, most other communities face the opposite problem - a significantly lower level of staffing capacity. There, environmental functions are reduced to several positions within broader administrations, which sharply limits the possibilities for systematic work.

Thus, in Chernivtsi, Zhytomyr, and Chernihiv, environmental functions are implemented

within divisions of 3-4 officials.

In Chernivtsi, there is an Environmental Division within the Housing and Communal Services Administration: the head of the division and two chief specialists. In Zhytomyr, there is a head of division, a chief specialist, and a leading specialist. In Chernihiv, there is a head of division, a deputy head, and two chief specialists.

A similar structure is also observed in Lutsk (5 positions), Cherkasy (5 persons in two units: the Environmental Division and the Waste Management Sector), Poltava, and Kramatorsk. In Kramatorsk, the situation is complicated by the fact that the single envisaged position of chief environmental specialist remains vacant.

A special model is represented by Kharkiv, where environmental functions are implemented through housing and/or communal services administrations within district administrations. The total number of positions involved is 58, including heads of administrations, deputies, and chief specialists in the administrations of the Saltivskyi, Kyivskyi, Industrialnyi, and Novobavarskyi districts. Such an approach makes it possible to respond to local requests, but complicates the formation of a unified policy and coordination of environmental activities at the level of the community as a whole.

In certain communities, such as Rivne, the environmental function does not have a separate unit, but is partially implemented through the Energy Management Administration within the Department of Economic Development. This administration includes three divisions employing heads and chief specialists (for example, in the Energy Saving Division - 6 persons). Formally, such an approach makes it possible to integrate energy efficiency issues into urban policy, but in practice environmental tasks remain blurred among other functions.

Thus, there are significant differences in the staffing capacity of local self-government bodies, which directly affects the level of implementation of environmental policy. In cities with a low number of specialized staff, there is a tendency toward a narrow range of functions: response to requests and control predominate, while issues of strategic planning fall outside everyday activities. This requires separate measures at the national level to equalize staffing capacity.

2. *Institutional autonomy of the structural units of local self-government bodies in the environmental field*

Institutional autonomy of local self-government bodies responsible for environmental policy is an important condition for the effective exercise of their powers. It is manifested, in particular, in the status of the unit, the level of its managerial subordination, as well as in the possibility to independently initiate and adopt decisions.

In cities where environmental functions are concentrated in a separate department or administration, a higher level of autonomy is usually ensured. For example, in Kyiv, the Department of Environmental Protection and Climate Change Adaptation has a separate status and is directly accountable to the Kyiv City Council. A similar situation exists in Odesa, where the Department of Ecology and Development of Recreational Areas operates as an independent unit within the structure of the executive bodies of the city council.

In cities where environmental functions are performed within multi-functional departments, the autonomy of such units is significantly lower. In Chernivtsi, Cherkasy, and Chernihiv, environmental divisions are part of departments of housing and communal services or infrastructure. In such cases, the environmental area loses the possibility of independently influencing managerial decisions, and the approval of important documents takes place through the head of the department as a whole. This creates additional barriers to a proactive position of the unit.

In Rivne, the environmental protection function has no separate institution; it is partially integrated into the structure of the Energy Management Administration within the Department of Economic Development. None of the regulations of the existing units provide for powers in the field of ecology as their core functions, and therefore the unit cannot formally initiate decisions in this field. This means that the environmental component depends on the priorities of economic development and remains secondary. The absence of institutional autonomy was also manifested in practice: the city authorities in fact failed to ensure protection of the city's main green zone, the Taras Shevchenko Park, where representatives of the restaurant business unlawfully occupied the territory (about 0.05 ha) and arranged a summer terrace. Only the intervention of the prosecutor's office and a court decision made it possible to return the land to the community.

In Kharkiv, where environmental powers are implemented through district administrations, yet another type of limited autonomy is observed. Formally, environmental functions are assigned to the heads of housing or communal services administrations in each district; however, these units are subordinate to the heads of district administrations. The absence of a centralized city-level unit for environmental issues makes it impossible to develop a unified environmental policy and also weakens possibilities for coordination with city council departments or central government bodies.

Similar risks were manifested in Lviv. The "waste crisis" was the result not only of infrastructure problems but also of the limited institutional autonomy of the environmental administration. Formally, the structure of the city council includes the Administration of Ecology and Natural Resources; however, key decisions on waste management were taken at the level of other departments and the city leadership. This deprived the environmental unit of the possibility to influence the development of a systemic solution to the problem, which ultimately grew into a multi-year conflict and created a threat to sanitary safety.

The example of Lviv shows that even the presence of a specialized administration does not guarantee real influence on policy if its autonomy is limited.

Thus, the level of institutional autonomy is uneven and significantly affects the effectiveness of the performance of environmental functions.

A high level of autonomy is observed only in a few of the largest cities, where separate departments of ecology have been established. In other communities, the powers of units are limited both formally (through regulations) and in practice, due either to their inclusion in structures with other priorities or to their dispersion at district level.

We believe that strengthening the level of autonomy is possible by: separating environmental units into an independent organizational unit (administration or department); establishing the direct subordination of the unit to the leadership of the city council or the executive committee.

Alongside the issue of institutional autonomy, it is also important how substantively the functions of environmental units at the community level are filled.

4 Functional scope of the structural units of local self-government bodies in the environmental field

The functional capacity of the structural units of local self-government bodies responsible for the implementation of environmental functions depends not only on the formal allocation of powers in job descriptions of employees or regulations on the division, administration, or department, but also on the actual content, scope, and level of autonomy in performing tasks.

Local self-government bodies are capable of formulating and implementing local environmental policy, ensuring strategic planning, analytical activity, and the involvement of the public in decision-making in the environmental field.

In most cases, the functions of such units are reduced to the implementation of national policy in the field of environmental protection, exercising control over compliance with environmental legislation within the powers granted, as well as performing operational functions related to improvement of territories, greening, waste management, and maintenance of natural and recreational zones.

At the same time, in practice, these functions are implemented predominantly in an executive-service logic rather than a managerial one. Formally, the competence of local self-government bodies may also include supervisory powers in the environmental field; however, their actual implementation is limited. In most communities, control is episodic and is carried out mainly through temporary commissions or working groups created to respond to specific conflict situations. Such a response model is effectively of a “fire-fighting” nature, where institutional mechanisms of systematic environmental control are absent or function weakly.

In different communities, the scope of functions is defined differently, depending on the role of environmental functions within the city council’s structure.

In general, several common organizational models can be identified that explain why the scope of such departments is limited primarily to service-related tasks.

A. Environmental functions within housing and communal services

In most communities where the environmental function is integrated into departments/administrations of housing and communal services, the list of powers usually includes: participation in the preparation and implementation of local environmental protection programmes; supervisory and reporting procedures; support for procurement and urban improvement measures; and interaction with municipal enterprises (cleaning, greening, sanitary condition).

In essence, this is more of an operational-procedural than a managerial-coordination profile: the units focus on accounting and urban improvement, while in strategic areas such as urban planning approvals and implementation of local development programmes, their role remains minimal.

Particular attention should be paid to the use of local environmental protection funds: their planning and allocation should be closely linked to the results of environmental monitoring and the priorities of the community’s environmental policy, rather than only to responses to current problems. The practice of using the resources of local environmental protection funds also requires a more systemic approach: it is advisable to link their financing to environmental monitoring data and the strategic environmental protection priorities of the community.

B. Tasks and functions environmental in substance are integrated into non-environmental departments

This occurs when environmental tasks are “dissolved” within economic or infrastructure units (for example, within an energy management administration as part of a department of economic development), where they are treated as ancillary to energy efficiency or tariff policy. This creates a risk of blurred priorities, fragmentation of decisions, and situational policy-making instead of a consistent approach.

C. Fragmentation of powers in the environmental field

This occurs when a significant part of environmental powers is exercised at the level of district administrations without a single city-wide coordination centre. Under this model, transaction costs increase, duplication and gaps arise (who is responsible for what), and the prioritization of measures becomes reactive in nature: most tasks are performed in response to residents' complaints or crisis situations rather than on the basis of long-term strategic planning.

For comparison, within the structure of Oblast Military Administrations, environmental units have a broader functional scope and cover, in particular, strategic, planning, and approval powers, including monitoring the implementation of various programmes. City councils, by contrast, remain predominantly at the level of "response" and "service provision," without reaching the level of strategic governance. The reason for this may be both weak staffing and the limited functions formalized in the relevant regulations.

We believe that, in order to strengthen the functional capacity of local environmental units, it would be advisable to: expand their functions in the direction of analytics, monitoring, and programming; clearly assign powers regarding project approvals; integrate issues of adaptation and biodiversity protection into the list of responsibilities; ensure interagency interaction within the executive bodies of the council; include environmental units in cross-sectoral planning (energy, transport, construction, investment); and develop model regulations taking into account best practices, providing for coordination functions, the ability to initiate regulatory changes, and participation in state procedures.

5 *Transparency, accessibility of information of local self-government bodies, and interaction with the public*

Transparency of local self-government bodies in the environmental field is a prerequisite for effective public participation and oversight of the activities of authorities. Analysis of official websites of city councils shows that publicity requirements are fulfilled only partially.

The requirements for publication of data subject to disclosure on the official websites of local self-government bodies are clearly defined by Resolution of the Cabinet of Ministers of Ukraine No. 835 "On Approval of the Regulation on Datasets Subject to Publication in the Form of Open Data." For local self-government bodies, these include, in particular:

the list of targeted local programmes and reports on their implementation; data on green spaces subject to removal; data on the location of container sites and waste management facilities; the register of urban planning conditions and restrictions, master plans, and detailed territorial plans; and the results of roll-call voting by deputies, including on environmental matters.

In practice, a significant part of this information is either not published or is placed in inconvenient formats. In communities closer to the frontline, the situation is even more difficult: websites often do not contain updated information on the state of the environment or implementation of programmes, although it is precisely in these regions that transparency is critically important for controlling environmental risks.

In Ivano-Frankivsk, Zhytomyr, Lutsk, Poltava, and Odesa, environmental information is presented on the official websites of local councils in a fragmented manner. Documents may be published, but there is no unified navigation logic: some materials are placed in sections such as "economy" or "urban improvement," reporting is irregular, and news is updated only episodically. In such cases, transparency is reduced to formal compliance with legal requirements, without real provision of feedback with the community.

Rivne, Cherkasy, Kramatorsk, Kharkiv. The environmental function has almost no public visibility: there are no regulations on units, no contacts of responsible officials, no texts of programmes, and no reports on their implementation. Interaction with the public remains weak. In most cases, it is reduced to consideration of individual appeals, responses to which

are often provided with delays.

Thus, transparency of local self-government bodies in the environmental field is predominantly formal in nature: even where separate web resources have been created, the information is incomplete and unsystematic, which complicates oversight of the activities of local authorities and limits community participation in shaping environmental policy.

A separate issue remains interaction with the public. In most cases, it is reduced to responding to appeals, often in violation of the legally established time limits.

Thus, the analysis makes it possible to conclude that, on the one hand, in some communities a primary practice of publicity has been formed (basic documents, contact information are posted, and occasionally the news feed is updated), while on the other hand, in most cases communication is reduced to formal fulfilment of the obligation to inform, without real dialogue with the public.

6 Conclusions and directions for strengthening the institutional capacity of local self-government bodies in the environmental field

The analysis conducted shows that the institutional capacity of local self-government bodies in the environmental field remains insufficiently developed and requires targeted strengthening at the systemic level.

In most city councils, environmental powers are implemented in a fragmented manner, through structural units that have other key functional priorities (housing and communal services, infrastructure, economy). The staffing capacity of such units is limited, often consisting of 2–4 persons, and their functional scope is reduced to the execution of current tasks and response to requests, without the possibility for analytical work, strategic planning, or coordination of environmental policy.

Existing positive examples, such as separate environmental departments in Kyiv and Odesa, demonstrate that with appropriate status, adequate staffing, and functional autonomy, local self-government bodies can not only effectively implement delegated powers but also shape policy in various areas of environmental protection.

At the same time, in communities where the environmental protection function is absent as a separate organizational unit or is implemented through district administrations, there is a loss of managerial focus, coordination, and transparency. This significantly limits both the ability to influence the environmental situation and the involvement of the public in decision-making processes.

Recommendations

Option A. Improvement of the existing model (insufficient)

1. Strengthen the institutional capacity for implementing the environmental function in local self-government bodies, in particular by establishing or developing separate units (divisions/administrations) responsible for environmental issues.
2. Ensure adequate staffing, taking into account the size of the community, population, and scope of powers.
3. Expand the functional scope of units by including analytical work, monitoring, strategic planning, and participation in local policy-making.
4. Strengthen the autonomy of environmental units, in particular through their direct subordination to the leadership of the community.
5. Increase transparency and public engagement by ensuring regular publication of information, conducting consultations, and developing partnerships.

6. Standardize approaches to organizing the environmental function by developing model regulations and recommendations on the structure and functions of units.
7. Develop local environmental monitoring systems and use their results in managerial decision-making.
8. Improve the use of funds from local environmental protection funds by ensuring more transparent use and targeted allocation.
9. Strengthen cross-sectoral integration by incorporating the environmental component into the energy, transport, and spatial policies of communities.

Option B. Systemic strengthening of the environmental function at the local level (recommended)

1. Introduce a mandatory organizational model of institutional conditions for implementing the environmental function at the level of local self-government bodies, providing for the creation of a specialized structural unit on environmental issues within the executive bodies of local councils. The basic model should be a separate department of ecology responsible for the formulation and implementation of local environmental policy.
2. For small communities, provide for an alternative model (division/administration), but exclusively on condition of ensuring institutional autonomy, adequate staffing, and clear division of functions.
3. Establish minimum staffing standards by defining the number of employees depending on the area of the community, population, level of anthropogenic pressure, and scope of powers, with the mandatory presence of specialized experts (waste, water resources, green spaces, climate policy, EIA).
4. Ensure the functional autonomy of environmental units, including the right to initiate decisions, direct subordination to community leadership, and participation in strategic planning.
5. Integrate environmental policy into all key areas of community development, making it a mandatory component of energy, transport, spatial, and economic policy.
6. Introduce mandatory local environmental monitoring systems, the results of which should be used as a basis for managerial decision-making and planning of environmental protection measures.
7. Ensure full transparency and accountability, including open data, regular public reporting, and mandatory mechanisms for public participation.
8. Standardize the organization of the environmental function at the national level by developing model structures, basic functions, and standards of activity for all communities in order to avoid fragmentation and duplication of powers.
9. Ensure effective and targeted use of funds from local environmental protection funds by linking financing to the priorities of environmental policy and monitoring results, with mandatory control and transparency.

Consistent implementation of these steps will make it possible to move from situational response to systemic management of environmental processes at the level of local self-government, which is key to implementing state environmental policy and preserving natural resources in communities.

IV. Certain points of overlap and potential conflicts of powers between Oblast Military Administrations and local self-government bodies

1. *Environmental planning.* Local self-government bodies are responsible for developing local environmental programmes, while Oblast Military Administrations coordinate and approve regional environmental protection programmes, including the scope and sources of financing. The absence of coordination between these levels may lead to duplication of measures, inefficient use of funds, or exclusion of the needs of specific communities from

regional planning.

2. *Regarding the nature reserve fund.* Local self-government bodies have the power to take decisions on the establishment of territories and objects of the nature reserve fund of local significance, while Oblast Military Administrations exercise management and regulation in this area regardless of the significance level of the objects. This to some extent limits the ability of local self-government bodies to influence the future of the protected territories they have established.

3. *Limits on the use of natural resources.* The issue of approving limits on the use of natural resources and discharges of pollutants is controversial. According to Article 19 of the Law of Ukraine "On Environmental Protection," local self-government bodies approve the relevant limits upon submission by Oblast Military Administrations. At the same time, Article 20-4 provides that Oblast Military Administrations approve these same limits upon submission by the central executive authority. Such a construction may create inconsistency in the decision-making procedure and risks of dual subordination.
4. Approval of enterprise activity plans. Local self-government bodies approve environmental plans, while Oblast Military Administrations issue permits for emissions and special use of natural resources. The absence of a clear mechanism for coordination between these decisions may create legal uncertainty for business entities.

5. *Waste management. The* Law of Ukraine "On Waste Management" signs to local self-government bodies key powers regarding the organization of service provision, tariff setting, designation of service providers, and elimination of unauthorized dumpsites. At the same time, Oblast Military Administrations ensure the development, approval, and implementation of regional waste management plans. In the absence of clear coordination procedures, the participation of communities in planning may be merely formal, which leads to local needs being disregarded and, in wartime conditions, to the actual assumption of local self-government powers by Oblast Military Administrations without a proper mechanism of delegation or accountability.

Conflicts may also arise at the stage of project implementation, in particular with regard to the siting of waste management facilities. The powers to approve the location of such facilities belong to councils, but the initiative to create them often comes from the oblast level. In the absence of community consent or an adequate level of consultation, the implementation of projects of regional significance may be complicated or blocked.

A separate source of tension is the contradiction between the infrastructural and environmental protection logic of waste management. In practice, local authorities often focus on ensuring uninterrupted waste collection and disposal, while issues of environmental safety, sorting, and recycling remain secondary. This may lead to conflicts between units responsible for urban improvement and infrastructure and environmental structural units, as well as to criticism from the public regarding the environmental consequences of such decisions.

An important instrument for financing environmental protection measures at the local level remains the Environmental Protection Funds. However, in practice, the use of these funds is not always linked to strategic planning in the environmental field. In a number of communities, fund resources are directed primarily to individual infrastructure projects or urban improvement measures, which sometimes gives rise to debate as to their compliance with environmental protection priorities.

In the context of post-war recovery, an important role is also played by comprehensive recovery programmes for community territories, which are expected to contain an environmental component. However, analysis of such programmes (see Annex No. 4) shows

that the integration of environmental issues into recovery planning is uneven: in some cases, they are addressed fragmentarily and are not always aligned with environmental priorities at the oblast level or with regional waste management plans. This creates additional challenges for coordination of environmental policy between the local and regional levels.

General conclusion and recommendations

The analysis of the institutional capacity of the environmental governance system in Ukraine has shown its fragmentation, staffing and financial instability, and the loss of a strategic focus on the State's environmental priorities. The integration of environmental functions into the structure of the Ministry of Economy, Environment and Agriculture has created systemic risks of marginalization of environmental policy, reduction of professional expertise, and weakening of accountability. Central executive authorities vested with environmental powers remain understaffed, overloaded, and insufficiently coordinated with each other, which complicates the proper performance of state tasks in this field, while the State's environmental policy is not cross-cutting. Overall, this architecture of environmental governance does not correspond either to the present-day challenges facing the environmental sphere in view of the full-scale Russian-Ukrainian war, or to the requirements of implementation of Chapter 27 of the Ukraine-EU negotiating framework.

The regional and local levels of governance demonstrate similar disproportions. The main problems of environmental governance at these levels are identified as staffing shortages, unevenness of resource provision, and the predominance of an administrative approach over a strategic one.

In the conditions of full-scale war, environmental degradation, and at the same time Ukraine's movement toward membership in the European Union, environmental policy must move into the category of basic state priorities, equivalent to issues of security, economic recovery, and energy independence. This requires the formation of a resilient, professional, and accountable institutional vertical of governance capable of ensuring strategic consistency of state decisions, integration of environmental considerations into all policy sectors, and guaranteed fulfilment of Ukraine's international obligations. Such a system must be based on the principles of scientific soundness, transparency, responsibility, and financial capacity as a guarantee of the transition from declarative to real protection of the environment and the State's natural resources.

In order to restore the effectiveness of the system, profound structural changes are required. Important steps could include the restoration of a specialized environmental ministry, its principal administrations in the oblasts, strengthening of the staffing potential of environmental bodies, and increased transparency and digitalization of processes. Without real strengthening of the institutional foundation, Ukraine's environmental policy will remain declarative, and the system of public authorities will be unable to guarantee everyone's right to a safe environment.

Based on the analysis carried out, three models of the organizational structure for environmental governance in Ukraine can be formulated.

I. "Minimum programme"

A strengthened and reformed Ministry of Economy, Environment and Agriculture of Ukraine + the existing system of central executive authorities subordinated to the Ministry and implementing environmental powers, but strengthened in staffing, financing, and regulations + separate environmental departments of Oblast Military Administrations, strengthened in staffing, regulations, and financing + separate environmental departments of local

self-government bodies, strengthened in staffing, regulations, and financing.

As a basic, compromise option, a model is proposed that provides for strengthening the existing institutional architecture without its radical transformation. Its essence lies in the functioning of a reformed and institutionally strengthened Ministry of Economy, Environment and Agriculture of Ukraine combined with the current system of central executive authorities implementing environmental powers, on condition of their substantial strengthening in staffing, financing, and regulations. A similar strengthening is envisaged for the relevant structures at the regional and local levels - environmental units of Oblast Military Administrations and local self-government bodies.

At the same time, this model is regarded as a "minimum programme," since it does not eliminate the systemic problems of fragmentation of powers and limited institutional capacity, but only partially mitigates them. Nevertheless, its implementation is capable of ensuring a noticeable improvement in the quality of governance in the short and medium term compared with the current state. In order to achieve sustainable results in the long term, deeper institutional changes are required.

<table>
<tr><th colspan="2">Model I. "Minimum Programme"</th></tr>
<tr><td>Strengthened and reformed Ministry of Economy, Environment and Agriculture of Ukraine</td><td rowspan="3">Basic, compromise option is a model that provides for strengthening the existing institutional architecture without its radical transformation. Its essence lies in the functioning of a reformed and institutionally strengthened Ministry of Economy, Environment and Agriculture of Ukraine combined with the current system of central executive authorities implementing environmental powers, subject to their substantial strengthening in staffing, financing, and regulations.</td></tr>
<tr><td>+</td></tr>
<tr><td>Existing system of central executive authorities subordinated to the Ministry that implement environmental powers, strengthened in staffing, financing, and regulations
+</td></tr>
<tr><td>Separate environmental departments of Oblast Military Administrations, strengthened in staffing, regulations, and financing</td><td rowspan="3">Similar strengthening is envisaged for relevant structures at the regional and local levels – environmental units of Oblast Military Administrations and local self-government bodies. At the same time, this model is considered a "minimum programme," since it does not eliminate systemic problems of fragmentation of powers and limited institutional capacity, but only partially mitigates them.</td></tr>
<tr><td>+</td></tr>
<tr><td>Separate environmental departments of local self-government bodies, strengthened in staffing, regulations, and financing</td></tr>
</table>

Figure No. 7. Change model "Minimum Programme"

II. Optimal changes

A restored separate specialized Ministry of Environmental Protection + the existing system of central executive authorities subordinated to the Ministry and implementing environmental powers, but strengthened in staffing, financing, and regulations + separate environmental departments of Oblast Military Administrations, strengthened in staffing, regulations, and

financing + separate environmental departments of local self-government bodies, strengthened in staffing, regulations, and financing.

This model provides for the restoration of a separate specialized Ministry of Environmental Protection as the central body for the formulation and coordination of state policy in the environmental field. At the same time, the current system of central executive authorities subordinated to the Ministry and implementing the relevant powers is preserved, subject to substantial strengthening in staffing, financing, and regulations. Similar strengthening is envisaged for separate environmental units of Oblast Military Administrations and local self-government bodies.

This model is optimal in view of the balance between institutional capacity and realistic feasibility of implementation. The separation of a specialized ministry ensures an appropriate level of political weight for environmental policy, consistency in decision-making, and better coordination between levels of governance. At the same time, preservation and strengthening of the existing system of bodies makes it possible to avoid institutional disruptions and ensure a rapid increase in the effectiveness of the functioning of the entire environmental governance system.

<table>
<tr><th colspan="2">Model II. “Optimal Changes”</th></tr>
<tr><td>Restored standalone Ministry of Environmental Protection</td><td rowspan="5">This model provides for restoration of a dedicated Ministry of Environmental Protection as the central authority responsible for shaping and coordinating state policy in the environmental field. The existing system of central executive authorities subordinated to the Ministry is preserved. Similar strengthening is envisaged for environmental units of Oblast Military Administrations and local self-government bodies.</td></tr>
<tr><td>+</td></tr>
<tr><td>Existing system of central executive authorities subordinated to the Ministry that implement environmental powers, strengthened in staffing, financing, and regulations</td></tr>
<tr><td>+</td></tr>
<tr><td></td></tr>
<tr><td>Separate environmental departments of Oblast Military Administrations, strengthened in staffing, regulations, and financing</td><td rowspan="5">This model is considered optimal in terms of balancing institutional capacity and feasibility of implementation. The separation of a profile ministry ensures an appropriate level of political weight of environmental policy, consistency in decision-making, and better coordination between levels of governance. At the same time, maintaining and strengthening the existing system of authorities helps avoid institutional disruptions and enables a rapid increase in the overall effectiveness of governance.</td></tr>
<tr><td>+</td></tr>
<tr><td>Separate environmental departments of local self-government bodies, strengthened in staffing, regulations, and financing</td></tr>
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Figure No. 8. Change model “Optimal Changes”

III. “Ideal option”

A restored separate specialized Ministry of Environmental Protection + the existing system of central executive authorities subordinated to the Ministry and implementing environmental powers, but strengthened in staffing, financing, and regulations + establishment of a Biodiversity Conservation Agency of Ukraine + territorial representations of the Ministry of Environmental Protection in the oblasts + separate environmental departments of Oblast Military Administrations + separate environmental departments of local self-government bodies, strengthened in staffing, regulations, and financing.

This model provides for the formation of a coherent and functionally balanced governance system through the restoration of a separate specialized Ministry of Environmental Protection as the centre for the formulation of state policy, while preserving and substantially strengthening the system of subordinated central executive authorities. A key element is also the establishment of a specialized Biodiversity Conservation Agency of Ukraine, which will make it possible to ensure professional and institutionally capable implementation of policy in this field. An important role is played by the introduction of territorial representations of the Ministry in the oblasts, which will contribute to strengthening the governance vertical and effective coordination at the regional level. In parallel, the functioning and strengthening of environmental units of Oblast Military Administrations and local self-government bodies is envisaged, with a clear delineation of powers between the territorial representations of the Ministry, the departments of Oblast Military Administrations, and local self-government bodies.

This model is the most comprehensive and institutionally capable, as it combines a clear distribution of functions between policy formulation and policy implementation, specialization in key areas (in particular, biodiversity conservation), and an effective multi-level governance system with proper coordination. It creates the preconditions for systematic, consistent, and effective implementation of state environmental policy in accordance with European approaches and standards of good governance.

<table>
<tr><td colspan="2">Model III. “Ideal Option”</td></tr>
<tr><td>Restored standalone Ministry of Environmental Protection</td><td rowspan="5">This model provides for the formation of a coherent and functionally balanced system of governance through the restoration of a dedicated Ministry of Environmental Protection as the centre for shaping state policy, while preserving and significantly strengthening the system of subordinated central executive authorities.</td></tr>
<tr><td>+</td></tr>
<tr><td>Existing system of central executive authorities subordinated to the Ministry that implement environmental powers, strengthened in staffing, financing, and regulations</td></tr>
<tr><td>+</td></tr>
<tr><td rowspan="2">Establishment of the Agency for Biodiversity Conservation of Ukraine</td><td rowspan="5">A key element is also the establishment of a specialized Agency for Biodiversity Conservation of Ukraine, which will ensure professional and institutionally capable implementation of policy in this field.</td></tr>
<tr><td>+</td></tr>
<tr><td>Territorial offices of the Ministry of Environmental Protection in the regions + separate environmental departments of Oblast Military Administrations</td></tr>
<tr><td>+</td></tr>
<tr><td rowspan="2">Separate environmental departments of local self-government bodies,</td></tr>
<tr><td>An important role is played by the introduction of territorial offices of the</td></tr>
</table>

strengthened in staffing, regulations, and financing	Ministry in the regions, which will strengthen the governance vertical and ensure effective coordination at the regional level.

Figure No. 9. Change model “Ideal Option”