Independent Reporting Mechanism

Results Report: Ukraine 2023-2025

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Table of Contents

Executive Summary....3
Section I. Key Observations....6
Section II. Early Results....8
Section III. Participation and Co-Creation....16
Section IV. Methodology....23
Annex I. Commitment Data....25

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Executive Summary

Ukraine's sixth action plan achieved strong completion and early results, despite the conditions of Russia's ongoing full-scale military invasion. The most significant early results were in war-related reconstruction transparency, while progress was also made in open data, extractive industries transparency, and public integrity reform. Commitments that advanced Ukraine's European Union (EU) integration tended to produce the deepest and most sustainable outcomes. In addition, Ukraine's multi-stakeholder forum was more active in the action plan's development and implementation compared to the previous cycle.

Implementation

All 10 commitments of Ukraine's sixth action plan were fully or substantially completed, and five produced early results. Commitment 1 achieved significant early results by advancing the Digital Restoration Ecosystem for Accountable Management ("DREAM"), a unified digital system for managing public investment and wartime reconstruction projects. The DREAM system was designated as the mandatory platform for public investment management, pursuant to the amendments to the Budget Code of Ukraine adopted in January 2025 and the relevant resolutions of the Cabinet of Ministers of Ukraine.[1]

Six commitments produced moderate early results: the Unified Geo-Information System for Monitoring and Evaluation of the Development of Regions and Territorial Communities, (Commitment 2), transparency of scientific research information (Commitment 4), Extractive Industries Transparency Initiative institutionalization (EITI) (Commitment 8), and open data (Commitment 9), higher education integrity (Commitment 7), and the subsoil use information system (Commitment 10). These commitments advanced Ukraine's European Union (EU) accession, alignment with EU open data standards, and reconstruction accountability, and were all relevant to national strategies and Ukraine's candidate country obligations.[2] However, Commitment 9's most ambitious milestones to publish information audits and wartime-sensitive datasets fell short of their targets.

At a Glance

LEVEL OF COMPLETION

10/10	Complete or substantially complete commitments

EARLY RESULTS

6/10	Commitments with early results
1/10	Commitments with significant results

KEY OBSERVATIONS

- Online co-creation under wartime conditions expanded participation beyond what previous in-person formats had achieved
- A jointly negotiated monitoring approach gave civil society leverage over how implementation was reported
- Commitments with dedicated institutional capacity and a clear legal pathway achieved the deepest and most sustainable results

Met the minimum requirements during implementation: Yes

The common factor across commitments that saw the deepest results was dedicated institutional capacity paired with a clear legal pathway. A clear illustration of this is the work of the DREAM Project Office under the Ministry for Development of Communities and Territories of Ukraine, operating on the basis of a formal memorandum and a Ministry order establishing the DREAM Project Office, and with support from international technical assistance partners. Commitments that lacked dedicated coordination capacity and a defined legal anchor tended to produce more limited outcomes opening government. Ukraine's ability to sustain meaningful OGP implementation under active wartime conditions, due to Russia's ongoing full-scale invasion, is a significant achievement.

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Independent Reporting Mechanism

Participation and Co-Creation

The Secretariat of the Cabinet of Ministers serves as the government focal point for OGP in Ukraine, with a dedicated unit responsible for day-to-day coordination. The Coordination Council, a 7+7 body co-chaired by a State Secretary from the Cabinet and a civil society representative, is the country's multi-stakeholder forum.[3] Compared to the fifth action plan cycle, when the Coordination Council effectively ceased to function, the sixth cycle marked a significant improvement in the quality of government and civil society dialogue.[4] The action plan was co-created entirely online due to Russia's full-scale invasion. This format proved more inclusive than previous in-person processes by drawing in stakeholders from regions and civil society coalitions that had not previously engaged with OGP. The cycle's most distinctive achievement during implementation was the introduction of a quarterly monitoring process in which civil society reviewed and provided input on draft government progress reports, changing a traditionally government-controlled reporting function into a joint accountability mechanism. Following the government co-chair's departure from the Coordination Council in August 2025, there were no formal plenary council sessions for the remainder of the implementation period (through December 2025).[5] However, Ukraine met the OGP Participation and Co-Creation Standards' minimum requirements during co-creation and implementation of the sixth action plan.[6]

Implementation in Context

Russia's full-scale military invasion, which began in February 2022, was the dominant contextual factor shaping the sixth action plan's design and implementation. Martial law restrictions limited what government-held data could be published, constraining the most ambitious milestones under Commitment 9 on open data. The ongoing invasion affected institutional capacity, particularly at the subnational level where capacity constraints limited the adoption of new systems such as DREAM by local governments.

Despite the difficulties brought on by the war, Ukraine has continued to push for integration with the EU. Ukraine's EU candidacy, granted in June 2022, served as a strong driver for commitments on open data alignment with EU standards, public investment transparency, and legislation harmonization. International partner support, including USAID's Digital Transformation Activity, which funded the Open Data Academy, and assistance from the OSCE and other partners, provided technical and financial resources that enabled implementation of the commitments on open data (Commitment 9) and EITI (Commitment 8).[7]

OGP in Ukraine has no dedicated budget line and is grounded in executive regulation, making its continuity dependent on individual champions rather than embedded institutional structures. No standalone open government strategy or legislation institutionalizing the OGP process was adopted during the cycle.

At the local level, three new communities (Kyiv, Zvyahel, and Orzhytsia) joined the OGP Local program, bringing Ukraine's total OGP Local membership to six local governments. In addition, the Parliament (Verkhovna Rada) announced the creation of the inter-factional association "Open Parliament of Ukraine" in April 2025 and submitted a Letter of Intent to join OGP's Open Parliament initiative in May 2025.[8] An Expert Council was established in August 2025 with 16 civil society representatives selected through an open competition, followed by a public consultation and more than 50 proposals for an Open Parliament action plan. On 4 September 2025, the Parliament adopted Resolution No. 4597-IX restoring live broadcasts of open plenary sessions.[9]

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[1] "DREAM gets the basis for the legislative regulation as the Ukrainian Parliament voted," DREAM, January 17, 2025, https://www.dream.gov.ua/news/article-78.

[2] "Law of Ukraine No. 4225-IX on Amendments to the Budget Code of Ukraine Regarding the Updating and Improvement of Certain Provisions," Verkhovna Rada of Ukraine, January 16, 2025, https://zakon.rada.gov.ua/laws/show/4225-20#Text; "Resolution No. 527 On Certain Issues of Public Investment Management," Cabinet of Ministers of Ukraine, February 28, 2025, https://zakon.rada.gov.ua/laws/show/527-2025-%D0%BF#Text.

[3] Nataliia Oksha (Secretariat of the Cabinet of Ministers of Ukraine), interview by the IRM, March 2026; "Composition of the Coordination Council on the implementation of the Open Government Partnership initiative in Ukraine," Government of

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Independent Reporting Mechanism

Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/partnerstvo/kr5-20230703.pdf.
[4] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025; "Ukraine Action Plan Review 2021–2022," Open Government Partnership, November 2021, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2021-2022.
[5] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2026; Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, March 2026.
[6] "OGP Participation and Co-Creation Standards," Open Government Partnership, 2021, https://www.opengovpartnership.org/ogp-participation-co-creation-standards/.
[7] Nadia Babynska-Virna (Open Up Ukraine), interview by the IRM, March 2026.
[8] "Ukraine Letter of Intent to Join OGP Open Parliament," Open Government Partnership, May 27, 2025, https://www.opengovpartnership.org/documents/ukraine-letter-of-intent-to-join-ogp-open-parliament/.
[9] "Rada resumes live broadcasts of parliamentary sessions," Liga.net, September 16, 2025, https://news.liga.net/en/politics/news/rada-resumes-live-broadcasts-of-parliamentary-sessions.

Section I. Key Observations

The key observations below offer reflections from Ukraine's sixth action plan cycle. These lessons aim to support Ukraine's future action plans and broader open government journey.

Observation 1: Online co-creation under wartime conditions expanded participation beyond what previous in-person formats had achieved

Russia's full-scale military invasion forced Ukrainian stakeholders to move the sixth action plan's co-creation process entirely online. This practice was already the norm during the fifth cycle (2020-2022) due to the COVID-19 lockdowns. Online consultations held in early 2023 allowed stakeholders in different regions and civil society representatives who had relocated abroad due to the security situation to participate in the national OGP process. In addition, a 15-day digital public consultation in August 2023 reached a broader audience than prior engagement modalities. This shift allowed for a more inclusive co-creation process compared to the fifth action plan, when the Coordination Council effectively ceased to function, and civil society based outside Kyiv was largely absent. Where geographic distance, security conditions, or resource constraints limited in-person participation, online and hybrid co-creation formats meaningfully widened the range of voices contributing to the action plan. As Ukraine begins to implement its seventh action plan (2026-2027), combining digital accessibility with in-person meetings could sustain this reach without sacrificing the depth that direct engagement enables.

Observation 2: A jointly negotiated monitoring approach gave civil society leverage over how implementation was reported

Ukraine's sixth action plan introduced a new accountability practice during implementation: before each quarterly progress report was published, the Secretariat of the Cabinet of Ministers circulated draft assessments to all Coordination Council members, including civil society, for review and comment. Civil society members used this process actively. When non-governmental representatives judged a commitment to be only partially complete, the published report reflected a partially complete status rather than the government's coding. Government implementers understood that civil society agreement was a prerequisite for marking a commitment as complete. This process gave non-governmental members a stronger role in monitoring implementation compared to Ukraine's previous action plans, going beyond the right to comment after the fact.

Observation 3: Commitments with dedicated institutional capacity and a clear legal pathway achieved the deepest and most sustainable results

The clearest predictor of strong results across the sixth action plan was whether a commitment had dedicated institutional backing and a defined legal pathway for implementation. The DREAM ecosystem, the plan's only commitment assessed by the IRM as generating significant results, benefited from the effective support of the Project Office. The Office operates jointly with the Open Contracting Partnership under the Ministry for Development of Communities and Territories of Ukraine based on a formal memorandum of cooperation and an order of the Ministry establishing the DREAM Project Office. This organizational arrangement provided technical leadership and institutional continuity throughout implementation, bringing together the efforts of government authorities, civil society, and international partners. Subsequently, following the amendments to the Budget Code of Ukraine adopted in January 2025 and the relevant resolutions of the Cabinet of Ministers of Ukraine adopted to implement those amendments, the DREAM ecosystem was established in legislation as the platform for managing all public investments. This transformed the use of the platform into a mandatory transparency requirement for more than 1,400 public-sector entities.

By contrast, commitments that lacked dedicated coordination or a clear legal pathway for implementation tended to produce limited outcomes. The OGP process operates without a

Open Government Partnership
Independent Reporting Mechanism

standalone budget line, relying on a unit within the Cabinet Secretariat that manages OGP alongside its broader responsibilities. This institutional gap between the well-resourced DREAM and the structures supporting other commitments points to a cross-cutting lesson: open government reforms achieve durable results when they are anchored in law, staffed with dedicated capacity, and housed in institutions with the mandate and resources to carry them forward.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 1: Transformed Ukraine's public investment management by establishing a digital reconstruction and investment management tool "DREAM" as the legally mandated platform for all public investments.
Commitment 9: Strengthened Ukraine's open data legal framework by introducing a binding high-value dataset regime aligned with EU Directive 2019/1024, expanding the number of publishing information holders, and restoring public access to the Registry of Legal Entities after four years of closure.

Commitment 1: Digital Tool for Infrastructure and Real Estate Reconstruction (DREAM)

Ministry for Communities, Territories, and Infrastructure Development; Agency for Reconstruction

Context and Objectives

Russia's full-scale military invasion in February 2022 created an unprecedented reconstruction challenge in Ukraine. By the end of 2023, the World Bank and the Government of Ukraine estimated that recovery would require approximately US$486 billion across tens of thousands of projects spanning all levels of government.[1] A 2023 opinion poll found that 79 percent of Ukrainians were concerned about a lack of control over reconstruction resulting in embezzlement or the use of poor-quality materials, and 75 percent were concerned about the resumption of money laundering in large-scale projects.[2] To address these concerns, a coalition of around 50 local and international organizations named Reconstruction Integrity, Sustainability and Engagement (RISE) Ukraine proposed a unified digital ecosystem for reconstruction project management. The Ministry of Infrastructure signed a memorandum of cooperation with RISE in August 2022 and the Cabinet of Ministers Resolution #1286 in November 2022 set the stage for implementation.

Commitment 1 aimed to develop, pilot, and operationalize the single platform named Digital Restoration Ecosystem for Accountable Management (DREAM). The platform would cover the full project lifecycle from identification through procurement, implementation, and reporting, with all data published under the Open Contracting Data Standard (OCDS) and publicly accessible.[3] In 2023 the DREAM Office was established to lead and coordinate the development and implementation of DREAM.[4] The system was developed jointly by the Ministry for Communities, Territories and Infrastructure Development, the Agency for Reconstruction, and the Open Contracting Partnership (OCP) and was supported by the British government and later the German government through the German Development Cooperation (GIZ), as well as USAID's and UK Dev Digital's Ukraine Digital Transformation Activity implemented by Eurasia Foundation.

Early Results: Significant Results

Three of the commitment's four milestones were fully implemented, with the fourth still in progress at the end of the action plan. In late 2023, the Agency for Reconstruction[5] approved the user instructions, and in January 2024 the Ministry for Communities, Territories and Infrastructure Development approved the DREAM Regulation giving the system its legal operating basis (milestone 1). The ministry launched DREAM in trial operation in August 2025 though the system had already been publicly accessible for over a year (milestone 2). During beta-testing, 70 webinars and workshops reached approximately 8,700 participants, and a further 20 sessions in 2025 reached 3,637 people. The Ukrainian government also established the DREAM Academy[6] as a permanent learning platform offering methodological guidance, manuals, and case studies

Open Government Partnership
Independent Reporting Mechanism

to users across all levels of government (milestone 3). For milestone 4, full industrial deployment is still ongoing. The system was expanded to monitor priority programs and projects in the Unified State Project Portfolio holding 195 programs and projects,[7] assessed based on their strategic fit, financial justification, and socio-economic impact and approved by the Strategic Investment Council.[8] More than 14,000 public investment projects have been submitted to DREAM as of April 2026.[9] Over 1,400 public institutions, including every ministry, every regional administration, most territorial communities, and most state-owned enterprises, are now registered and actively using the platform. Its transition to a fully live and operational information system remains ongoing as of April 2026.

This commitment has had significant early results. Prior to DREAM, Ukraine had no unified digital system for managing reconstruction or public investment projects. There were 18 different procedures through which a project could be initiated, prioritized, and funded, and citizens had no reliable source of information on what their municipality was planning to build, how much it would cost, or who was implementing it.[10] Data on over 14,500 projects from all regions of Ukraine was made publicly available, spanning education, healthcare, reconstruction, construction, and social protection, as well as information on 195 programs and projects in the State Project Portfolio.[11] Each project profile includes detailed information such as project justification, environmental impact and gender assessments, and procurement plans. The interactive map allows users to look up projects in their neighborhood, identify funding sources including which international donors are contributing, and access individual project profiles. Civil society organizations (CSOs) can monitor each step of implementation and report violations. The RISE Ukraine coalition actively monitors reconstruction projects through the platform, and a separate recovery portal uses DREAM's open contracting data to apply risk-management algorithms.[12] Stakeholders describe DREAM as Ukraine's "flagship" commitment for the 2023-2025 action plan.[13] The DREAM Project Office conducted capacity-building activities for CSOs and media on using DREAM data, including training sessions on how to analyze project profiles and report concerns through the platform's complaint mechanisms.[14]

The significance of the change goes beyond the platform itself. In January 2025, Parliament adopted amendments to the Budget Code, and the Cabinet of Ministers of Ukraine adopted the relevant resolutions to implement those amendments, establishing a new framework for public investment management and designating DREAM as the single, mandatory information system for investment project preparation, appraisal, and implementation, replacing the fragmented landscape that preceded it.[15] The framework also introduces the first mandatory requirements for environmental impact assessment, gender sensitivity, energy efficiency, and consideration of vulnerable groups including veterans and internally displaced persons.[16] Secondary legislation by the Cabinet of Ministers regulated how projects are prepared, appraised, prioritized, approved for implementation, funded, and reported on, with all steps required to proceed through DREAM. This transformed the platform from a reconstruction monitoring tool into the government-wide system for managing all public investments. Both the state budget and over 800 municipal budgets have been built on DREAM's data, meaning investment prioritization decisions are now grounded in a common, transparent methodology rather than ad hoc processes. According to the Head of DREAM Project Office, the DREAM helpdesk handled over 850 requests per day on average during the peak budget planning period of November–December 2024, illustrating the scale of this change on the one hand and the platform's responsiveness on the other.[17] The helpdesk pairs an algorithmic chatbot for common questions with a human support team, and each municipality has its own direct channel to it. A more advanced AI integration is also planned to reduce the workload on the human team. These results went beyond the original commitment. The legal mandate is now in place, covering all public investments rather than reconstruction alone. Its integration into state and municipal budget processes has sustained DREAM beyond donor support. Implementation also addressed recommendations from the IRM 2023-2025 Action Plan Review for the government to specify a roadmap for mandating DREAM and continue capacity building particularly for local governments.[18]

Open government values are integral to the platform. As stakeholders noted, the system is designed to introduce "complete transparency and accountability, not only to Ukrainian citizens in every municipality, but also to international partners."[19] All data is published in line with the

Open Government Partnership
Independent Reporting Mechanism

OCDS, enabling machine-readable access and bulk reuse by civil society and media.[20] Public accountability is legally enforced through mandatory monthly progress reporting by implementing bodies. The RISE Ukraine coalition tracks the projects DREAM publishes and the three of its members[21] run the EU-funded Big Recovery Portal, which turns DREAM's data into a monitoring tool built for public scrutiny. On the portal, each project is organized around questions such as where the works are, what they cost, and who funds them. It also scores every project against risk factors such as unpublished tender documents, unanswered citizen requests, and the absence of public hearings, flagging the projects most closed to the public. Work on the participatory module is under way.[22] So far, participation is largely limited to the option of commenting or filing complaints. Complaints filed through the recovery portal are not reflected on DREAM's records, and implementing bodies carry no duty to respond.[23] TI Ukraine noted that converting digital transparency into accountability will require stronger legal requirements on data quality and reliability alongside political and institutional readiness across all levels of government.[24] In 2024, the DREAM Project Office announced the development of the citizen engagement function's e-democracy component[25] and its integration on DREAM, that would let the public take part in hearings, discussions, voting, and polls on the allocation of public budgets. It plans to complete the engagement concept in 2026 and develop the models in 2027–2028.

Several factors contributed to the strong results. The DREAM Project Office, managed by OCP and embedded within the Ministry for Communities, Territories, and Infrastructure Development through a formal memorandum, provided technical leadership and institutional continuity throughout implementation.[26] International support from OCP, GIZ, USAID's Digital Transformation Activity, and UK Dev provided critical funding and technical capacity. The co-design model, involving government, civil society, the private sector, and international partners at each stage of development, ensured quality and stakeholder ownership. The expansion of DREAM's mandate to all public investments, the January 2025 budget code amendments and the DREAM Academy emerged from the co-design process, driven by the growing ambition of the reform as its results became visible.

The reform carries strong prospects for sustainable results. The January 2025 Budget Code amendments and Cabinet of Ministers regulations have made DREAM a legal requirement for all public investment planning, reporting, and budget preparation in Ukraine. DREAM is also part of a long-term open government agenda in Ukraine that includes Prozorro and Prozorro Sale.[27] The longer-term gains such as more efficient and accountable public investment, lower corruption risk in reconstruction, increased public trust and better outcomes for citizens are realistic, but will require continued investment in local government capacity and a stable funding model for the DREAM Project Office.

An ongoing challenge, as the IRM Action Plan Review anticipated, is the limited capacity in local governments for integrating DREAM. Many municipalities struggle with documentation and methodological requirements, and stakeholders acknowledge that the quality of their submissions is often a problem. The methodology requires deeper analysis than many municipalities can produce. For example, some lack the capacity to calculate the demand for services or assess alternative technical solutions.[28] Transparency International Ukraine notes that the system currently holds only partial information on project implementation, readiness, and financing, and calls for stronger legal requirements on data quality and reliability.[29] The Ministry of Economy has developed a concept for Regional Centers of Excellence in Public Investment Management to address this, though it is at an early stage.

Looking Ahead

Ukraine is carrying DREAM forward in the next action plan (2026-2027)[30] and has submitted the new commitment as an Open Government Challenge.[31] The new commitment aims to expand DREAM and the Unified Geo-Information System for Monitoring and Evaluation of the Development of Regions and Territorial Communities (GIS - Commitment 2 in the sixth action plan) using AI to improve the feasibility studies, apply open contracting practices over how investment projects are procured and delivered, widen public access to investment information,

Open Government Partnership
Independent Reporting Mechanism

and introduce citizen participation in investment decisions. This integration is a significant opportunity to connect investment data with strategic planning data across government levels, and fits within Ukraine's broader public investment management reform, including the Public Investment Management Roadmap for 2024–2028. To realize that potential, three priorities stand out.

First, Ukraine could use the integration of DREAM and the GIS RD to close the gap between investment and outcomes. DREAM already mandates implementing bodies to return to projects three to five years after their delivery to measure their results. Linking this to the GIS's indicator database would allow Ukraine to connect infrastructure investment to community-level outcomes, significantly advancing accountability in reconstruction and investments. The use of AI tools could reinforce this by making project appraisals more consistent from the outset and results more measurable for the quality evaluation of outcomes.

Second, Ukraine could move citizen engagement from concept to an integrated part of DREAM. The next action plan commits to introducing mechanisms for public participation in investment and the DREAM Project Office is integrating civic participation across planning, prioritization, and impact assessment. To anchor these changes, the IRM recommends incorporating into DREAM's regulatory framework a requirement for implementing bodies to respond to public input, along the lines of Italy's OpenCoesione.[32] Without such a requirement, the participation module risks remaining advisory in practice.

Third, the quality of project submissions remains a major constraint on data quality across both systems. The 2026-2027 action plan flags 15 different pathways for preparing investment projects and integrating AI tools for improved feasibility studies.[33] To this end, the IRM recommends giving the Regional Centers of Excellence a wider scope of remit beyond training, to coaching and hands-on support for municipalities to prepare submissions. The centers could draw on DREAM Academy's standard curriculum and the guidance on the weakest points and apply it to individual municipalities and projects with progress tracked over time.

Commitment 9: Ensuring Access to Public Information in the Form of Open Data

Implementers: Ministry of Digital Transformation; central, regional, and local executive bodies (information holders)

Context and Objectives

Ukraine entered the sixth action plan as one of Europe's strongest open data performers, ranked third in the 2023 EU Open Data Maturity Report, and the most mature country among EU candidates in this domain.[34] Following Russia's full-scale invasion in February 2022, the Ukrainian government closed numerous datasets citing national security, but without applying the three-part test legally required by the Law on Access to Information. The closed datasets included key registers for anti-corruption monitoring, such as the unified state register of legal entities, the register of damaged property, and cadastral data, at a time when reconstruction spending and wartime procurement were presenting significant new corruption risks.[35]

This commitment sought to restore and strengthen Ukraine's open data ecosystem. It entailed training information holders, publishing datasets in line with updated regulations, introducing a mandatory information audit methodology, aligning agency-level regulations with open data legislation, and publishing new datasets in the areas of circular economy, military damage, and post-war reconstruction.[36] It also reflected Ukraine's EU candidacy obligations, particularly harmonization with EU Directive 2019/1024 on open data and the re-use of public sector information.

Early Results: Moderate

The IRM assesses this commitment as having moderate early results because it strengthened Ukraine's open data legal architecture through the introduction of a binding high-value dataset framework aligned with EU standards. The more ambitious milestones on information audits,

Open Government Partnership
Independent Reporting Mechanism

agency regulatory alignment, and the publication of security-sensitive datasets remained incomplete.

The commitment had substantial completion. Under milestones 1 and 2, the Ministry of Digital Transformation organized open data qualification trainings for local self-government officials across six regions[37] and for personnel of agencies including the State Land Cadastre Service, Accounting Chamber, and the Office of the Prosecutor General, drawing over 6,000 participants, while two online courses, "Basics of Working with Open Data" and "Open Data for Civil Servants" recorded more than 14,000 completions.[38] The Cabinet of Ministers introduced Ukraine's first binding list of high-value datasets with Resolution No. 1151 aligning the country with EU Directive 2019/1024.[39] By November 2025, 62 of 83 defined datasets were live on the open data portal data.gov.ua and the number of central-level publishers grew from 76 to 97.[40] A representative of the Ministry of Digital Transformation highlighted the restoration of access to the Registry of Legal Entities was a key result of this commitment, noting that civil society had been pushing for four years to reopen it. Authorities ultimately restored it with some fields such as addresses and contact details withheld on security grounds.[41]

Under milestone 3, the Ministry of Digital Transformation's audit methodology remained in development during the action plan period.[42] Despite this gap, several central and local information holders conducted internal audits, publishing results for 103 datasets,[43] designating open data focal points, and approving internal plans (milestone 4). However, without an approved methodology, many information holders had not completed their audit and designation obligations by the action plan's end.[44] For milestones 5 (circular and low-carbon economy datasets) and 6 (war-related damage and reconstruction data), the Ministry of Digital Transformation fell short of their targets. On milestone 5, the Eurasia Foundation's "Transparency and Accountability in Public Administration and Services" (TAPAS) project had previously identified 15 priority datasets and drafted their data structures, while resolution N1151 added circular economy datasets to the State Statistics Service's mandatory publication list. The State Statistics Service published three waste datasets aligned with EU Regulation No. 2150/2002, and the Ministry of Economy began analyzing greenhouse gas inventory data for eventual publication.[45] On milestone 6, the Ministry of Digital Transformation held an "Open Data Day: reOpening" workshop in March 2025 where participants assessed publication risks by dataset, developed a mechanism for restoring data access, and mapped the legal, technical, and organizational conditions required. Resolution N1151 formally included the State Registry of Damaged and Destroyed Property in the mandatory open data list, and the Ministries of Culture and Health each held public consultations to identify priority datasets. The Ministry of Social Policy published one dataset on internally displaced persons by settlement, age, and gender. However, no datasets on military damage were fully published.

Civil society stakeholders cautioned that wider uptake of data requires information holders comply with their disclosure obligations and to continuously publish and update data. Monitoring of Resolution No. 835, done with the support from OGP through the EU-funded Integrity Programme for the Eastern Partnership, Ukraine's Better Regulation Delivery Office (BRDO) found that as of November 2025, only 19 data holders (22 percent) publish all required datasets and seven data holders (8 percent) update all required datasets on time.[46] Data on reconstruction remains unavailable despite the legal requirement for its disclosure. Government stakeholders continue to argue that publishing certain data, such as the State Registry of Damaged and Destroyed Property, carries national security risks during the ongoing full-scale invasion by the Russian Federation.[47]

Civil society stakeholders also expressed concerns about the capacities of the central and local data-holders to comply with the open data obligations. According to interviewed stakeholders, trainings addressed this capacity gap only partially, given the large number of information holders across Ukraine. The Ministry of Digital Transformation delivered most sessions on request from individual data holders rather than systematically, and the Open Data Academy ran only while USAID's Digital Transformation Activity funded it, ending after this support stopped. Wartime turnover among responsible officials leaves newly appointed staff in continual need of basic training. Beyond trainings, stakeholders pointed to the need for dedicated staffing and sustained

Open Government Partnership
Independent Reporting Mechanism

funding, as the Ministry of Justice assigns two to three officials to open data, funding remains minimal, and CSOs working on open data receive almost none.[48]

Implementation was aided by USAID's Digital Transformation Activity (which followed the TAPAS project) which funded the Open Data Academy, and by the OSCE, the E-Governance for Accountability and Participation (EGAP), and the EU for Digital program which supported open data trainings and information audits. The legal anchoring of Resolution N1151 to EU accession obligations provides a foundation for sustaining implementation beyond the action plan period. However, stakeholders outlined that the government's compliance to obligations requires sustained civil society monitoring, that goes beyond tracking published datasets, to assessing how data holders meet their obligations and shaping which datasets open and on what criteria. Yet the funding for open data work flows to projects that serve the ministries, which limits the monitoring independence of the CSOs delivering them. The organizations with the expertise to assess compliance are largely the ones contracted to help the ministries in implementation, while separate funding for watchdog work is almost absent. BRDO's monitoring tool is an exception, and wartime strains have narrowed such resources further.[49]

Looking Ahead

The government of Ukraine indicates that implementation of Commitment 9 will continue until its completion. Moving forward, the IRM reiterates the following recommendations from the 2023-2025 Action Plan Review:

- The Ministry of Digital Transformation, civil society, and international partners could continue awareness raising and capacity building at local and regional levels through trainings, exchange events, and sharing success stories.
- The Ministry of Digital Transformation could provide on-job technical support to data holders and persons responsible of managing open data at public bodies, such as data of international aid spending, register of seized assets, inflow and spending of foreign funds resulted from sanctioned and seized Russian assets, and other data based on consultation with civil society.

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[1] "Government and World Bank present RDNA3: Ukraine's reconstruction needs already amount to nearly USD 486 billion," Cabinet of Ministers of Ukraine, February 15, 2024, https://www.kmu.gov.ua/en/news/uriad-i-svitovyi-bank-predstavyly-rdna3-potreby-na-vidbudovu-ukrainy-skladaiut-vzhe-maizhe-486-miliardiv-dolariv; "Updated Ukraine Recovery and Reconstruction Needs Assessment Released," World Bank, February 15, 2024, https://www.worldbank.org/en/news/press-release/2024/02/15/updated-ukraine-recovery-and-reconstruction-needs-assessment-released.

[2] "Ukrainians want a fight against evil - The evil at hand today is corruption," Transparency International Ukraine, December 7, 2023, https://ti-ukraine.org/en/blogs/ukrainians-want-a-fight-against-evil-the-evil-at-hand-today-is-corruption.

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Independent Reporting Mechanism

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Independent Reporting Mechanism

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Section III. Participation and Co-Creation

Despite the pressures of Russia's full-scale invasion, Ukraine sustained active participation throughout the 2023–2025 action plan cycle. The Coordination Council (Ukraine's multi-stakeholder forum) was more active than at any point in the country's recent OGP history. Civil society engagement was particularly meaningful during implementation, providing an accountability role that had been absent in previous cycles. The departure of the government co-chair of the Coordination Council in August 2025, resulted in the suspension of formal Council operations in the final five months of the action plan (until December 2025).

OGP in Ukraine

The Secretariat of the Cabinet of Ministers of Ukraine is the government focal point for OGP. A dedicated unit within the Department of Information and Public Relations is responsible for coordinating OGP across implementing agencies, organizing the Coordination Council, and maintaining public communication.[1] No standalone OGP office or budget line exists. Instead, the Secretariat performs this function alongside its other coordination responsibilities. Much of the operational capacity for the implementation of individual commitments during the sixth action plan cycle was provided by international donor partners and civil society organizations (CSOs).[2]

Ukraine's multi-stakeholder forum, the Coordination Council, has seven representatives from government and seven from civil society, co-chaired by a State Secretary from the Cabinet of Ministers and an elected civil society representative.[3] The current Council was constituted in May 2021. During the co-creation of the sixth action plan, the Council brought together civil society members with expertise spanning anti-corruption, youth participation, human rights, infrastructure transparency, and community associations, a broader thematic range than earlier compositions. Non-governmental members were selected through an open and transparent process, and the Council's regulations and work provisions are available on the government's OGP webpage.[4]

Following the departure of the State Secretary of the Cabinet of Ministers in August 2025, no successor was confirmed in the reporting period.[5] The civil society co-chair noted that this gap left the Council without the government-side "pushing force" necessary to convene sessions and to advance the seventh action plan (2026-2027) for approval in the Cabinet of Ministers. Although the Coordination Council's March 2025 schedule foresaw submission of the draft of the seventh plan for Government approval in November–December 2025,[6] the plan was ultimately adopted on 17 June 2026, six months into its own implementation period.[7] According to the government, the delay in developing the seventh action plan was caused by the fact that Russia's full-scale invasion of Ukraine continued and the approval procedures took longer.[8] The absence of the State Secretary of the Cabinet of Ministers reflected a broader pattern of frequent senior-level turnover within the Cabinet Secretariat.[9] However, one civil society representative noted that, although the appointment of the government co-chair was delayed, the Coordination Committee continued to work under the leadership of the civil society co-chair and the executive secretary of the Coordination Council, who represented the Secretariat of the Cabinet of Ministers of Ukraine.[10]

The Cabinet of Ministers' OGP webpage provided documentation on the Coordination Council, past and current action plans, quarterly implementation reports (with links to relevant legal acts and government sources), and news of OGP events.[11] The OGP Ukraine Facebook page served as another channel for public engagement.[12] In 2025, a dedicated Instagram page for the initiative was also established, at the initiative of young people.[13] Several stakeholders noted that awareness of OGP among regional organizations and non-specialist civil society actors remained limited, a gap identified in the IRM Action Plan Review.[14]

The broader legal environment for civic participation in Ukraine progressed during the sixth action plan cycle. In 2024, the Parliament adopted the Law "On Public Consultations," establishing future unified standards for public consultations across all levels of government that

Open Government Partnership
Independent Reporting Mechanism

will enter into force 12 months after the termination or cancellation of martial law. Moreover, in January 2025 the Law "On Amendments to Certain Laws of Ukraine on People's Power at the Local Self-Government Level" entered into force, expanding the forms of local democracy and strengthening transparency requirements at the community level.[15] These laws create an additional legal foundation for civic participation, but do not provide the OGP process with a dedicated institutional home. However, civil society have consistently noted that OGP remains under-institutionalized within the Ukrainian government.[16] OGP's continuity depends on the interest and capacity of the officials assigned to coordinate it.[17] While civil society members have used OGP as a strategic umbrella for advancing their reform priorities, they noted that government motivation to maintain the process was less certain.

Ukraine's participation in the OGP Local program expanded during the sixth action plan. In 2024, three communities — Kyiv, Zvyahel city, and Orzhytsia settlement — joined the program, adding to Vinnytsia, Ternopil, and Khmelnytskyi, which have participated since 2020. By 2025, the three new members had adopted their own action plans, and the Khmelnytskyi City Council adopted its second action plan.[18] Ukraine also received international recognition within OGP during the cycle: at the OGP Global Summit in 2025, Ukraine was named the winner of the Regional Awards (National) category for the creation of the State Anti-Corruption Programme monitoring system,[19] which was also submitted as an Open Gov Challenge.[20] In addition, the Parliament (Verkhovna Rada) submitted a Letter of Intent to join OGP's Open Parliament initiative in May 2025.[21] An Expert Council was established in August 2025 with 16 civil society representatives, followed by a public consultation for an Open Parliament action plan.

Action Plan Co-Creation

Ukraine's sixth action plan was developed during Russia's full-scale military invasion, shaping both the priorities in the plan and the way consultations were conducted. The Cabinet of Ministers published a co-creation timeline on 23 December 2022[22] and opened a public call for commitment proposals in January 2023 through a Google Form.[23] Thematic discussions followed in February 2023, with participation of youth organizations, civil society, the business community, and other stakeholder groups. Several were held online and were recorded, a format that proved inclusive as many Ukrainian civil society representatives had relocated abroad or were based outside of Kyiv due to the security situation.[24]

The Coordination Council held three online meetings during the development process, in August 2022, December 2022, and May 2023.[25] Following the Council's approval of the draft action plan, a 15-day public consultation was conducted in August 2023. The Cabinet of Ministers published a consolidated table of proposals from the entire co-creation process, together with explanations of which proposals were incorporated and which were not, providing a degree of transparency on how their inputs shaped the final document.[26] Government officials also responded directly to proposals during the thematic discussions.[27] The final plan was presented at a hybrid event in December 2023.

At a Coordination Council meeting on 3 October 2024, members agreed on the need to clarify certain activities. A draft order amending the plan underwent an online public consultation and was adopted as Cabinet of Ministers Order No. 132 of 18 February 2025.[28] This process demonstrated the Council's capacity to not only monitor progress but also support adjustments to the plan itself.

The Coordination Council's role in co-creation was a marked shift compared to the previous, fifth cycle (2020-2022). During the fifth action plan's co-creation, the Council effectively ceased to function because several members moved on from their jobs in government and civil society.[29] In the sixth cycle, by contrast, the Council actively engaged in agenda-setting and decision-making throughout the development process. The diversity of civil society expertise on the reformed Council contributed to a more balanced dialogue between governmental and non-governmental stakeholders.[30] The online co-creation format, a response to wartime necessity, also expanded the reach of consultations by enabling participation from stakeholders in Ukrainian regions and from those who had left the country.

Open Government Partnership
Independent Reporting Mechanism

The commitments in the plan reflect government-initiated priorities, particularly those tied to Ukraine's EU candidacy and reconstruction agenda, and proposals from civil society, including several that had been advocated through previous OGP cycles.[31] Government and civil society stakeholders acknowledged there were meaningful opportunities to contribute to the plan, though some noted that certain proposals were not incorporated into the plan.[32] However, awareness of OGP among regional and non-specialist organizations remained limited, limiting the reach of the co-creation process beyond those already engaged in the Coordination Council.[33]

Participation During Implementation

The Coordination Council was the primary forum for civil society engagement during implementation. It operated through a quarterly monitoring cycle in which the Secretariat of the Cabinet of Ministers compiled implementation data from responsible government bodies and circulated draft reports to Council members for review and commenting before publication.[34] This process gave non-governmental members a role in shaping the public record of implementation progress. The civil society co-chair described a pattern in which Council members would challenge progress assessments they considered overstated: when civil society judged a commitment to be partially complete, the published report reflected a "yellow" status rather than the government's preferred "green." This negotiated approach to progress assessment was understood by both sides as standard practice, with government implementers expected to continue work on commitments until civil society concurred that they were complete.

According to the government's final implementation report, the Coordination Council held four formal plenary sessions during the 2023–2025 reporting period, where implementation results were reviewed with government officials and partner organizations.[35] These sessions created opportunities for dialogue on implementation challenges beyond what written reports could capture. In addition to formal plenaries, the Secretariat organized commitment-specific coordination meetings during implementation: on 27 February 2024 on open data (Commitment 9); on 19 November 2024 on civic engagement in regional recovery (Commitment 3); and on 27 November 2024 on establishing the EITI National Secretariat and securing funding for the EITI platform (Commitment 8).[36] These meetings brought together government representatives, civil society, and international partners to review implementation problems and discuss solutions.

The last formal plenary session took place in March 2025, at which the Council approved the schedule for co-creating the seventh action plan and took note of amendments to the 2023–2025 action plan.[37] Following the departure of the government co-chair in August 2025, no further formal plenary was convened before the end of the action plan (December 2025). Civil society members continued to meet informally and engaged with the Secretariat through working sessions including preparatory meetings for Open Government Week, but the formal structure for joint oversight of the results was not reconstituted within the action plan period.[38]

Open Gov Week was an additional opportunity for dialogue and the exchange of practices during the implementation period. In 2024, 111 events were held during Open Gov Week, covering governance openness, access to information, civil society development, public engagement, and human rights. In 2025, approximately 150 events were proposed, of which 58 were announced on the Government Portal and 51 on the global Open Gov Week website.[39]

CSOs and international partners were engaged directly in the implementation of individual commitments. For example:

- The RISE Ukraine coalition, comprising local and international organizations, used data from the DREAM platform (Commitment 1) to monitor public investment projects, flag irregularities, and build analytical capacity among civil society.[40]
- On open data (Commitment 9), CSOs engaged in advocacy throughout the implementation period to reopen datasets closed under martial law restrictions. Civil society conducted its own research on which datasets could be made publicly available without compromising national security, presenting findings to the Coordination Council and to relevant ministries.[41] The Ministry of Digital Transformation and the Ministry of

Open Government Partnership
Independent Reporting Mechanism

Justice began reopening some datasets during implementation, including the business register.[42]

- The EITI multi-stakeholder group (Commitment 8) had its own meeting cycle, convening to oversee implementation of the extractive industries transparency platform and the related legislative and institutional milestones. This body continued to function during the implementation period, with the multi-stakeholder group meeting regularly, including sessions as recently as the time of this assessment.[43]

Compared to Ukraine's previous action plan cycles, the quality of participation during implementation of the sixth plan was a significant improvement. Nevertheless, the government co-chair vacancy in the plan's final five months highlighted the extent to which the Council depends on the personal commitment of senior officials and its vulnerability to institutional personnel changes. This fragility continues to be compounded by Ukraine's political and wartime context.

Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.[44] Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.[45] The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.[46]

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue. Ukraine's Coordination Council, the multi-stakeholder forum, held four formal plenary sessions during the 2023–2025 reporting period.[47] The last formal plenary took place in March 2025. Following the departure of the government co-chair in August 2025, no further formal session was convened for the remainder of the action plan period (between March and December 2025). However, government and civil society members of the Council continued to meet informally to discuss the action plan's progress, including preparatory working sessions for Open Gov Week in 2025.[48] The Council's regulations and work provisions are available on the government's OGP webpage.[49]	Yes	Yes
2.1 OGP website: The Cabinet of Ministers maintained a publicly accessible OGP webpage throughout the implementation period, containing the sixth action plan, quarterly implementation reports, Coordination Council documentation, and news on OGP events.[50]	Yes	Yes
2.2 Repository: The government's OGP webpage provided an online repository of OGP documentation throughout the implementation period.[51] Quarterly implementation reports were published covering Q1–Q4 2023, Q1–Q3 2024, and Q1–Q3 2025, updating the repository more than twice per year.[52] The repository contains documentation on both the co-creation process and implementation progress, including links to relevant legal acts and government sources.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review[53]	Yes	Not applicable
3.2 Outreach: See the Action Plan Review[54]	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review[55]	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review [56]	Yes	Not applicable
5.1 Open implementation: The Coordination Council held four formal plenary sessions during the 2023–2025 reporting period where implementation results were presented and civil society could raise questions about progress assessments before publication.[57] Informal	Not applicable	Yes

Open Government Partnership
Independent Reporting Mechanism

working sessions between civil society and the Secretariat continued in 2025 following the cessation of formal plenaries. The Secretariat of the Cabinet of Ministers continued to engage civil society in informal working sessions, including preparation for Open Gov Week in 2025 and circulating implementation reports for civil society review.[58]		

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Open Government Partnership
Independent Reporting Mechanism

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[28] "Report on Implementation of the Open Government Partnership Action Plan for 2023–2025 (Government Draft, 2025)," Government of Ukraine, Section II. The Coordination Council meeting of 3 October 2024 is documented at: https://www.kmu.gov.ua/news/vidbulosia-rozshyrene-zasidannia-koordynatsiinoi-rady-z-pytan-realizatsii-initsiatyvy-partnerstvo-vidkrytyi-uriad; "Order No. 132 of 18 February 2025," Cabinet of Ministers, https://www.kmu.gov.ua/npas/pro-vnesennia-zmin-do-planu-dii-iz-vprovadzhennia-initsiatyvy-partnerstvo-vidkrytyi-uriad-u-20232025-rokakh-132r-180225.
[29] "Ukraine Action Plan Review 2021–2022," Open Government Partnership, November 2021, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2021-2022.
[30] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, March 2024.
[31] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," pp. 2–3.
[32] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, March 2024; Nadia Babynska-Virna (Open Up Ukraine), interview by the IRM, March 2024. Note: one open data practitioner reported that she had proposed a commitment on AI readiness of Ukrainian public datasets for the upcoming 2026–2027 action plan reflecting a gap she perceived in the current cycle's scope, which was not taken up.
[33] Nadia Babynska-Virna (Open Up Ukraine), interview by the IRM, March 2024; Andrii Gnap (Waste Ukraine Analytics), interview by the IRM, March 2024; Oksana Kosenko (United Nations Development Programme), interview by the IRM, April 2024; "IRM Action Plan Review: Ukraine Action Plan 2023–2025."
[34] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, March 2024.
[35] "Report on Implementation of the Open Government Partnership Action Plan for 2023–2025 (Government Draft, 2025)," Government of Ukraine.
[36] "Report on Implementation of the Open Government Partnership Action Plan for 2023–2025 (Government Draft, 2025)," Government of Ukraine; Ініціатива "Партнерство "Відкритий Уряд" в Україні - OGP Ukraine, Facebook, accessed September 29, 2026, https://www.facebook.com/ogpUkraine/posts/pfbid0LeMa9XVqtzK6MpWCiyzGvXfztye9H1TDCk2LLnh1cVyNMteooUUpBEXBHk4qjyJWl; Coordination meetings were held to discuss problematic issues of the implementation of certain measures of the action plan for the implementation of the Open Government Partnership Initiative in 2023 - 2025, Government of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/news/provedeni-koordynatsiini-zustrichi-z-obhovorennia-problemnykh-pytan-vykonannia-okremykh-zakhodiv-planu-dii-iz-vprovadzhennia-initsiatyvy-partnerstvo-vidkrytyi-uriad-u-2023-2025-rokakh.
[37] "Coordination Council Minutes," Government of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/partnerstvo-vidkritij-uryad/pro-iniciativu/protokoly-zasidan; "OGP Action Plan 2023–2025 Implementation Report, Q3 2024," Government of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/partnerstvo-vidkritij-uryad/plani-zviti.
[38] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, March 2024.
[39] "Report on Implementation of the Open Government Partnership Action Plan for 2023–2025 (Government Draft, 2025)," Government of Ukraine; "What was the Open Government Week 2024 in Ukraine like," Government of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/news/yakym-buv-tyzhden-vidkrytoho-uriadu-2024-v-ukraini; "Ukraine Joined the Open Government Week 2025," Government of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/news/ukraina-doluchylasia-do-provedennia-tyzhnia-vidkrytoho-uriadu-2025.
[40] RISE Ukraine Coalition, accessed September 29, 2026, https://www.rise.org.ua; Viktor Nestulia (Head of DREAM Project Office, Open Contracting Partnership), interview by the IRM, April 2026.
[41] "Open statement of the RISE Ukraine Coalition on ensuring the availability of open data," RISE Ukraine, January 10, 2023, https://www.rise.org.ua/statements-and-appeals-en/open-statement-of-the-rise-ukraine-coalition-on-ensuring-the-availability-of-open-data; "We urge you to restore open data," RISE Ukraine, August 17, 2023, https://www.rise.org.ua/statements-and-appeals-uas/zaklikaiemo-reanimuvati-vidkriti-dani; Nadia Babynska-Virna (Open Up Ukraine), interview by the IRM, March 2024.

Open Government Partnership
Independent Reporting Mechanism

[42] Nadia Babynska-Virna (Open Up Ukraine), interview by the IRM, March 2024; "OGP Action Plan 2023–2025 Self-Monitoring Report, Q3 2025," Government of Ukraine.
[43] Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, 2026; "OGP Action Plan 2023–2025 Self-Monitoring Report, Q3 2025," Government of Ukraine.
[44] "OGP Participation and Co-Creation Standards," Open Government Partnership, 2021, https://www.opengovpartnership.org/ogp-participation-co-creation-standards/.
[45] "IRM Guidelines for the Assessment of Minimum Requirements," Open Government Partnership, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.
[46] On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024, https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf; For information on the OGP Procedural Review Policy, https://www.opengovpartnership.org/procedural-review/#IC
[47] "OGP Action Plan 2023–2025 Implementation Reports, Q1–Q4 2023 and Q1–Q3 2024," Government of Ukraine, https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/partnerstvo-vidkritij-uryad/plani-zviti; Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Oleksiy Orlovsky (International Renaissance Foundation), interview by the IRM, March 2024.
[48] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Nataliia Oksha (Secretariat of the Cabinet of Ministers of Ukraine), interview by the IRM, March 2026.
[49] "OGP Webpage," Cabinet of Ministers of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/partnerstvo-vidkritij-uryad.
[50] "OGP Webpage," Cabinet of Ministers of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/partnerstvo-vidkritij-uryad; "OGP Action Plan 2023–2025 Self-Monitoring Report, Q3 2025," Government of Ukraine.
[51] "OGP Webpage," Cabinet of Ministers of Ukraine, accessed September 29, 2026, https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/partnerstvo-vidkritij-uryad.
[52] "OGP Action Plan 2023–2025 Implementation Reports, Q1–Q4 2023 and Q1–Q3 2024," Government of Ukraine; "OGP Action Plan 2023–2025 Self-Monitoring Report, Q3 2025," Government of Ukraine.
[53] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025.
[54] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025.
[55] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025.
[56] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025.
[57] "OGP Action Plan 2023–2025 Implementation Reports, Q1–Q4 2023 and Q1–Q3 2024," Government of Ukraine; Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024.
[58] Olesya Arkhypska (Transparency International Ukraine & Co-Chair of Coordination Council), interview by the IRM, March 2024; Nataliia Oksha (Secretariat of the Cabinet of Ministers of Ukraine), interview by the IRM, March 2026.

Open Government Partnership
Independent Reporting Mechanism

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.[1]

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.[2] The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies, or institutions governing a policy area or within the public sector,
  - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies, or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

Open Government Partnership
Independent Reporting Mechanism

- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
    - improving practices, policies, or institutions governing a policy area or within the public sector, or
    - enhancing the enabling environment to build trust between citizens and the state.

  Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Nodar Kherkheulidze and was reviewed by Jeff Lovitt, IRM external expert. The IRM methodology, quality of IRM products, and review process is overseen by the IRM's International Experts Panel (IEP).[3] This report was prepared in accordance with the IRM Procedures Manual[4] and guidance on artificial intelligence. For more information, refer to IRM webpage[5] or the glossary of IRM and OGP terms.[6]

[1] For definitions of OGP terms, such as co-creation and promising commitments, see "OGP Glossary," https://www.opengovpartnership.org/glossary/.
[2] The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.
[3] "International Experts Panel," Open Government Partnership, Independent Reporting Mechanism, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/.
[4] IRM Procedures Manual, Independent Reporting Mechanism, https://www.opengovpartnership.org/wp-content/uploads/2025/06/IRM-Procedures-Manual-2025-EN.pdf.
[5] "IRM Overview," Open Government Partnership, https://www.opengovpartnership.org/irm-guidance-overview/.
[6] "OGP Glossary," Open Government Partnership, https://www.opengovpartnership.org/glossary/.

Annex I. Commitment Data[1]

Commitment 1: Digital tool for infrastructure and real estate reconstruction	
∉ **Verifiable:** Yes ∉ **Does it have an open government lens?** Yes ∉ **Potential for results:** Substantial	∉ **Completion:** Complete ∉ **Early results:** Significant Results
This commitment is assessed in Section II above.	
Commitment 2: Monitoring the development of regions and territorial communities	
∉ **Verifiable:** Yes ∉ **Does it have an open government lens?** Yes ∉ **Potential for results:** Substantial	∉ **Completion:** Substantial ∉ **Early results:** Moderate

This commitment aimed to establish a unified monitoring and evaluation framework for regional and community development, including a unified geo-information system (GIS) to consolidate strategic planning data across national, regional, and local levels.

Milestone 1 was fully completed, while milestones 2 and 3 reached substantial implementation. Cabinet of Ministers Resolution No. 305 of 15 March 2024 approved the Procedure for Monitoring State Regional Policy and the Procedure for Evaluating its Implementation.[2] The EU Anti-Corruption Initiative in Ukraine (EUACI) supported the development of the GIS, and it was handed over to the Ministry for Communities, Territories and Infrastructure Development in April 2025. The ministry's Order No. 1218 of 5 August 2025 launched the GIS as a pilot. The ministry delivered a training program with support from the Swiss-Ukrainian "Ukraine's Cohesion and Regional development" (UCORD) program on 20 June, 3 July, 10 October, and 17 November 2025 for representatives of regional state administrations, territorial communities, and regional development agencies. UCORD experts were also trained to provide methodological support to regions and communities on data entry and system use.[3]

The GIS, which is publicly accessible at gisrr.gov.ua, consists of two parts: a strategic documents module bringing together state, regional, and community development strategies, and an indicator database covering socioeconomic, financial, and administrative data at local and regional levels. All regional and Kyiv City state (military) administrations provide data and strategic documents to the system, with 25 regional development strategies entered as of 31 December 2025 (the end of the implementation period).[4]

The IRM assesses this commitment as having moderate early results. For the first time, this information has been consolidated in a single, structured, digital, and publicly accessible platform, replacing the fragmented, paper-based reporting.[5] It provides CSOs and media access to regional and community data such as the distribution of family doctors across Hromadas (communities), the spending record of local business support programs, or patterns in hospital funding across communities, that was not previously available in a usable, comparable form. However, stakeholders noted that government and civil society have limited capacity to populate the system with quality data. Central and regional government agencies rarely use the geospatial data to inform policy decisions, and CSOs rarely use it to track implementation of strategic plans in communities and regions. Using the geospatial data involves three skills: reading and interpreting a map, preparing data for it, and using it to inform policy decisions. Few actors in government or civil society currently possess these skills and building this literacy is a next step.[6] The system's full analytical value will become clearer

Open Government Partnership
Independent Reporting Mechanism

during the 2028 planning cycle, when all levels of government must prepare new strategies and enter them into the GIS, producing for the first time a complete, cross-level picture of strategic alignment.

Sustainability remains a concern. After the EUACI transferred the GIS to the Ministry of Communities, Territories and Infrastructure Development in April 2025, technical support is provided by the International Organization for Migration (IOM) and the UCORD program. The government has carried GIS implementation into the next action plan (2026-2027) as part of a commitment on the further development of the DREAM system (see Section II of this report).

Commitment 3: Public participation in the restoration of regions

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- **Potential for results:** Modest
- **Completion:** Substantial
- **Early results:** No Notable Results

This commitment aimed to develop public participation mechanisms for the recovery and development of regions and territorial communities damaged by Russia's full-scale invasion.

Implementation of the three milestones was substantial. The Methodology for Developing a Comprehensive Recovery Programme for a Territorial Community, including a public engagement component, was developed by the USAID Decentralization Offering Better Results and Efficiency (DOBRE) Program in cooperation with the Ministry for Communities, Territories, and Infrastructure Development and made public on the "Decentralization" portal.[7] More than 20 online training events were held, and coordination and methodological support was provided to public representatives, state authorities, and local self-government bodies. Over 180 communities developed comprehensive recovery programs, 35 of which had been approved.[8] However, the core deliverable remained incomplete, namely formal recommendations on public engagement in planning, implementing, and monitoring community recovery and development plans. A draft of the Methodological Recommendations was prepared in cooperation with civil society representatives but was not approved by the close of the action plan period (31 December 2025).[9] Therefore, the commitment produced no notable early results in institutionalizing public participation in regional recovery processes.

Commitment 4: Transparency of scientific research information

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- **Potential for results:** Modest
- **Completion:** Substantial
- **Early results:** Moderate

This commitment aimed to improve the transparency and access to scientific research data, building on open science activities from the fifth action plan (2020-2022).

Most milestones advanced during the implementation period. The Ministry of Education and Science (MES) provided access to all Research and Development (R&D) registration and accounting cards and dissertation accounting cards through dedicated portals. It also registered the National Repository of Academic Texts (NRAT) as a data source for OpenAIRE, FAIRsharing, and OpenDOAR and connected it to 63 repositories, including 55 higher education institutions, two scientific institutions, and six scientific publication repositories.[10] An open peer review service was introduced on the NRAT portal, allowing authorized system users to compose, preview, and publish non-anonymous reviews linked to academic texts in open access; an online course on open responsible peer review was also launched in June 2024.[11] Methodological Guidelines on Scientific Data Management for higher education institutions and scientific establishments were published on the MES website, and MES Order

Open Government Partnership
Independent Reporting Mechanism

No. 1304 of 11 September 2024 amended the procedure for state registration and accounting of R&D works and dissertations to enable uploading of scientific data to NRAT.[12] As of the end of 2025, a total of 767,000 NRAT pages were submitted for indexing, and OpenAIRE conducted monthly NRAT data imports.[13] State Statistics Service Order No. 28 of 22 February 2024, Order No. 54 of 8 March 2024, and MES Order No. 493 of 10 April 2024 formalized new reporting forms and methodological provisions for scientific statistics.[14] MES Order No. 1304 of 11 September 2024 introduced mandatory submission of research implementation information to the Automated Information Fund and an Action Plan for the Popularization of Open Science for 2025–2026 was developed. However, full functionality and data submission procedures remained under development at the close of the action plan period.[15]

On 31 December 2025, MES Order No. 1732 approved the Roadmap for Ukraine's Integration into the European Research Area until 2027, aligned with the European Research Area Policy Agenda 2025–2027. One of its structural policy areas is "Enabling open science via sharing and re-use of data, including through the European Open Science Cloud (EOSC)."[16] In addition, after the end of the action plan, on 25 February 2026, Ukraine adopted Law of Ukraine No. 4794-IX of "On Amendments to the Law of Ukraine 'On Scientific and Scientific and Technical Activities' regarding Research Infrastructure and Support for Young Scientists".[17] Among other provisions, the Law introduced into the Ukrainian legal framework the concepts of "open science," "open access," "FAIR data," and "FAIR principles," and established requirements for ensuring open access to research results, research data, and scientific publications produced with state and/or local budget funding. Thus, this policy area received further regulatory and institutional reinforcement within and after the reporting period, supporting the sustainability and further institutionalization of the results achieved during the 2023–2025 action plan.

Work on the relevant legislative amendments was carried out during the action plan implementation period: Draft Law No. 10218 was registered in November 2023 and, in 2025, proceeded through preparation for the second and repeated second readings. Its subsequent adoption in 2026 is a continuation and further institutionalization of processes initiated during the reporting period.

The commitment produced moderate early results in the transparency of and access to scientific research. The changes delivered during the sixth action plan were primarily technical, expanding discoverability, metadata quality, and interoperability rather than changing open science practices across higher education.

The 2026–2027 action plan carries this agenda forward through two commitments. Commitment 7 will scale the country's research-data management into a full National Research Data Repository.[18] It will require researchers funded from the state budget to deposit datasets in open, machine-readable formats, assign each dataset a digital identifier (DOI), and align metadata with international standards contributing to raise the visibility of Ukrainian research on international platforms. Commitment 6 will introduce public dashboards and an interactive map in Ukraine's National Electronic Scientific Information System (URIS) that lets users track and compare HEI and research-institution indicators by field of science, region, funding, and publication activity, with the relevant datasets also published as open data.

Commitment 5: Harmonization of the European integration legislation

- ∉ **Verifiable:** Yes
- ∉ **Does it have an open government lens?** Yes
- ∉ **Potential for results:** Modest
- ∉ **Completion:** Substantial
- ∉ **Early results:** No Notable Results

This commitment aimed to adopt a national program for adapting Ukrainian legislation to EU law and a related action plan, partially through public participation.

Implementation took place in the context of Ukraine's EU accession screening process, which

Open Government Partnership
Independent Reporting Mechanism

shaped how the deliverables were implemented and sequenced. Draft Law No. 13653 (17 August 2025) on amendments to establish the Cabinet of Ministers' obligation to approve the National Programme was registered in the Parliament, and an alternative Draft Law No. 13653-1 was registered on 1 September 2025.[19] The Cabinet of Ministers Resolution approving the related action plan remained at limited progress by the end of action plan period. The processing of proposals for Negotiation Cluster 1 "Fundamentals of EU Accession" was ongoing, and following a Vice Prime Minister instruction of 25 September 2025, the collection of proposals for Clusters 2, 3, and 6 commenced. However, the adoption of the Resolution was contingent on Parliament's adoption of the National Programme Law.[20] Cabinet of Ministers Resolution No. 438 of 1 April 2026 approved the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis). The draft was reviewed in working groups on Ukraine's EU accession negotiations, with the involvement of civil society, scientific establishments, and business associations. The structure of the National Programme provides the definition of tasks by direction, deadlines, and responsible bodies, effectively incorporating the implementation action plan.[21]

Resolution No. 438 established for the first time a consolidated programmatic framework for adapting Ukrainian legislation to EU law, with structured tasks, timelines, and responsibilities. However, because the Resolution was approved in April 2026, it is too early to assess the extent to which it improved public participation in Ukraine's EU accession process as of this writing.[22]

Commitment 6: Development of the E-Youth digital platform

- ∉ **Verifiable:** Yes
- ∉ **Does it have an open government lens?** Yes
- ∉ **Potential for results:** Modest
- ∉ **Completion:** Substantial
- ∉ **Early results:** No Notable Results

This commitment aimed to develop a unified digital platform consolidating youth-related projects and activities across state and non-governmental sources.

A stakeholder and market analysis was conducted with IREX "Dream and Act" programme support, platform development stages were defined, CMU Resolution No. 1227 of 1 October 2025 established the operating procedures for the "Youth Opportunities" web portal, and the Ministry of Youth and Sports approved the technical requirements on 2 July 2025.[23] The platform was made available at https://easy.gov.ua. The East Europe Foundation finalized the back-end, including a chatbot to help youth search for opportunities.[24] The platform was presented at the Ukrainian Youth Forum on 12 August 2025, but no broad public information campaign was conducted, and modernization work remained ongoing at the close of the action plan period.[25] Therefore, the commitment is assessed as being substantially completed.

The commitment produced no notable early results. While the platform aggregates youth opportunities from different organizations, it falls short of its goal of being a comprehensive destination. Youth organizations continue publishing opportunities on their own or other platforms. In addition, civil society stakeholders noted that the original concept was a cross-sectoral data system on youth demographics, labor market status, and risk categories, designed to inform both state and donor policy decisions. The existing platform lacks the data that would allow the state or international organizations to see the full picture of young people's situations across education, employment, displacement, and risk.[26] Without it, the platform's ability to drive meaningful policy decisions is limited.[27]

The platform was transferred to the Ukrainian Youth Fund under the Ministry of Youth and Sports, providing a stable budget basis for its maintenance.[28] However, the platform's reach among young people, including the estimated 3.9 million youth in risk categories such as internally displaced persons and those affected by the war, remains uncertain.[29]

Open Government Partnership
Independent Reporting Mechanism

Commitment 7: Transparency and integrity of employees of higher education institutions (Gold Standard)

- ∉ **Verifiable:** Yes
- ∉ **Does it have an open government lens?** Yes
- ∉ **Potential for results:** Modest
- ∉ **Completion:** Substantial
- ∉ **Early results:** No Notable Results

This commitment aimed to develop "gold standard" recommendations for higher education institutions (HEIs), covering administration, anti-corruption, student engagement, and whistleblowing.

The first three milestones, which entailed drafting the recommendations through public consultations, were completed.[30] The Ministry of Education and Science (MES)'s) approved the methodological integrity development recommendations with Order No. 576 (17 April 2025) and distributed them to all educational institutions in Ukraine.[31] These recommendations set out the organization of anti-corruption work, the educational process, university administration, academic integrity, and partnerships, and include actions such as appointing anti-corruption commissioners, assessing corruption risks and adopting anti-corruption programs, establishing secure channels for reporting corruption and integrity breaches, and running anonymous surveys on teaching quality.[32] The piloting of the recommendations (milestones 4, 5, and 6) was substantial but incomplete. In October 2025, five HEIs were selected to pilot the recommendations. Between November and December 2025, these HEIs formed integrity teams and analyzed their institutional integrity policies against the recommendations. However, piloting reports and a revision of the recommendations based on the pilot had not been produced and disseminated in HEIs (milestones 4 and 5), and a report on the implementation of the integrity-building recommendations in the work of HEIs was not prepared (milestone 6) as of April 2025. The pilots reached only the team-formation and policy-analysis stage, achieving substantial but incomplete progress.[33] The final step of producing a monitoring report on implementation across HEIs, remained incomplete, with a sociological survey planned but not conducted by the close of the action plan period.[34]

The commitment produced no notable early results. The distribution of recommendations to all HEIs was a concrete step, though the non-binding nature of the recommendations and the early stage of piloting mean broader systemic results in HEI integrity have yet to materialize.

The transparency and integrity agenda for HEIs continues in the 2026–2027 action plan.[35] Commitment 4 builds the integrity-building recommendations into an online self-assessment tool that will let HEIs score themselves on questions covering their managerial, financial, and educational transparency and integrity, and generate an automated report with recommendations for improvement. The use of the tool remains voluntary, and its automation and low resource and cost design are aimed to make self-assessment regular, giving students, applicants, and the public more consistent, comparable data on transparency and integrity across HEIs.

Commitment 8: Institutionalization of the Extractive Industries Transparency Initiative

- ∉ **Verifiable:** Yes
- ∉ **Does it have an open government lens?** Yes
- ∉ **Potential for results:** Modest
- ∉ **Completion:** Substantial
- ∉ **Early results:** Moderate Results

This commitment aimed to further institutionalize the Extractive Industries Transparency Initiative (EITI) in Ukraine by reforming the EITI multi-stakeholder group (MSG), establishing a National Secretariat, and improving the EITI online platform.

Open Government Partnership
Independent Reporting Mechanism

The Ministry of Energy adopted a new EITI MSG Regulation with Order No. 228 (July 2023) and the new MSG membership was elected by November 2023. Ministry of Energy Order No. 121 of 19 March 2025 subsequently amended the MSG composition.[36] The Secretariat functions are currently performed by the Directorate for Resource-Efficient Transformations within the Ministry of Energy, with MSG members supporting a decision in December 2024 to formalize this as an advisory body. However, the Ministry of Energy Order approving the National Secretariat Regulation was pending by the close of the action plan period.[37] The online EITI platform continued to be supported by GIZ under a Protocol of Cooperation signed in March 2025, with analytical modules in test mode and data exchange protocols with the Tax Service and State Geological Survey under development. Data exchange protocols with the State Tax Service and the State Service of Geology and Subsoil Resources were signed, completing this milestone of the commitment. A draft information interaction agreement with the Ministry of Justice and the State Enterprise NAIS remains under development.[38] New sections were added to the EITI portal including Analytics, Reporting Extractive Sector Companies, Material Reporting Companies, Paper Report Registry, Data Flows and EITI Standard Compliance, and Energy Transition and a training program for government bodies, enterprises, and the public on the use of the platform was completed.[39] Thus, while certain analytical modules remained under test or phased implementation, the EITI portal was operational and used for reporting, data disclosure and analytical purposes.

The commitment produced moderate early results in the transparency of the extractives sector. The revitalized MSG established data exchange protocols and expanded platform laid the foundations for EITI's institutional structure. Extractive companies began publishing data through the expanded platform, widening public access to sector information. At the time of the assessment, certain categories of government-held data had not yet been directly published through the EITI platform. Work is currently ongoing to draw up protocols on electronic data exchange with state executive authorities. However, the formal institutionalization of the National Secretariat was not completed during the period of the 2023–2025 action plan. In accordance with the MSG decision, the Secretariat's functions were temporarily performed by the Directorate for Resource-Efficient Transformations of the Ministry of Energy, with support from an external EITI expert. During this period, the Ministry of Energy and MSG members developed the institutional model and regulatory framework for the Secretariat.

On 17 July 2026, Ministry of Energy Order No. 348, as amended by Order No. 379 of 11 August 2026, approved the Regulation on the EITI National Secretariat, under which its membership is to be established. The National Secretariat may include representatives of independent structural units of the Ministry of Energy of Ukraine, central executive authorities, as well as independent experts. The Head of the EITI Secretariat is the head of the independent structural unit of the Ministry of Energy of Ukraine responsible for EITI implementation in Ukraine. Also, in June 2025, Ukraine achieved a high score of 85.5 out of 100 possible points in the EITI Validation of the 2019 EITI Standard.[40] This score provides contextual evidence of the functioning of Ukraine's EITI institutional and transparency framework during the implementation period.

Ukraine is carrying the EITI commitment into its 2026–2027 action plan, to further align with the new 2023 EITI Standard.[41] The new commitment adds broader disclosures such as greenhouse-gas emissions, gender, social and environmental impacts, energy transition, and anti-corruption. It also plans to move the preparation of the National Report onto the EITI platform.

Commitment 9: Publishing open datasets

- ∉ **Verifiable:** Yes
- ∉ **Does it have an open government lens?** Yes
- ∉ **Completion:** Substantial
- ∉ **Early results:** Moderate Results

Open Government Partnership
Independent Reporting Mechanism

∉ **Potential for results:** Substantial	
This commitment is assessed in Section II above.	
Commitment 10: Ensuring transparency in the system of subsoil use	
∉ **Verifiable:** Yes ∉ **Does it have an open government lens?** Yes ∉ **Potential for results:** Modest	∉ **Completion:** Substantial ∉ **Early results:** Moderate Results
This commitment aimed to create a unified electronic geo-information system (GIS) for subsoil use and to amend related normative legal acts. The State Service of Geology and Subsoil developed the technical specifications for the GIS and completed the procurement for designs, software solutions, and the Comprehensive Information Security System.[42] Several GIS components were launched in 2025: on 1 April 2025 the "Obtaining a special subsoil use permit via registry extract" component went live, followed by five others on 1 September 2025 — the State Registry of Oil and Gas Wells, the State Registry of Artesian Wells, the Catalogue of Geological Information, Information on state registration of geological survey works, and Information on special subsoil use permit applications. GIS data became accessible via the State Geological Web Portal.[43] Council of Ministers Resolution No. 1399 (27 December 2023) resolved conflicts regarding the extension of previously issued special permits,[44] and Resolution No. 1314 (15 November 2024) amended the maintenance procedures for the state registries on special permits, artesian wells, and oil and gas wells.[45] Amendments to the special permit form were being finalized at the end of the implementation period.[46] As a result, the commitment is assessed as substantially, rather than fully, complete. The commitment produced moderate early results. The operationalization of several GIS components made subsoil use data publicly accessible for the first time in a consolidated digital format, although the system remains incomplete pending international technical assistance funding for the remaining components.	

[1] Editorial notes:
1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Ukraine's action plan: https://www.opengovpartnership.org/documents/ukraine-action-plan-2023-2025
3. For more information on the assessment of the commitments' design, see Ukraine's Action Plan Review: https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025

[2] Cabinet of Ministers Resolution No. 305 (15 March 2024), Government of Ukraine, OGP Action Plan 2023–2025 Government Draft Final Report (2025), Commitment 2, Step 1.
[3] "OGP Action Plan 2023–2025 Government Draft Final Report (2025)," Government of Ukraine.
[4] Ministry of Development Order No. 1218 (5 August 2025). Government of Ukraine, OGP Action Plan 2023–2025 Government Draft Final Report (2025), Commitment 2, Step 2. https://gisrr.gov.ua
[5] "IRM Action Plan Review: Ukraine Action Plan 2023–2025," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/ukraine-action-plan-review-2023-2025.
[6] Pavlo Ostapenko (NGO Society of Researchers of Ukraine), interview by the IRM, April 2026.
[7] "OGP Action Plan 2023–2025 Government Draft Final Report (2025)," Government of Ukraine; "Methodology for Developing Community Comprehensive Recovery Programmes," Decentralization portal, https://decentralization.ua/uploads/library/file/895/Методика_ПКВ.pdf; "Final Implementation Report, OGP Action Plan 2023–2025 (draft, 2025)," Government of Ukraine.
[8] "OGP Action Plan 2023–2025 Government Draft Final Report (2025)," Government of Ukraine; Nataliia Oksha (Secretariat of the Cabinet of Ministers of Ukraine), interview by the IRM, March 2026.

Open Government Partnership
Independent Reporting Mechanism

[9] "OGP Action Plan 2023–2025 Government Draft Final Report (2025)," Government of Ukraine; Nataliia Oksha (Secretariat of the Cabinet of Ministers of Ukraine), interview by the IRM, March 2026.
[10] "OGP Action Plan 2023–2025 Government Draft Final Report (2025)," Government of Ukraine, accessed September 29, 2026, https://nrat.ukrintei.ua/pro-nrat/lokalni-repozytariy.
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Open Government Partnership
Independent Reporting Mechanism

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