

Country Strategic Framework for Ukraine 2025-2028 (DK-MFA)

Hearing statement

1. Data-driven and needs-based approach

The inclusion of dynamic humanitarian and civil society support in the strategy is commendable, as the shifting front lines and continuous presence of 3.5 million IDPs requires a well-documented and needs-based approach. However, the analyses and scenarios appear somewhat limited and do not fully reflect the complexity and fluidity of the situation on the ground. Notably, there is a lack of references or evidence supporting the likelihood and implications of the scenarios presented, which poses a challenge, particularly with the omission of Scenario 1 from the remaining strategy. We believe this omission underestimates the potential risks of escalation and worsening security dynamics, which could significantly impact the success of planned long-term interventions in the strategy. We strongly encourage the Danish Ministry of Foreign Affairs (DK-MFA) to incorporate more robust data and insights in the analysis, which can be provided by civil society, who are often well-positioned to provide real-time, nuanced information and by whom needs-based analyses are regularly carried out. This would ensure a more comprehensive understanding of the evolving challenges and help tailor Denmark's approach to remain adaptive and impactful, even in the event of significant shifts in the security landscape. This would ultimately ensure that Denmark's contributions to Ukraine remain effective and aligned with both immediate needs and long-term goals.

Moreover, the strategy could benefit from putting greater emphasis on the fact that a large part of the Danish civil society and Danish partners have been present in Ukraine for more than a decade, both physically and through direct and local partnerships. This means that many Danish partners have excellent understanding of the Ukrainian context, stakeholders, needs and interests. Combined with the proven track record of putting its "know-how" into practice in Ukraine, Danish partners are a source of knowledge, experience and inspiration that should be fully utilised in realising Danish strategy for the country. This can be achieved through closer and more systematic coordination by the DK-MFA, and through clearer modalities that would allow for civil society actors and their partners to become more active partners in Danish Government supported initiatives.

We recommend that:

- The Danish Ministry of Foreign Affairs (DK-MFA) incorporate more robust data and insights to qualify the context analysis, which can be provided by DK MFA-civil society and other ground-level actors.

2. Strengthened Coordination

We encourage the Danish Ministry of Foreign Affairs to prioritize strong coordination mechanisms between the Danish government, Ukrainian authorities, civil society, the private sector, and international partners. Effective reconstruction in Ukraine requires an integrated approach that bridges humanitarian aid, recovery, and development efforts.

The current draft of the strategy lacks a clear modality on how to facilitate this coordination and ensure clear linkages to key elements like the Stabilisation Programme, humanitarian funding streams, sectoral programmes and advisors. With this breadth of interventions envisioned by the

Danish Government, it will be vital to ensure a clear strategy for coordination and linking the initiatives in one comprehensive approach. By facilitating robust coordination across governmental initiatives and engaging stakeholders from the private, public and CSO sectors active in Ukraine, Denmark can help ensure that the transition from emergency aid to long-term development is seamless, inclusive, and impactful. For instance, in Mykolaiv alone, Danish CSOs and partners are working with other civil society actors and local partners to ensure a more comprehensive approach. However, the absence of a unifying strategy to connect sector specialists, the Embassy, Ukrainian government and other contributors like private sector and investment funds, hinders broad impact. Of the three coordinating bodies that are outlined in the strategy and include civil society, two are based in Copenhagen and the third has yet to be created. It currently remains unclear who, outside of civil society, is to be included in this ‘Partner forum’.

We recommend that:

- The DK-MFA develops fora or modalities across initiatives, to ensure coordination between private sector, public sector and civil society. Danish civil society partners can play a role in such coordination, considering their well-established presence across Ukraine and their capacity to bring actors together for coordination and integration, as proven in existing platforms (Mykolaiv Danish CSO group, NGO platform, Clusters).

3. Prioritization of Local Leadership

The Danish Ministry of Foreign Affairs should center Ukraine’s recovery on local ownership, supporting local actors, businesses and civil society organizations who possess invaluable expertise and legitimacy within their communities. Local leadership is key to achieving sustainable, people-centered recovery, as local actors understand the unique needs and dynamics of their regions.

Currently, the draft strategy emphasizes the work with local and national authorities as the main mode of localization. While close coordination with authorities is a requisite component of local leadership, greater inclusion and the parallel development of the civil society will be crucial in aligning interventions with local needs and ensuring their sustainability. The Ukrainian civil society has already demonstrated substantial contributions to the humanitarian response, and their inclusion in the country’s recovery process is both beneficial and indispensable. However, short-term grants and one-year commitments to CSOs and other partners limit their ability to serve as a reliable, long-term partner to their local partners in Ukraine.

The strategy puts an equal focus on working with and through Danish civil society organisations and global agencies and instruments, such as UN agencies. While certain contexts call for the capacity of larger agencies, the need for sustainable and localized interventions on municipal and oblast levels seems to contradict the overreliance on multilateral organizations. Greater prioritization of locally anchored approaches, driven by Ukrainian civil society (in partnership with their Danish and international counter parts) and local stakeholders, would better align with the strategy’s focus on long-term resilience and community-level impact while it also allows for a more flexible and constantly relevant approach that acknowledged the fast-changing context.

Inclusion and prioritization of local leadership should not only apply to civil society actors but also be extended to private sector engagement. It is equally important when locally represented Danish companies are investing and supporting Ukraine’s recovery and reconstruction. The local private sector must be involved to ensure that recovery efforts are not replacing Ukrainian businesses with

international companies. By empowering not only Ukrainian Authorities, but also Ukrainian civil society and the private sector, Denmark can strengthen local capacities, stimulate economic recovery, build community resilience, and create durable long-term solutions.

We recommend to:

- Systemically prioritize capacity strengthening of local partners through multi-year financial modalities of the DK-MFA for both civil society and public and private sector, and enabling sustainable, community-led solutions. Consortia among Danish and/or Ukrainian civil society partners can be considered for a coordinated approach.

4. EU Accession

The Danish Ministry of Foreign Affairs should adopt a long-term, strategic approach to Ukraine's recovery that complements and amplifies broader EU initiatives. This should also include support to the Ukrainian Civil Society in alignment with the requirements for the EU Accession. The 2023 EU Accession Report on Ukraine highlighted gaps in transparency and insufficient support to civil society within Ukrainian governmental structures. To address these issues, the Danish Ministry of Foreign Affairs' approach should prioritize aligning its support with EU Accession criteria and strive to improve the collaboration between public entities and civil society. This collaboration should emphasize key areas such as democracy, human rights, social inclusion, the rule of law and decentralisation, allowing local authorities, private sector and CSOs to become involved at the local level. Through sustained and strategic engagement, Denmark can not only enhance its role in supporting Ukraine's democratic and social development but also demonstrate its unwavering commitment to Ukraine's long-term recovery and integration into the European Union.

We recommend that:

- DK-MFA supports the Ukrainian Government in strengthening the policies for support of civil society to improve transparency.
- The DK-MFA utilizes their role and access to enhance the dialogue and coordination between Ukrainian Civil Society and Ukrainian National, Regional and Local authorities to foster decentralization.

5. Integrating Energy and Environment in Civil Society Response:

While the strategy addresses energy independence and green transition, the framework would benefit from specifying how civil society organisations and local partners can contribute to sustainable energy transition and environmental protection efforts, as they are entirely absent from the 2nd strategic goal, *Energy security, green transition and just growth*. Currently, civil society organisations are actively implementing decentralized sustainable energy solutions to address the increasing needs expected during the winter. Engagement with civil society to identify local needs, raise awareness, encourage behaviour change and ensure local buy-in should be the minimum level of involvement.

We recommend that:

- The DK-MFA encourages the Ukrainian government to prioritize the inclusion of civil society in the efforts to secure and implement energy and environmental initiatives nationwide and that civil society is included within the 2nd goal.

These inputs have been developed in joint collaboration with DanChurchAid, Danish Cultural Institute, ADRA, Save the Children Denmark and Danish Red Cross.