Danish Red Cross Comments to Public Consultation: Danish Eastern Neighbourhood Programme January 2027 – December 2031

Page number	Type (concern, comment etc)	Comment
p. 6	Need for extra information	The paragraph reads *"The Russian full-scale invasion has caused profound economic disruption, but Ukraine has shown resilience through international support and trade diversification. However, growth is slowing reflecting ongoing challenges such as labour shortages and energy infrastructure damage."* While the economic impact of the conflict is significant and closely tied to livelihoods, social resilience, and recovery, we would encourage that it is not presented as the first or only consequence of the conflict. The conflict also affects livelihoods, physical and mental health, access to basic services and infrastructure, and social cohesion, and it disrupts everyday life. Similarly, labour shortages and damaged energy infrastructure are not the only sources of economic pressure in the country. Other contributing factors include: • limited capacity for public investment, as resources are diverted to defence and the military; and to private investment, not least from abroad, due to the risk environment • lack of opportunities for youth to get involved in the recovery of the country; • contamination by mines and unexploded ordnance; • constant air raid alerts and attacks on infrastructure (warehouses, agriculture, economic actors, and civilian facilities), which disrupt work and economic activity; • insufficient reintegration of veterans into civilian life; • the physical and mental toll of the conflict on workers
p. 9	Clarification	The sentence reads *"Where there is a greater need for local engagement, this ownership will be based on local priorities and non-state priorities as expressed by local actors and civil society"*. The need for local engagement is important in any context. It would be relevant to be more precise with references to specific fora, policies or similar, in lieu of the broad reference to civil actors: "as expressed by local actors and civil society".
p. 12	Suggestion	Sub-area 3: Gender equality, women's empowerment, youth and culture It is suggested that these themes might be better treated as distinct sub-areas. There is certainly meaningful overlap between them, and actions in one area can benefit the others. However, gender equality, youth and culture each engage different specialised organisations, and each merits recognition as a sector in its own right. These are all important objectives that are often difficult to fund, particularly in humanitarian contexts such as Ukraine, where the urgency of the emergency response tends to take precedence over other priorities. With this in mind, we would propose creating one sub-area dedicated to gender equality and women's empowerment, and another dedicated to youth and culture. This could help ensure that specialised organisations are not placed in competition with one another, and that the distinct value of each theme is fully acknowledged as complementary to each other.

p.12	Suggestion	It is suggested to add: "Support organisations and state actors integrating youth into civil society and empowering youth to become an active part of communities".
p. 13	Suggestion	Sub-area 4, adding support to organizations supporting local communities in vocational training and the support of livelihood for the most vulnerable
p. 15-16	Clarification	In the programme project portfolio, a few thematic areas are marked as having a "regional" focus. Our understanding is that the entire programme has a regional focus. Does it mean that interventions funded under those thematics are expected to cover the whole region? This could be constraining and the needs and the implementation reality may vary according to the topic.