

Danish Refugee Council's Feedback to the Ukraine Strategic Framework 2025-2028

The Danish Refugee Council (DRC) welcomes the opportunity to comment on the draft Strategic Framework for Denmark's Partnership with Ukraine 2025-2028.

DRC highly appreciates that the Strategic Framework applies a holistic and multi-sectoral approach to reconstruction, recovery and development in Ukraine.

A key consideration is that certain aspects of the strategy could benefit from greater integration, as there appears to be separate focus areas for the private sector and the NGOs. Encouraging multi-stakeholder partnerships and fostering co-creation and innovative collaboration between private sector and NGOs could enhance the effectiveness of the strategy in achieving its intended outcomes.

Page 10 – Vulnerable groups

We propose also including focus on the increased protection risks for people with diverse SOGIESC, as a potential missing vulnerable group.

Page 20 – Strategic Goal 2

DMFA can highlight the great scope and need for support to the agricultural sector to align with EU requirements and in preparation for post-2027 CAP reform – this includes participatory rural development policy, not just agricultural production.

8. Ukraine Transition Country Programme July 2025 – June 2028

The transition programme part of the strategy reflects many good sectoral programme areas and priorities. The principles emphasise strengthened national ownership and 'whole of Denmark approach'. We would encourage to also strengthen multi-stakeholder partnerships between NGOs and private sector both Ukraine national and Denmark based (e.g. on 8.2., 8.3.).

The sub-chapters 8.2-8.4. are not stringent structured. In some chapters specific activities are mentioned and partnerships highlighted (8.2., 8.3) while in others (8.4) this is not mentioned.

8.2.1

It is appreciated to see the focus on civil society and duty bearer dialogue. This can be expanded to include the private sector, for their valuable insights and role in local economic development, to promote new partnerships, and also to increase their accountability and civil society oversight. This would emphasise the need for multi-stakeholder partnerships in achieving shared outcomes more effectively.

8.2.2

Suggestion to also include repairs to key market infrastructure, either here or under 8.3.3, to enable business continuity and reduce local market disruptions. (e.g. repairs to reopen tractor mechanic services).

8.2.4

DRC suggests to re-phrase 8.2.4 to broaden the scope of protection activities beyond mental health and psychosocial support, considering the significant protection needs identified in the Strategic Framework (GBV, MHPSS, and Social Cohesion), linking also to DRC protection monitoring as well as Cluster priorities for 2025.

Proposed amendment: 8.2.4. Support to health and protection services to provide holistic support to aid the recovery of people affected by conflict.

Protection support provided can include legal assistance, psychosocial, gender-based violence prevention and response, and case management/social accompaniment support for persons with protection, including veterans, persons with disabilities, IDPs, children/youth, and persons affected by GBV.

Specifically on GBV, it is appreciated that GBV “prevention” is mentioned in Section 8.4.6 on Reforms and EU-accession under the Peace and Stabilisation Programme, but DRC recommends it is also reflected in Section 8.2.4, including both prevention and response activities. While response for GBV survivors is critical, the ability of the protection team to reduce the overall protection risk of GBV is augmented when both GBV prevention and response activities are implemented. This is in line with DRC’s Global Guidance on Prevention Programming in the Protection Sector, GBV Policy and the [Inter-Agency Minimum Standards on GBV](#).

8.3.2

DRC suggests including technical assistance to municipalities to lead local economic development efforts as critical support to decentralization. This will not only create the conditions for economic recovery and participation but enhance local resource bases for the delivery of social protection services.

Overall, DRC suggests an increased emphasis on support to decentralisation as important not only for economic development but also as critical to the accessibility and functionality of social protection mechanisms in Ukraine.