

Ukraine's public investment management reform

Sectoral analysis of the Single Project Pipeline



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Introduction

Over the past two years, Ukraine's public investment management system has moved from the conceptual stage to a phase of intensive implementation. Formally, almost all the key elements of a modern public investment management system are now in place: the Strategic Investment Council; sectoral project and programme portfolios; the national Single Project Pipeline; the Medium-Term Plan for Priority Public Investments (2026–2028); and an updated methodology for project preparation and evaluation, including requirements for feasibility studies and environmental and social impact assessments. In parallel, the Digital Restoration Ecosystem for Accountable Management (DREAM) is gradually being scaled into a unified public investment management information system, designed to scale and track investment initiatives from the local to the national level.

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However, behind this new institutional architecture, a number of problems and internal contradictions are evident.¹ From the outset of the public investment management reform until mid-2025, methodological support was severely limited. Chronic time constraints in developing the procedures and methodological recommendations prescribed in the action plan for implementing the public investment management reform roadmap resulted not only in delays, but also weaknesses in document quality. This, in turn, led to terminological uncertainty and confusion among stakeholders – particularly at the community level – over the sequence of actions.

Currently, Ukraine is developing a modern public investment management framework to meet International Monetary Fund (IMF) requirements, donor expectations, and future integration with EU instruments. However, many of the system's key elements are still being tested and yet to become operational.

The Single Project Pipeline is a core instrument of the national public investment management system, focused on specific investment projects and programmes tied to particular sectors and territories. Through the Pipeline, projects can access budget funding and attract financing from international financial institutions under the EU's dedicated recovery funding package, the Ukraine Facility (2024–2027).²

The Pipeline primarily focuses on areas prioritising sustainable recovery, including energy modernisation and renewable energy sources, transport and logistics, housing and municipal infrastructure, as well as industrial and social projects that support regional development and community recovery. It is vital for the Pipeline to fully leverage the Ukraine Facility for macroeconomic, investment, and reform support. Beyond financing, the Facility also establishes the key frameworks and criteria for project selection and prioritisation, including the green and digital transitions and the intersection of environmental and climate considerations.³

The first component of the Ukraine Facility – Pillar I – is anchored in the Ukraine Plan,⁴ which functions as a roadmap of reforms and investments between 2024 and 2027. The Plan is structured into 15 thematic and sectoral sections, combining reform milestones with indicative investment directions.

The Plan also includes several large cross-cutting blocks, including public administration and governance reform, anti-corruption measures, development of business and financial markets, and state asset

¹ Mykola Kobets, [Ukraine's Single Project Pipeline: The challenges of reforming public investment management](#), CEE Bankwatch Network, 14 November 2025.

² European Commission, [Ukraine Facility](#), accessed 1 December 2025.

³ Ministry of Economy of Ukraine, [Керівна рада Ukraine Investment Framework розглянула план реалізації другої фази інвестиційної складової Ukraine Facility](#), 24 September 2024.

⁴ Government of Ukraine, [Ukraine Plan 2024 - 2027](#), 18 March 2024.

management. These blocks primarily function as horizontal enabling conditions for investment rather than as investment sectors in their own right.

However, our sectoral comparison of the Ukraine Plan with both the Medium-Term Plan for Priority Public Investments and the Single Project Pipeline reveals a significant misalignment. In particular, key sectors such as agribusiness and the extraction of critical raw materials are not explicitly referenced in the Medium-Term Plan or the Pipeline, despite their relevance within the broader Ukraine Plan framework.

The second component of the Ukraine Facility – Pillar II – is designed to mobilise investment by combining different sources of financing, including grants, loans, guarantees and budgetary funds. This framework aims to reduce the risk of individual investments, making them more financially viable and attractive to investors. In practice, projects supported under Pillar II are intended to strengthen the sustainability of the energy sector, restore social infrastructure and housing, and bolster civilian protection.

The Fourth Rapid Damage and Needs Assessment⁵ – a comprehensive report on Ukraine’s recovery co-authored by the World Bank, the Government of Ukraine, the European Commission and the United Nations – serves as the primary economic roadmap throughout 2025. Covering the period from February 2022 to December 2024, the assessment identifies nine priority areas requiring immediate investment to underpin budgetary planning and international support programmes.

These areas include housing, energy, transport, education, healthcare, water supply and sanitation, emergency response, explosive ordnance management, and social protection and livelihoods. Almost all of these areas are now integrated into the Single Project Pipeline, with the exception of social protection and livelihoods, which are not considered traditional capital investment projects.

The core objective is for the Pipeline and the Medium-Term Plan to become effective instruments for managing Ukraine’s transformation. This is extremely important for Ukraine’s international partners, who – due to state budget constraints – will be called upon to finance most of the investment portfolio.

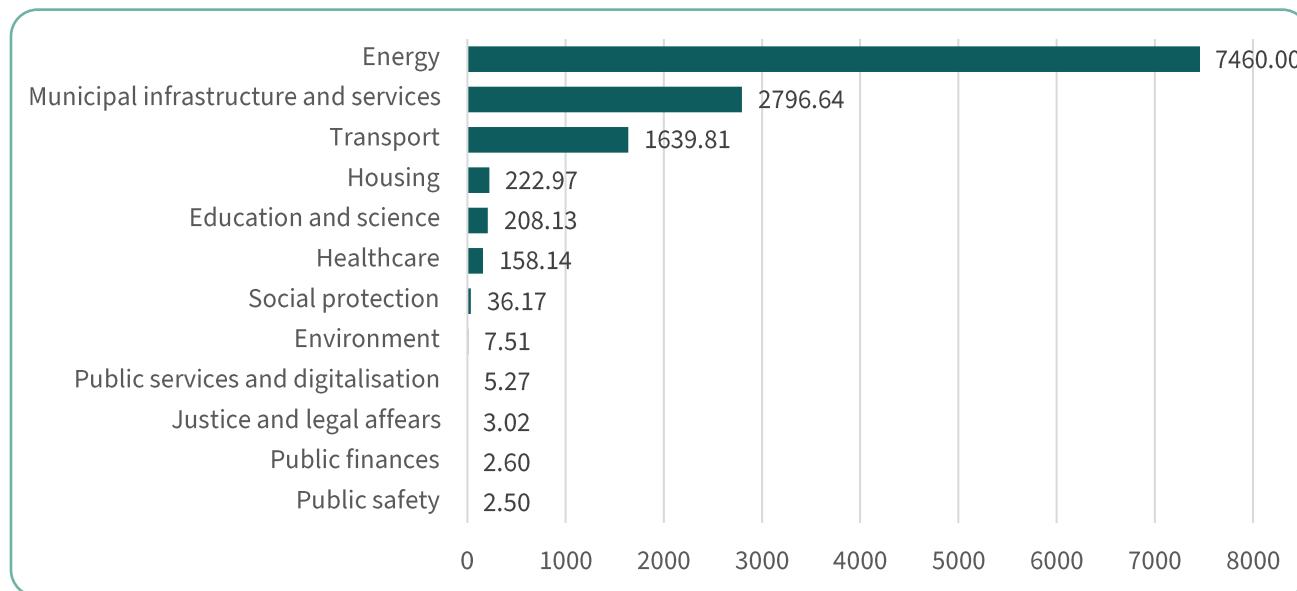
Against this backdrop, analysing the development of the next phase of the Single Project Pipeline (2026–2028) is of particular importance. This analytical report assesses the extent to which the Pipeline reflects the Ukraine government’s stated priorities, aligns with the budgetary framework, provides space for community and regional projects, and brings Ukraine closer to an EU model of partnership and sustainable development – or whether it perpetuates a legacy system in which large infrastructure initiatives are chosen on an ad hoc basis. These issues form the central themes discussed in this report.

The Single Project Pipeline includes investment initiatives across 12 sectors specified in the Medium-Term Plan for Priority Public Investments. However, three sectors – energy, transport, and municipal infrastructure and services – account for almost half (48.2%) of all initiatives. The financial needs declared

⁵ World Bank Group, Government of Ukraine, European Commission, United Nations, [Ukraine Fourth Rapid Damage and Needs Assessment \(RDNA4\) | February 2022 – December 2024](#), 28 February 2025.

by project and programme initiators in these sectors total UAH 11.89 trillion, representing almost 95% of the Pipeline's reported total financing needs (Figure 1). For this reason, these three sectors have been selected for more detailed analysis.

Figure 1. Sectoral assessment of financing needs for investment projects and programmes under the Single Project Pipeline (UAH billion).^{6*}



*Data correct as of 1 December 2025.

Formation of the Single Project Pipeline

For a project or programme to be included in the Single Project Pipeline, it must meet the following criteria:

1. Correspond to one of the main directions of public investment.
2. Be entered into the DREAM system and undergo automatic screening.
3. Pass a sectoral assessment.
4. Be included in the relevant sectoral portfolio and prioritised within the main areas of public investment.⁷
5. Undergo an expert assessment conducted by the Ministry of Economy, Environment and Agriculture, the Ministry of Finance, and the Ministry of Development.

⁶ DREAM Analytics, [Единий проектний портфель держави](#), accessed 1 December 2025.

⁷ The main public investment areas align with the objectives of Ukraine's State Strategy for Regional Development and with sectoral strategies within the framework of state policy, regional priorities and territorial development. These areas are assigned the highest priority within their respective sectors for funding.

Once the expert assessment is completed, the Ministry of Economy, Environment and Agriculture submits the projects and programmes to be included in the Pipeline for approval by the Strategic Investment Council – the Ukrainian government’s top-level decision-making body for public investment projects.

Notably, inclusion in the Pipeline does not guarantee funding. While it is a necessary step, it is not sufficient: projects remain subject to state budget constraints, priorities under the Medium-Term Plan for Priority Public Investments, co-financing opportunities, readiness for implementation, and other considerations.

Only projects and programmes that are included in the relevant sectoral portfolio and align with the main public investment areas⁸ defined in Annex 1 of the Medium-Term Plan⁹ can be incorporated into the Pipeline’s public investments, thus becoming eligible for funding from the budget or through state support.

Formation of the new Single Project Pipeline began on 29 August 2025, when the Strategic Investment Council approved the inclusion of 149 investment initiatives: 89 projects (with an estimated value of UAH 7.28 trillion) and 60 programmes (with an estimated value of UAH 4.11 trillion). Of these, 75 were already active¹⁰ and 74 were new. At this initial stage, projects and programmes spanned 11 sectors of the economy and were initiated exclusively by central executive authorities, state-owned enterprises, and joint-stock companies in which the state’s stake exceeds 50%. The total declared funding requirement for all initiatives amounted to UAH 11.39 trillion.¹¹

Further, on 22 October 2025, the Strategic Investment Council approved the inclusion of an additional 42 projects and 4 programmes, with a combined estimated value exceeding UAH 1.1 trillion.¹² This update affected six sectors of the portfolio, with three projects added to a new sector: public security.

As a result of this ongoing expansion, as of 1 December 2025, the Pipeline comprised 195 investment initiatives – 131 projects and 64 programmes – spanning 12 sectors, with a total declared funding requirement of UAH 12.54 trillion.¹³

The DREAM system indicates that 39 projects are at the preliminary investment feasibility study stage and 92 projects are at the investment feasibility study stage, while all programmes remain under preparation.

⁸ The main public investment areas represent the highest-priority thematic focus areas within priority sectors. They specify the areas in which the state – or region or community – plans to allocate public investment over the medium term, in line with state policy objectives and strategies.

⁹ Ministry of Economy, Environment and Agriculture of Ukraine, [Середньостроковий план пріоритетних публічних інвестицій держави](#), 4 July 2025.

¹⁰ The DREAM analytics section does not provide information on which projects and programmes in the updated Pipeline are already active.

¹¹ Ministry of Finance of Ukraine, [Стратегічна інвестиційна рада схвалила Єдиний проектний портфель публічних інвестицій](#), 4 September 2025.

¹² Ministry of Economy, Environment and Agriculture of Ukraine, [Оновлено Єдиний проектний портфель публічних інвестицій держави](#), 25 October 2025.

¹³ DREAM Analytics, [Єдиний проектний портфель держави](#), accessed 1 December 2025.

Currently, the DREAM system does not provide information on which projects and programmes have entered implementation, nor on the volumes of funding already allocated or disbursed.

However, some projects and programmes in the Pipeline are marked as ongoing on the Ministry of Finance's website.¹⁴ For the purposes of this analysis, therefore, these programmes and projects are considered active, meaning they are currently being implemented.

Sectoral analysis of the Single Project Pipeline

This sectoral analysis of projects and programmes included in the national Single Project Pipeline encompasses the total number of initiatives in each sector, their thematic focus (including subsectoral distribution), the ratio of new-to-existing projects and programmes, and their compliance with the main public investment areas. It also assesses whether the declared costs of projects and programmes are consistent with the Medium-Term Plan for Priority Public Investments and overall budgetary capacity.

In its current phase, the Pipeline is primarily oriented towards sustainable recovery, focusing on energy modernisation and renewables, transport and logistics, housing and municipal infrastructure, as well as a number of industrial and social projects supporting regional development and community recovery. The focus differs from that of the Ukraine Plan – the reform and investment framework underpinning the EU's Ukraine Facility – which covers a wider range of priorities, including strategic industries, critical raw materials, the agri-food sector, the green and digital transitions, as well as governance reforms and support for small and medium-sized enterprises.

Both the Ukraine Plan and the Ukraine Facility set out EU approaches to environmental standards, climate goals, sustainable development, and the institutional reforms required to achieve them. Financing for both private-sector activities and municipal projects is expected to be channelled primarily through programmes supported by international financial institutions under the Ukraine Investment Framework – the dedicated investment arm of the Ukraine Facility.¹⁵

The functionality of the Digital Restoration Ecosystem for Accountable Management (DREAM) continues to expand, with new modules and analytical tools being integrated into the platform. Since early December 2025, the system has provided public access to the results of expert assessments of public investment projects and programmes.¹⁶

Until the end of 2025, this functionality focused on assessments at the national level, specifically those conducted by the Ministry of Economy, Environment and Agriculture, the Ministry of Finance, and the

¹⁴ Ministry of Finance of Ukraine, [Єдиний проектний портфель публічних інвестицій держави \(Single Project Pipeline\)](#), 29 August 2025.

¹⁵ European Commission, [Strategic Orientations of the Ukraine Investment Framework 2024-2027](#), May 2024.

¹⁶ DREAM Analytics, [Експертна оцінка проектів і програм](#), accessed 1 December 2025.

Ministry for Development of Communities and Territories. These evaluations are carried out before the results are submitted to the Strategic Investment Council for potential inclusion in the Single Project Pipeline. Following recent updates, these assessments now also extend to regional and local levels, providing a more comprehensive dataset.

The expert assessment results are presented in the form of a structured questionnaire based on the five-case model – a best-practice framework for developing business cases, particularly for public sector investments. Currently, the environmental, climate and social components of the programme evaluation are reduced to a single qualitative question: Are the potential risks associated with the implementation of the programme, including economic, environmental and social factors, sufficiently defined?

According to DREAM data, expert assessments have been completed for 66 national investment programmes, 37 of which were recommended for inclusion in the Pipeline. However, the data highlight significant gaps in risk assessment: within this recommended group, 3 programmes had only partially identified their economic, environmental and social risks, while 24 programmes – representing the vast majority – had not determined these risks at all.

Furthermore, while the project-level evaluation framework includes seven specific criteria related to ecology, climate and sustainable development goals, these factors do not appear to be decisive for a project's inclusion in the Pipeline. Out of the 208 national-level projects reviewed, 101 were recommended for inclusion. Notably, 68 of these recommended projects lacked baseline assessments of their potential contribution to environmental and climate goals, and compliance with the 'do no significant harm' principle.

Municipal infrastructure and services sector

According to the Medium-Term Plan for Priority Public Investments (2026–2028), investment in the municipal infrastructure and services sector focuses on three pillars: modernisation of water supply and sanitation systems, improvement of energy efficiency in public buildings, and broader restoration of municipal infrastructure.¹⁷ The Plan defines 13 investment streams for the sector, categorised into 5 primary areas¹⁸ and 8 secondary areas.

¹⁷ Ministry of Economy, Environment and Agriculture of Ukraine, [Середньостроковий план пріоритетних публічних інвестицій держави](#), 4 July 2025.

¹⁸ The main investment areas in the municipal infrastructure and services sector include: restoring, developing and modernising the centralised water supply and sewerage infrastructure, including the introduction of alternative energy sources; developing and restoring municipal infrastructure at the subnational level; improving energy efficiency in public buildings; restoring, modernising and protecting critical infrastructure facilities to strengthen resilience to threats and to continue providing vital services; and enhancing the management of waste generated by post-destruction debris, including construction and demolition waste.

The DREAM portfolio for the sector comprises 24 projects and 32 programmes, with a combined estimated cost of approximately UAH 2.88 trillion. Of these, 16 projects and 28 programmes are included in the Single Project Pipeline, representing a total investment value of UAH 2.79 trillion (Table 1).

Table 1. Investment demand versus budgetary ceilings for the municipal infrastructure and services sector.*

Total public investment ceiling in the Medium-Term Plan for Priority Public Investments		
Time period	Estimated cost (UAH billion)	
2026	5.83	
2026–2028	12.64	
Projects and programmes included in the Single Project Pipeline [#]		
Projects and programmes	Number	Estimated cost (UAH billion)
Total projects (currently active)	16 (8)	66.64 (52.15)
Total programmes (currently active)	28 (8)	2 730 (260)
Total projects and programmes	44	2 790

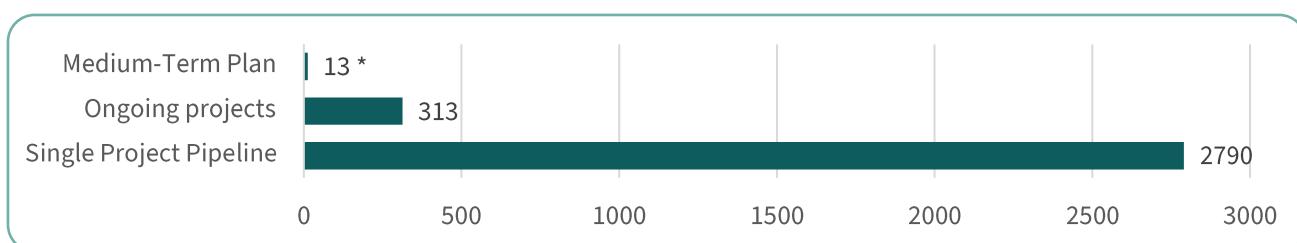
*Data correct as of 1 December 2025.

[#]Approved by the Strategic Investment Council.

Under the Medium-Term Plan, the maximum funding allocated to projects and programmes in this sector for 2026 is UAH 5.83 billion. This represents just 0.21% of the total financing needs of the investment initiatives already included in the Pipeline, and less than 2% of the funding required to complete existing projects and programmes.

Between 2026 and 2028, a total of UAH 12.64 billion in public investment is earmarked for initiatives in the sector. This amount would cover only 0.45% of the financial needs of investment initiatives submitted to the Pipeline, and just 4.2% of the funding required to complete existing projects and programmes (Figure 2).

Figure 2. Estimated financial needs of the municipal infrastructure and services sector under the Single Project Pipeline compared with allocations under the Medium-Term Plan for Priority Public Investments (UAH billion).



*Representing 0.45% of the Pipeline and 4.2% of the budget for ongoing projects.

The municipal infrastructure and services sector within the Single Project Pipeline comprises eight subsectors. Projects and programmes from five of these subsectors are included in the Pipeline: water supply and sanitation; development and reconstruction of subnational infrastructure; urban planning and landscaping; protective structures for infrastructure facilities; and management of debris waste.

No projects or programmes from the household waste management, heat supply, or tourism services subsectors are included. The distribution of projects and programmes by subsector is presented in Table 2.

Table 2. Estimated cost of projects and programmes in the municipal infrastructure and services sector under the Single Project Pipeline.*

Subsector	Number of projects	Estimated project cost (UAH billion)	Number of programmes	Estimated programme cost (UAH billion)
Water supply and sanitation	9	61.37	5	909.86
Development and reconstruction of subnational infrastructure	4	4.95	18	890.63
Protective structures for infrastructure facilities	3	0.31	1	200.26
Urban planning and landscaping	0	0	3	205.11
Debris waste	0	0	1	520.00
Total	16	66.63	28	2 725.86

*Data correct as of 1 December 2025.

According to the Ministry of Finance, of the 44 investment initiatives included in the Single Project Pipeline, 16 (8 projects and 8 programmes) are active and require priority funding for completion. Existing programmes in this sector include:

1. Ukraine Recovery Programme III¹⁹
2. Construction of protective structures against damage by unmanned aerial vehicles and missiles at energy infrastructure facilities²⁰

¹⁹ DREAM Public Investment Management System, [Програма відновлення України III](#), 5 August 2025.

²⁰ DREAM Public Investment Management System, [Будівництво захисних споруд від ураження безпілотними літальними апаратами та ракетами на об'єктах енергетичної інфраструктури](#), 6 August 2025.

3. Energy efficiency of public buildings²¹
4. Energy efficiency in communities²²
5. Restoration of energy supply in winter and supply of energy resources²³
6. Ukraine Recovery Programme²⁴
7. Emergency loan programme for the recovery of Ukraine²⁵
8. Municipal infrastructure development programme²⁶

Among the notable investment initiatives approved by the Strategic Investment Council is the Renewable Energy Solutions programme,²⁷ launched by the State Agency for Infrastructure Restoration and Development. Expected to run for three years, the programme aims to improve energy efficiency in public buildings through renovation measures and renewable energy solutions. The programme is financed through grant funding from the European Investment Bank.²⁸ The grant agreement provides for the following renewable energy solutions:

- photovoltaic systems without battery storage, installed on suitable roofs, car parks or integrated façades;
- photovoltaic systems with battery storage, installed on suitable roofs, car parks or integrated façades;
- solar thermal systems;
- biomass heating systems;
- geothermal heat pumps; and
- air-to-water heat pumps.

²¹ DREAM Public Investment Management System, [Енергоефективність громадських будівель в Україні](#), 6 August 2025.

²² DREAM Public Investment Management System, [Енергоефективність у громадах](#), 7 August 2025.

²³ DREAM Public Investment Management System, [Відновлення енергозабезпечення у зимовий період та постачання енергетичних ресурсів](#), 8 August 2025.

²⁴ DREAM Public Investment Management System, [Програма з відновлення України](#), 6 August 2025.

²⁵ DREAM Public Investment Management System, [Надзвичайна кредитна програма для відновлення України](#), 11 August 2025.

²⁶ DREAM Public Investment Management System, [Програма розвитку муніципальної інфраструктури України](#), 12 August 2025.

²⁷ DREAM Public Investment Management System, [Рішення для відновлюваної енергетики \(RES\)](#), 2 September 2025.

²⁸ Verkhovna Rada of Ukraine, [Грантова Угода про надання технічної допомоги для інвестицій та закупівель "Рішення для відновлюваної енергетики \(RES\)" між Україною та Європейським інвестиційним банком](#), 10 February 2025.

In practice, however, the programme supports just one technical solution: the installation of photovoltaic systems with battery storage at social infrastructure facilities, primarily healthcare and educational institutions. And while the agreement provides for the implementation of works at 130 facilities – a performance indicator for the agreement – the programme itself envisages the installation of solar panels on only 50 public buildings.

Another programme implemented by the State Agency for Restoration and Infrastructure Development aims to develop a network of combined heat and power plants using solid recovered fuel and refuse-derived fuel.²⁹ With a declared funding requirement of UAH 34.57 billion, the programme will create an innovative and scalable solid-waste management system through a network of regional centres spanning the entire process chain, from waste sorting and the production of alternative fuels to the construction or retrofitting of combined heat and power plants for the generation of heat and electricity.

The programme is based on the National Regional Development Strategy (2021–2027). However, it does not refer to the National Waste Management Strategy (until 2030) or the National Waste Management Plan (until 2033), which makes only limited reference to fuel derived from waste or renewable solid fuel from waste.³⁰ Though implementation measures attached to the Plan³¹ include a provision to develop draft technical requirements for the production and use of these fuels by 2028, it is not addressed in the main text.

More fundamentally, the viability of using waste for energy generation remains contentious. In the EU, for example, the use of fuel derived from waste and renewable solid fuel from waste is tightly constrained by permitting requirements and best available techniques. These fuels are regulated primarily through waste management policy, circular economy frameworks, and environmental and energy legislation, rather than through energy policy alone. Crucially, energy recovery from waste should only apply to residual non-recyclable fractions. It should not undermine separate waste collection, reuse, recycling or other higher-value forms of recovery.³²

The Single Project Pipeline also includes several initiatives in the municipal infrastructure and services sector that are either cultural or social in nature, or aimed at community development. These include initiatives launched by the Ministry for Development of Communities and Territories, such as a programme linking war-related memorial sites and museums across the country³³ (UAH 845.6 million) and another establishing modern public parks for recreation and community use (UAH 261 million).³⁴

²⁹ DREAM Public Investment Management System, [Програма розвитку мережі ТЕЦ на твердому паливи \(RDF/SRF\)](#), 13 August 2025.

³⁰ Cabinet of Ministers of Ukraine, [Національний план управління відходами до 2033 року](#), December 2024.

³¹ Cabinet of Ministers of Ukraine, [План заходів з реалізації Національного плану управління відходами на 2025-2033 роки](#), December 2024.

³² CEE Bankwatch Network, Beyond Fossil Fuels, [Cleaning up District Heating: Best technologies and real-life examples](#), 18 April 2024.

³³ DREAM Public Investment Management System, [Маршрути місцями пам'яті](#), 12 August 2025.

³⁴ DREAM Public Investment Management System, [Будівництво урбан парків в громадах](#), 6 August 2025.

It is less clear why two projects implemented by Ukrvodshlyakh, the state enterprise responsible for inland waterways, have been classified under the municipal infrastructure and services sector, specifically within the investment area covering the restoration, modernisation and protection of critical infrastructure, aimed at strengthening the resilience and continuity of essential services.

The first project involves repairing damage inflicted by a Russian missile strike on the Srednedniprotskyi shipping lock on the Dnipro River (UAH 81.6 million).³⁵ The second project covers preparatory work for the reconstruction of multiple shipping locks managed by Ukrvodshlyakh, including the installation of physical protection measures for critical infrastructure elements (UAH 7.5 million).³⁶

Given that shipping locks are not municipal infrastructure, their inclusion in this sector appears misplaced. They would be more appropriately classified under the transport sector.

Energy sector

Under the Medium-Term Plan for Priority Public Investments, investment projects and programmes in the energy sector aim to support the development and modernisation of energy infrastructure. Public investment will focus on fossil gas and oil production, the creation of new facilities, and the expansion, reconstruction, and upgrading of existing energy infrastructure.³⁷

Within the Single Project Pipeline, there are eight primary and seven secondary investment streams in this sector.³⁸ The state-level portfolio for energy, as recorded in the DREAM system, contains 66 investment projects with a total estimated value of UAH 7.65 trillion. As of 1 December 2025, only 50 of these projects had been included, with a combined estimated implementation cost of UAH 7.46 trillion (Table 3).

³⁵ DREAM Public Investment Management System, [Відновлення ВП «Середньодніпровський судноплавний шлюз» ДП «УКРВОДШЛЯХ» після ракетної атаки РФ](#), 8 August 2025.

³⁶ DREAM Public Investment Management System, [Виготовлення проекту "Реконструкція судноплавних шлюзів з влаштуванням фізичного захисту елементів критичної інфраструктури"](#), 7 October 2025.

³⁷ Ministry of Economy, Environment and Agriculture of Ukraine, [Середньостроковий план пріоритетних публічних інвестицій держави](#), 4 July 2025.

³⁸ The main investment areas in the energy sector include: oil and gas development and production; gas transmission; the development, expansion, reconstruction, and technical upgrading of energy infrastructure; the modernisation and development of electricity distribution networks, including deployment of smart-grid technologies; the refurbishment of existing generation capacity; and the construction of new facilities, specifically wind power, small-scale hydropower, and general generation capacity.

Table 3. Investment demand versus budgetary ceilings for the energy sector.*

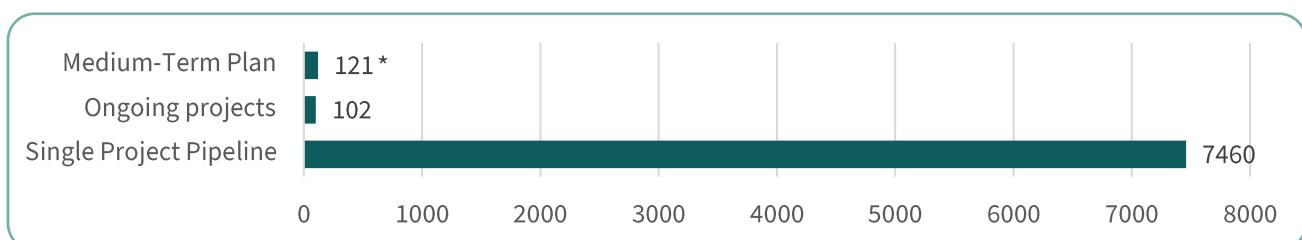
Total public investment ceiling in the Medium-Term Plan for Priority Public Investments		
Time period	Estimated cost (UAH billion)	
2026	75.47	
2026–2028	120.83	
Projects and programmes included in the Single Project Pipeline [#]		
Projects and programmes	Number	Estimated cost (UAH billion)
Total projects (currently active)	50 (10)	7 460 (101.97)
Total programmes	0	0
Total projects and programmes	50	7 460

*Data correct as of 1 December 2025.

[#]Approved by the Strategic Investment Council.

The maximum funding allocated for energy projects and programmes for 2026 in the Medium-Term Plan for Priority Public Investments is UAH 75.47 billion – approximately 1% of the total financial needs of initiatives already submitted to the Pipeline, but covering 74% of the funding required to complete existing projects.

Between 2026 and 2028, a total of UAH 120.83 billion has been allocated for the implementation of investment initiatives in the energy sector. Though this represents just 1.6% of the total financial needs of initiatives submitted to the Pipeline, it is sufficient to complete all existing projects (Figure 3).

Figure 3. Estimated financial needs of the energy sector under the Single Project Pipeline compared with allocations under the Medium-Term Plan for Priority Public Investments (UAH billion).

*Representing 1.6% of the Pipeline and 118% of the budget for ongoing projects.

The energy sector under the Single Project Pipeline comprises four subsectors. As of 1 December 2025, projects and programmes from three of these subsectors have been included: the oil and gas industry, the electric power industry, and renewable energy sources and alternative fuels.

Currently, the Medium-Term Plan does not include a dedicated nuclear energy subsector. Yet at least six investment projects in the energy sector initiated by Energoatom, the state-owned nuclear power operator, directly relate to nuclear energy. Four of these projects focus specifically on the Khmelnytskyi nuclear power plant: completing the construction of power units 3 and 4;³⁹ the design and production of turbines for these units;⁴⁰ the construction of new power units (5 and 6) equipped with AP1000 reactor technology; and the modernisation of the K-1000-60/3000 steam turbine at power unit 2.⁴¹ In addition, a programme to improve the safety and reliability of the country's nuclear power plant equipment has been included,⁴² along with the construction of a facility to manufacture nuclear fuel assemblies for use in the country's nuclear power plants.⁴³

Currently, all of these projects are grouped under the Pipeline's electricity subsector. However, this classification is misleading, as categorising large-scale nuclear expansion projects alongside projects focused on grid maintenance, such as high-voltage power lines and substations, obscures the scale and risk of these projects.

The projects slated for Khmelnytskyi in particular should be viewed as red flags. The Ukrainian government must ensure maximum transparency and rigorous oversight when it comes to nuclear energy, balancing immediate energy needs against long-term environmental and technological safety. Moreover, the proposed completion of power units 3 and 4 contradicts government pledges to decentralise the energy supply and increase system resilience.⁴⁴

Any nuclear expansion requires strict compliance with international regulations and procedures. Rushing these processes without adequate preparation poses significant risks to both current and future generations. Detailed opposition to these projects is presented in a joint report by the Ukrainian non-governmental organisations Ecoaction and Ecoclub, in collaboration with the Heinrich Böll Foundation.⁴⁵ The distribution of energy projects by subsector is provided in Table 4.

³⁹ DREAM Public Investment Management System, [Будівництво енергоблоків №№ 3, 4 "Хмельницької АЕС"](#), 5 August 2025.

⁴⁰ DREAM Public Investment Management System, [Проектування та виробництво турбінних установок, призначених для енергоблоків № 3, 4 Хмельницької АЕС](#), 7 August 2025.

⁴¹ DREAM Public Investment Management System, [Будівництво енергоблоків № 5,6 з реакторною установкою AP1000 на майданчику Хмельницької АЕС](#), 21 August 2024.

⁴² DREAM Public Investment Management System, [Зведення програма підвищення безпеки та надійності обладнання АЕС \(ЗПБНО\)](#), 6 August 2025.

⁴³ DREAM Public Investment Management System, [Нове будівництво. Технологічний комплекс з виробництва тепловиділяючих збірок](#), 24 September 2025.

⁴⁴ International Energy Agency, [Empowering Ukraine Through a Decentralised Electricity System](#), updated February 2025.

⁴⁵ Anastasia Kolesnyk, Yurii Kvitka, Oleksandr Lyashchuk et al., [Аналітична довідка щодо особливостей добудови 3 та 4 блоків Хмельницької атомної електростанції та спорудження нових блоків \(5, 6\)](#), Ecoclub, Ecoaction, Heinrich Böll Foundation, 5 December 2024.

Table 4. Distribution of energy projects by subsector under the Single Project Pipeline.*

Subsector	Number of projects	Estimated total cost (UAH billion)
Electric power industry	40	7 340.05
Renewable energy and alternative fuels	5	85.14
Oil and gas industry	5	33.14
Total	50	7 458.33

*Data correct as of 1 December 2025.

According to the Ministry of Finance, 10 of the 50 investment projects included in the Pipeline are classified as active, meaning they require priority funding under the budget code. These projects include:

1. Procurement of workover rigs and energy efficiency improvements (Ukrgasvydobuvannya)⁴⁶
2. Rehabilitation of hydropower fleet and life extension (Ukrhydroenergo)⁴⁷
3. Northern region grid reinforcement and substation modernisation (Ukrenergo)⁴⁸
4. Restoration of critical lifting and hydromechanical equipment (Ukrhydroenergo)⁴⁹
5. Modernisation of large-scale generation assets and heavy-lift equipment (Ukrhydroenergo)⁵⁰
6. Operational resilience and contingent emergency response (Ukrhydroenergo)⁵¹
7. Electricity transmission system modernisation (Ukrenergo)⁵²
8. Hybrid power generation systems and European grid integration (Ukrhydroenergo)⁵³

⁴⁶ DREAM Public Investment Management System, [Закупівля верстатів КРС та покращення енергоефективності АТ «Укргазвидобування»](#), 6 August 2025.

⁴⁷ DREAM Public Investment Management System, [Реабілітація гідроелектростанцій](#), 6 August 2025.

⁴⁸ DREAM Public Investment Management System, [Проект розширення Північного регіону](#), 6 August 2025.

⁴⁹ DREAM Public Investment Management System, [Аварійне відновлення гідроелектростанцій](#), 7 August 2025.

⁵⁰ DREAM Public Investment Management System, [Модернізація та відновлення об'єктів генерації гідроелектростанцій ПрАТ "Укргідроенерго" \(Підтримка енергетичного сектору\)](#), 8 August 2025.

⁵¹ DREAM Public Investment Management System, [ПІДТРИМКА СТАБІЛЬНОСТІ ТА ВІДНОВЛЕННЯ УГЕ \(Відновлення обладнання для підвищення експлуатаційної стійкості та надійності гідроелектростанцій\)](#), 7 August 2025.

⁵² DREAM Public Investment Management System, [Другий проект з передачі електроенергії](#), 11 August 2025.

⁵³ DREAM Public Investment Management System, [Україна – Підвищення стійкості енергосистеми для європейської інтеграції енергомережі \(Встановлення гібридних систем з виробництва електроенергії в ПрАТ «Укргідроенерго»\)](#), 11 August 2025.

9. Emergency restoration of winter energy and heating supply (Ministry for Development of Communities and Territories)⁵⁴

10. Power transmission efficiency and substation modernisation (Ukrenergo)⁵⁵

Of these active projects, five were initiated by the state-owned hydropower generation company, Ukrhydroenergo, with a total budget of approximately UAH 54 billion. The company is expected to secure a financial package under the Ukraine Investment Framework (Pillar II of the Ukraine Facility), comprising a loan of up to EUR 75 million from the European Bank for Reconstruction and Development (EBRD) and up to EUR 20 million in investment grants from international donors. These funds are earmarked for critical hydropower equipment, an emergency electrical reserve, and project implementation consultancy services.⁵⁶

A number of projects involving renewable energy sources are scattered across unrelated sectors of the Pipeline. For example, the energy sector features only five projects in the field of renewable energy sources and alternative fuels. Four of these focus on wind energy construction, with a total capacity of approximately 500 megawatts (MW). Surprisingly, all four were initiated by Naftogaz Bioenergy, a subsidiary of the national oil and gas group, Naftogaz. While Naftogaz Bioenergy is tasked with developing biomethane and biomass heat networks, it has no prior experience in wind power.

Transport sector

According to the Medium-Term Plan for Priority Public Investments, investment projects and programmes in the transport sector focus on road modernisation, the development of rail networks, and the expansion of urban transport systems. Planned road safety programmes will support the restoration and development of a competitive and efficient transport system that integrates into the Trans-European Transport Network, in line with EU policies and standards.⁵⁷ The Medium-Term Plan identifies six primary and six secondary investment streams within the sector.⁵⁸

⁵⁴ DREAM Public Investment Management System, [Відновлення енергозабезпечення у зимовий період та постачання енергетичних ресурсів \(Re-PoWER\)](#), 11 August 2025.

⁵⁵ DREAM Public Investment Management System, [Проект підвищення ефективності передачі електроенергії \(модернізація підстанцій\)](#), 11 August 2025.

⁵⁶ European Bank for Reconstruction and Development, [EBRD and EU support Ukraine's energy security with €75 million for hydropower](#), 8 January 2026.

⁵⁷ Ministry of Economy, Environment and Agriculture of Ukraine, [Середньостроковий план пріоритетних публічних інвестицій держави](#), 4 July 2025.

⁵⁸ The main investment areas in the transport sector include: the integrated development of public transport and urban infrastructure; the development and restoration of public road infrastructure; the introduction of tolls on public roads of national importance; ensuring the efficiency and continuity of passenger and freight transport; ensuring the sustainable functioning of rail transport; and the development and expansion of border infrastructure with EU Member States and Moldova.

Table 5. Investment demand versus budgetary ceilings for the transport sector.*

Total public investment ceiling under the Medium-Term Plan for Priority Public Investments		
Time period	Estimated cost (UAH billion)	
2026	27.67	
2026–2028	198.15	
Projects and programmes included in the Single Project Pipeline [#]		
Projects and programmes	Number	Estimated cost (UAH billion)
Total projects (currently active)	44 (19)	732.82 (246.89)
Total programmes (currently active)	6 (1)	906.98 (16.67)
Total projects and programmes	50	1 640

*Data correct as of 1 December 2025.

[#]Approved by the Strategic Investment Council.

The transport sector comprises seven subsectors within the Single Project Pipeline. As of 1 December 2025, projects and programmes are included in the following four subsectors: public transport, road transport and infrastructure, rail transport, and border checkpoints. Currently, there are no projects or programmes in the air transport, sea and river transport, or postal services sectors. The sectoral distribution and estimated cost of projects and programmes in the transport sector are presented in Table 6.

Table 6. Sectoral distribution and estimated cost of projects and programmes in the transport sector under the Single Project Pipeline.*

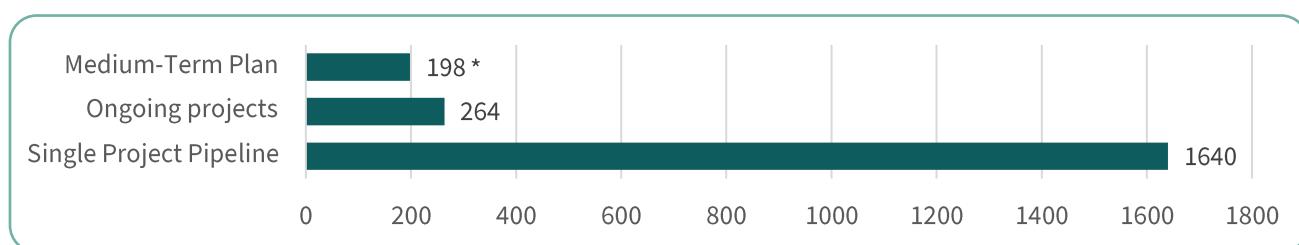
Subsector	Number of projects	Estimated project cost (UAH billion)	Number of programmes	Estimated programme cost (UAH billion)
Public transport	5	54.94	1	486.13
Rail transport	23	232.20	2	131.52
Border checkpoints	4	2.02	1	16.67
Road transport and infrastructure	12	443.66	2	272.66
Total	44	732.82	6	906.98

*Data correct as of 1 December 2025.

The Medium-Term Plan sets the maximum funding for projects and programmes in the transport sector for 2026 at UAH 27.67 billion, representing only 1.67% of the total investment needs of initiatives already submitted to the Pipeline, or 10.5% of the funding required to complete existing projects and programmes.

Between 2026 and 2028, a total of UAH 198.15 billion has been allocated to the implementation of investment initiatives in the transport sector. This amount covers only 12.1% of the total financial needs of initiatives submitted to the Single Project Pipeline, or 75% of the funding required to complete existing projects and programmes (Figure 4).

Figure 4. Estimated financial needs of the transport sector under the Single Project Pipeline compared with allocations under the Medium-Term Plan for Priority Public Investments (UAH billion).



*Representing 12.1% of the Pipeline and 75% of the budget for ongoing projects.

On 18 June 2025, three megaprojects in the transport sector, with a total value of UAH 554 billion (over EUR 12 billion), were simultaneously entered into the DREAM system:

1. Reconstruction of the M-07 Kyiv–Kovel–Yagodyn highway towards Lublin (UAH 120 billion);⁵⁹
2. Reconstruction of the M-30 Stryi–Uman–Dnipro–Izvaryne highway via Vinnytsia and Kropyvnytskyi (UAH 300 billion); and⁶⁰
3. Reconstruction of the M-15 Odesa–Renі highway towards Bucharest (UAH 134 billion).⁶¹

The DREAM system indicates that all three projects are currently in the implementation stage. On 6 August 2025, the M-30 highway reconstruction project was newly listed as being at the investment feasibility study stage and requiring funding of approximately UAH.⁶² Yet this projected figure gives cause for concern.

⁵⁹ DREAM Public Investment Management System, [Реконструкція автомобільної дороги М-07 Київ - Ковель - Ягодин \(на м. Люблін\)](#), 18 June 2025.

⁶⁰ DREAM Public Investment Management System, [Реконструкція автомобільної дороги М-30 Стрий - Умань - Дніпро - Ізварине \(через мм. Вінницю, Кропивницький\)](#), 18 June 2025.

⁶¹ DREAM Public Investment Management System, [Розбудова автомобільної дороги загального користування державного значення М-15 Одеса - Рені \(на м. Бухарест\)](#), 18 June 2025.

⁶² DREAM Public Investment Management System, [Реконструкція автомобільної дороги М-30 Стрий - Умань - Дніпро - Ізварине \(через мм. Вінницю, Кропивницький\)](#), 6 August 2025.

For context, Ukravtodor – the state agency responsible for national road construction and maintenance – reported in 2020 that the average cost of constructing a new category I road was UAH 170.6 million per kilometre, with road overhaul costs ranging from UAH 60 to 100 million per kilometre.⁶³ Based on these estimates, reconstructing the M-30's 950 kilometres would cost between UAH 57 and 162 billion.

Therefore, the declared financial requirement of approximately UAH 302 billion is almost double the cost of building a new highway. Since DREAM does not provide a detailed breakdown of construction costs, it is impossible to verify whether these figures are realistic. However, compared with Ukravtodor's previous, more modest estimates, the costs declared seem unusually high.

Additionally, the Pipeline includes two projects related to the M-15 Odesa–Reni highway: a preliminary investment feasibility study (UAH 52 billion)⁶⁴ and a project involving the construction of a rest and parking area near the Reni–Giurgiuleşti border crossing (UAH 246 million).⁶⁵ Both projects are currently in development.

However, there is a large discrepancy in estimated costs between the three M-15 highway projects. The main reconstruction project, registered in June 2025, was costed at UAH 134 billion and marked as under implementation, whereas the first of the two ancillary projects added in August 2025 – described as being at the investment feasibility study stage – was assigned an estimated cost of UAH 52 billion.

Urban transport investments share similar feasibility issues, notably a project to complete construction of the Dnipro metro system.⁶⁶ Construction originally began in 2016 with a completion date set for 2021. However, despite years of work and EBRD funding (EUR 304 million), the project was suspended due to minimal progress; Muzeyna station remains only 10% complete.⁶⁷ Yet the consolidated list of projects and programmes under the Single Project Pipeline – published by the Ministry of Finance in September 2025 – indicates that a further UAH 2 billion (12.7% of the total estimated cost of almost UAH 16 billion) has been slated for the project until 2027, with no funding allocated for 2028.⁶⁸

⁶³ Maria Makuh, [Укравтодор» оприлюднив вартість будівництва 1 кілометра автодороги](#), Mind.ua, 1 October 2020.

⁶⁴ DREAM Public Investment Management System, [Розбудова автомобільної дороги загального користування державного значення М-15 Одеса - Рені \(на м. Бухарест\)](#), 8 August 2025.

⁶⁵ DREAM Public Investment Management System, [Капітальний ремонт автомобільної дороги загального користування державного значення М-15 Одеса — Рені \(на м. Бухарест\). Влаштування майданчика для стоянки транспортних засобів і відпочинку учасників дорожнього руху на км 307 + 070 \(зліва\)](#), 8 August 2025.

⁶⁶ DREAM Public Investment Management System, [Завершення будівництва метрополітену у м. Дніпропетровську](#), 4 August 2025.

⁶⁷ Oleksandr Kolesnichenko, [Гроші під землю. Чому зупинилося будівництво метро в Дніпрі і коли його відновлять](#), Ekonomichna Pravda, 14 October 2025.

⁶⁸ Ministry of Finance of Ukraine, [Консолідований перелік публічних інвестиційних проектів та програм публічних інвестицій єдиного проектного портфеля публічних інвестицій держави і розподіл публічних інвестицій на їх підготовку та реалізацію на 2026-2028 роки у розрізі джерел і механізмів фінансового забезпечення \(станом на 10.09.2025\)](#), 10 September 2025.

Under the investment stream for the introduction of tolls on public roads of national importance, the Pipeline includes a project to establish a national toll system at an estimated cost of UAH 7.3 billion.⁶⁹ The aim is to provide stable financing for road maintenance by levying tolls on heavy vehicles. In line with the National Transport Strategy until 2030, tolls on vehicles weighing 12 tonnes or more are expected to be applied to 3,112 kilometres of public roads of national importance by the end of 2028. However, under the EU's Eurovignette Directive,⁷⁰ this threshold can only be applied until March 2027. After that date, tolls must cover all heavy goods vehicles over 3.5 tonnes. This example highlights the need for new investments to align with both national strategies and EU legislation.

The consolidated list for the Pipeline includes 14 existing projects and 1 new project in the transport sector, initially costing UAH 23.3 billion in 2026 before rising to UAH 50.7 billion between 2026 and 2028.⁷¹ Excluding the UAH 120 billion already allocated to ongoing projects, the Pipeline still exceeds UAH 1.13 trillion, making it a highly ambitious portfolio. Additionally, the 2026–2028 Budget Declaration projects a deficit in the special fund – the portion of the state budget reserved for infrastructure and investment projects – with total expenditures expected to exceed revenue by an average of 47% over the three years.⁷²

The maximum total allocated for transport between 2026 and 2028 under the Medium-Term Plan is UAH 198.2 billion, covering 21 existing projects and programmes.⁷³ Comparing 2026 figures, current projects on the consolidated list require UAH 23.3 billion, while the Medium-Term Plan allows a maximum of UAH 27.7 billion. This leaves UAH 4.4 billion available for new transport projects in the Single Project Pipeline – an insignificant amount relative to the overall Pipeline portfolio, which exceeds UAH 1 trillion (Table 7).

⁶⁹ DREAM Public Investment Management System, [Створення національної системи оплати за проїзд дорогами в Україні](#), 11 August 2025.

⁷⁰ European Commission, Council of the European Union, [Directive \(EU\) 2022/362 of the European Parliament and of the Council of 24 February 2022 amending Directives 1999/62/EC, 1999/37/EC and \(EU\) 2019/520, as regards the charging of vehicles for the use of certain infrastructures](#), 14, 24 February 2022.

⁷¹ Ministry of Finance of Ukraine, [Консолідований перелік публічних інвестиційних проектів та програм публічних інвестицій єдиного проектного портфеля публічних інвестицій держави і розподіл публічних інвестицій на їх підготовку та реалізацію на 2026–2028 роки у розрізі джерел і механізмів фінансового забезпечення \(станом на 10.09.2025\)](#), 10 September 2025.

⁷² Cabinet of Ministers of Ukraine, [Кабінет Міністрів України, постанова від 27 червня 2025 р. № 774 Київ Про схвалення Бюджетної декларації на 2026–2028 роки](#), 27 June 2025.

⁷³ Ministry of Economy, Environment and Agriculture of Ukraine, [Середньостроковий план пріоритетних публічних інвестицій держави](#), 4 July 2025.

Table 7. Financing needs of existing projects in the transport sector versus maximum allocations under the Medium-Term Plan for Priority Public Investments.

Year	Cost of current projects on the Ministry of Finance's consolidated list (UAH billion)	Maximum allocation under the Medium-Term Plan for Priority Public Investments (UAH billion)	Remaining for new projects (UAH billion)
2026	23.3	27.7	4.4
2027	18.4	92.0	73.6
2028	9.0	78.5	69.5
2026–2028	50.7	198.2	147.5

A positive example of investment in the Pipeline's transport sector is the public electric transport and infrastructure development programme. Costed at UAH 486 billion, the programme currently accounts for almost a third of the sector's financing needs.⁷⁴ The programme aims to modernise urban electric transport systems serving Ukrainian municipalities by upgrading infrastructure, rolling stock and management systems. Other objectives include improving the quality, safety and energy efficiency of passenger transport, reducing emissions, restoring infrastructure damaged by hostilities, and bringing Ukrainian cities closer to EU mobility standards. Financing is expected to be provided by a mix of international financial institutions and governments, state and local budgets, and municipal utility contributions.

Conclusions

A systemic challenge in developing the Single Project Pipeline is the extremely centralised, top-down nature of the public investment management reform. At present, the Pipeline is being completed exclusively by ministries, state-owned enterprises, and joint-stock companies with majority state participation.

The latest updates on the action plan for the 2024–2028 public investment management reform roadmap highlight significant delays in developing the legislative and methodological frameworks for the reform.⁷⁵ Though the procedures for developing, monitoring, evaluating and reporting on sectoral strategies were due to be approved by February 2025, neither the frameworks nor the strategies themselves have been completed.⁷⁶

⁷⁴ DREAM Public Investment Management System, [Розвиток громадського електричного транспорту та інфраструктури](#), 6 August 2025.

⁷⁵ Ministry of Finance of Ukraine, [Стан виконання Плану заходів з реалізації Дорожньої карти реформування управління публічними інвестиціями на 2024–2028 роки](#), 1 October 2025.

⁷⁶ The IMF Executive Board set the development of sectoral strategies as a structural benchmark under the Eighth Review of the Extended Arrangement under the Extended Fund Facility (EFF) for Ukraine, with a deadline of December 2025.

Similarly, progress in developing a national strategic planning system has also lagged. The overarching concept and corresponding action plan for the system, originally due to be finalised by December 2024, were only approved in August 2025.⁷⁷ Adding to the backlog, the draft legislation intended to regulate the system is not expected to be formulated until mid-2026.

Both the pilot Single Project Pipeline, launched in 2025,⁷⁸ and the subsequent 2026 update reveal a substantial gap between declared financial requirements and actual budgetary capacity. While the total cost of projects and programmes listed in the new Pipeline is estimated in the trillions of hryvnias, both the Medium-Term Plan for Priority Public Investments (2026–2028) and the 2026 state budget cover only a small fraction of this demand.⁷⁹

For example, the municipal infrastructure and services sector requires approximately UAH 2.8 trillion, yet the maximum aggregate volume of public investment allocated under the Medium-Term Plan is a mere UAH 5.83 billion. Additionally, a lack of uniform funding criteria has led to the inconsistent classification of projects and programmes across various sectors of the Pipeline.

While these budgetary constraints demand rigorous project selection, the current framework lacks accountability. The Strategic Investment Council determines Pipeline inclusion without transparent criteria, which means the DREAM prioritisation mechanism has virtually no effect on the final selections.

There is also a major disconnect between the formal inclusion of environmental and climate requirements and their actual weight in the selection process. In practice, the environmental, climatic and social components of expert assessments are reduced to a single, generic question about risks. Indeed, the Ministry of Economy has recommended a substantial number of projects for Pipeline inclusion despite a lack of adequate risk descriptions. According to DREAM data, 68 recommended projects failed to provide baseline assessments of their contribution to environmental and climate goals, and of compliance with the ‘do no significant harm’ principle.

Finally, this report reveals flawed sectoral classifications and a lack of alignment with international frameworks. While the Pipeline serves as the primary entry point for both budgetary and donor funding – including the Ukraine Facility – its sectoral structure does not fully reflect the priorities of the Ukraine Plan. Key areas such as agriculture, small and medium-sized enterprises, strategic industries, and critical raw materials are notably absent from both the Pipeline and the Medium-Term Plan.

⁷⁷ Cabinet of Ministers of Ukraine, [Про схвалення Концепції національної системи стратегічного планування](#), 13 August 2025.

⁷⁸ Anna Danyliak, Valeriya Izhyk, Mykola Kobets et al., [Reforming public investment management in Ukraine: An analysis of Ukraine’s Single Project Pipeline](#), CEE Bankwatch Network, 7 March 2025.

⁷⁹ Mykola Kobets, [Ukraine’s Single Project Pipeline: The challenges of reforming public investment management](#), CEE Bankwatch Network, 14 November 2025.

Recommendations

To transform Ukraine's Single Project Pipeline into a realistic instrument for managing the national public investment portfolio – one rooted in decentralised initiatives, transparent in governance, and green in substance rather than form – and to ensure it functions as an effective bridge between the state budget, donor instruments and reform objectives, the following measures are required:

- **Align the Pipeline with the actual fiscal framework underpinning the Medium-Term Plan for Priority Public Investments.** The Pipeline must serve as a 'filter' that determines how many projects and programmes can realistically be financed and completed within budgetary limits and expected macro-financial assistance.
- **Increase the transparency of the Digital Restoration Ecosystem for Accountable Management (DREAM)** by ensuring the priority completion of active projects, as specified in Article 33-1 of the Budget Code of Ukraine.⁸⁰
- **Make prioritisation a functional filter** to ensure Pipeline investments reflect the needs of a country facing severe fiscal constraints and ongoing military aggression. This requires a clear cut-off threshold based on the financial forecasts of the Medium-Term Plan, a stage-gate approach to the admission of Pipeline projects, and mandatory ranking of projects by social impact and implementation readiness.
- **Decentralise project selection and create a mechanism for integrating regional portfolios.** Regional and local communities must be fully involved in the formation of the Pipeline. To support their involvement, the state should provide targeted technical assistance at the local level to ensure the preparation of high-quality feasibility studies.
- **Ensure that DREAM provides detailed information on active projects** in order to track compliance with the priority completion principle for public investments.⁸¹
- **Strengthen the transparency of decisions made by the Strategic Investment Council**, ensuring that clear selection criteria, formal protocols, and justifications for rejecting or supporting investments are clearly communicated to the public. In line with EU best practice, stakeholder participation should be institutionalised through partnership mechanisms such as monitoring committees.
- **Ensure that each investment added to the Pipeline complies with or, at the very least, does not contradict EU *acquis* provisions.**

⁸⁰ Verkhovna Rada of Ukraine, [Бюджетний кодекс України](#), 8 July 2010.

⁸¹ Ibid.

- **Mandate environmental, climate and social criteria.** Baseline assessments of compliance with the ‘do no significant harm’ principle and of climate contribution should be prerequisites for recommending projects for inclusion in the Pipeline. That 68 investment initiatives lacked even baseline assessments indicates the need for a revision of the procedures for weighting these criteria and the peer-review process itself.
- **Close sectoral gaps and remove investment initiatives that breach wartime requirements.** For instance, the municipal and infrastructure services sector currently lacks projects focused on household waste management and heat supply. Initiatives that fail to meet the realities of wartime and recovery should be withdrawn or postponed.
- **Avoid, or mandate additional safeguards for, high-risk projects.** Proposed nuclear projects – notably the completion of units 3 and 4 at Khmelnytskyi – should be required to conduct separate procedures to increase transparency, including comprehensive feasibility studies, alternative assessments of long-term safety and environmental impacts, public consultation, and verifying compliance with international obligations.
- **Unify investment streams and project classification** to prevent duplication and opportunities for manipulation.