

UKRAINE ADAPTED ANNUAL NATIONAL PROGRAMME ASSESSMENT FOR 2024

In line with the decisions made by Allied Heads of State and Government at the 2023 Vilnius Summit and 2024 Washington Summit, Ukraine continues to take forward reforms on its path towards future NATO membership through the adapted Annual National Programme (aANP). Ukraine has become increasingly interoperable and politically integrated with the Alliance. NATO Foreign Ministers endorsed recommendations for priority reforms in November 2023, and Ukraine presented a draft aANP for 2024. In February, Ukraine's Commission on the Coordination of the Euro-Atlantic integration, chaired by Deputy Prime Minister Olha Stefanishyna, finalised the 2024 aANP.² Throughout the year, Ukraine briefed Allies on its reform efforts in the NATO-Ukraine Council and its subcommittees and provided several written reviews of the implementation of the aANP.

Main trends

The severe security, budgetary, and personnel constraints imposed by Russia's full-scale invasion inevitably affect Ukraine's implementation of reforms, in particular in the defence and security sector. In addition to the Armed Forces of Ukraine, other ministries and agencies are providing large-scale contributions to Ukraine's self-defence. Significant numbers of civilian staff across the Ukrainian government, at all levels, have joined the military or other security forces or are engaged in the war effort in other ways, leaving a high number of vacancies. As Ukraine's government works to maintain services to citizens, the war causes further personnel and resource challenges across Ukraine's government, law enforcement, and judicial institutions.

Despite these constraints, Ukraine demonstrates political will and continues to implement required democratic, economic, and security reforms. Throughout 2024, Ukraine undertook important reforms that demonstrate its commitment to Euro-Atlantic integration. Ukraine has continued to lay the foundation for long-term governance and defence and security sector reform, including through draft legislation, strategies, action plans, and projects. The Verkhovna Rada, with the involvement of opposition parties, remains active in passing key legislation crucial both for the war effort and reforms. Under conditions of martial law, Ukraine has maintained efforts to increase transparency in governance and policy-making. Ukraine's civil society is often closely involved in shaping policies and reforms, including in the defence and security sector, demonstrating a strong culture of civilian oversight and public engagement. Consistent progress in implementing reform plans will remain essential to sustaining long-term institutional change.

The scale and scope of Ukraine's reform efforts are reflected in the wide range of international cooperation frameworks in which Ukraine is engaged. In 2024, following the European Council's decision to open EU accession negotiations, the EU and Ukraine launched a comprehensive screening of Ukraine's alignment with EU legislation. At the same time, Ukraine is also implementing reforms to meet requirements associated with the 2017 EU-Ukraine Association Agreement and the Ukraine Facility. In October, the European Commission presented an annual assessment of Ukraine's reforms on its path towards EU accession. Further economic, governance, and political reform efforts take place in the framework of Ukraine's cooperation with the G7, the International Monetary Fund, the World Bank, the Council of Europe, and the Organisation for Economic Co-operation and Development.

Political and Economic Issues

In 2024, Ukraine maintained judicial services and continued to make progress on judicial reforms. Ukraine resumed the operations of critical judicial bodies needed to strengthen the integrity and efficiency of the judicial system. The High Council of Justice (HCJ) was reconstituted following a vetting process that adhered to international best practices, and the

High Qualification Commission of Judges (HQCJ) resumed its work to address the shortage of judges, applying a comprehensive assessment procedure. Further achievements include progress in the competitive selection of judges for the Constitutional Court with the involvement of an Advisory Group of Experts, including international and national representatives. Ukraine passed legislation expanding the number of judges in the High Anti-Corruption Court (HACC), increasing the capacity and prosecutions by the Court. Ongoing efforts to advance recruitment and strengthen institutional capacity remain important for the long-term effectiveness and independence of the judiciary.

Significant law enforcement personnel and resources are diverted to the war effort, which has affected the overall pace of law enforcement reforms. Nevertheless, the Ukrainian government has demonstrated continued political commitment to reforming its law enforcement institutions. Ukraine adopted oversight mechanisms and competitive selection for leadership roles in the Bureau of Economic Security (BES), a step towards enhancing the oversight and prosecution of financial crimes. Digital transformation, such as electronic criminal proceedings, is being implemented to boost transparency and reduce corruption risks in investigations and prosecutions. In August, Ukraine approved an Action Plan to implement the Strategic Plan for Law Enforcement Reform for 2023-2027, which will guide comprehensive law enforcement reform efforts going forward. It will be important to ensure tangible progress in implementing the Action Plan, which includes measures to enhance transparency and accountability, public oversight, institutional capacities, and digitalisation in law enforcement.

Ukraine has continued making progress on implementing the State Anti-Corruption Programme (SAP) for 2023-2025, which is aimed at strengthening institutional mechanisms, eliminating corrupt practices, and promoting integrity. Ukraine has made further progress in strengthening key anti-corruption institutions, such as the National Anti-Corruption Bureau

(NABU), Specialised Anti-Corruption Prosecutor's Office (SAPO), and the National Agency on Corruption Prevention (NACP). These institutions are establishing a track record of high-profile anti-corruption cases and indictments. NABU and SAPO leadership has been appointed through competitive selection processes, and steps are being taken to expand staff capacity.

Ukraine has reinstated the obligation for public officials to provide asset declarations, which are made publicly available. The Diia platform consolidates various public services into a single online portal, enhancing transparency. Ukraine has passed legislation to reduce oligarchic influence and strengthen the Antimonopoly Committee. Financial reporting requirements for political parties were reinstated in 2024, and reports are being verified by the NACP. A new lobbying law introduced a regulatory framework, which will be supported by a Transparency Register. To meet OECD standards, Ukraine has also introduced draft laws on tax non-deductibility of bribes and criminal liability of legal entities. Ukraine's customs reform law, adopted in October 2024, establishes a transparent, independent process for selecting the head of the State Customs Service, mandates a re-certification of all customs officers, and introduces independent audits.

Ukraine has continued reforms to further advance human rights and the rule of law. In 2024, Ukraine ratified the Rome Statute of the International Criminal Court and amended its Criminal Code to establish criminal liability for crimes against humanity. Following the ratification of the Istanbul Convention in 2022, Ukraine adopted legislation aimed at combating gender-based violence. Ukraine has maintained open and unrestricted access for international observers to the detention places of Russian prisoners of war. In December 2023, Ukraine adopted amendments to several laws regarding the rights of national minorities, including the Law on National Minorities and the Law on Education. Practical steps to implement these laws are

ongoing, in consultation with representatives of national minorities, in order to achieve meaningful results.

Ukraine continues to make progress on media reform, aligning its regulations with European standards. The media law, effective from 2023, strengthened Ukraine's legal framework for both traditional and digital media platforms. The media landscape, especially online media, remains diverse. Ukrainians exercise freedom of expression, and critical and investigative reporting continues. However, the media advertising market has contracted due to the war and the television sector has faced increased concentration, in part due to the government-coordinated programming that unifies major news broadcasts. Ukraine is also confronting heightened disinformation in the context of the war, further complicating the media landscape.

Defence and Military Issues

In the area of civil and democratic control of security forces, progress is slower than expected. Draft legislation to further develop the Law on National Security remains under consideration in the Verkhovna Rada. The draft Law on Security Service of Ukraine (SSU) has not been taken forward, although an International Advisory Group that includes NATO continues its work with the SSU and other stakeholders to develop the draft law. Ukraine made some progress on modernising its command and control (C2) system by developing a new model of joint governance to enhance coordination between civilian leadership in the Ministry of Defence and the Armed Forces of Ukraine. However, changes to implement operational command and control structures for the armed forces and its operations, in line with NATO principles, have not been implemented. The implementation of such systemic changes has been challenging due to the ongoing wartime operations, staffing constraints, and martial law.

Ukraine made considerable progress with moving towards NATO standards and interoperability in 2024, working closely with NATO to develop a series of initial interoperability requirements. These requirements address institutional, functional, and quantitative requirements to facilitate Ukraine's long-term interoperability with NATO. Work is ongoing to implement the interoperability requirements, including Ukraine's priority capability packages. Additionally, Ukraine has implemented several NATO Standardisation Agreements (STANAGS) throughout its defence and security sector.

Ukraine also undertook key steps to modernise its defence planning and management systems by developing both the Model for Transformation of the defence management system and the Interoperability Roadmap to implement a planning, programming, and budgeting process. When implemented, these tools will help with Ukraine's defence modernisation. Ukraine's future force structure for the post-war context, which remains under development, will have significant implications for further reform of Ukraine's strategic defence planning.

Ukraine made progress with improving the efficiency and transparency of its defence procurement system during 2024, through two newly established procurement agencies, the Defence Procurement Agency (DPA, for lethal procurement) and the State Logistics Operator (DOT, for non-lethal procurement). With NATO assistance, Ukraine undertook a Strategic Defence Procurement Review (SDPR), which resulted in a series of concrete high-level recommendations to align Ukraine's defence procurement with Euro-Atlantic principles and best practices. In October, in line with SDPR recommendations, Ukraine appointed independent supervisory boards for the DPA and DOT.

Meanwhile, to take forward defence industry reforms, Ukraine is currently drafting a law on the development of the defence industry, aimed at ensuring Ukraine's security and defence needs, attracting investments, and developing exports. The Ministry of Strategic Industries has

also developed a state programme to support the use of artificial intelligence in the defence sector and has continued the process of restructuring state-owned enterprises, with 16 new joint stock companies and limited liability companies created as of October 2024.

Social and humanitarian services for military personnel and their dependents have been enhanced. The Ministry of Social Policy adopted a State Standard of social services for war veterans and their dependents. The Ministry of Veterans Affairs also developed a number of regulations to ensure the provision of psychological assistance for veterans and is developing institutional reforms to support the reintegration of veterans and their transition to civilian life.

Ukraine fulfilled several of its 2024 aANP goals for digital transformation in the defence sector. Notably, Ukraine completed a trial operation of NATO LOGFAS software and is working on the legal, technical, and operational documentation needed to employ LOGFAS. Ukraine introduced the Army+ and Reserve+ apps to digitise and streamline administrative processes and services for military personnel. Progress with implementing a medical information system in the Ministry of Defence healthcare facilities was stalled, due to delays in the delivery of required hardware that NATO agreed to provide for this system.

Ukraine undertook several steps to implement Ukraine's National Action Plan for the implementation of UN Security Council Resolution 1325 on Women, Peace, and Security, including the development and testing of uniforms and protective equipment for women service members. The Armed Forces of Ukraine established a department to monitor gender integration and the Ministry of Defence introduced a gender aspect into its personnel policy.

Resources

In 2024, Ukraine's defence and security spending was budgeted at around UAH 1.7 trillion (approx. USD 42 billion or 22% of GDP). In 2025, the draft budget forecasts this to increase to 26% of GDP (UAH 2.2 trillion, USD 54 billion). This includes expected international financial assistance for military aid of approximately USD 38 billion.

Security Issues

In 2024, in support of the Security Agreement between NATO and Ukraine, the NATO Office of Security certified Ukraine's security authorities, legal framework, and procedures underpinning secure exchange and sharing of classified information. Ukraine has put in place mechanisms for the exchange and protection of NATO classified information with NATO and among Ukrainian institutions. Ukraine has developed an efficient system to track and address cybersecurity incidents. Work is ongoing to update the legal regulation of cybersecurity issues.

Legal Issues

Ukraine and NATO have initiated consultations and a process to exchange NATO regulatory and legal documents. As Ukraine continues to assess its national defence and security legislation for alignment with NATO regulatory and legal documents, relevant NATO legal offices will support additional consultations as needed.