(DE) CENTRALISATION?

TRENDS IN THE INTERACTION OF LOCAL SELF-GOVERNMENT AND STATE AUTHORITIES AT THE LOCAL LEVEL IN UKRAINE

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LIST OF ABBREVIATIONS

LSG	Local Self-Government
LMA	Local Military Administrations
RMA	Regional (Oblast) Military Administrations
DMA	District (Rayon) Military Administrations
Hromada	Territorial Community as an administrative unit
District	For Ukrainian "Rayon" as administrative level
Region	For Ukrainian "Oblast" as administrative level

Subnational public authorities, regional public authorities, and local public authorities are all terms used to describe RMAs and DMAs.

Military administrations are temporary state bodies that operate for the period of martial law to ensure the operation of the Constitution and laws of Ukraine, to ensure, together with the military command, the implementation of measures of the legal regime of martial law, defence, civil protection, public safety and order, protection of the rights, freedoms, and legitimate interests of citizens. (Article 4, Article 8 of Law No. 389).

MAIN CONCLUSIONS

Our hypothesis was that with establishment of military administrations at the hromada level, it would be easier for the central government to implement its policies and projects along the vertical "Cabinet of Ministers of Ukraine - Regional Military Administration - District Military Administration - Local Military Administration" rather than waiting for decisions to be made at the local government level.

In emergency situations such as war, centralising decisions for efficiency **may be a natural response of the system**. However, it does not consider the advantage of local self-governance - the ability to quickly mobilise local resources to address local needs. Striking a balance between centralised military control and the need for local self-governance is, therefore, a key issue (Keudel & Huss, 2023). The ability to build effective and transparent dialogues contributes to the efficient distribution of roles, decision-making and conflict reduction.

The research resulted in **three analytical products:**

- Assessment of martial law legislation at the local level and the **practice of establishing military administrations.**
- Identification of **hromadas groups** that have effective/ineffective interaction with the state authorities at the local level.
- Highlighting the **challenges and strengths of cooperation** between territorial communities (LSGs and MAs) and regional state actors (RMAs and DMAs).

When assessing the martial law legislation at the local level and the practice of creating military administrations, we saw the risks:

13% of the total number of hromadas in Ukraine have military administrations, and it is in these territorial communities some local affairs have been transferred to representatives appointed by the President of Ukraine.

In some hromadas LSGs exist parallel with the LMAs and duplicate each other's powers. There is no clear legislative delineation of powers between the LSG and the LMA, and as a result, the two institutions function simultaneously without distinction.

The practice of establishing LMAs is not unified. Although we have not seen clear patterns of party affiliation influencing this process, under the current legislation, there **is still** a possibility that **informal ties between RMAs and self-government may influence the process of establishing** LMAs in hromadas. This can be used to influence local self-government bodies since the law does not clearly define and prescribe **indicators for assessing the ability of local self-government bodies to perform their functions**.

Main conclusions

When assessing the **types of hromadas that have effective/ineffective** interaction with the state authorities at the local level, we saw the following main patterns:

Common trends among the study's hromadas are centralisation in hromadas with LMAs, forced self-sufficiency in territorial communities, lack of importance human resources, and maintaining of representative offices.

In **4 out of 5 aspects of interaction[1] identified in the methodology, RMAs** need to revise their interaction strategy with **the occupied hromadas**. **Frontline and border territorial communities** need changes in in **3 of the 5** aspects of interaction.

Proximity to the front line and the **level of urbanisation** are important factors that influence **the nature of interaction and resource allocation**. In this paper, we have noted that the level of assistance to hromadas within the 30-kilometre zone varies by region and whether the RMA prioritises the provision of resources to frontline areas. Often, these (within the 30-kilometre zone) territorial communities have worse interactions. **Urban hromadas,** compared to rural ones, **demonstrate greater self-sufficiency**, better economic capacity, and a tendency to **establish a wide network of partnerships**.

The level of formalisation of interaction also varies depending on the context of the hromadas: **territorial communities that are actively engaged in reconstruction** tend to **interact** with regional authorities in a **less formalised manner** compared to territorial communities **under occupation,** which **complain about excessive formalisation of** communication and the inability to establish proper cooperation.

Among the factors affecting dissatisfaction with interaction, the main ones are excessive **bureaucratic burden** and, in some cases, formalisation of communication, **overlapping functions and responsibilities of district and region administrations**.

From our interviews with representatives of the RMAs and DMAs, we have seen the following challenges and strengths of cooperation with local self-government:

The main reasons for dissatisfaction of LMA'*s* cooperation with the RMA were the **forced cooperation with LMAs inexperienced local managers** and **their low knowledge of the local context**.

Representatives of the RMA also cited **the exclusivity of the decision-making process for allocating funds of local level authorities, the lack of external parties to consult with, and the excessive burden of communication with hromadas** as problems.

Among the negative practices on the *part of the DMAs* were **forced paternalism and passivity of hromadas in the issue of reconstruction and fiscal decentralisation**, which eliminates the possibility of district influence on allocation and spending.

Regional actors positively **assess the proactivity of LMAs and LSGs** in addressing their own needs and their initiative in interacting with both the state authorities and donors. That is, there is a partially **paradoxical situation** when both the RMA and the DMA would like to **have more instruments of influence,** but at the same time, they want **local self-government to be more self-sufficient and independent**.

The DMAs were praised for their interaction with hromadas, which included the district level as important decision-making center rather than marginalising it,

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[1] System of resource allocation, Degree of formalisation of interaction, Nature of interaction organisation, Level of participation in decision-making, Satisfaction with cooperation.

SECTION 1.
INTRODUCTION

1.1. THE CONTEXT OF CENTRALISATION RISK IN UKRAINE

The decentralisation reform is considered **one of the most successful reforms after Euromaidan** and an essential **factor in Ukraine's resilience to Russian invasion** (Council of Europe, 2021, Rabinovych et al., 2023). A key result of the reform was the creation of preconditions for democratising governance in Ukraine. First, instead of local state administrations accountable to the President and the Cabinet of Ministers, the management of hromada's resources was effectively transferred to local governments accountable to their residents. It is noteworthy that since the start of the reform, trust in local authorities has increased (Helge Arends, Tymofii Brik, 2023). Secondly, the logic of interaction between local governments and local state administrations has begun to change from subordination to cooperation as equal partners, an essential step towards implementing the European Charter of Local Self-Government.

However, Russian aggression and the resulting in establishment of martial law have significantly changed the interaction dynamic **between the central government and local self-government**. In particular, the powers of military (former state) administrations were expanded (Verkhovna Rada, 2015). At the same time, experts noted an increase in tensions between the government and local self-government (Umland, Burkovskiy, 2023) and insufficient involvement of local self-government in discussions of important issues such as the adoption of the draft law No. 5655, "On Amendments to Certain Legislative Acts of Ukraine on Reforming the Sphere of Urban Development" (Verkhovna Rada, 2021; AUC, 2022) and the redistribution of "military" PIT from local budgets to the state budget (AUC, 2023).

In emergency situations such as war, centralising decisions for efficiency **may be a natural response of the system**. However, it does not consider the advantage of local self-governance - the ability to quickly mobilise local resources to address local needs. Striking a balance between sound centralised military control and the need for local self-governance is, therefore, a vital issue (Keudel & Huss, 2023). The ability to build effective and transparent dialogues contributes to the efficient distribution of roles, decision-making and conflict reduction.

However, the risks of (re)centralisation under martial law in Ukraine arise not only from the potential logic of the state trying to centralise resources to fight the enemy. The establishing of martial law restrictions can be used by actors opposed to decentralisation to restore the status quo that the reform has changed.

This situation is described by the theory of **"stubborn structures" (**Magyar, 2019), when institutions try to return to the previous rules of the game. Decentralisation, the first phase of which ended only in 2020, with the adoption of a new administrative division and new economic opportunities for hromadas, may now be very sensitive to the attempts of "stubborn structures" to take advantage of martial law.

The full range of challenges is not unique to Ukraine but rather is rooted in the centralised and hierarchical governance structure shaped by the communist legacy. As the case of **Poland** shows, **post-communist leaders** inherited **highly centralised**, **overly bureaucratic and cumbersome state structures** (Regulska, 1997). In the previous system, both political and economic **decisions were made exclusively in the upper echelons of the party-state**

apparatus through a paradoxical process of "democratic centralism." In contrast, lower levels of the party-state apparatus merely implemented these decisions.

> In Ukraine, **a centralised decision-making system at the subnational and local levels existed for more than 20 years before the decentralisation reform began in 2014,** making it difficult to break down existing *"stubborn" structures* and governance models (Magyar, <u>2019</u>, Minakov, <u>2019</u>).

Thus, we see the real risks of centralisation of power both from the scientific literature in the concept of **"stubborn structures" and** from the possible logic of the state to increase centralisation for the sake of efficiency.

1.2. ANALYTICAL FRAMEWORK FOR THE STUDY OF INTERACTION

> The purpose of this study is to **analyze the main trends and changes in the interaction system between the state authorities and local self-government bodies in the context of war and martial law.**

Interaction is a crucial component of democratic governance, contributing to the stability and effectiveness of democratic systems (Olson, <u>1969</u>; Bergholz, 2018).

The existence and quality of interaction between institutions in a society are crucial aspects of social cohesion (Marc et al, <u>2013</u>) and the ability to deal with existing societal challenges. Currently, the biggest challenges facing hromadas in Ukraine are **security and recovery.** None of the state and non-state actors can solve these problems independently, so the interaction between local governments and state authorities at the hromada, district, and region levels was chosen for the study.

An essential aspect of the study is also an attempt to assess the interaction within the framework of centralisation of power. This report presents the **results of a study of the interaction** between the key actors of the territorial organisation of power in Ukraine, **local self-government** (LSG) and the LMAs **that replace them,** and **local state military administrations** (RMAs and DMAs). We have studied both the formal and informal sides of the interaction between these governmental actors in terms of several characteristics.

Characteristics by which interaction was evaluated

The Report of the European Committee on Local and Regional Democracy (CDLR) on the relations between local and central governments identifies four aspects of their interaction (Council of Europe, 2007). These are **cooperation, mutual information and consultation,**

monitoring, and financial sufficiency. In our analysis, we focus on the first two aspects, namely **collaboration and mutual exchange of information and experience**.

We propose to analyse the interaction between actors according to the characteristics disclosed in Table 1[2].

Table 1: Measures of interaction between government and local self-government.

MEASUREMENT	COMPONENTS/SIGNS		IMPORTANCE
Resource allocation	**Distribution patterns**		Resource allocation is one of the main patterns that describes the interaction between the hromada and the regional level.
Nature/organisation of interaction	● **Systemic interaction:** regular interactions that consistently solve complex problems; ● **Sporadic interaction:** irregular interactions that focus on solving a specific issue.		**Systematic cooperation** is deployed on a **regular basis**, implementing a **consistent approach** to solving complex problems. It often involves long-term planning, strategy development, and the implementation of integrated solutions. In contrast, **sporadic** collaboration is **infrequent** and mostly occurs in **response to specific problems** or pressing issues, as it lacks the structured, ongoing nature of systemic collaboration.
Degree of formalisation	● **Formalised interaction**: defined and performed within predefined structures and procedures; ● **Informal interaction**: occurs outside the procedures defined by formal rules and regulations.		It serves as a key indicator of the capacity of actors to be effective. In our study, we investigate the extent to which established protocols, clear hierarchy, and systematic communication channels contribute to their joint effectiveness in navigating the complex socio-political landscape. The presence of informal and formal interaction at the same time we see as the most positive option.
Level of participation of local governments in decision-making	**Informing**	The local government receives information about the problem from the other party to the interaction.	Information, consultation, suggestions, systematic exchange, feedback, and implementation are the different levels that **categorise stakeholder engagement in political cycle.** These forms of interaction can be characterised by the degree of formalisation inherent in the interaction. Information exchange and consultation provide a mutual understanding of relevant opportunities, which is vital for the development of well-informed policies. Proposals and systematic exchanges demonstrate the degree of activity of local governments in the
	Consulting	The other side actively drew the attention of local authorities to the need for consultations on this issue.	
	Suggestions	The other party collected proposals for solving the problem from local authorities.	

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MEASUREMENT	COMPONENTS/SIGNS		IMPORTANCE
	Systematic exchange	Local authorities and the other party regularly exchange views on the problem and its solution.	communication process, engaging in joint problem solving. In general, it provides a framework for assessing the quality of interaction and cooperation between local and central authorities.
	Feedback	Feedback from local authorities influences how the other party solves the problem.	
	Execution and coordination	Local authorities participated in the implementation of the decision as an implementer or coordinator.	
Perception of interaction	Participants' opinion on the usefulness of the interaction and their satisfaction with it.		The level of satisfaction creates a favourable environment for open communication, building trust and successful implementation of joint initiatives, thereby increasing the overall effectiveness of management structures.

We acknowledge the limitations of our study, focusing on two selected aspects of stakeholder engagement: cooperation and mutual information exchange and consultation. However, these aspects were recognised as the main ones based on both supporting sources (e.g. Council of Europe, 2007, 2018) and in-depth interviews. Nevertheless, this analytical approach allows us to clearly distinguish between different forms and prevailing trends of actors' interaction.

We also propose to look **at the interaction from the perspective of the state authorities at the local level (RMAs and DMAs)**. Therefore, from the interviews with them, we have identified the main problems that they mention on their part and the factors that they believe improve interaction.

1.3. FACTORS AFFECTING INTERACTION

In our analysis, we examined the criteria that characterise the hromada and its experience in the context of a full-scale invasion to trace the patterns of relevant interactions.

We hypothesise that hromada's characteristics, such as region, security factor, periphery and urbanisation factor, and political characteristics of the hromada leader, will influence the **format and type of interaction.**

For analysis, we divided all 30 hromadas by the following characteristics:

We have operationalised these criteria for hromadas in this way:

1. **The region/oblast** in which the territorial hromada is located. Although all regions have the same functions, regional military administrations have flexibility in how they perform these functions and organise their work. For example, during the process of hromadas amalgamation in 2014-2020, representatives of some regional administrations blocked the process of territorial hromada formation (Lukeria, [2018]). In addition, there are differences in the duration of the occupation of parts of different regions. The occupied parts of Chernihiv, Kyiv, Zhytomyr, and Sumy regions were liberated in April 2022 (the first wave of de-occupation), while Mykolaiv, Kherson, and Kharkiv regions were liberated from occupation in September 2022 (the second wave of de-occupation). Hromadas in the Zaporizhzhia region are still under occupation.

2. **Security factor.** Although hromadas may be located in the same region, their proximity to the borders with Russia and Belarus and/or the frontline limits their priorities to security, evacuation, and basic services. Some donors also do not allow these areas to apply for recovery funding: The European Investment Bank has designated the red and orange[3] zones prohibiting project implementation (Ministry of Reconstruction of Ukraine, [2023]).

3. **The factor of urbanisation and periphery.** Rabinovych et al. (2023) found a relationship between the type of hromada (urban or rural and its location) and its institutional resilience. It is believed that this relationship may vary due to differences in governance practices and models in different types of hromadas. These practices may influence the dynamics of cooperation between hromadas and regional military administrations, which is a critical aspect in the context of this study.

4. **Affiliation with the government party.** We assume that differences in the cooperation models between administrations and hromadas may be due to differences in the party affiliation of territorial hromada heads. The hypothesis is that hromada heads affiliated with the Servant of the People party are likely to have a more substantial influence on interacting with representatives of the RMA, as this party formed the government and has a connection to the President, who approves the heads of the RMA and the DMA. This hypothesis builds on Coman (2018), as well as Diaz-Cayeros et al. (2003) and Luna and Mardones (2009), who show that the executive tends to support cities with mayors affiliated with the majority party in parliament.

1.4. RESEARCH DATA AND SAMPLE

Our study includes a total of **43 interviews** conducted with hromadas' representatives living in regions where territorial communities were either under occupation and then liberated or continue to be under occupation. In particular, our study covers hromadas located within Sumy, Kharkiv, Kherson, Chernihiv, and Zaporizhzhia regions. In each of these regions, one interview was conducted with a **regional and district military administration representative and six representatives of local governments** or**local military administrations**. Additionally, **two interviews** were conducted with the heads of regional departments of the largest donor organisations in Ukraine working in the studied hromadas

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[3] Less than 100 km to active hostilities and 20-70 km to the border with Belarus and Russia.

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and **four interviews were** conducted with representatives of **regional offices of international cooperation in the studied regions**.

Map 1: Areas where in-depth interviews were conducted
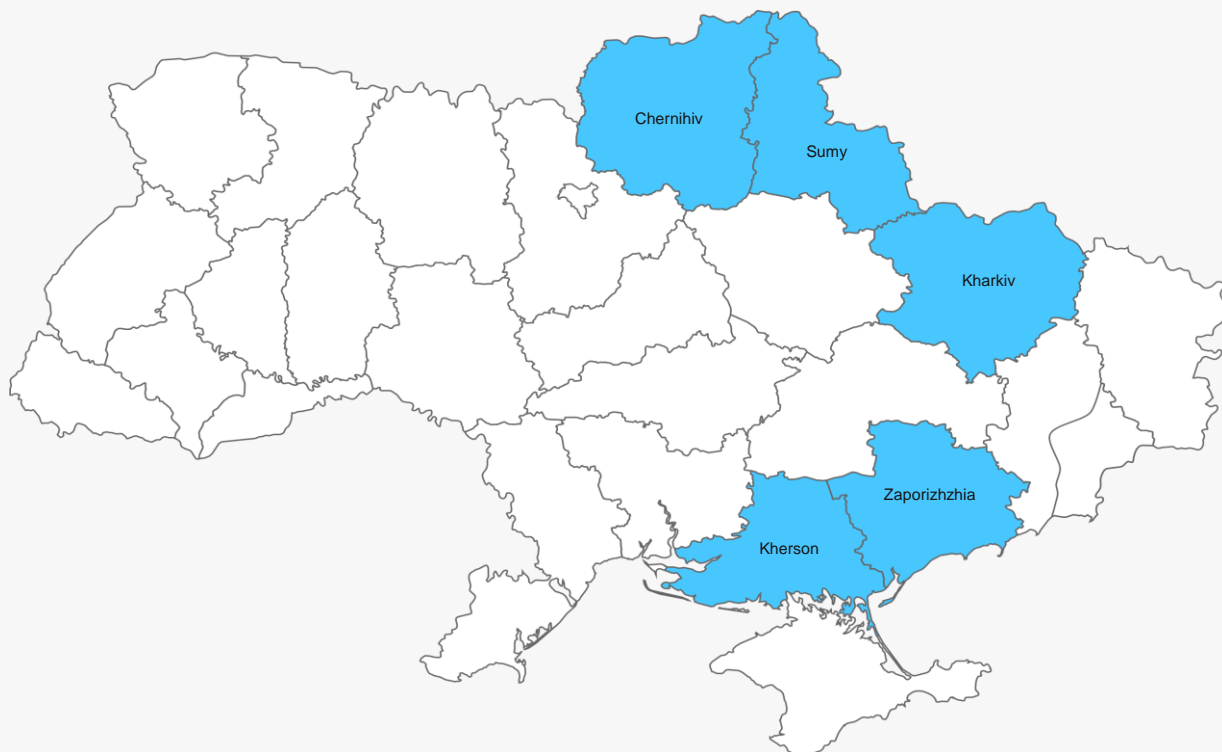
Our sampling strategy aimed to include hromadas representing two scenarios of the division of powers between local governments and military administrations: territorial communities where the transition from local government to the local military administration took place and those where local governments continue to perform their administrative functions. Thus, we have **16 hromadas with LMAs** and **14 hromadas with local self-government**. Of the 30 territorial communities in our sample, **10 are still fully or partially temporarily occupied,** while the rest have been liberated. The sample includes **15 urban hromadas** and **15 rural and settlement hromadas**. Also, **8 territorial communities in the sample** are located in the **30-km zone before the hostilities.**

Also, the hromadas were elected so that the heads of the hromadas elected in the 2020 local elections would be representatives of the government party (**6** territorial communities), as well as local and national parties.

Table 3: Hromadas where in-depth interviews were conducted[4]

Region (Oblast)	Number of hromadas in the sample	Total number of hromadas in the region	Number of hromadas with LMAs in sample	The number of LMAs in region	The number of occupied hromadas in sample	Hromadas in the 30-km zone before the hostilities in the sample
Kharkiv	6	56	6	27	0	1
Chernihiv	6	57	0	1	0	2
Kherson	6	49	6	49	2	4
Sumy	6	51	0	1	0	3
Zaporizhzhia	6	67	3	37	6	0

The interviews were conducted in August-November 2023 by the Ukrainian research agency *FAMA Custom Research Agency*. The recruitment process involved sending formal requests to the heads of institutions, which were responded to by less than 10% of them. Given this low response rate, alternative channels, such as reception offices and official social media, were used, but they proved ineffective. Therefore, direct contact was made through personal means, including email, personal phones, and personal social media profiles, which resulted in an 80% response rate. **Our researchers have committed to protecting participant responses by ensuring that any potentially identifying or harmful data for analytical purposes will only be shared with explicit participant consent and permission to publish.** Therefore, we cannot publicly disclose the results for each hromada and can only provide a characterisation by type.

To mitigate risks and ensure the safety of our interviewers, all interactions took place through online platforms.

To assess the number and geography of military administrations, we will also use data from the [Repository of the Centre for Sociological Research, Decentralisation and Regional Development](#) and data [provided to us by the NGO "CHESNO Movement"](#).

1.5. STRUCTURE AND EXPECTED RESULTS

Our document consists of 6 sections:

- The first section briefly describes the research objective, analytical framework, **and methodology.**

- In the second, we **describe the legislative changes to martial law at the local level** and analyse the **practice of establishing military administrations.**

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[4] Data as of the beginning of the report. Subject to change in the number of liberated/occupied hromadas and distribution of LMA/OMS

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- In the third section, we show the **main patterns of interaction** with regional state actors (RMAs and DMAs) on the part of hromadas and show what characteristics of territorial communities can potentially influence the interaction format.

- In the **fourth section,** we show the strengths and challenges of cooperation as seen by the RMA and the DMA.

- In the section **"5 quotes about 5 problems from donor organisations"**, we record the main problems of hromadas functioning that affect interaction with other actors.

- The **conclusions provide the** main **answers** to the questions set out in the analytical framework: assessment of martial law legislation at the local level and the practice of establishing military administrations, evaluation of hromadas' groups that have better/worse interaction with the state authorities at the local level, and highlighting the main problems and strengths of interaction, on the part of hromadas (LMAs and MAs) and regional state actors (RMAs and DMAs).

RISKS OF POWER RECENTRALISATION DURING THE MARTIAL LAW

In this section, we will consider:

What is the **legal framework** for the functioning of the regional, district and hromadas' level during martial law

How martial law **has affected decentralised local self-government**

Where and when were military administrations created in Ukraine after the start of the full-scale invasion, and what are the patterns of their creation

2.1. MARTIAL LAW 2022 AND CHANGES FOR LOCAL AUTHORITIES

General provisions

On February 24, 2022, in response to Russian aggression, the President of Ukraine declared martial law. Under such conditions, **public authorities, military command, military administrations and local governments are granted all the powers necessary to avert the threat.** Accordingly, freedom of movement, pluralism of information, increased control over individuals, etc., are restricted. Also, during martial law, it is impossible to amend the Constitution, hold elections, national and local referendums, or hold strikes, mass gatherings, and rallies.

Temporary state bodies - military administrations - are created to ensure the effective exercise of the powers granted and to repel the enemy. They are formed at the regional and district level in all regions and districts of Ukraine "based on" the civilian vertical of state power at the local level (Regional and District State Administrations). It is also worth noting that by presidential decree, the heads of pre-war administrations acquired the status of military administrations heads. **Local** military administrations, according to the current legislation, are formed instead of local self-government bodies **"from scratch"** from personnel of military, law enforcement agencies, civil defence services, who have concluded an employment contract with regional military administrations or the General Staff of the Armed Forces of Ukraine. In other words, unlike **district and regional administrations, the current heads of territorial communities did not automatically become heads of local military administrations. Still, they could be appointed after appropriate checks by President (Law on the Legal Regime of Martial Law, Verkhovna Rada, 2015).**

The difference and scope of responsibility of regional military administrations is determined by law "On the Legal Regime of Martial Law. The military command, along with the Military Intelligence and the Military Regulatory Authority, is authorised to **temporarily restrict the constitutional rights and freedoms of individuals and citizens, as well as legal entities**. Such authorisations include:

Section 2. Risks of power decentralisation during the martial law

- protection of objects of national importance and special regime of their operation;

- the use of enterprises and organisations for defence purposes, changes in working hours and working conditions;

- compulsory alienation and seizure of property for the needs of the state;

- establishing of curfew and special mode of light camouflage;

- establishing a special regime of entry and exit;

- setting restrictions on freedom of movement and traffic of vehicles;

- verification of documents, inspection of belongings, vehicles, luggage and cargo, office premises and homes of citizens;

- prohibition of peaceful gatherings, rallies, marches and demonstrations, and other mass events;

- establishing the procedure for the use of the fund of civil defence facilities.

Table 2. Changes to budgetary powers during martial law[5]

Local level	It was	It became
"Approval district and regional budgets and changes to them"	District and regional councils	District and regional military administrations
"Decision on the budget of the territorial hromada and amendments to it"	City/township/village council	Local military administration (if established)
"Decision on the transfer of funds from the relevant local budget for the needs of the Armed Forces of Ukraine and/or to ensure measures of the legal regime of martial law"	City/township/village council	Mayor/head of the LMA

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[5] https://zakon.rada.gov.ua/laws/show/252-2022-%D0%BF#Text

Table 3: Military administrations

	Local level (Hromada)	District (Rayon)	Region (Oblast)
Territory	On the territory of the respective hromada	On the territory of the district	On the territory of the region
By whom it is formed	By the decision of the President of Ukraine on the proposal of regional state administrations and military leadership		
Conditions for education	In case of failure of village, settlement or city councils and/or their executive bodies and/or village, settlement, city mayors to perform the functions assigned to them by the Constitution and laws of Ukraine "In other cases provided for by this Law" (Ibid., Art. 4(3))	In case of failure to hold a session of the district or regional council, if their powers are terminated in accordance with the law, or to exercise leadership in the field of defence, public security, and order [broad wording that leaves the issue of granting military status to state administrations to the discretion of the President of Ukraine].	
Composition	Composed of military personnel, law enforcement officers and civil defence officials	If a decision is made to establish district and regional military administrations, their status shall be that of district and regional state administrations, and the heads of district and regional state administrations shall be the heads of the respective military administrations.	
Appointment of the head of the administration	The head of the administration is appointed and dismissed by the President of Ukraine upon the proposal of the General Staff or the Regional council. The head of the relevant local self-government body may be appointed as the head of the military administration	Heads of district and regional administrations are appointed by the President of Ukraine.	
Accountability	District and Region administration	The General Staff of the Armed Forces of Ukraine and the Regional Administration (on defence-related issues), the Cabinet of Ministers of Ukraine (on other issues)	General Staff (Defence) of the Cabinet of Ministers of Ukraine (on other issues)

It is worth noting that before the full-scale invasion, there were already military-civilian administrations (MCAs) in Ukraine, which can be called a prototype of military administrations. They are governed by the law "On Military-Civilian Administrations" and, by law, can be established only in Donetsk and Luhansk regions. In fact, this institution **replaced local self-government in the government-controlled territories** (Movement CHESNO, 2023) as a response to the challenges of the time, in order not to impose martial law, not to stop reforms, and at the same time to ensure defence capability in the east (CPLR, 2023).

Local military administrations

The Law "On the Legal Regime of Martial Law" states that *local military administrations are formed within the territories of territorial communities where village, town, city councils and/or their executive bodies and/or village, town, city mayors do not exercise the powers assigned to them by the Constitution and laws of Ukraine* (Verkhovna Rada, 2015).

As mentioned above, the Law on the Legal Regime of Martial Law **does not abolish local self-government bodies**. When a municipal military administration is introduced, the head of the LMA approves its structure and staffing. It is registered as a separate legal entity and with the Treasury as a budget management body. The military administration exercises its powers during the duration of martial law and for another 30 days after its termination.

> However, the **establishment of the military administration itself does not terminate the city council as a legal entity**: neither do municipal enterprises, nor do municipal institutions, nor do municipal institutions on the territory of the city.

At the same time, Article 10 of the Law "On the Legal Regime of Martial Law" contains part two, which states that in addition to the powers granted by law, the Verkhovna Rada of Ukraine, upon the proposal of the President, **may decide to authorise the head of the military administration to exercise the powers of the executive committee and the mayor.**

Attempts to change the situation with the approval of the expansion of the powers of the LMAs by the Parliament Resolutions were associated **with the draft law No. 8056**, according to which part of these powers was to be **transferred to the LMAs automatically,** which potentially meant the possibility of practically cutting off the powers of local authorities at any time. After the expected criticism from the experts and civil society, the draft law was taken back for revision.

In fact, there can be two formats of **local military administration**:

When the administration is established, the city council and the mayor **retain part of the powers** of the executive committee.	The head of the military administration **receives a full list of powers of the city council and the executive committee.** Head of LMA has all the power in the hromada territory.

The option of transferring the full list of powers is **approved by the Verkhovna Rada of Ukraine by its Resolution**. According to our analysis, as of the time of the study, **19 such resolutions** had been published**, each of which expands the rights of several LMAs**. According to the Parliament website, the latest one was issued in August 2023. Most of these documents have a typical structure with a main thesis:

> … in addition to the powers referred to their competence by the <u>Law of Ukraine</u> "On the Legal Regime of Martial Law", **exercise the powers of the respective village, settlement and city councils**, their **executive committees**, respective **village, settlement and city mayors**; may approve **the temporary structure of the executive bodies** of the relevant village, town or city council.
>
> *From the Verkhovna Rada Resolution "On the Exercise by the Heads of Military Administrations of Settlements ... of Powers Provided for in Part Two of Article 10 of the Law of Ukraine "On the Legal Regime of Martial Law"*

In the scenario where the head of the local military administration receives the entire list of powers, the activities of the city council members do not stop, but they are limited in their powers. Thus, the **city council does not meet, sessions are not held, executive committees are not held**, and everything is **decided solely by the head of the local military administration**.

At the same time, **local military administrations** may be established **only in those settlements where village, town, city councils and/or their executive bodies do not exercise the powers vested in them by the Constitution and laws of Ukraine** (including as a result of actual self-dissolution or self-disqualification from exercising their powers, or their actual non-exercise, or termination of their powers under the law), as well as in other cases provided for by this Law (sub para. 1, Part 3, Article 4 of the Law "On the Legal Regime of Martial Law").

This wording <u>may be considered debatable</u> from the point of view of *legal certainty*. Firstly, the provision "other cases" **does not refer to specific requirements** of the **law** specifying other grounds for establishing MAs. Secondly, the construction "do not carry out... powers" **may create too much discretion** since the list of powers of local self-government bodies, in particular city councils, is very extensive (Chapter 1, Section II of the Law "On Local Self-Government in Ukraine"), and some of them are exercised at their discretion (passing a motion of no confidence in the mayor, uniting in associations, establishing mass media, etc.). Thirdly, it is unclear whether it is the inability to perform powers in general (i.e., the inability of the council to function) or the failure to exercise any specific powers. Fourth, the law does not define the entity authorised to establish the legal fact of inability to perform powers (from now on, we will also use the term *"failure to perform powers"* - author's note). Usually, such an entity is the court as an independent and impartial body. (OPORA, <u>2023</u>).

> I mean, I cannot yet conclude for myself how military administrations are appointed, in particular, for example, from the **43 fully occupied territorial communities of the Zaporizhzhia region, the military administration was introduced at 32**. What is the principle behind this? It is not clear. Accordingly, this has a particular impact on everyone's understanding of this issue. By the way, there are 5 territorial communities under the control of Ukraine, but military administration has been introduced in them, so there is a particular imbalance and a certain misunderstanding of the creation of such a temporary state body as the military administration of settlements.
>
> *Interviews with representatives of donor organisations*
> *working in Zaporizhzhia region*

In addition, in hromadas where local self-government bodies have been retained, the **powers of hromadas' heads have been increased,** who, following the amendments of May 12, 2022, to the Law of Ukraine "On the Legal Regime of Martial **Law," have the opportunity to make decisions** on issues that in peacetime fall within the competence of collegial local governments. With the obligatory notification of the head of the relevant regional military administration within 24 hours, the head of the territorial hromada "solely for the purpose of implementing measures of the legal regime of martial law may decide" to *transfer funds from the relevant local budget for the needs of the Armed Forces of Ukraine* to *free communal land plots from illegally placed temporary structures*, to *establish institutions to provide free primary legal aid, to appoint and dismiss the heads of such institutions, to sell alcohol in hromada* and defined in changes to other powers.

There is no clear legal **distinction in the** legislation between the **powers of the LSG and the LMA**, and as a result, the LSG and the LMA may overlap each other's powers when **all powers are not transferred to the head of the LMA**. The distinction exists only in words. The law does not clearly define and prescribe indicators for assessing the ability of local authorities to perform their functions.

District and regional military administrations

Also, the functioning of **elected bodies at the regional level**, such as **district and regional councils** and their interaction with district and regional administrations under martial law was highly debated during the first months of the war. However, with the adoption in May 2022 of the Law of Ukraine "On Amendments to Certain Laws of Ukraine on the Functioning of the Civil Service and Local Self-Government under Martial Law," the issue of the coexistence of district and regional councils was clarified (Verkhovna Rada, 2022). In particular, it was noted that if a district or regional council continues to operate, the establishment of the relevant military administration should not stop its work. Still, the council's powers will be limited to ensure that the administration fulfils its powers under Article 15(3) of the Law of Ukraine, "On Local Self-Government" (Verkhovna Rada, 2015).

The de facto functions of the district level and the region have hardly changed from the controlling ones, although specific responsibilities related to martial law have been added by law. Most RMAs did not even change the functions on their official websites from the previous versions of the Regional State Administration.

At the same time, we see from in-depth interviews that the actual powers of the RMA have increased:

> "Hromada budgets **are approved by the regional military administrations**, and the budgets of local military administrations are not just agreed upon; they are actually **written by the regional administration**. Therefore, it is pretty difficult to talk about local self-government there.
>
> Therefore, everything related to the control over the spending of funds is not done independently but **under the strict control of the regional military administration**. And this is not only in our region, but all the money that can be used is used under control. **We have even a commission… it was created in the ... region under the regional military the administration that controls the tenders, even those that are applied for local governments, even tenders related to road rehabilitation.**"
>
> *Interviews with representatives of donor organisations*
> *working with frontline hromadas*

Being temporary, the local military administrations, district and regional military administrations exercise their powers during martial law and 30 days after its termination or cancellation (Verkhovna Rada, 2015). However, even in this part, some points need to be legislatively regulated before the end of martial law. Currently, there are no provisions for the resumption of the activities of local self-government bodies or the procedure for transferring their powers back after the termination of martial law.

2.2. PRACTICE OF CREATING LMA

### 2.2.1. Regional practices for creating LMA

Most often, local military administrations are created in a scenario where the government is restored in the liberated territories or to ensure governance in the temporarily occupied territories or territories where hostilities are ongoing. Currently, military administrations operate in all types of hromadas:

**61** urban   **59** settlement   **64** village

Map 2. Geography of LMA programs in Ukraine.

Local Self-Governance
Local Military Administration
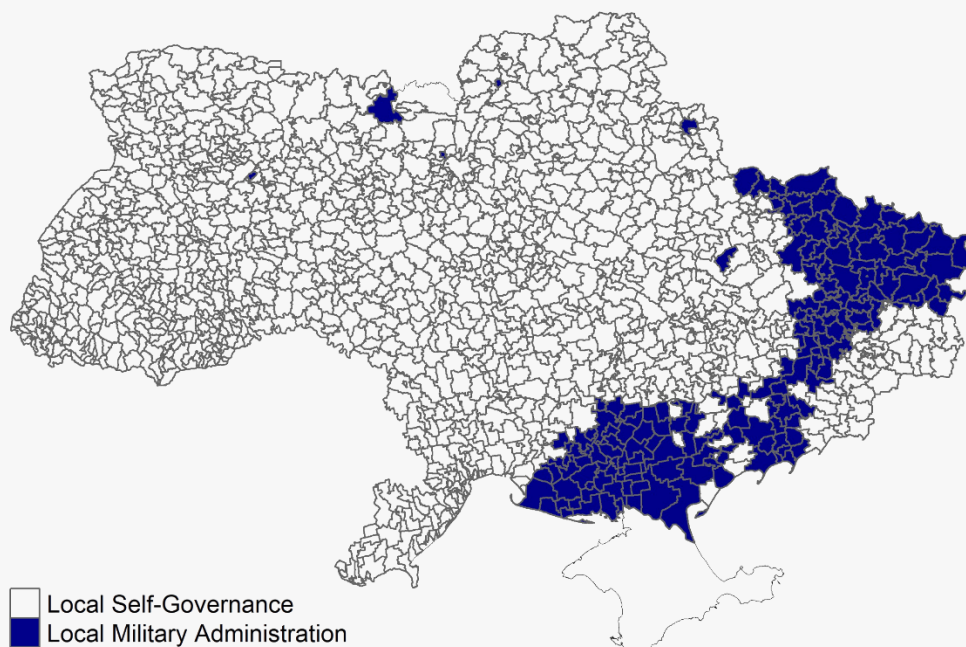
Most of these administrations were established in **Kherson (49)**, **Zaporizhzhia (37)**, **Donetsk (36)**, **Luhansk and Kharkiv (26)** regions, i.e., in relative proximity to the frontline. At the same time, the work of almost half of the military administrations is impossible due to the occupation of settlements. These administrations often operate in other cities on government-controlled territory.

Graph 1. Regional distribution of all LMAs by region
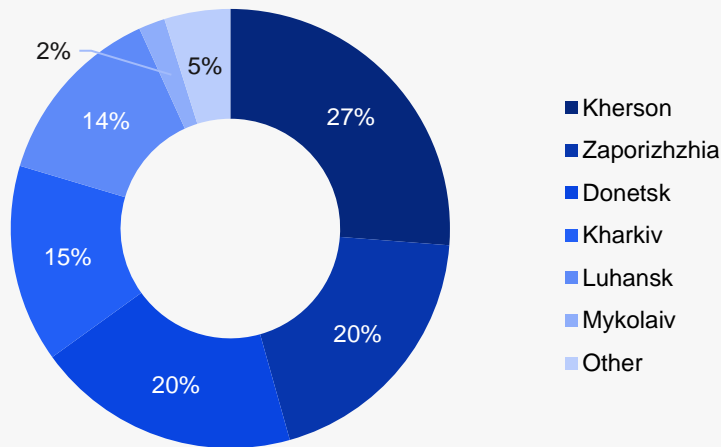
Only **13% of the total number of hromadas** in Ukraine have military administrations at the territorial community level.

We see that the **practices of establishing LMAs in the regions are not unified**. We see this in the example of Kherson region, where local self-government bodies were changed to LMAs in all hromadas. At the same time, Donetsk, Luhansk and Zaporizhzhia region, where the fighting and the level of occupation are same, still have local self-government bodies even in the occupied hromadas.

Graph 2. Number of LMAs among hromadas in the regions of Ukraine
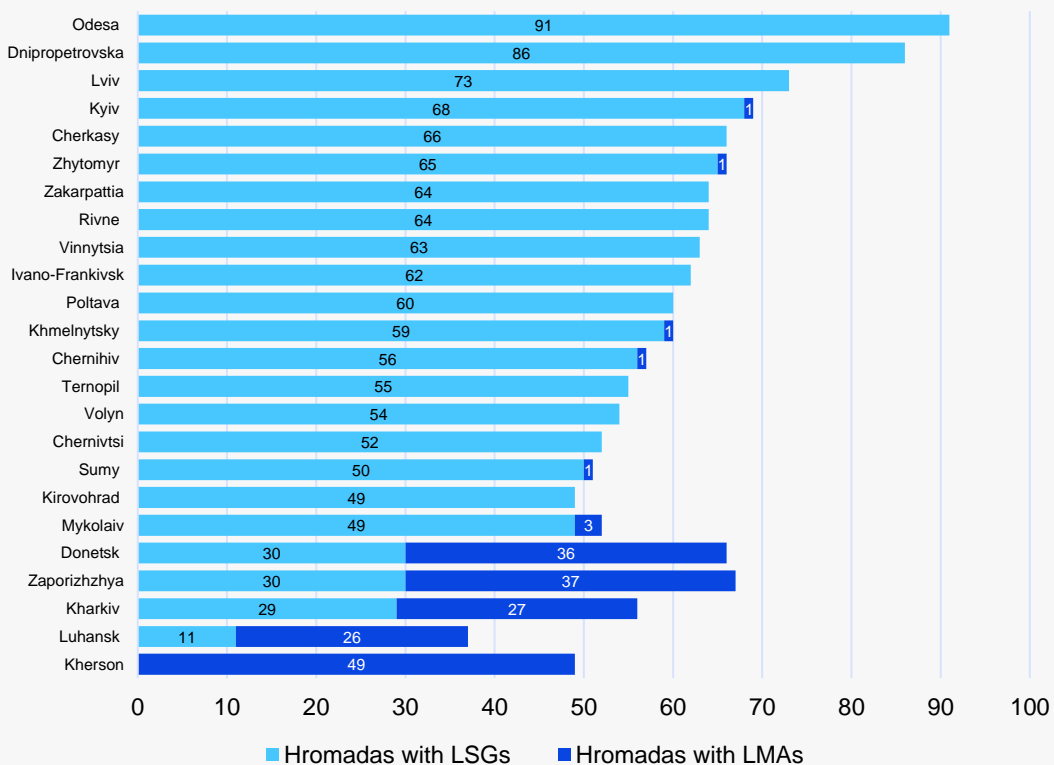
As we can see, only **in the Kherson region absolutely in all hromadas have established LMAs**. LMAs have been established in 70% of hromadas in the Luhansk region, and in 55% of Zaporizhzhia and Donetsk region.
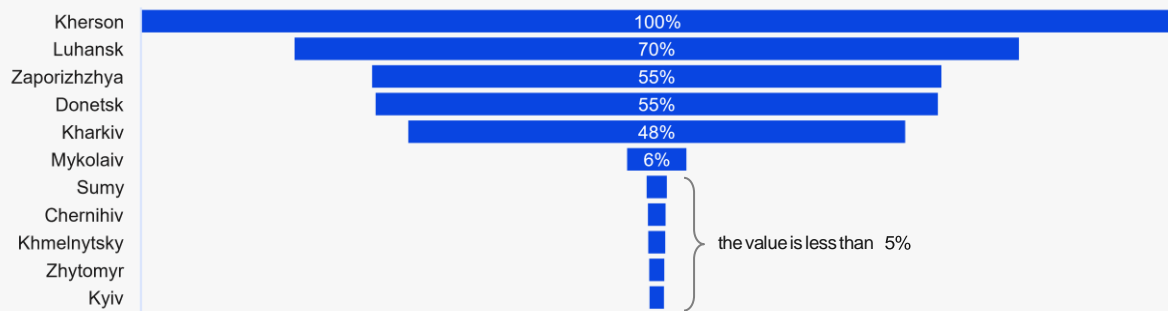
The logic behind creating LMAs in the occupied hromadas is **that not all deputies leave occupied hromadas**. This has led to problems with solving urgent issues for the territorial hromada.

> *There are 22 deputies in our village council. **Only 6 have** left to the territory controlled by Ukraine. At least **12 votes are** needed to make decisions. That is, while the village head and the executive committee are capable of making decisions and acting, the village council session does not actually fulfill its task. The last time the session was convened was in mid-February before the creation of the LMA.*

**Graph 3. Percentage of LMAs among hromadas in the region**

Region	
Kherson	100%
Luhansk	70%
Zaporizhzhya	55%
Donetsk	55%
Kharkiv	48%
Mykolaiv	6%
Sumy	the value is less than 5%
Chernihiv	
Khmelnytsky	
Zhytomyr	
Kyiv	

It is not only the security logic that can explain the fact that local military administrations established in **Chernihiv hromada**, **Sumy hromada**, **Gostomel hromada** (Kyiv region), **Shepetivka hromada** (Khmelnytsky region)**,** and **Netishyn hromada (**Zhytomyr regions). These hromadas are the only ones per their region with LMAs.

2.2.2. The impact of political affiliation on the creation of LMAs

The media often **attribute the** unjustified establishment of LMAs in hromadas in certain regions to **political conflicts between territorial hromada leaders** and the **central government,** as in the [Chernihiv case](#). Therefore, we analysed the political affiliation of elected in 2020 head in hromada where LMAs were established and where LSG are not changed in frontline regions.

*Graph 4. Number of LMAs by political affiliation of the head in frontline regions[6]*
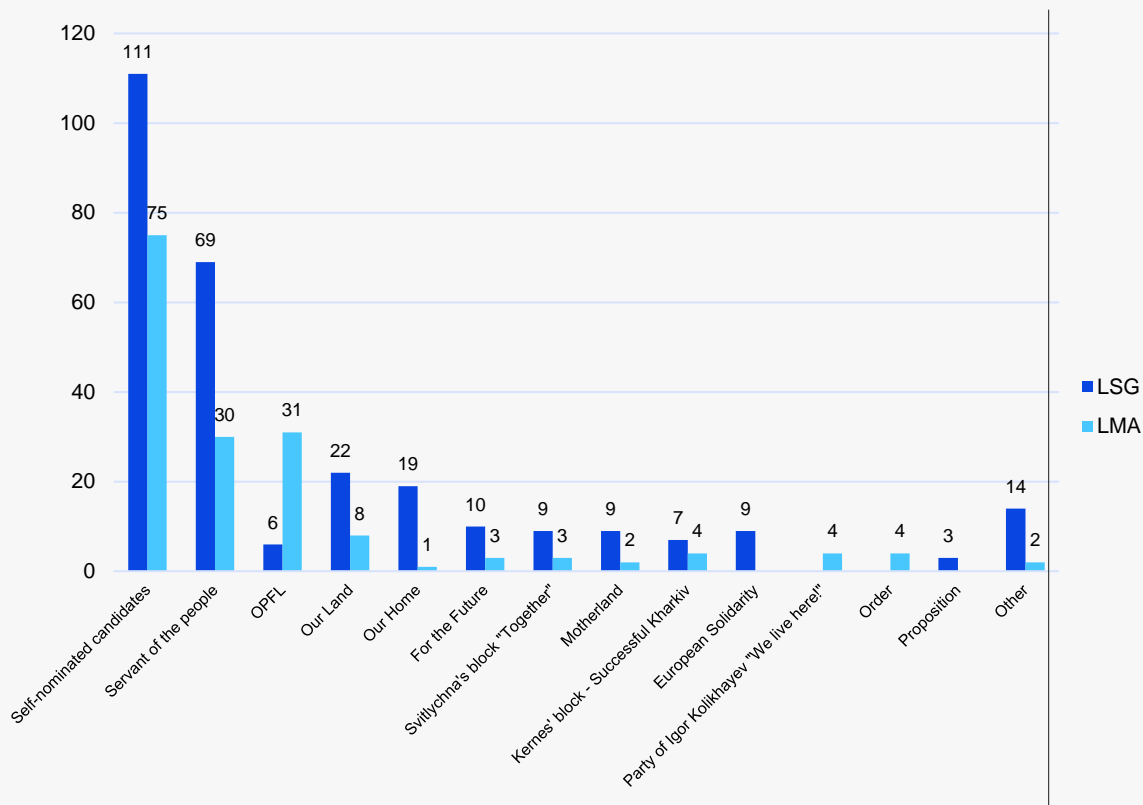
In general, we do not see any evident political distortions in the structure of the hromadas where the LMAs are established. **Several observations** are interesting:

- Local military administrations were established **in 57% of the hromadas, where representatives of banned in Ukraine parties Opposition Platform for Life(OPFL) and Opposition Bloc were heads of local council**. Of course, this is not to say that all 32 leaders from these parties were replaced, as the LMA may have appointed some, as we saw in the Kharkiv and Kherson regions, but most were. Interestingly, in the areas with active hostilities (Chernihiv, Kyiv, Sumy, Kharkiv, Zaporizhzhia, Kherson, Mykolaiv, Luhansk, and Donetsk), in **32 out of 39 hromadas with representatives of these parties as heads have established LMAs.**

---

[6] Chernihiv, Kyiv, Sumy, Kharkiv, Zaporizhzhia, Kherson, Mykolaiv, Luhansk and Donetsk regions

Figure 5. LMAs and LSGs in hromadas where heads were elected from banned parties (OPFL and Opposition Bloc) in 2020
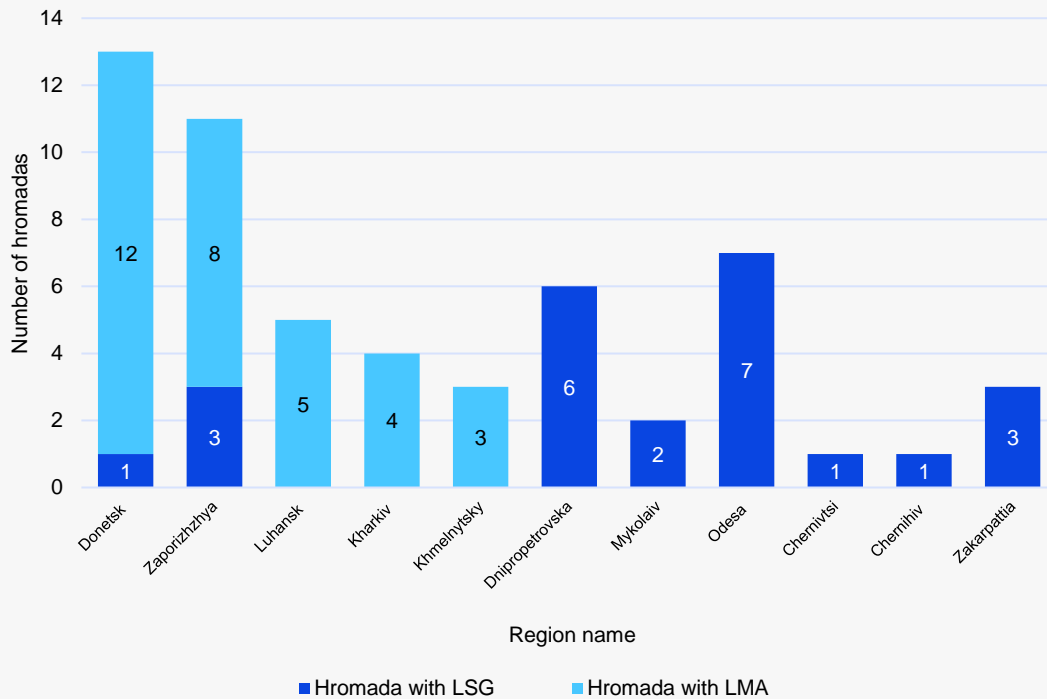
However, **24 hromadas' heads elected from banned parties are still heading LSGs in Ukrainian hromadas**, even in 3 hromadas in the Zaporizhzhia region, 2 in the Mykolaiv region and 1 in the Donetsk region. Part of one of these territorial communities, the Staromlynivska village hromada in the Donetsk region, is **already under occupation**.

- **In** the **30 hromadas** headed by representatives of the **Servant of the People**, LMAs were also established, and territorial hromada leaders were partially replaced. Military administrations were established in all hromadas in Donetsk and Kherson regions, where mayors from this party were elected.

Figure 6. LMAs and LSG in hromadas where the heads of the Servant of the People party were elected in 2020
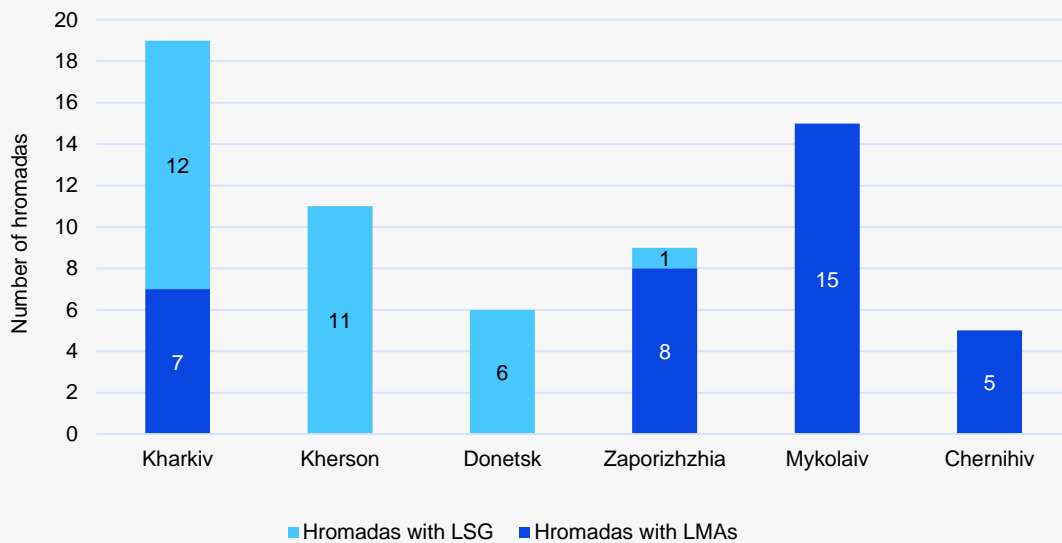
- In **none of the 9 hromadas** in the areas where there was fighting, where the head was a representative of the **European Solidarity**, no LMA was established.

In addition to the party affiliation of the chairman, we also checked which **parties in the hromadas in the regions where the LMAs were established** (Kherson, Zaporizhzhia, Mykolaiv, Luhansk, Donetsk, Kharkiv, Chernihiv, Sumy) had a decisive influence on the work of elected hromada councils. We assessed which parties had a "**potential majority", i.e. 40% or more of the elected deputies in the hromada**. We take into account the limitation that not all councils had such an almost absolute majority. Still, among the hromadas in these regions, **110 hromadas had a party with such a majority**.

Interestingly, the **Servant of the People** party potentially had the majority in **31 territorial communities** from the frontline regions. In contrast, the **OPFL** representatives had the **majority in 27**.

We can see from the practice of creating an LMA:

- **In hromadas, where the OPFL potentially controlled the majority of the council,** LMAs were most often established. **Thus, in 88% of hromadas** in the frontline regions, where this party gained potential control over decision-making in the 2020 elections, **LMAs were established**. This is often explained in in-depth interviews by respondents that **representatives of this party, which is already banned in Ukraine, usually refused to leave the occupied territorial communities** and stopped conducting deputy activities, which set a **precedent for creating an LMA in the hromada.**

- **In hromadas, where the Servant of the People had a** potential majority, **LMA were nevertheless established**. Thus, in **42% of the hromadas** in the frontline regions **with a majority of the Servant of the People, LMAs** were **established**.

Graph 7. The practice of creating a party affiliation of the potential majority in the hromada
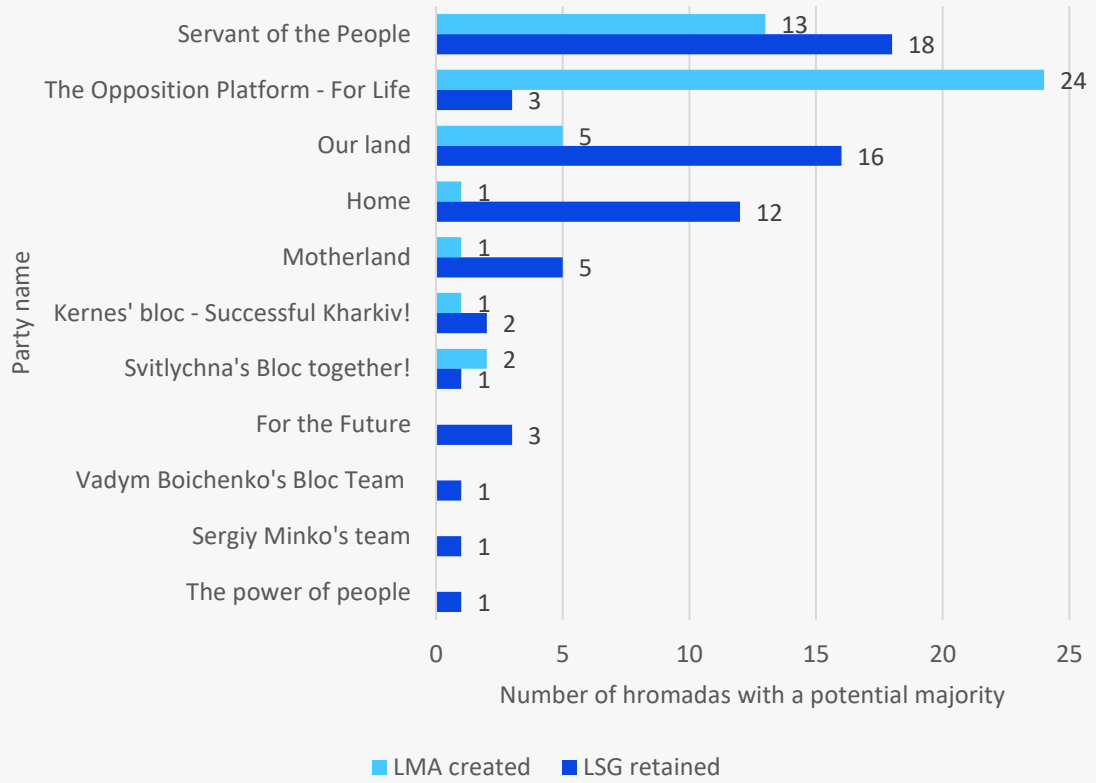
2.3. CONCLUSIONS

- The establishment of martial law in Ukraine: 1) created a new level of local government authority, namely military administrations at the hromada level. Only **13% of the total number of hromadas** in Ukraine have military administrations at the territorial hromada level. In some of these hromadas, local affairs have been transferred to representatives appointed by the President of Ukraine. In most cases, these hromadas have been under prolonged occupation, which means they face many security challenges and/or are close to the frontline.

- **Currently, LSGs exist in parallel with LMAs and duplicate each other's powers**. At the same time, there is no clear legislative delineation of the powers of LSG bodies and LMAs, and, as a result, such a delineation exists only in words.

- The **law does not** clearly define and prescribe **indicators for assessing the ability of LSGs to perform their functions, which leaves room for abuse**. Although there are currently few such hromadas, the lack of separation of powers creates risks for the future in organising governance in the liberated territories.

- The establishment of martial law **turned all district and regional administrations into military administrations** (subordinating their activities not only to the President and the Cabinet of Ministers of Ukraine but also to the General Staff of the Armed Forces of Ukraine). At the legislative level, there were no significant changes to the functions of district and regional administrations**.**

- The Law "On the Legal Regime of Martial Law" does not abolish local governments but **increases the powers of hromadas' heads**, **which can make certain decisions alone**.

- We see that the **practices of establishing LMAs are not unified, are most likely regional in nature,** and are coordinated with the regional level of government. We can see this in the example of the Kherson region, where LSG bodies were changed to LMAs in all hromadas, while in Donetsk, Luhansk and Zaporizhzhia regions, where the fighting and the level of occupation are no less, LSG bodies remain in place even in the occupied hromadas. **We do not see clear signs of party affiliation influencing the policy of establishing LMAs** in frontline hromadas, although there are exceptions, such as in the regional centres of Chernihiv and Sumy. At the same time, in some in-depth interviews with LSG leaders, the risks of both party and informal personal affiliation are mentioned.

INTER-LEVEL INTERACTION WITH PROSPECTS FOR THE LSG AND LMA

In this section, we will consider:

At the beginning of the section, we present **general trends in interaction according to all hromadas**.

In the second part, we will show the **main patterns and types of hromadas with problems in interaction according to each interaction criterion**.

3.1.   GENERAL TRENDS

Centralisation of processes for hromadas where LMAs have been established

The establishment of local military administrations has significantly **changed the decision-making landscape for local governments in more than a hundred hromadas (where LMAs were introduced instead of LSGs)**, transforming them from autonomous actors to executors of higher-level directives. Traditionally, the powers of local self-government were distributed among different actors, such as the mayor, the executive committee, and the local council. However, in the context of military administrations, these powers are centralised under the leadership of the head of the local military administration.

This centralisation leads to a directive approach, with local administrations primarily executing orders from district and regional military authorities. An interlocutor from a local military administration emphasises this change:

> *When you are a local authority, you decide the fate of people and resolve certain issues. There [in the local military administration] you can start some good work, and then the region wants to stop it - you must stop.*
>
> *[xvi]*

This shift represents the centralisation of power, as explained by a local government representative:

> *If we talk about military administrations now, about this whole restoration, then yes, there is centralisation. The head of the military administration is directly subordinate to the region.*
>
> *[xvii]*

Hromadas' leadership and the idea of self-reliance

LSG representatives in hromadas, where military administrations have not been established, emphasise the **importance of autonomy in the face of challenges after the shock of the first months of the war**. One of the critical aspects **is to systematically monitor and analyse humanitarian aid, ensure fair distribution, and effectively meet hromada's needs.** They recognise the need for hromadas to be self-sufficient, often taking initiatives on their own rather than relying on regional or district administrations.

Hromadas leaders are also actively participating in meetings and decision-making processes, which indicates a shift from exclusive discussions to more inclusive ones:

> *We are constantly invited to meetings, and meetings are already being held with the participation of all hromada heads. Previously (until February 24, 2022), these were only heads of administrations, but now all heads of hromadas are invited. And, of course, all the tasks that have been set for both the region and the district today, of course, the primary fulfillment of these tasks depends on the hromadas.*
>
> *[xviii]*

In addition, **there is an understanding and acceptance of the additional responsibilities imposed on local authorities in wartime, which are generally not** provided for in local government laws. This adaptability and willingness to take on extra tasks, even those outside their ordinary competence, underscores the desire for self-sufficiency.

The importance of human resources

In addition, the interviews point to the **importance of human resources** in determining the ability of hromadas to become self-sufficient. Territorial communities with employees who **speak English** or other languages are able to travel for business and establish partnerships, demonstrating a higher level of operational independence. However, not all hromadas can afford to offer the high-paying positions necessary to attract specialists for such a capacity. The deputy head of one of the rural hromada notes that financial constraints hinder this advantage:

> *In order to raise funds, you need to have staff with the ability to travel abroad and knowledge of a foreign language, which most hromadas cannot afford. These are highly paid positions, and they are often not kept in the state.*
>
> *[xix]*

> *Frontline hromadas, wartime, you understand, there were not many personnel before, and now there are even fewer.*
>
> *[xix]*

Maintaining a representativeness

Our results also show a dominant tendency to **maintain representation in hromadas**, where in territorial communities that was in sample of research, approximately *one-third of the heads of local military administrations (LMAs)* are **incumbents** *elected in the 2020 local elections as heads of municipalities*. *In addition, a* significant number of the appointed heads of regional military administrations **(RMAs) were previously deputies of hromadas councils**, district, or regional councils in their respective regions.

A significant number of the **newly appointed heads of the LMAs** from the hromadas surveyed were previously affiliated with the *Servant of the People* party. However, there were cases where the appointed leaders were politically affiliated with other political parties, including both regional political initiatives and parliamentary parties. It is worth noting that these parliamentary parties (*For the Future, Motherland*) often enter situational coalitions with the government party in the parliament. This phenomenon can be explained by the dominance of these parties in the 2020 local elections in the regions studied.

3.2. INTERACTION CHARACTERISTIC

3.2.1. Resource allocation system

Current impact	**There is a need to revise the strategy of interaction between the RMA/DMA and hromadas:**
region / area	Border hromadas
periphery factor	occupied hromadas
urbanization	less urbanised hromadas
safety factor	the most economically capable hromadas in the region

✅ General positive aspects:

- In all the regions studied, RMAs **play a crucial role in facilitating resource allocation** by serving as a conduit between donors at the state level and recipients at the hromadas level. A recurring theme in discussions with various territorial communities, regardless of the type of administrative body they have - LSG or LMA - is their dependence on the region administration to help them identify and connect with donors.

- The distribution of material assistance and economic resources is largely formalised by Ukrainian legislation, mostly centralised at the level of the State Agency for the Reconstruction and Development of Infrastructure of Ukraine and the Ministry of Hromadas, Territories Development and Infrastructure of Ukraine. This formalisation is particularly evident **in the adherence to legal protocols that ensure a standardised and regulated approach to resource allocation.** It is worth noting that as state recovery initiatives are currently in the early pilot stages in most hromadas, respondents rarely mentioned challenges in cooperation at this level.

- No differences are evident in hromadas, where the leaders belong to the majority party in parliament. The heads of LSG bodies and LMAs, regardless of their pre-war and current party affiliation, reported similar experiences with the RMA's assistance in the distribution of humanitarian aid and donor projects.

❌ General negative aspects:

- However, the assistance the RMAs provide in engaging **with donors needs to be completed in supporting partnerships**. There is a noticeable gap whereby the RMAs do not give the hromadas **consistent guidance on effective strategies for engaging donors independently** but instead **focus the networking process on themselves**.

- On the one hand, the RMA, as an intermediary in establishing relations with donors, facilitates the hromada's work in finding partners. On the other hand, the representatives of LSG bodies mention the formation of dependence on the RMA **as an intermediary in establishing relations with donors.** This dependence raises concerns that certain hromadas will receive more significant resources from international aid sources.

- Interactions with the RMA are also accompanied by respondents' concerns about the potential centralisation of resources and the role the RMA could play in managing the distribution of economic resources as these resources increase. There is also a concern among hromadas' leaders that future political motivations may prevent them from supporting hromadas, **where the chairman may become a political competitor.** However**,** this risk is not observed in the surveyed liberated hromadas.

Problems with resources in border/frontline hromadas (30 km from the)

There is a noticeable trend in the distribution of material resources, especially for hromadas in the 30-km zone close to the contact line, where Donor [restricts](#) their participation in recovery efforts. Some hromadas indicate that the assistance is sufficient to provide the necessary resources for critical recovery needs, including materials and tools. Conversely, other hromadas in the same area have a contrary sentiment, expressing a sense of self-dependence and the need to address all recovery issues independently. However, this divide in satisfaction appears to vary by region, with some RMAs **prioritising support for hromadas in the frontline zone while others focus on hromadas where full recovery is possible.** As the interaction between local authorities and the RMA unfolds, these regional differences in resource allocation strategies prompt reflection on the broader implications for equitable recovery in different hromadas.

The situation with resources is worse in the failed and non-urbanised hromadas

Another vital pattern identified during the interviews emphasises the greater self-sufficiency of urban hromadas in resource allocation. **Urban hromadas** leaders **often develop personal connections with municipalities abroad and establish various partnerships,** which leads to financial support and better project cooperation[iii].

In addition, **urban hromadas demonstrate a greater capacity to defend their interests** at the regional and national levels. Also, due to their economic strength, urban hromadas have more influence in protecting their interests at both the regional and national levels.

Conversely, some heads of economically viable urban hromadas say they feel a **lack of resource support,** as the RMA may believe these territorial communities are capable of raising funds on their own.

More resources may be available for hromadas that are popular in the media

Our in-depth interviews emphasise that the **media presence of a hromada or mayor** can potentially influence the dynamics of resource allocation negotiations with the RMA. Leaders of urban hromadas use media appearances to draw attention to specific topics or issues of the hromada, thus influencing the RMA in the negotiation process. For instance, the head of the LMA of one hromada explicitly stated that "the popularity of the hromada in the media and my publicity helps a lot in communicating about resources with the region".

3.2.2. Degree of formalisation of interaction

Current impact	There is a need to revise the strategy of interaction between the RMA/DMA and hromadas:
region / area	border/frontline hromadas
periphery factor	occupied hromadas
safety factor	hromadas with leaders without political experience in the region
personal experience of the chairman	
LMA existence in the hromada	

The analysis of cooperation between local self-government bodies (LSG) or local military administrations (LMA) with **RMAs/DMAs** revealed a clear trend: **interaction involving local military administrations (LMA)** is more often **formalised**.

✅ **General positive aspects:**

- **In one-third of the hromadas** surveyed, we **saw both formal and informal cooperation** between regional actors and hromadas.

It is appropriate to emphasise the importance of both formal and informal interaction within the framework of a modern approach to governance focused on overcoming the consequences of wartime emergencies in Ukraine. Representatives of the hromadas speak about this:

> *I can reach the department, heads, and deputies for online and offline meetings, or just by phone. It's convenient when I can quickly resolve urgent issues and formal processes work well.*
>
> *[xxi]*

In addition, we recognise that the overwhelming dominance of formal or informal mechanisms has a negative impact on the effectiveness of cooperation processes.

❌ General negative aspects:

- We can see the **influence of some factors on the level of formalisation in the work of hromadas and** RMAs, which indicates a difference in approaches to hromadas. The factors that influence more formal cooperation between hromadas and RMAs are primarily related to the *security status of hromadas, peripheral status and personal characteristics of hromada or RMA leaders.*

- *Interaction is more informal in territorial communities, where the heads have previous experience in region administration.* A vital pattern that influences the degree of formalisation of cooperation is the influence of **personal characteristics, particularly the prior experience of the LSG** and **LMA heads**. The degree of formalisation is significantly influenced by whether these individuals have pre-war experience in the respective region and the regional administration and whether they are influential and famous in the media. For example, compared to the leadership of LSG, the heads of **LMAs often have more informal communication** with the regional level due to their previous experience with district or region administrations. This emphasises the interconnectedness of personal and professional experience in shaping the dynamics of formal or informal interaction.

Excessive formalisation of border/frontline (30 km zone) and occupied hromadas

Challenges are particularly acute in small hromadas located on the periphery, especially in the 30-kilometre zone from the contact line, as these areas **cannot be recognised as recovery areas** under Ukrainian law. This statement can be illustrated by a quote from one of our respondents representing a small peripheral hromada:

> " *Sometimes I think that we have been forgotten, not to mention informal communication. The previous head of the RMA had never been to the hromada at all.*
>
> **[iv]** "

At the same time, respondents from hromadas who are **actively recovering** recognise that they have **informal communication with regional authorities at all levels**. They mention frequent phone calls directly with the head of the administration and his deputies, informal communication in messengers, and the ability to schedule personal meetings frequently.

Another noteworthy problem arises in the context of hromadas **currently under occupation**, where respondents often emphasise the **high degree of formalisation and difficulties in accessing the RMA.** This poses challenges for the occupied hromadas regarding resolving their issues quickly.

3.2.3. *The nature of the interaction organisation*

Current impact:	No impact:
safety factor	region / area
	periphery factor
There is a need for revision strategies for interaction between the RMA/DMA and hromadas:	political affiliation of the chairman
occupied hromadas	urbanisation

✅ **General positive aspects:**

- **Systematic cooperation is widespread in most of the hromadas in our study**. It is noteworthy that hromadas that report exceptionally sporadic cooperation, usually problem-oriented in nature, tend to assess the quality of their collaboration with the RMA positively. This indicates that for these hromadas, episodic cooperation is satisfactory, and they do not perceive it as a significant challenge.

- The systematic cooperation between the LSG and the LMA, on the one hand, and the RMA, on the other, is manifested in regular interaction, such as *weekly meetings, online calls, and joint meetings with various agencies*. In addition, in some cases, **chats** are created **in messengers.**

- Sporadic cooperation, on the other hand, is characterised by *unplanned and irregular meetings and calls*. Such interaction occurs mainly in response to specific problems in the hromada:

> *We are not afraid to ask questions directly to the chairman and deputies. And if we really see a problem, we can pick up the phone and talk about it directly. I don't have to write long letters and wait for a response.*
>
> *[vi]*

The majority of LSG and LMA leaders expressed a preference for communication on specific issues over regular meetings, noting that

> *Yes, we have meetings. But the thing is that they are held about once a month or once every three weeks.*
>
> *[vii]*

❌ **General negative aspects:**

- While party affiliation, peripherality, and the urban/rural criterion did not significantly impact, the security factor was influential. Hromadas that are currently **under occupation more often mention sporadic cooperation.** This pattern can be observed in many regions with occupied hromadas.

3.2.4. Level of participation in decision-making

Current impact:	**No impact:**
🔒 safety factor	🗺 region / area
🏢 urbanisation	📍 periphery factor
	👥 political affiliation heads

There is a need to revise the strategy of interaction between the RMA/DMA and hromadas:
🚧 border hromadas
🏡 rural/settlement hromadas

✅ **General positive aspects:**

- RMAs play a key role in informing hromadas about various opportunities and resources. Their role **goes beyond simply informing**: they provide detailed information about projects, grants, and ways to cooperate with international partners. RMAs also share important details about funding, the work of humanitarian organisations and how to get involved in various programs. Also, RMAs are perceived as a more reliable way to address issues at the level of the Congress of Regional and Local Authorities.

> *You know how it is, we watch the meetings [referring to the Congress], observe what is happening, and draw some conclusions for ourselves. We try to voice our concerns. But still, you know, not directly, but through the regional military administration more of our appeals.*
>
> **[xii]**

- Consultations between the RMAs and hromadas are another key aspect of their interaction. Regional administrations **work with hromadas to develop strategic documents, including recovery plans, and encourage the integration of national and regional strategies** into local planning. They also support hromadas in gaining access to public funds and participating in the recovery of specific projects, both through total funding and co-financing. In addition, the RMAs facilitate communication with the Ministry of Reconstruction, offer recommendations on the state's eRecovery program, and hold meetings to provide guidance and consultation, where hromadas can present their situation, financial status, and other relevant criteria.

- Feedback from the hromadas plays an essential role in understanding both the shortcomings in their work and the problems of the hromadas. To emphasise the importance of feedback in this process, the head of the village hromada said in an interview:

> *The RMA is aware of problems not only from written sources, but also because they are openly voiced in front of MPs and colleagues. Procedures, both painful and hromada-specific, are clear. If many hromadas have similar complaints about a service or department, efforts are made to address them effectively. In fact, thanks to the feedback, the RMA receives information about the problems in each hromada.*
>
> **[xiii]**

❌ **General negative aspects:**

Failure to take into account the peculiarities of border/frontline hromadas

Hromada leaders, especially in border areas, often express a desire for a more individualised consultation process. They **want their unique concerns and circumstances to be recognised and considered,** which suggests the need for the RMA to listen more closely to them and respond more specifically to their individual situations. Since the inability to offer individualised consultations to hromadas is quite common, it contributes to a decrease in the effectiveness of communication, as hromadas feel that they are not heard. It should be borne in mind that the problem may lie not only in the lack of communication with the RMAs

regarding the problematic issues in these territories but also in the extent to which these issues are addressed at the national level.

> *I mean, [the name of the regional center] heard us, if we told them about the problem, they heard us, but the solution... I mean, not everything depends on the regional military administration. If everything depended on them, maybe things would be a little different.*
>
> *[xii]*

The more active and successful a hromada is, the more formats of cooperation there are

The partnership between regional military administrations (RMAs) and hromadas varies considerably, influenced by factors such as **administrative capacity and the hromadas' initiative**. **Urban hromadas, with their more qualified staff and greater economic resources, tend to be more actively involved in cooperation**. As one of the deputy heads of an urban hromada explains:

> *So, if you ask if the RMA helps us, it's hard to help those who have more contacts and more experience. It is not because the military administration is not working well or not doing something. But because it is the position of the mayor, and it is his job.*
>
> *[xv]*

For example, one deputy chairman describes how their self-government **organised a forum on the reintegration of the occupied territories,** to which they **also invited the regional military administrations,** which further expanded the list of formats for interaction with the RMA. In addition, the **personal qualities and management style of the leaders of the RMA in different regions also affect these partnerships**. In some regions, hromadas are viewed as equal partners, leading to more effective and inclusive cooperation, while in others, this may not be the case, resulting in different levels of engagement and cooperation.

RMAs also play an important role **in monitoring and comparing the performance of different hromadas**. During meetings and briefings at the region level, they **highlight successful hromadas and use them as benchmarks for others**. They point out where some territorial communities are receiving assistance, and others are not, thus identifying and addressing those lagging behind[xiv]. This comparative approach serves as both a motivational tool and a means of identifying areas that require more attention or a different strategy. It also encourages hromadas to cooperate more actively with each other.

3.2.5. Satisfaction with cooperation

Current impact:	**No impact:**
🛡 safety factor	🗺 region / area
	📍 periphery factor
There is a need to revise the strategy of interaction between the RMA/DMA and hromadas:	👥 political affiliation of the chairman
⋇ occupied hromadas	🏢 urbanisation
🏛 urbanised hromadas	

✅ **General positive aspects:**

- We have seen that hromadas with systematic interaction with the RMA, both in formal and informal formats, are more satisfied with their cooperation with the RMA.

❌ **General negative aspects:**

When discussing the factors that influence dissatisfaction with cooperation between hromadas and regional military administrations (RMAs), we can identify the following:

- There is an **increased bureaucratic burden due to the significant volume of correspondence related to the dissemination of information and requests coming from region and district administrations** and reaching hromadas. This administrative process leads to an increased workload and potential delays.

- Hromadas report **duplication of functions** between district and region administrations, which leads to an increased administrative burden. Some districts are proactively addressing this problem by consolidating information from hromadas and managing requests from region administrations in an effort to streamline the process. Interviews show positive responses from hromadas to **cooperation with districts that have adapted their work to real, local needs, prioritise areas not covered by the RMA, and move away from the model of copying the functions of region administrations.**

- In addition, high staff turnover in military administrations hinders the establishment of effective joint work with hromadas, which prevents constant involvement in administrative processes. These factors combine to affect the overall level of satisfaction with cooperation between hromadas and the regional level.

- **Rural hromadas tend to express higher satisfaction with region administrations than their urban counterparts.** A plausible explanation for this

higher satisfaction is a difference in perception related to the smaller resource base in rural areas. The material, financial and coordination assistance provided by the regional military administrations (RMAs) is likely to be perceived as more significant support in a resource-limited environment. A striking example that illustrates this is the key role of regional administrations in linking rural hromadas with donors, especially those with low financial capacity.

- **Most of the hromadas expressing dissatisfaction** are currently located in the **occupied territories**. The lack of cooperation from the RMAs in these occupied hromadas partly explains this dissatisfaction. Notably, neither political affiliation nor proximity to the region centre significantly impacts the level of satisfaction with cooperation. On the contrary, most hromadas that demonstrate satisfactory cooperation have either informal or a combination of formal and informal cooperation structures.

3.3. CONCLUSIONS

- In 4 out of 5 aspects of interaction, the **occupied hromadas need to revise their** interaction strategy with them. In turn, the **frontline and border hromadas** need to change the cooperation formats in 3 out of 5 aspects of interaction.

- Hromada heads say that the factors of **awareness of the heads of the LMA and LSG in the context of the region**, the **media presence of the** hromada head, and the **availability of previous management experience** and **informal connections are** important **for effective interaction**.

- Our results also show a dominant tendency to **maintain representation in hromadas**, where in the studied hromadas, about **a third of the heads of local military administrations (LMAs)** are incumbents **elected in the 2020 local elections to the positions of municipal heads**.

- Cooperation between actors on resource allocation is quite constructive, with regional administrations performing well in **mediating contacts with donors**. However, the policy of constant external assistance **risks** creating hromadas' dependency on support, potentially eliminating strategic autonomy.

- **Proximity to the front line and the level of urbanisation are** important factors that influence the **nature of interaction and resource allocation**. In this paper, we have noted that the level of assistance to hromadas within the 30-kilometre zone varies by region and whether the RMA prioritises providing resources to frontline areas. **Urban hromadas,** compared to rural ones, **demonstrate greater self-sufficiency**, better economic capacity, and a tendency to **establish a wide network of partnerships**.

- The level of formalisation of interaction also depends on the context of the hromadas: **territorial communities engaged in active reconstruction** tend to **interact** with

regional authorities in a **less formalised manner** compared to those **under occupation,** which **complain about excessive formalisation of** communication and the inability to establish proper cooperation.

- Among the factors that influence dissatisfaction with cooperation on the part of hromadas, the main ones are excessive bureaucratic burden and, in some cases, formalisation of communication, overlapping **functions and responsibilities of district and region administrations,** and the type of hromada. **Rural territorial communities are** much **more likely to give positive feedback on cooperation** than urban hromadas, which can be explained by the fact that they have fewer resources and appreciate the assistance provided by the district or region in the context of resource constraints.

STRENGTHS AND CHALLENGES IN COOPERATION PERCEIVED BY THE RMA AND DMA

In this section, we will consider:

In the first part, we will show the **vision of interaction between the Regional Military Administrations.**

In the second part, we will present **theses and quotes from representatives of the District Military Administrations.**

4.1. VISION OF REGIONAL MILITARY ADMINISTRATIONS

From the interviews, we identified the **main aspects of the vision of interaction with hromadas.**

The main **reasons of dissatisfaction with** cooperation on the part of the RMA are:

Forced cooperation with **inexperienced LMA managers who do not know the local context of the hromadas.**

Exclusive right and **hromadas' unreasonableness in allocating funds.**

Excessive burden of communicating with hromadas, which could be facilitated by introducing the **role of the district as an intermediary.**

The most **positive** assessments given to the RMA are:

Proactivity of LSG: working out their own **needs** and being proactive **in their interaction** with both the state authorities and donors.

A high **level of self-awareness** of gaps **in the hromadas' own work,** which eliminates the need for regular intervention by the region.

Problems in interaction

- **Forced to cooperate with inexperienced local leaders who have little knowledge of the local context**

   More representatives of regional administrations were inclined to use negative connotations to describe cooperation in **which they were forced to work with inexperienced heads of military administrations or those who did not**

understand the local context sufficiently. The situation is problematic primarily because the process of acquiring expertise and familiarising oneself with the dynamics of hromada functioning and its main problems requires a lot of time and mandatory cooperation with previous staff. In addition, lack of **awareness is quite critical for border and occupied hromadas, as it, along with the inability to establish quality communication channels, creates obstacles to understanding hromada needs and developing a strategy for assistance.**

- **In the opinion of the RMA, hromadas are not reasonable in their use of funds**

Another important factor, according to the respondents from the RMA, is the unreasonableness of **hromadas in using funds and the exclusivity of the process of allocating funds without consulting the district or region.** The vision of the hierarchy of needs may often differ from what the region considers necessary - most often the **need for increased defence spending -** and misunderstandings arise. Also, since the responsibility for finding and inviting donors is largely delegated to regional administrations, they are unhappy when the mismanagement of finances scares away donors or deteriorates established partnerships.

- **Excessive burden of communication that could be facilitated by the district's role as an intermediary**

Although regional administrations praise **informal interaction with hromada and its success**, many recognise that **increasing the role of the district as an intermediary would be more effective**. But, of course, such optimisation is out of the question regarding security conditions when hromadas are either occupied or in direct danger and under regular shelling.

Best practices in interaction

- **The proactivity of LSGs in working out their own needs and initiative in interacting with both the state authorities and donors.**

Firstly, the **proactive role of LSGs in identifying and working out their own needs and their initiative in communicating with both government agencies and donors** is important to the RMA. Based on the in-depth interviews, it can be concluded that regional administrations are very satisfied with the partnership with a self-sufficient party in the interaction rather than with inert recipients of resources and assistance. Working with LSGs, which were either autonomous by default or acquired this characteristic after consultation with the region or district, relieves the **burden of responsibilities on the RMA**.

Another influential aspect is the **hromadas'** high **self-awareness of gaps in their work, eliminating the need for the RMA to point out shortcomings and assist in resolving problematic issues.** That is, this format of interaction is more accessible and allows for a partial return of responsibility for hromadas to monitor their decisions and various vectors of activity, increasing their ability to self-regulate and eliminating the need for external intervention.

RMA on the problems identified by the hromadas:

- Some RMAs **already work with border hromadas separately.** This practice should be introduced to the occupied hromadas as well**:**

> *In addition, recently **we have been more actively cooperating and gathered them separately, the border hromadas, to understand their needs**. They gave us their problems in advance, and we prepared answers and comments, especially for the fifteen border hromadas I mentioned, because they exist there in more difficult conditions than any other hromadas.*
>
> ***Representative of the RMA***

- Also, the **greater emphasis on cooperation with rear hromadas** in the RMAs **is explained by the requirements for cooperation from international organisations** or the **vision of the ability to** implement projects:

> *It is inappropriate to gather all hromadas, **we gather urban hromadas or rear hromadas**. There are some projects of the European Investment Bank, for example, you know, they have a restriction **that you should not be closer than 70, and preferably 100 kilometers from the border.** Then, on the contrary, we gather only our rear hromadas. We are the only district that does not border the aggressor country. And even then, we discuss with them opportunities for cooperation, submitting applications, and so on. In addition, **we have a practice where deputies are assigned to districts, and they meet and hold field meetings with hromadas.** For example, I met offline with [Name of District] about 2 weeks ago, with all the heads of hromadas, and we discussed several issues, including international cooperation.*
>
> ***Representative of the RMA***

- Some RMAs have established **Regional Offices for International Cooperation(ROIC),** which are positioned as an initiative of the Congress of Local and Regional Authorities under the President of Ukraine, aimed at **developing the interaction of local and regional authorities with international partners** seeking to cooperate at the level of the region and territorial hromada. The problem is that even representatives of the largest cities in the regions where these offices have been established did not respond to in-depth interviews were not yet aware of their activities (it should be noted that at the time of the interview, the process of establishing ROIC had just been completed):

- The RMA representatives also **agreed with the problem of duplication of functions** with the DMA:

> " Today, the **functions of district administrations**, let's say... I'm not talking about the whole Ukraine because maybe they are valid somewhere, but for us today, they are a little bit of an **extra link in communication directly with the heads** of local military administrations. Today, I have to communicate with the district administration, where there are just a catastrophic lack of people – it is both time and information, so, **today, the regional military administration communicates directly with the LMA**. We have a department for **development and decentralisation, which has direct communication functions with hromadas**.
>
> **Representative of the RMA** "

4.2. THE VISION OF THE DISTRICT MILITARY ADMINISTRATIONS

The main **reasons of dissatisfaction** with cooperation on the side of the DMA are:

Forced paternalism and passivity of hromadas in initiating reconstruction processes

Excessive fiscal decentralisation of hromadas

The most **positive** assessed by DMA are:

Active engagement of hromadas with the district, rather than direct cooperation with the RMA

The presence of an active civil society that can influence hromada decisions

Problems in interaction

- **Forced paternalism and passivity of hromadas in the initiation of the processes of reconstruction**

The following factors are clearly identified as the main elements of negative influence on the perception of cooperation by district administrations.

One of the most frequently mentioned problems from the DMAs is the **forced paternalism and passivity of hromadas in initiating recovery processes.** The districts pointed to difficulties in interacting with inactive hromadas, where there is a

need for technical assistance in submitting grant applications that require clarification of the requirements for submitting the necessary packages of documents, explanation of the operational component of communication with donors, harmonisation of the authorities' vision with the local population, etc. The DMA faces an **increased workload due to the inability to mobilise hromadas to take a more active position and move from vertical to horizontal cooperation.**

- **Excessive fiscal decentralisation of hromadas**

  Another important aspect is the **dissatisfaction** shared with the RMA with **excessive fiscal decentralisation** and very limited opportunities to influence the policy of allocating funds. The factor that causes negative reactions, specifically from the district, is the lack of mechanisms to hold accountable for failure to comply with the DMA's instructions in financing defence issues.

Best practices in interaction

Based on the analysis of interviews with representatives of district administrations, the following are among the main positive components of cooperation with hromadas.

- **Active interaction of hromadas with the district**

  The DMAs gave a very **positive assessment of the work with the hromadas, treating the district as an important integral link with the region and not excluding it from the decision-making process.** When developing recovery plans and identifying urgent development vectors was followed by a positive response to the district's proposals, with feedback from the hromadas on continuing further work in conjunction, the DMAs described the interaction in an exclusively positive light. The opposite **trend was present and widespread, where the district as an intermediary and mediator in communication with the region was ignored and not considered necessary to work with it as a team.**

- **The presence of an active civil society**

  Another interesting factor **is the presence of an active civil society in hromadas** that responds quickly to requests for justice, appeals against questionable decisions of LSGs, or healthy undermining of their influence. Active citizens perform a monitoring function and, in case of **problems being brought to the public domain, mobilise quickly and influence government decisions**. The DMAs highly appreciate this el because such communities are a mechanism for changing local government policies in cases where hromada leaders do not comply with orders from the district or region level. According to the interviews, **some DMAs even specifically raise issues they want to see change on for public discussion, and the local population quickly picks up on these topics.**

MA about the problems identified by the hromadas:

- Some DMAs are **already working on unloading hromada requests and forming datasets:**

> *We are trying, among other things, to ensure that **our employees at the level of the district state administration do not simply act as transmitters of these letters from higher state authorities to hromadas and vice versa**. We want to do this, and we are trying to **organise the collection of such information that passes** through us so that if the **state requests certain information that has** already been requested before or has not changed, we **can operate with this information on the spot and not burden them with unnecessary bureaucratic paperwork the local government body**. We need to relieve them a little bit, and provide such answers ourselves, if it is within our competence, if we have such information.*
>
> **DMA representative**

- DMAs understand the **need to reform the powers of the district level:**

> *So, as a result of the local government reform, there was and is a need **to reform the vertical of public administration**. Because the district state administrations do not have the means to... **they have a structure that does not actually correspond to their powers**.*
>
> *I believe and support the opinion that existed before the full-scale invasion of the so-called Russia that we should still implement the reform, and that state administrations, district, and regional administrations, including, should still **make more supervisory bodies that would comply with, let's say, monitoring compliance with the law by local authorities' self-government**. And they also coordinated state policy on the ground, the same state subventions for the most critical areas of work. Because today there are no such control powers, and they should be. There are not enough powers.*
>
> **RMA representative**

4.3. CONCLUSIONS

As noted earlier, the interaction system is not perfect and has positives and negatives. The main reasons for dissatisfaction with the cooperation of the LMAs on the *side of the RMAs* were the **forced cooperation with inexperienced local leaders** and **their low awareness of the local context**. Representatives of the DMAs and LMAs also noted the lack of **independence in decision-making on the allocation of funds by hromadas, the failure to engage external parties for consultations, and the excessive burden of communication, which could be** alleviated by greater involvement of the district as a mediator. Among the negative practices on the *part of the DMAs* were **forced paternalism and passivity of hromadas** in the issue of reconstruction and fiscal decentralisation, which eliminates the possibility of the district's influence on the allocation and spending of funds.

Interestingly, such theses about excessive fiscal decentralisation and **autonomy in the decision-making process of allocating funds to hromadas** precisely show the logic of *stubborn structures* that would like to **regain** more of the tools of influence they had **before the decentralisation reform.**

At the same time, these same regional actors positively **assess the proactivity of LSGs** in working out their own needs and their initiative in interacting with both the state authorities and donors. That is, there is a partially **paradoxical situation** when both the RMA and the DMA would like to **have more instruments of influence,** but at the same time, they want **local self-government to be more self-sufficient and independent**.

The DMA was praised for their engagement with hromadas, for **including the district in important decision-making** rather than marginalising it, and for having an active civil society that could bring discussions of problems into the public space and mobilise quickly to respond to questionable decisions of the authorities.

5 QUOTES ABOUT 5 PROBLEMS FROM DONOR ORGANISATIONS

Forced leadership of local governments in solving problematic issues:

> *The duality that arises in some hromadas where LSGs have remained and LMAs have been created is for citizens, for service users, and causes great confusion about "who is to blame and what to do," as they say. Where to go and whom to ask? And out of old habits, they still **run to the municipality and knock on the door**. And municipalities, it's not that they don't pass on this need; **they pass on this need to the right place**. But they don't wait for someone to respond because they have real people here with their own life problems, and **they have to respond to them.***

Bureaucratic overload of LSG:

> *At the request of the Department of Education, you received information on the composition. For example, demographics, yes, well, take it to manage with civil cases, but not for the health department. These are constant requests - **hromadas are "howling", to be honest, because all they do are tables for yesterday's report tables, then tables for today's report, then tables for tomorrow,** and they feel very pressured in this way.*

The different situations in the regions:

> *There are cases of allocation of funds from the Recovery Fund **to hromadas that have not been physically damaged**. But I cannot say that this is wrong under the law because there are conflicts in the law itself. While the law defines what a recovery area is and is tied only to hostilities and damage, the Cabinet of Ministers' resolution says that such **recovery areas** include those areas **where has been an influx of more than 10% of the population**. And how do you view this position? I consider it as follows: **if 10% of internally displaced persons come to my hromada, it is a big plus** for me because it is my labour force, and I have to figure out how to use this labour force. It has to create working capital for me. This is my investment in my territory because these are taxes.*

Problems of management practices in LMA:

"

...the elected chairman, he doesn't go anywhere, and either he does a situation where he is forced to be idle for two-thirds of the time without any reason, yes, or, if the relationship is normal, then you need to build communication somehow. *The mayor still has his powers, yes, and they gave them to the chief. And the mayor is left with only communication with the residents, like, we're going to decide everything here, we're going to be in charge of finances and everything else, and you go there and calm the citizens down, and you do some reception, and something else.*

"

Staff shortage in frontline hromadas:

"

Here, it all depends on the competence, skills, and abilities of a particular official at a particular workplace. For example, if a school is destroyed, who should look for money to rebuild this school? Probably some department or education department. But does this education department have a person who has these skills, knowledge, and abilities? ***You can't go to a store and buy this specialist; you have*** *to grow him. Even if some people grew up in local government, they just left today.*

"

CONCLUSIONS

Martial law objectively **creates favourable conditions for the centralisation of power, even in countries with a decentralised system of governance**. In Ukraine, we can observe that the establishment of martial law has **strengthened the executive authorities' role** at the local level. Instead of the respective state administrations, the establishment of regional and district military administrations **also strengthened the administrative vertical,** forcing LSGs to reconsider their cooperation models with the RMA and DMA and adapt. It is worth mentioning that some LSGs were replaced by LMAs, strengthening the executive branch's influence in those hromadas.

The threat of centralisation should also be discussed in a systematic context. Ukraine is still experiencing the baggage of the Soviet legacy in the public administration system, so the **young local government system may be vulnerable to the risks of centralisation due to the challenge of "stubborn structures."** However, our research confirms that **hromadas and LSGs remain important actors in Ukraine's governance system.**

Also instrument of creating an LMA, due to a lack of clarity and precision, can be used by the central government and the RMA **to influence local self-government**. War and security needs make it easy to invoke wartime considerations, which are undoubtedly important but can be abused without clear grounds. As the reconstruction and recovery efforts in Ukraine are still at an early stage, **there is a risk that recovery funds could be centralised if all processes are tied to the RMA alone**.

Another important conclusion of our study is that the interaction strategy **between the RMA and the DMA needs to be revised for the occupied hromadas, border and frontline hromadas. The representatives of LSGs and LMAs of these types of hromadas** most often pointed to ineffective and complicated interaction with the RMAs and DMAs. Most problems stem from excessive formalisation, lack of interest in the problems and special context, and lack of resources.

But so far, we **cannot state any unambiguous practical threats of a rollback from the decentralised system of governance back to the Soviet model of highly centralised management**. This **does not mean there are no problems and threats to decentralised governance in Ukraine,** as they exist and have been highlighted in this paper. However, it points to the need for further constant monitoring and careful analysis of changes in the interaction system between the state and local governments.

At the same time, the methods of appointing military administrations and their working methods, the ability of administrations to ignore the needs and interests of local governments and exclude them from the processes of solving important issues for the hromada, led to a **weakening of the political leadership of hromadas and the interest of local political leaders** to **participate in socio-political life actively**. This can, in turn, have **negative consequences for the involvement of producers and local politicians in fundamental political processes**. Although our study does not establish specific dimensions of this problem, it identifies the perceptions and complaints of the LSG.

RECOMMENDATIONS

At the level of the RMAs and the DMAs, we see significant differences in policies and practices of interaction and communication with hromadas. As of the time of the study (September - November 2023), the most problematic situation in terms of interaction was with **border hromadas, rural hromadas remote from regional centers, and occupied hromadas.** A possible solution to this problem would be for the RMA in regions with a large number of **such hromadas to** hold **separate regular thematic meetings with the heads of LSGs and LMAs** of these types of hromadas (if they are not already held regularly).

To improve communication and scale up successful practices between regional actors, it is worthwhile to **systematise and share regional experience on topics** between employees of **RMAs economic development departments**, as well as regional institutions such as **Regional Development Agencies** and **Regional Offices for International Cooperation in** various areas with common problems. It is important to focus not only on meetings, but also on summarising successful practices/projects.

A new tool for hromada representatives to interact with the central government, the **Congress of Local and Regional Councils under the President of Ukraine**, has been created, but some hromadas are not ready to discuss their problems in this format. Therefore, the RMA and Donors should also **engage with regional offices of hromada associations,** which are an important source of data and information about problems and challenges from a select group of hromada leaders.

To reduce the **duplication of requests and functions between the RMA** and the **DMA**, the reporting and data requirements of these levels should be reviewed. Learning from experiences where the DMA facilitates or moderates cooperation with the RMA may be useful for **redistribution of roles and functions of RMAs/DMAs at the national level**.

To reduce the existing **heterogeneity in the practices of establishing LMAs**, it is important to clearly define and **prescribe indicators for assessing the capacity** of an LSG to perform its functions. This will also facilitate communication for the public and international partners in the case of new LMAs.

International partners' resources can be used to develop a platform for interaction between hromadas and regional authorities, and as it has been done at the regional and hromada levels to create **Recovery and development offices,** in cooperation **with international partners such as the European Union, the Government of Sweden and the United Nations Development Program.**

SOURCES USED

Interview citation

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[ii]   Acting head of a village hromada on the periphery of the Ukrainian-Russian border, personal communication, 10/23.

[iii]   Deputy head of the city, hromada, personal communication, 10/23.

[iv]   Head of the village hromada, personal communication, 06/2023.

[v]   Deputy head of a city's temporarily occupied hromada, personal communication, 10/23.

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