

# **ROADMAP FOR ENSURING ORGANIZATION OF POSTWAR ELECTIONS IN UKRAINE**

**REVISED AND UPDATED**

This document is intended to draw the attention of our partners and stakeholders to the primary steps for the preparation of the first postwar elections in Ukraine and the reform of the electoral legislation in the foreseeable future. The Roadmap is only a framework document; therefore, certain topics require broader and more meaningful coverage. Civil Network OPORA has prepared its own expert vision, incorporating the results of previous professional discussions with official parties (Central Election Commission, Ministry of Foreign Affairs, Verkhovna Rada, National Police, National Agency for Corruption Prevention, National Television and Radio Broadcasting Council, and others) to overcome challenges and fulfill European integration commitments existing as of May 2025. Given the need for a critical number of agreed-upon developments in the organization of post-war elections in advance, before the end of the legal regime of martial law, OPORA calls on the Parliament not to postpone substantive discussions aimed at finding systemic solutions. The preparation of the legislative framework, the prevention of Russian interference in the postwar elections, and EU integration directly depend on a depoliticized, high-quality discussion.

**This is the second version of the Roadmap, updated based on discussions with a wide range of stakeholders, which resulted in the refinement of key recommendations.**

## RELEVANCE

- Advance preparation and legal certainty are prerequisite for the conduct of first postwar elections, even if that's a long way off. Commencement of work on the **“electoral framework” does not signal the start of election race, but it will prove that democracy is highly valued by the responsible parties.**
- **Security audit** in territorial hromadas is a universal tool for monitoring organizational capacity, which will provide Ukrainian society and our partners with a transparent system for deciding whether or not to hold elections in certain territories of Ukraine. Modeling of scenarios in the field of physical, informational and cyber security will help us plan future decisions and determine the budget for priority tasks.
- Reforms in the field of elections, democracy and good governance, which involve eliminating legislative shortcomings as specified in the [OSCE/ODIHR recommendations](#), are on the list of **requirements for Ukraine's integration into the EU.**
- Dynamic internal and external migration of millions of Ukrainians is one of the biggest challenges facing Ukraine in general and those responsible for organizing postwar elections in particular. As of March 2025, 4.6 million people were [registered as](#) internally displaced in Ukraine, which, however, may not coincide with their actual number. According to the Ministry of Foreign Affairs, **7.6 million Ukrainian citizens live abroad.** Decisions on

the electoral process and voting procedure should be made as far in advance as possible to resolve certain organizational issues, including through the conclusion of international agreements (if necessary).

- The factor of large-scale displacement of Ukrainians calls for ensuring proper regulation and **exercise of passive and active suffrage rights of millions of citizens**, creating additional electoral infrastructure, changing the voting procedures, and increasing the capacity of polling stations. Engagement of Ukrainians abroad in the political process will serve as an additional element of national unity.
- One of the government's main responsibilities is to **ensure the electoral rights of military personnel** and other people involved in the Armed Forces of Ukraine in the postwar elections. This includes creating adequate conditions for voting and running in elections.
- It will be necessary to **introduce ad hoc procedures for the first postwar elections at the legislative level** in order to negate the effect of full-scale war on the electoral process and properly guarantee the electoral rights of citizens in the postwar period.

## SECTION 1.

# HIGH-LEVEL DECISIONS

This section covers the topics that can be applied to the first postwar elections in exceptional circumstances and are a significant factor in determining the level of democracy in Ukraine. This section also provides insights into program areas of government work, including the European integration track. Ukraine has already made big commitments in this area, and it is strategically important for our country to fulfill them.

## 1.1. SECURITY

This subsection describes the steps that should be taken by the state authorities in order to determine the security conditions for holding postwar elections. It also provides a list of recommendations to hinder Russia's influence on the political process in Ukraine.

### 1.1.1. SECURITY ASSESSMENT AND THREAT RESPONSE CAPACITY

It is impossible to hold elections in Ukraine under the legal regime of martial law, which was introduced due to Russia's unprovoked military aggression on February 24, 2022. After the repeal of martial law (after the end of the war), Ukraine will face a number of security challenges related to the consequences of Russia's full-scale invasion in preparation for the

electoral process. These will include a wide range of issues: from evaluating the current state of electoral infrastructure, especially in heavily mined areas, to ensuring the security of voting abroad and preventing the aggressor state from interfering in the electoral process. The conditions for holding elections may vary significantly from one territory to another, and scenarios for responding to such challenges should be prepared in advance.

In order to determine whether it is possible to organize elections in specific communities or territories and to make a well-founded decision based solely on reliable and official data, a multi-level security audit must be conducted.. **Such an audit should be conducted by designated bodies responsible for collecting and verifying the data with the use of criteria and indicators established in accordance with legislation.**

Such an approach will allow Ukraine to minimize the probability of political disputes on the issue of determining territorial hromadas eligible/ineligible for holding elections, as well as apply uniform methods for assessing the security situation and planning the necessary investments to develop future capabilities (information and cyber security, crackdown on aggressor state's interference in the political life of Ukraine).

## RECOMMENDED STEPS:

- Based on the results of the discussion with stakeholders, the Parliament appoints the procedure and establishes clear criteria (indicators) for assessing the security of communities/territories, and also designates the body responsible for conducting such an assessment to determine the possibility of holding elections in individual territories. It is advisable to use the [proposals](#) of the Central Election Commission (CEC) (resolution No. 102 dated September 27, 2022), which include the previous work of OPORA and the Verkhovna Rada of Ukraine Committee on State Power Organization, Local Self-Government, Regional Development and Urban Planning, as a basis, with due account for the recommendations of the Venice Commission and the OSCE ODIHR, as well as the [methodology](#) for conducting community security audits developed by the Civil Network OPORA. At the same time, there is a discussion about which body is best suited to adopt such a decision. In its proposals, the Central Election Commission (CEC) recommends referring these issues to the competence of the National Security and Defense Council of Ukraine (NSDC), the decisions of which are put into effect by decrees of the President of Ukraine. Among the expert community and people's deputies, alternative proposals are being made to consolidate such powers with the Parliament, the CEC, or to attribute them to the competence of the Cabinet of Ministers of Ukraine (CMU). Taking into account the advantages and disadvantages of each of these approaches, it is considered optimal for the final decision on whether or not to hold elections in individual territories to be made by the Parliament. In any case, changes to the legislation related to the security assessment should be based on the following principles: 1) the procedures clearly defined by laws; 2) a transparent assessment process

based on clear and non-politicized criteria; 3) the decision made after verification of data with the involvement of the CEC.

- The Verkhovna Rada of Ukraine, in cooperation with the CMU, should allocate state budget funds for security assessment and related activities, as well as designate an executive body responsible for conducting training for the officials who will assess the security situation in certain hromadas/territories.
- CEC should ensure that the results of the security assessment/audit, including all the assessment criteria and security ratings (scores) of hromadas/territories, are made available to the public.
- The Ministry of Foreign Affairs (MFA) must ensure communication with international governmental and non-governmental organizations, foreign states (hereinafter referred to as international partners) regarding the results of the assessment/audit and justification of the possibility/impossibility of holding elections in communities/ territories.

### **1.1.2. INDEPENDENT PRE-ELECTION SECURITY ASSESSMENT MISSION**

Adequate security in postwar Ukraine should be considered a prerequisite for holding any type of elections. OSCE/ODIHR, European Union, International Republican Institute (IRI), National Democratic Institute (NDI), NATO, and the Council of Europe could send analytical monitoring missions to Ukraine to assess security risks and threats.

#### **RECOMMENDED STEPS:**

- Create a legal framework for independent international security assessment missions to work in Ukraine.
- Invite independent international missions (OSCE/ ODIHR, EU, IRI, NDI, etc.) to Ukraine to assess the security situation, including the risks and threats to the possible conduct of elections.
- Appoint persons/units responsible for communicating with and facilitating the work of pre-election security assessment missions.
- Take due account of the results of the assessment made by independent international missions when deciding whether or not to hold elections. In case of a high level of security threats, reports of independent international organizations may reinforce the position on the impossibility of holding elections.
- Ensure that the results of the work of international missions and their security assessments are made available to the public.



- Ensure communication with international partners on Ukraine's further actions after completion of the pre-election security assessment.
- International technical assistance projects on security and electoral issues should take due account of the programmatic recommendations of independent missions.

### **1.1.3. CRACKDOWN ON RUSSIAN INTERFERENCE IN THE ELECTORAL PROCESS**

After the war is over, Russia will continue to use all the tools at its disposal to restore political influence in Ukraine. These include financing of politicians and conducting massive and systematic propaganda and disinformation campaigns.

To strengthen information security, it is necessary to neutralize Russia's influence in the media, especially foreign outlets, given its attempts to sway millions of voters abroad where Ukrainian legislation does not apply. Ukraine, for its part, should:

- seek ways to cooperate with shared-access platforms (Meta, Google, X, TikTok, Telegram) and foreign governments to block Russian disinformation, limit the reach of such content, and ensure that such photos, videos, and text materials are clearly labeled as such disinformation;
- support media literacy campaigns, particularly for Ukrainians living abroad who may be more vulnerable to Russian disinformation efforts.

Further, it is necessary to strengthen control over campaign finance and implement measures of political lustration in order to limit Russian influence on Ukrainian elections.

### **RECOMMENDED STEPS TO STRENGTHEN INFORMATION SECURITY:**

- Harmonize the Ukrainian regulatory framework with EU legislation in the field of digitalization and creation of a common information market. First of all, we are talking about the [EU regulation on the transparency and targeting of political advertising](#), the [Digital Services Act](#) (DSA), and the [Digital Markets Act](#) (DMA). These legal documents provide for the protection of personal user data, hinder the spread of disinformation and illegal content on social media, regulate political advertising, etc. The creation of a common information market with the EU will help establish a sustainable dialogue with shared-access platforms (Meta, Google, X, TikTok).
- Establish a permanent dialogue with Meta, Google, X, TikTok, and partner states to counteract the spread of Russian narratives and influence on Ukrainian elections. Russia is using a wide range of tools for exerting information influence, including disinformation content created with the help of artificial intelligence (AI).

- Adapt EU's and other countries' best practices of countering information security threats. An example of such an adaptation would be the prohibition of the use of TikTok by civil servants, law enforcement officers, and MPs on devices with work-related applications. Special attention should be paid to Telegram, which is one of the most popular sources of information in Ukraine but does not implement any content moderation policies, unlike other social networks. Furthermore, this social media platform is commonly used by Russian and Ukrainian citizens, which further increases the amount of disinformation being disseminated on it.
- Develop and conduct a long-term media literacy campaign, including at the level of basic education.

## **RECOMMENDED STEPS TO INCREASE THE TRANSPARENCY OF POLITICAL PARTIES AND CAMPAIGN FINANCE (BEFORE THE START OF THE ELECTORAL PROCESS):**

- Adopt the [draft law No. 11462](#) and other amendments the Law of Ukraine "On Political Parties" and the Electoral Code of Ukraine to incorporate the [OSCE/ODIHR recommendations](#), particularly resolving the issue of overlapping oversight powers between the National Agency on Corruption Prevention (NACP) and election commissions, ensuring transparency in financial operations and reporting by election fund managers, and preventing excessive campaign spending, including by introducing limits on the use of personal funds by parties and candidates.
- Introduce proportionate sanctions and ensure effective investigation of violations of political financing rules, with due account to the [proposals](#) made by OPORA, the NACP, and the expert community.
- Ensure effective monitoring of political party and election campaign financing by legislatively improving reporting tools and other procedures.

## **RECOMMENDED STEPS TO NEUTRALIZE AGGRESSOR STATE'S POLITICAL INFLUENCE:**

- Develop and adopt a mechanism requiring candidates to declare information regarding the absence of collaboration with the aggressor state and any membership in banned political parties. This information should be disclosed in their autobiographies, on ballots, and in informational posters/brochures to ensure that citizens are properly informed and able to make an informed choice. Liability may be established for concealing such information or providing false data, taking into account best practices and international standards.

- In accordance with Paragraph 6 of the Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE (1990), develop and implement a proportional and effective mechanism to bar individuals, groups, and organizations from holding elected office if they have engaged in or refused to renounce terrorism or violence aimed at overthrowing the democratic order or have posed a threat to Ukraine's national security, sovereignty, or territorial integrity.
- Improve the legislation on criminal liability to promote uniformity of judicial practice in the application of punishment in the form of deprivation of the right to occupy certain (including elected) positions and to engage in certain activities (related to elections and referendums) for committing grave and especially grave crimes against the foundations of national security, electoral and corruption offences, as well as international crimes (war crimes, crimes against humanity, crimes of aggression and genocide).
- Introduce legal mechanisms of informational support for elections and campaigning in a foreign electoral district. Otherwise, the voters will be more exposed to disinformation (in particular, disinformation activities of the aggressor state) due to the lack of access to official information from the election administration body and electoral process participants.

## **RECOMMENDED STEPS TO STRENGTHEN CYBER THREAT RESPONSE CAPABILITIES:**

- Central government bodies responsible for ensuring cybersecurity should elaborate and implement a plan for building the cybersecurity capacity of the CEC. This plan should be integrated into the overall risk response system to deal with cyber threats facing Ukraine.

### **1.1.4. POLLING STATIONS SECURITY**

Parliament, in cooperation with the CEC and law enforcement and security agencies, should develop and implement legally enshrined protocols of action and guarantees of protection of electoral process participants in case of security threats (shelling, mining, etc.). For example, it should be defined how to act in the event of an air raid alert, a report of a bomb threat to polling stations, or possible shelling by drones, missiles, or artillery. These protocols should be clearly defined for individual election participants (primarily election commissions) and law enforcement agencies, depending on the stage of the election process and the election procedures being carried out (voting, counting, transportation of election documents, etc.).

**It is necessary to strengthen the capacity of the National Police to ensure the security of polling stations.** In particular, polling stations should be equipped with additional technical control measures (such as metal detectors), and the number of police personnel involved in maintaining public order during the work of election commissions and the voting process



should be increased. Additional briefings and training sessions should be conducted for law enforcement officers on how to respond in case of emergencies or attempts to disrupt the electoral process.

The security of polling stations abroad is another issue. It is essential to develop additional security protocols for stations that may be located outside diplomatic premises and to explore the possibility of involving external security providers to ensure the safety of overseas precinct election commissions.

## 1.2. FUNDAMENTAL DECISIONS

This section describes key actions and decisions necessary for the organization and conduct of democratic elections.

### 1.2.1. UPDATING THE STATE VOTER REGISTER AND VOTER LISTS

The process of entering citizens into the voter list, which is primarily based on the State Voter Register, is a prerequisite for ensuring the exercise of active suffrage rights and, as a result, the fundamental principle of universal suffrage.

Due to massive internal and external migration, the postwar elections will require additional procedures to update all the information. As of early March 2025, 4.6 million internally displaced persons (IDPs) were [registered](#) in Ukraine, which may not coincide with their actual number. In order to update their personal data, change their electoral address or place of voting in national elections, they must proactively apply to the State Voter Register management bodies. In turn, according to various sources, as of April 2025, [4-5 million](#) Ukrainian citizens have moved abroad since 2022. Without changes to the current legislation, the majority of them will not be included in the voter lists at foreign polling stations, as they are not registered with Ukrainian consulates. As of the end of March 2025, approximately 400,000 Ukrainian citizens were registered with Ukrainian diplomatic missions abroad. That's why it is necessary to take the following steps:

- Fully restore the operation of the State Voters Register (SVR) and expand (or supplement) the existing mechanisms for updating its data.
- Conduct an independent assessment of the SVR to verify the accuracy and completeness of its data. Transparency is one of the core principles of elections, and voter lists are the foundation on which voting, vote counting, and ultimately the determination of election results are based. Carrying out such an assessment ahead of the post-war elections and addressing any errors that may have arisen due to Russia's full-scale invasion will help reduce challenges during the electoral process. An independent assessment will increase

trust in the quality of the voter lists and can serve as an additional counterargument in the event of disinformation campaigns alleging large-scale fraud based on flawed registers. This, in turn, will help reduce tensions among electoral stakeholders, voter groups, the state, and international partners, and will strengthen overall trust in the electoral process. Such an assessment may be conducted by civil society organizations and engaged experts, and its methodology should be coordinated with the CEC, the SVR, and other relevant stakeholders.

- Conduct a broad public awareness campaign on the procedures for changing one's place of voting and electoral address.

### 1.2.2. TYPE OF ELECTION AND THE BODY RESPONSIBLE FOR ADOPTING DECISIONS ON THE CONDUCT OF ELECTIONS

The Constitution of Ukraine does not contain a special provision on the type of election if regular elections were not carried out on time due to the imposition of martial law. However, these can be either postponed regular or special postwar elections (should such a category be defined in legislation).

In the case of regular postponed elections, the body responsible for scheduling or announcing the start of the electoral process is defined in the Constitution and the Electoral Code of Ukraine. In the case of special postwar elections, it is necessary to enshrine the specifics of conducting this type of election at the statutory level, as well as **appoint a body responsible for scheduling special elections**. Such bodies may include:

- Verkhovna Rada of Ukraine—considering that this body has the most representative mandate and exercises full legislative powers.
- Central Election Commission—taking into account the nature of this body's powers and adherence to the principles of impartiality and independence.

### 1.2.3. WHEN TO HOLD ELECTIONS

In order to hold the first postwar elections, it is necessary to create proper democratic conditions, including the freedom of action of media outlets, political parties, and civil society organizations. All of this requires extensive preparation.

The [conclusions](#) approved during the ninth Jean Monnet Dialogue stipulate that free and fair national elections will be held **no earlier than 6 months after the repeal of martial law**.

However, such wording of the political agreement allows for an ambiguous interpretation of the duration of the preparatory period before the start of the electoral process—ranging from 3 to 6 months.

At present, there is a discrepancy between the election deadlines set out in the political agreements and the provisions of Paragraph 6 of Part 1 of Article 20 of the Electoral Code and Part 2 of Article 19 of the Law of Ukraine “On the Legal Regime of Martial Law”. Therefore, OPORA considers that these provisions need to be amended, and the deadlines provided for in the law should be extended to ensure at least a 6-month preparatory period between the end of martial law and the start of the electoral process.

It is worth noting that the Constitution of Ukraine sets strict time limits for conducting regular elections (on the last Sunday of March/October of the fifth year of the term of office), but it does not determine the date of elections in case of their postponement due to martial law.

#### 1.2.4. SEQUENCING OF ELECTIONS

The Constitution does not contain a special provision on the sequencing of elections if regular elections (including regular parliamentary and presidential elections) were not held on time due to martial law. Therefore, given the special nature of the first postwar elections, they may be held in different sequences. The sequence of postwar elections can be determined by the Parliament. Furthermore, the elections should not coincide with each other: national elections could be held first, followed by local elections later.

Regarding which national elections—presidential or parliamentary—should be held first in this sequence, two main approaches are currently under discussion:

- **Depending on the sequence in which the elections were supposed to be held.** In this case, the parliamentary election should be held first, given that the regular parliamentary election was to take place on October 29, 2023, and the presidential election—on March 31, 2024.
- **Depending on the actual period of tenure.** In this case, the election to the body that has been exercising its representative mandate for the longest time should be held first. This means that the presidential election should be the first to take place in postwar Ukraine, given that the incumbent President assumed office earlier than others (May 20, 2019) and has been exercising his powers for about 5 years and 7 months, while members of Parliament commenced work three months later (August 29, 2019) and have been exercising their powers for about 5 years and 4 months.

#### 1.2.5. ELECTORAL SYSTEM

[During the ninth Jean Monnet Dialogue](#) held on November 10-12, 2023, the leaders and delegated representatives of parliamentary factions and deputy groups agreed that postwar elections should be held on the basis of the existing Electoral Code while preserving the current systems of national and local elections as a foundation. They also concluded that it is

necessary to amend the law to ensure fair competition of candidates within the same party list (in particular, it was agreed that the 25% electoral quota limit for advancing a candidate on the electoral list should be abolished).

The adoption of the Electoral Code, which provides for the introduction of open-list proportional representation system, has been one of the most anticipated reforms in the political sphere for the past 15 years. In this context, a complete abandonment of the principles of this system is unacceptable. At the same time, Civil Network OPORA proposes to strengthen the proportional system with open lists in parliamentary elections by eliminating the guaranteed mandates for the first 9 candidates on the national party list, reducing the threshold from 25% of the electoral quota required for candidates to advance within the regional list, and introducing legislative mechanisms to ensure compliance with gender quotas at all stages of the electoral process.

At the same time, organizing the first post-war elections will inevitably require adapting certain aspects of the current electoral legislation to post-war realities — particularly the electoral system for parliamentary elections in light of the expansion of territories that had been under occupation.

### **1.2.6. ACCESSIBILITY OF ELECTIONS**

Significant level of destruction of Ukrainian infrastructure, dire situation in the energy sector, large-scale internal and external migration of the population, and security threats caused by Russian aggression pose additional challenges in the context of making elections accessible to a large number of Ukrainian voters. First of all, this concerns ensuring the exercise of active suffrage rights, i.e., providing an opportunity to vote and increasing the capacity of polling stations.

### **DURATION OF VOTING PERIOD**

The duration of voting, as defined in current legislation, should be reconsidered, as the destruction of electoral infrastructure and large-scale migration may significantly increase the load on the capacity of certain polling stations. There is a clear need to introduce extended voting hours, particularly abroad and in communities where the number of voters has substantially increased. This problem can be solved in two ways

- Increasing the number of voting hours during the day. For example, voting from 8:00 to 22:00 can be used instead of the traditional 8:00 to 20:00 timeframe;

- Multi-day voting. For example, this option can be used in the foreign electoral district or for voting by military personnel.<sup>1</sup>

## VOTING METHODS

Traditional in-person voting at polling stations using paper ballots remains the most reliable and easily understood method of expressing one's will, which is critically important in the context of post-war elections. An alternative could be postal voting, which would primarily expand voting opportunities for citizens abroad. However, its introduction requires the development of additional procedures through the joint efforts of the CEC, VRU and expert community, as well as implementation of pilot projects.

Other measures should be introduced to ensure the participation of as many voters as possible:

- creating additional polling stations in Ukraine and abroad;
- increasing the size of election commissions (in cases where the number of voters within a polling station significantly increases).

## ENSURING ELECTORAL RIGHTS OF MILITARY PERSONNEL

To ensure the exercise of active voting rights by servicemen of all branches of the armed forces, conditions must be created to facilitate their participation in elections: where possible, at regular polling stations, and in exceptional cases, at special polling stations located within the permanent or temporary deployment areas of military units and other formations. Implementing alternative voting methods, including postal voting, may prove too complex from both logistical and security standpoints.

Elections entail not only the right to vote but also the right to be elected to public office. Since candidate status does not constitute grounds for demobilization, and the discharge process is not immediate, additional guarantees must be provided to enable military personnel to run for office. This could include, for example, granting special leave for the duration of the election campaign.

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<sup>1</sup> It is worth considering that increasing the number of days for voting will require coordination with the deadlines for implementing some election procedures, in particular, updating voter lists, transferring ballots to PECs, etc. There is also a discussion regarding the compliance of such initiatives with the Constitution, since in a number of its provisions (Part 1 of Article 77, Part 5 of Article 103, Part 2 of Article 136) it provides that elections are held on Sunday. At the same time, there is an opinion about the need to distinguish between the concepts of "elections" and "voting", which should be understood as a process and its stage, respectively. In turn, the meaning of the "voting day" concept is defined only at the level of the Electoral Code, which leads to the opinion about the sufficiency of making amendments only to it (Part 1 of Article 5).

## **VOTING OF VULNERABLE VOTER GROUPS**

Another key challenge is to ensure that many more people with disabilities are able to vote in postwar elections. During the full-scale war, the number of disabled people has increased by at least 300,000. That's why it is necessary to introduce a mechanism for the periodic assessment of polling station accessibility and make special arrangements for people with disabilities at regular polling stations or ensure the expression of the will of the required number of people through the application of "mobile voting" procedure. Another way of guaranteeing the exercise of voting rights of the disabled is to provide them with an opportunity to change their voting place from an "inaccessible" to an inclusive polling station, with information about such stations published on the State Voter Register portal. It is also necessary to ensure the active suffrage rights of other vulnerable groups of voters.

### **1.2.7. ENSURING THE EXERCISE OF ACTIVE AND PASSIVE SUFFRAGE RIGHTS OF UKRAINIAN CITIZENS WHO STAY ABROAD ON LEGAL GROUNDS DUE TO RUSSIAN AGGRESSION**

CEC created 3 working groups after the start of full-scale invasion. Members of these groups have developed a number of proposals to ensure the voting rights of Ukrainians abroad.

## **EXPANDED VOTING**

The war has led to a significant increase in the number of Ukrainians abroad, but the electoral infrastructure remains unchanged, which makes it difficult to exercise their right to vote. In this regard, the following measures could be taken to properly guarantee voting opportunities for Ukrainians abroad:

- create additional polling stations abroad and strengthen the staffing capacity of election commissions;
- extend the voting period;
- change the procedure for the production and transportation of ballots.

## **ACTIVE VOTER REGISTRATION**

Current legislation guarantees inclusion in the voter lists abroad primarily for citizens registered with a consulate. However, because of the unprecedented external migration caused by the full-scale invasion, a large number of Ukrainians abroad are not covered by this procedure. Existing mechanisms for changing one's electoral address or temporary voting location require substantial modernization and digitalization, and the current electoral infrastructure abroad is objectively insufficient to ensure the right to vote for all those willing to participate.



In this context, the introduction of an “active registration” mechanism is considered a way to address the issue. This approach envisions that Ukrainian citizens residing or temporarily staying abroad who wish to participate in voting—regardless of whether they are registered with a consulate—must proactively declare their intention and register to be included in the voter list at a specific foreign polling station.

Such a system would allow to:

- generate up-to-date voter lists abroad;
- assess the actual number of citizens intending to vote in a given country or region;
- plan resources more effectively and, where possible and necessary, expand the network of polling stations or explore alternative voting methods.

Civil Network OPORA supports the idea of introducing “active registration” for voters abroad, combined with the possibility of conveniently changing one’s place of voting (including through digital tools). A key condition is the timely creation and proper functioning of these mechanisms before the start of the official electoral process, in order to ensure the voting rights of the maximum number of Ukrainian citizens abroad.

## EXEMPTIONS FROM PERMANENT RESIDENCY REQUIREMENT

Millions of Ukrainians are forced to stay abroad, which makes it difficult to ensure the exercise of their passive suffrage rights. The permanent residency requirement (the qualifying period of residence in Ukraine for presidential candidates is 10 years, for parliamentary candidates, it is 5 years) creates significant obstacles, especially for women who make up the majority of those living abroad.

To ensure the right to run for office for Ukrainian citizens who had to temporarily leave the country due to Russian military aggression, we propose expanding the list of exceptions to the residency requirement for the first post-war elections. This would follow the example of exceptions already provided in the Electoral Code for other categories of citizens. Such exceptions should take into account the lawful and involuntary nature of their stay abroad. It is also necessary to define the time frame for citizens’ advance return to Ukraine in order for these exceptions to apply.

To develop an appropriate legislative mechanism, the following factors may be taken into account:

- **the time of departure abroad** (e.g., after the start of the full-scale invasion and the declaration of martial law on February 24, 2022);

- **the legality of border crossing** (exceptions may apply only to civilians unlawfully detained in Russia, prisoners of war, and—under certain conditions—to citizens who were forced to evacuate from temporarily occupied territories (TOT) or active combat zones through the territory of the aggressor state or third countries, provided they can verify residence in these areas prior to occupation or the onset of hostilities, as well as the fact of evacuation) and **compliance with Ukrainian legislation on mobilization and military registration** (exceptions should not apply to individuals for whom there is verified evidence of illegal border crossing, unlawful stay abroad—particularly to evade mobilization—or violation of laws on mobilization and military registration while abroad);
- **possession of international protection status** (refugee, temporary, or similar forms of protection).

To uphold the principle of free elections, all candidates seeking to benefit from such exceptions must declare the relevant information when submitting their registration documents. This should include the duration of their stay abroad, their legal status, and the reasons that prevented their return to Ukraine.

It is also necessary to define the time frames for citizens' return in order for these exceptions to apply. Possible criteria may include:

- **returning to Ukraine** in advance of the start of the electoral process following the end of martial law;
- **residing in Ukraine for at least 3 months** after the end of martial law (provided that the preparatory period lasts no less than 6 months).

### **1.2.8. LEGAL REGULATION OF THE TRANSITIONAL PERIOD FOR ORGANIZING DEMOCRATIC ELECTION PROCESS IN THE DE-OCCUPIED TERRITORIES AND THE AREAS ADJACENT TO ACTIVE COMBAT ZONE**

A significant part of Ukraine's territory has been under Russian occupation since 2014. Duly constituted authorities, media outlets and political parties of Ukraine have not been operating in the temporarily occupied territories (TOT) for a long time; some residents of the TOT have obtained citizenship of the aggressor state; others are actively engaged in collaborationism; and there is no up-to-date information about voters in the TOT. Therefore, conduct of elections in these regions will require large-scale preparatory works that are unlikely to be completed even within a year after termination of hostilities.

It will also be extremely difficult to conduct preparations for postwar elections in the territories that were de-occupied after the start of the full-scale invasion in 2022, as well as in the areas adjacent to the Russian border and in the frontline zones. Some of these hromadas have lost

all of their infrastructure facilities and voters, while others face significant infrastructural and security risks.

It will become possible to hold elections in these territories only after all the risks are eliminated, the government of Ukraine regains effective control over them, and the judicial system, law enforcement agencies, executive bodies, and other state authorities of Ukraine resume unimpaired operation.

At the same time, it is advisable to ensure that the voters from temporarily occupied territories have an easy access to the procedure for changing their electoral address, and, if necessary, create additional polling stations for displaced voters from the temporarily occupied territories in the government-controlled areas.

### **1.2.9. APPEAL TO THE CONSTITUTIONAL COURT AS AN ADDITIONAL TOOL TO STRENGTHEN THE LEGITIMACY OF SOME FUNDAMENTAL DECISIONS**

A number of unresolved issues relating to the elections that were not held within the legal period due to imposition of martial law need to be clarified by the Constitutional Court of Ukraine since the Constitution does not provide for special regulation of such cases. In particular, it is necessary to clarify the following issues:

- **Will the postwar elections be considered as regular but postponed?**
- **When and in what sequence should such elections be held?**
- **Can voting period last several days?**

The answers to these questions can be received through the official interpretation of Article 77 (1), Article 103 (5), and Article 136 (2) of the Constitution. For this purpose, the President of Ukraine or other petitioners (for example, a group of 45 or more MPs) must apply to the Constitutional Court in advance with requests for clarification. This will allow the Constitutional Court to adopt decisions within the deadlines necessary for making amendments in the legislation before the start of electoral process.

These measures should help to remove doubts about the constitutionality of legal provisions that will regulate the conduct of postwar elections and prevent the risk of delegitimization of state bodies that will be elected in these elections.

# EUROPEAN INTEGRATION

This section describes the steps to be taken by Ukraine in the process of accession to the European Union insofar as they relate to ensuring the functioning of democratic institutions.

Reforms in the field of elections, democracy and good governance are on the list of **requirements for Ukraine's integration into the EU**. In the long term, Ukraine's membership in the European Union will also require harmonization of national legislation with EU legal norms, particularly with:

- **Article 39 of the EU Charter of Fundamental Rights** (the right to vote and stand as a candidate in elections to the European Parliament),
- **Article 40 of the Charter** (the right to vote and stand as a candidate in municipal elections), and **Council Directive 94/80/EC of 19 December 1994**, which governs the exercise of voting rights by EU citizens residing in a Member State of which they are not nationals.

## 2.1. ROADMAP IMPLEMENTATION

In 2024–2025, the negotiating group for preparation of negotiating positions on Ukraine's accession to the European Union, which brought together representatives of the government and non-governmental sector, developed [the “Functioning of democratic institutions” section of the roadmap](#). This roadmap contains a list of measures related to free and fair elections, financing of political parties and election campaigns, the role of mass media in election campaigns, transparency, accountability and efficiency of the Verkhovna Rada, and the functioning of civil society organizations.

The European Commission's 2023 and 2024 reports **emphasize the need to continue implementing electoral reform with due account for the unfulfilled [ODIHR/OSCE recommendations](#)** on the stability of electoral legislation, professional development and independence of election commissioners, improvement of the institution of official election observation, measures to prevent the creation of unfair competitive advantages in the electoral process, strengthening the secrecy of voting, improving gender quotas in candidate lists, etc.

In order to implement these recommendations, representatives of state authorities, expert community and civil society organizations developed a number of legislative amendments in

the 2020–2022 timeframe with the aim of improving the electoral process. The main areas of improvement include:

**1. Election campaigning and informational provision:**

- Implementing legal regulation of online and social-media campaigning.
- Updating and adapting standards for informing the public and covering the electoral process in the media.
- Harmonization of the Electoral Code with media legislation.
- Defining covert campaigning and preventing the use of administrative resources.
- Setting special requirements for campaigning products.

**2. Accessibility and transparency:**

- Guaranteeing the access of journalists and observers to election events.
- Clear delineation of powers between the election commissions and the National Council on Television and Radio Broadcasting.

**3. Gender-balanced representation and anti-discrimination:**

- Reinforcing the gender quota requirement and replacing withdrawn candidates with persons of the same gender.
- Prohibition of campaigning with elements of sexism.

**4. Election financing:**

- Automation of funds reporting through an electronic system (POLITDATA) with provision of prompt public access to information on receipts and expenditures of the election funds during the election campaign.
- Improvement of procedures for forming election funds, coordination and revision of contribution limits and sizes of election funds for different types of elections.

**5. Election administration:**

- Limiting the ability of political parties to replace members of election commissions.
- Introduction of mandatory training for persons who occupy certain positions in election commissions.

Some of these provisions have been reflected in recently registered draft laws, in particular, draft law [No. 8310 dated December 27, 2022](#), draft law [No. 11300 dated May 27, 2024](#), and draft law [No. 11462 dated August 05, 2024](#).

The Roadmap under the Fundamentals cluster should be adopted as soon as possible and contain realistic measures that are not too time-consuming.

On May 5, 2025, the [Interagency Working Group approved draft Roadmaps](#) on “Rule of Law,” “Public Administration Reform,” and “Functioning of Democratic Institutions,” as well as the

draft Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine.



# ROADMAP IMPLEMENTATION SCHEME

## SECTION: SECURITY

### 1. SECURITY ASSESSMENT AND THREAT RESPONSE CAPACITY

- a) At the legislative level, establish clear criteria and methodology for determining the possibility or impossibility of holding elections at the hromada level and/or in the frontline areas, as well as identify a responsible body that will conduct a security audit of these areas and make appropriate decisions. Provide the necessary funding for such an audit. } In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a
- b) Conduct an assessment of the situation in individual territories in accordance with approved criteria and determine the possibility or impossibility of holding elections in each hromada/territory. } Before the start of the electoral process (3 months – start of the electoral process) / b

#### GROUNDWORK:

- CEC [Resolution](#) No. 102 dated September 27, 2022
- [Methodology](#) for conducting a hromada security audit developed by Civil Network OPORA

#### STAKEHOLDERS AND INVOLVED PARTIES:

- CEC, National Security and Defense Council (NSDC), Verkhovna Rada, CMU, civil society organizations (CSOs), international governmental and non-governmental organizations, foreign states (hereinafter referred to as foreign partners)

### 2. INDEPENDENT PRE-ELECTION SECURITY ASSESSMENT MISSION

- a) Establish a legal framework in Ukraine for the operation of independent international missions tasked with assessing the security situation. No later than 6 months before the start of the electoral process / a
- b) Invite independent international missions (OSCE/ODIHR, EU, IRI, NDI, etc.) to Ukraine to assess the security situation, including security risks and threats in the context of possible conduct of elections. } From 6 to 3 months before the start of the electoral process / b
- c) Take due account of the results of security audit carried out by independent international missions when deciding whether or not to hold elections. } Before the start of the electoral process (3 months – start of the electoral process) / c, d
- d) Ensure communication with Western partners on Ukraine's further actions following on the results of pre-election security assessment.

#### STAKEHOLDERS AND INVOLVED PARTIES:

- CEC, NSDC, Verkhovna Rada, MFA, international organizations, CSOs, foreign partners

### 3.1. STRENGTHENING INFORMATIONAL SECURITY

- a) Step up measures to crackdown on Russia's disinformation activities (in particular on social media) by adapting Ukrainian legislation to EU digital and political advertising law.
- b) Establish an ongoing dialog with Meta, Google, X, TikTok and partner countries to hinder the spread of Russian narratives and influence on Ukrainian elections.
- c) Adapt EU's and other countries' best practices of countering information security threats, including the prohibition of use of certain social media platforms by civil servants.
- d) Develop and conduct a long-term media literacy campaign, including at the level of basic education..

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b, c, d

#### GROUNDWORK:

- [Regulation](#) of the European Parliament on the transparency and targeting of political advertising
- The Digital Services [Act](#) (DSA)
- The Digital Markets [Act](#) (DMA)

#### STAKEHOLDERS AND INVOLVED PARTIES:

- Verkhovna Rada, CEC, NSDC, Ministry of Digital Transformation, Ministry of Education and Science

### 3.2. INCREASING THE TRANSPARENCY OF POLITICAL FINANCE

- a) Adopt the draft law No. 11462 and other amendments the Law of Ukraine "On Political Parties" and the Electoral Code of Ukraine to incorporate the recommendations of the OSCE/ODIHR. In particular, these changes should address the duplication of oversight functions between the NACP and election commissions, ensure transparency of financial operations and reporting by election fund managers, and prevent excessive campaign spending.
- b) Ensure effective monitoring of political party and election campaign funding by legislatively improving reporting tools and other procedures.
- c) Introduce proportionate sanctions and ensure effective investigation of infringement of political finance rules with due account for the proposals made by OPORA, NACP and the expert community.

No later than 12 months before the election day / a, b, c

#### GROUNDWORK:

- Draft law [No. 11462 dated August 5, 2024](#)
- expanded POLITDATA functions for reporting by election fund managers.

#### STAKEHOLDERS AND INVOLVED PARTIES:

- Verkhovna Rada, CEC, NACP, National Police, CSOs

### 3.3. NEUTRALIZING AGGRESSOR STATE'S POLITICAL INFLUENCE AND RESPONDING

#### TO CYBER THREATS

- a) Improve criminal liability legislation to promote consistency in judicial practice regarding the application of penalties involving disqualification from holding certain (including elected) positions or engaging in specific activities related to elections and referenda. Such penalties should apply to individuals convicted of serious and especially serious criminal offenses against national security, electoral and corruption-related crimes, as well as international crimes.
- b) Develop effective mechanisms for providing election-related information and campaigning in the foreign electoral district. Without adequate access to official information from the election administration body and electoral stakeholders, voters abroad are more likely to be influenced by disinformation, particularly from the aggressor state.
- c) Develop and implement a plan to build the cyber security capacity of the CEC. This plan should be integrated into the overall government risk response system in this area.

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b, c

#### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, MFA, CEC, CSOs

### 3.4. POLLING STATIONS SECURITY

- a) Develop and implement legally enshrined protocols of actions and guarantees for the protection of electoral process participants in case of security threats.
- b) Strengthen the capacity of the police to ensure the security of polling stations.
- c) Develop additional security protocols for foreign polling stations that may potentially be located outside diplomatic premises.

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b, c

#### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, MFA, CEC, National Police, CSOs

## SECTION: FUNDAMENTAL DECISIONS<sup>2</sup>

### 4. UPDATING THE STATE VOTERS REGISTER AND VOTER LISTS

- a) Fully restore the operation of the State Voter Register and expand (supplement) the existing mechanisms for updating its data.
- b) Conduct an independent study of the State Voter Register to verify the accuracy and completeness of the register's data.

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b

#### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, CSOs

### 5. TYPE OF ELECTIONS

Determine the type of election, given that the Constitution of Ukraine does not contain a special provision on the type of election if the regular elections were not carried out within the legal period due to imposition of martial law:

- Postponed regular elections
- Special (first) post-war elections

Before the repeal of martial law

#### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, CSOs

### 6. STATE BODY RESPONSIBLE FOR ADOPTING DECISIONS ON THE CONDUCT

In the case of regular postponed elections, the body responsible for scheduling or announcing the start of electoral process is defined in the Constitution and the Electoral Code of Ukraine. In the case of special elections, it is necessary to appoint a body responsible for adopting decisions on the conduct of elections:

- Verkhovna Rada
- CEC

Before the repeal of martial law

#### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, CSOs

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- 2 To strengthen the legitimacy of a number of fundamental decisions, it is recommended to appeal to the Constitutional Court. First of all, the Constitutional Court could help resolve some issues related to elections that were not held on time due to martial law, in particular:
    - Will the post-war elections be considered regular but postponed?
    - When and in what sequence should such elections be held?
    - Can voting last for several days?

To do this, the President of Ukraine or other subjects of constitutional submission (for example, not less than 45 people's deputies) should apply to the Constitutional Court in advance.

## 7. WHEN TO HOLD ELECTIONS

Amend the provisions of paragraph 6 of section 1 of Article 20 of the Electoral Code and section 2 of Article 19 of the Law of Ukraine “On the Legal Regime of Martial Law” to ensure compliance with statutory deadline for holding postwar elections, that is, **no earlier than 6 months** after the repeal of martial law.

Before the repeal of martial law

### GROUNDWORK:

→ [Conclusions](#) approved during the ninth Jean Monnet Dialogue

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, CSOs

## 8. SEQUENCING OF ELECTIONS

Determine the sequence of holding post-war elections in such a way that they are spread out over time: first hold national elections, and then local elections.

Before the repeal of martial law

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, CSOs

## 9. ELECTORAL SYSTEM

Adapt the electoral system, which is applied to parliamentary and local elections as provided for in the current Electoral Code, to the new challenges posed by full-scale war.

Before the repeal of martial law

### GROUNDWORK:

→ [Conclusions](#) approved during the ninth Jean Monnet Dialogue

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, CSOs

## 10. DURATION OF VOTING PERIOD

Analyze and adopt necessary changes to the duration of voting at polling stations with due account for the following options:

- Increase the number of voting hours during the day. For example, introduce voting from 8:00 to 22:00 instead of the traditional 8:00 to 20:00 timeframe.
- Multi-day voting. This option can be used for voting abroad or for voting of military personnel

Before the repeal of martial law

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, MFA, CSOs

## 11. VOTING METHODS TO BE USED IN THE ELECTIONS

- a) Assess the necessity and feasibility of introducing an alternative voting method and, if needed, adopt the corresponding legislative amendments.
- b) Determine the need to establish additional polling stations in Ukraine and abroad. Introduce relevant amendments to the legislation and, if necessary, conclude interstate agreements.
- c) Determine the need to increase the number of election commissions and, if necessary, adopt legislative changes.

Before the repeal of martial law / a, b, c

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, MFA, CSOs

## 12. VOTING OF THE VULNERABLE CATEGORIES OF VOTERS

- a) Evaluate the current state of electoral infrastructure, including accessibility of polling stations for vulnerable groups. Implement projects to restore and rebuild damaged polling stations.
- b) Amend the legislation to make necessary accommodations for people with disabilities at regular polling stations, and if this is not possible, provide for the application of “mobile voting” procedure to the disabled.
- c) Introduce a mechanism for periodic audits of polling stations accessibility.

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b, c

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, CEC, Ministry of Social Policy, CSOs

## 13. ENSURING THE ELECTORAL RIGHTS OF MILITARY PERSONNEL

- a) Develop and implement mechanisms to enable military personnel to vote at regular polling stations and, in exceptional cases, at special polling stations located within the permanent or temporary deployment areas of military units and formations.
- b) Provide additional guarantees to allow military personnel to run for office, such as granting special leave for the duration of the election campaign.

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b

### STAKEHOLDERS AND INVOLVED PARTIES:

→ Verkhovna Rada, Ministry of Defense, CEC, CSOs



## 14. ENSURING THE EXERCISE OF ACTIVE AND PASSIVE SUFFRAGE RIGHTS OF CITIZENS OF UKRAINE WHO STAY ABROAD ON LEGAL GROUNDS DUE TO RUSSIAN AGGRESSION

- a) Introduce necessary amendments to the legislation and create opportunities for **expanded voting** abroad:
  - Establish additional polling stations;
  - Extend the voting period;
  - Change the procedure for the production and transportation of ballots.
- b) Introduce a procedure for **active registration** of voters abroad, which is aimed at including in the voter lists those citizens who are abroad but have not registered with the consulate.
- c) Provide for **exemption from permanent residency requirement** (the qualifying period of residence in Ukraine for presidential candidates is 10 years, for parliamentary candidates, it is 5) for those who were forced to go abroad because of the war and returned to Ukraine in advance.

Before the repeal of martial law / a, b, c

### GROUNDWORK:

- Draft Law [No. 11300](#) exempts all citizens who stay abroad from the permanent residency requirement under conditions of martial law

### STAKEHOLDERS AND INVOLVED PARTIES:

- Verkhovna Rada, CEC, MFA, CSOs

## 15. LEGAL REGULATION OF THE TRANSITIONAL PERIOD FOR ORGANIZING DEMOCRATIC ELECTION PROCESS IN THE DE-OCCUPIED TERRITORIES AND THE AREAS ADJACENT TO ACTIVE COMBAT ZONE

- a) Enshrine in legislation the transitional period for organizing elections in certain territories of Ukraine.

In advance of the start of the electoral process (no later than 6 months before the start of the electoral process)

### STAKEHOLDERS AND INVOLVED PARTIES:

- CEC, NSDC, Verkhovna Rada, CMU, CSOs

# SECTION: EUROPEAN INTEGRATION

## 16. IMPLEMENTATION OF EUROPEAN INTEGRATION ROADMAP

- a) Approve the “Fundamentals” section of the Roadmap as soon as possible. This section should contain realistic measures that are not too time-consuming.<sup>3</sup>
- b) Continue carrying out electoral reforms with due account for the unimplemented OSCE/ODIHR recommendations. Adopt legislative amendments developed by governmental and non-governmental sectors in the following areas:
  - **Election campaigning;**
  - **Accessibility and transparency;**
  - **Gender-balanced representation and anti-discrimination<sup>4</sup>**
  - **Electoral campaigns funding;**
  - **Election administration.**

Develop legislation on electoral processes before the repeal of martial law / a, b

Adopt legislation on electoral processes in advance of the start of the electoral process (no later than 6 months before the start of the electoral process) / a, b

### GROUNDWORK:

- The “Functioning of democratic institutions” section of the [Roadmap](#);
- OSCE/ODIHR [Recommendations](#);
- Draft laws:
  - [No. 8310 dated December 27, 2022](#);
  - [No. 11300 dated May 27, 2025](#);
  - [No. 11462 dated August 8, 2025](#).

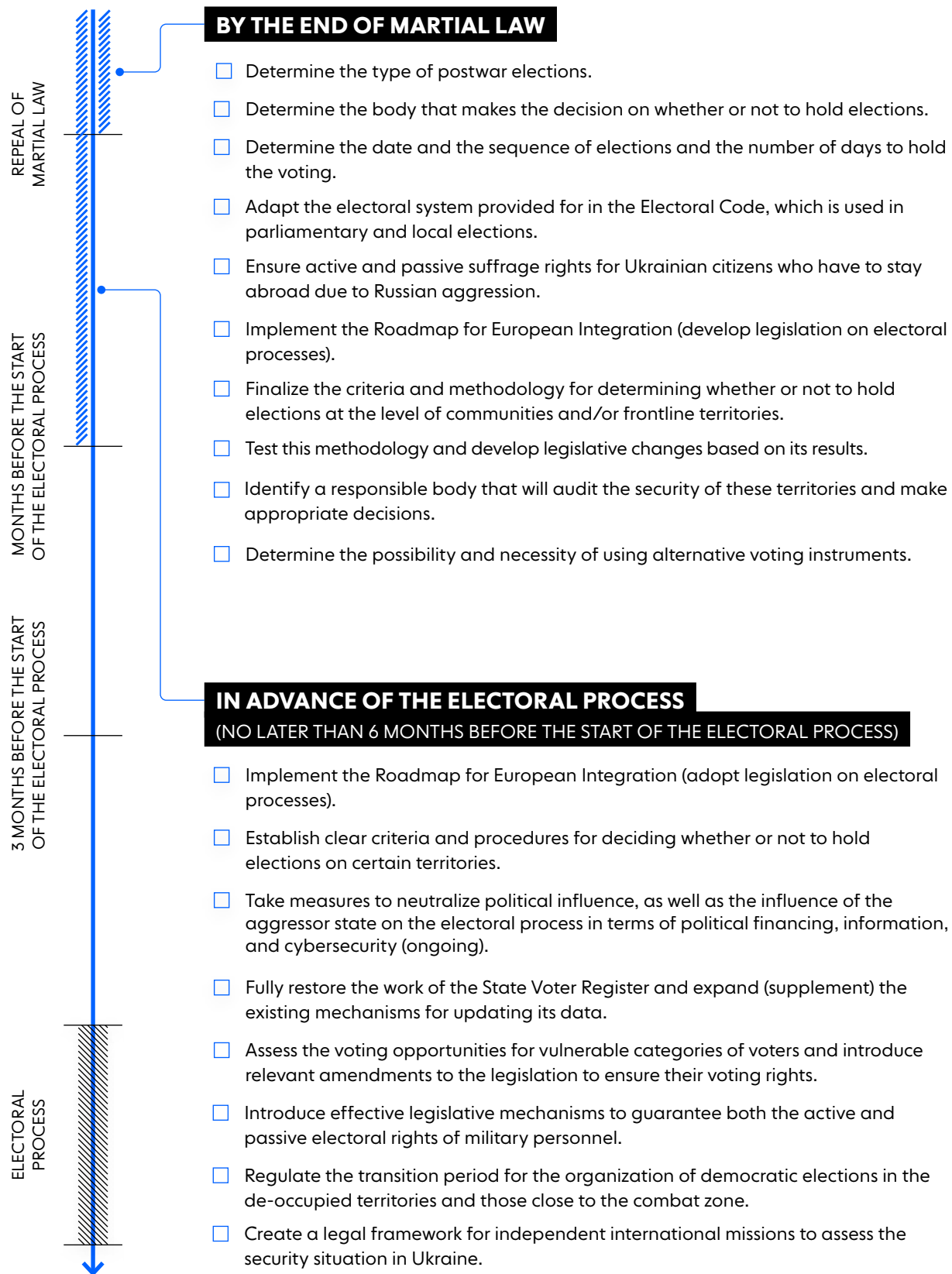
### STAKEHOLDERS AND INVOLVED PARTIES:

- Verkhovna Rada, CMU, CEC, MFA, CSOs.

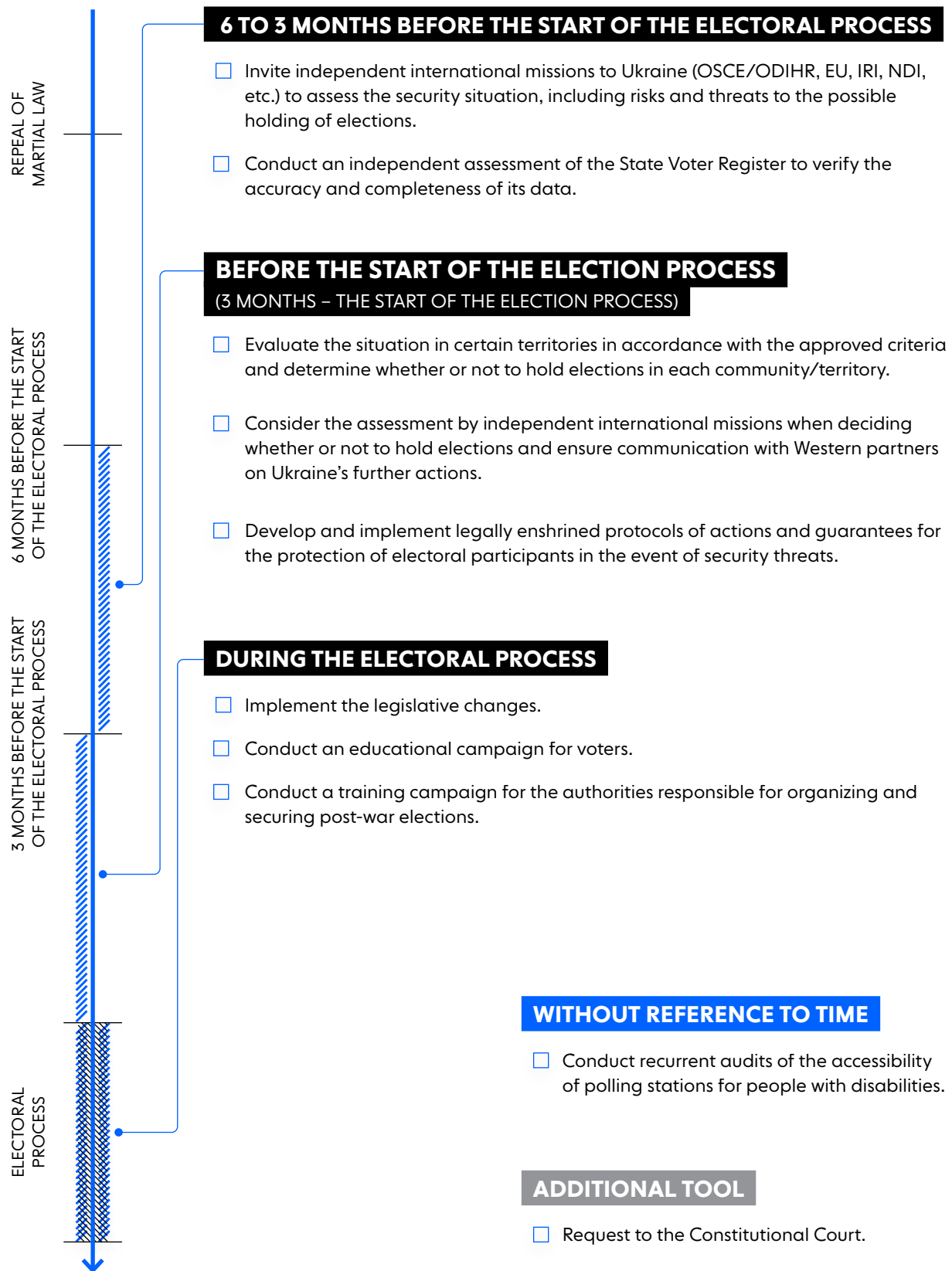
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<sup>3</sup> Approved on May 5, 2025.

# TIMELINE/CHECKLIST FOR THE IMPLEMENTATION OF THE ROADMAP



# TIMELINE/CHECKLIST FOR THE IMPLEMENTATION OF THE ROADMAP



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