

Consolidated Table of Comments Received from Public Authorities
Following the Public Consultation on the Draft “Roadmap” for Expanding Green Jobs in Ukraine

Ministry of Economy, Environment and Agriculture of Ukraine (letter No. 4803-08/8159-07 of 27 November 2025)	
1. It should be noted that conducting geological exploration works in all areas... requires appropriate specialized education and professional experience, which cannot be ensured through short retraining programmes lasting 2–12 months. Related office-based (desk) activities may be performed after completing retraining programmes.	Section 2, after item 6 Within the implementation of the Roadmap, Administrative Service Centres (ASCs) are not considered institutions responsible for employment functions or professional retraining. Employment-related tasks are carried out by the State Employment Service and its regional offices; tasks in the field of education, micro-qualifications and RPL are performed by the Ministry of Education and Science, the National Qualifications Agency and educational institutions. ASCs provide only those administrative services defined by legislation and do not duplicate the functions of other bodies.
“...in the sections where the responsible authorities in Ukraine are listed and the State Service of Geology and Subsoil (Derzhheonadra) is indicated, the list of relevant authorities requires clarification due to incorrect and incomplete referencing. In addition, Derzhheonadra was not involved in preparing the inputs...”	Derzhheonadra has been removed from the sectors where it is not competent or not relevant.
2. The Law of Ukraine “On Remuneration of Labour” clearly distinguishes between state and contractual regulation of wages. The Roadmap cannot include instruments that establish specific wage levels. The Ministry of Economy notes that any interference with the system of state or contractual wage regulation is unacceptable.	Section 1, after “Decent work as a foundation” The principles of decent work, including the concept of fair remuneration, are presented in this Roadmap solely as guiding orientations aligned with ILO approaches. They do not entail any interference with the mechanisms of state or contractual wage regulation defined by the Law of Ukraine “On Remuneration of Labour” and collective agreements.
3. We request that any references in the Roadmap to the SME Strategy or the Operational Plan include their current official titles with all relevant details. In addition, in Annex 3, in Sector 3 “Water Supply...”, please remove: – “SME Development Strategy in Ukraine for the period up to 2027...” (2017, No. 504-r) – “SME Development Strategy...” (2023, No. 437-r)	Amendments have been introduced to Annexes 10, 9 and 3, as well as to Sections 1, 4 and 5 of the main report, reflecting the updated title: “Strategy for the Recovery, Sustainable Development and Digital Transformation of Small and Medium-Sized Enterprises for the Period up to

	2027”, approved by CMU Order No. 821-r of 30 August 2024.
4. The text of the Roadmap uses different titles for strategic documents, including: – “National Employment Strategy until 2030” – “Employment Strategy–2030” which creates ambiguity. In addition, the draft states that the National Employment Strategy is currently in force, while in fact it has not yet been approved. The Ministry of Economy is working on the draft Employment Strategy of Ukraine for the period up to 2030.	Amendments have been made to Annexes 10, 9 and 3, and to Sections 1, 4 and 5 of the main report, reflecting the updated title: “Employment Strategy of Ukraine for the Period up to 2030 (draft; once approved, it will serve to align measures on skills development, micro-qualifications and veteran support)”.
5. The text of the Roadmap and Annex 3 (Annex 2 to the Final Report) contains incomplete or incorrect titles of regulatory acts. These should be presented in their current versions, with correct references and full official titles.	In the Final Report, the following sections have been revised: Section 1 “Policy and Socio-Economic Context”; Annex 2 “EU and Ukrainian Policies and Legislative Acts”; Annex 9 “Sectoral Analysis and Recommendations”; Annex 10 “Draft Roadmap for Increasing the Number of New Green Jobs and Reintegration of Veterans into the Green Labour Market”.
6. In the area “Production of environmentally friendly construction products and other building materials,” the tasks include, among other things, ensuring the application of technical regulations on eco-design. We propose adding the State Agency on Energy Efficiency and Energy Saving of Ukraine as one of the implementing institutions for this task.	Accepted
7. In Annex 9, Sector 1: Regarding the entry “Regulation (EU) ... (Euro 7)”, remove the Ministry of Economy; for “Regulation (EU) 2020/740 (Tyre Labelling)”, replace the Ministry of Economy with the State Agency on Energy Efficiency... In Sector 2, for “Regulation (EU) 2017/1369 (energy labelling) + Eco-design...”, replace the Ministry of Economy, the Ministry of Environment, and the Ministry of Agrarian Policy of Ukraine with the State Agency on Energy Efficiency.	Accepted
8. In Sector 1 of Annex 3 to the draft Roadmap, regarding the entry “EU Eco-label – lubricants / ISO 14024” in the column “Applicable national acts (Ukraine)”, delete the words “Law of Ukraine ‘On Technical Regulations...”	Accepted
9. In Sector 2, regarding the entry “Regulation (EU) 2017/1369 (energy labelling) + Eco-design (Sustainable Products Regulation and transitional provisions)” in the column “Comments (Taxonomy/DNSH, GPP, eco-labelling, jobs)”, delete the phrase “creates jobs in the field of certification and quality control;”	Accepted

10. In Sector 2, the entry “EU Ecolabel / ISO 14024 – detergents” should be implemented as a technical regulation introducing voluntary ecological labelling and a procedure for developing environmental criteria.	Accepted
11. In point 2 of Annex 4 “Explanations on implementation”, replace the words “technical standards” with “technical regulations”. Delete the phrase “The National Standardization Body of Ukraine and technical standardization committees develop new standards.”	Accepted
12. In the DK... entry “Rehabilitation and recycling of demolition waste,” we propose that the Ministry of Economy cannot serve as the responsible authority for the activity on developing and implementing standards for secondary construction and road materials.	Accepted
13. In the Consolidated Table of Key EU and UN Policies and Legislative Acts (including EU amendments for 2024–2025), refine the wording of “Align with national standards.”	Accepted
14. In Sector 1, the word “DSTU” must be deleted.	Accepted
15. In Sector 2 “Energy efficiency...”, delete the words “national standards.”	Accepted
16. In Sector 3 “Water supply...”, delete the phrase “national standards for quaternary treatment.”	Accepted
17. In Sector 4 “Demining...”, delete the phrase “National standards for the restoration of degraded/war-contaminated areas.”	Accepted
18. In the main text of the draft Roadmap, include a reference to DSTU ISO 14024:2018 (ISO 14024:2018, IDT).	Accepted
19. Clarification	Accepted, added to Annex 2
State Agency for Tourism Development of Ukraine, email dated 21 November 2025, prepared by Tetiana Hrytska	
To revise the occupational title “Guide–Excursion Leader” (5113) to “Tourism Guide” (5113).	Reflected in Annex 3 to the Analytical Report.
To review the spelling of words containing the “eco-” prefix. According to the current Ukrainian orthography (2019 edition), the prefix <i>eco-</i> in compound words is written together, regardless of whether the second part begins with a consonant or a vowel.	Reflected in Annex 3 to the Analytical Report.
To use the terms “Western Ukraine”, “Central Ukraine”, “Southern Ukraine”, and “Northern Ukraine” instead of “western”, “central”, etc.	Reflected in Annex 2 to the Analytical Report.
According to the State Agency for Tourism Development, it is advisable to consider ecotourism as a smart specialisation not only in western and southern regions, but also in Kyiv and the central regions.	Reflected in Annex 2 to the Analytical Report.

To complement the list of actors under the area “Sustainable Tourism and Development of Recreational Activities in National Parks” by including the Ministry for Communities and Territories Development.	Reflected in Annex 10 to the Analytical Report.
Міністерство освіти і науки України, лист від 28.10.2025 № 52608-25	
<p>To implement this component, it is essential to ensure the methodological involvement of the Ministry of Education and Science and educational institutions. In particular, a network of green retraining centres should be established on the basis of vocational and professional pre-tertiary education institutions; mechanisms for recognising non-formal and prior learning (RPL) should be integrated; and micro-qualifications should be expanded for priority green occupations.</p> <p>Updated educational programmes and standards must correspond to the list of green occupations and competencies defined in this Roadmap, while educational institutions should serve as key providers of short, modular programmes tailored to veterans and internally displaced persons.</p> <p>At the same time, certain occupations in the field of subsoil use and geological exploration require specialised professional education and substantial practical experience, and therefore cannot be delivered solely through short-term retraining courses. Short modular programmes may only be applied to supporting functions (chamber work, GIS processing, mapping, laboratory operations, data processing, digital monitoring) that do not involve performing specialised field-based geological work. This ensures an accurate allocation of professional requirements without compromising safety and quality standards.</p>	Reflected in Annex 10 to the Analytical Report.
Replace “vocational and technical education” with “vocational education”.	Accepted