

Recovering through Compensation

The Role of Compensation for Damaged and Destroyed Housing in Rebuilding Lives and Communities in Ukraine

Ukraine's eRecovery programme is an important pathway to housing recovery, but legal, operational and financial barriers continue to limit access for conflict-affected communities, particularly displaced people and those with complex property cases.

Background

Compensation for damage and destruction of housing represents a crucial tool to allow those affected by conflict to overcome the shock of an attack and move towards recovery and self-reliance. Initially introduced to support those affected by conflict in Donetsk and Luhansk regions between 2014 and 2022, it was expanded in 2023 to cover the whole country after the escalation of the war.ⁱ Since then, the compensation mechanism has become critically important to ensure that civilians remain able to access their Housing, Land and Property (HLP) rights while being affected by violence and displacement.

Access to safe and adequate housing remains a key challenge in Ukraine after 4 and a half years of full-scale war. Over the past year, aerial attacks and armed violence have

sharply deteriorated across the country, increasingly impacting civilians and civilian objects. Additionally, sudden large-scale shocks such as the Kakhovka Dam destruction in June 2023 have further exacerbated the issue.ⁱⁱ As of February 2026, 61.1 billion USD in direct damages have been reported for housing and private properties, affecting over 3 million households.ⁱⁱⁱ

This report aims to highlight the main barriers that people in Ukraine face when trying to access their right to compensation for damaged or destroyed housing. The analysis is built on over a decade of work by the Norwegian Refugee Council (NRC) and partner organisations in Ukraine supporting people affected by conflict and displacement in accessing their rights through information sharing, counselling and legal assistance. Over the past two years, NRC has worked with of a broad group of compensation commissions (which will hereinafter be

referred to as “commissions”), who are in direct contact with the day-to-day realities of the compensation programme. Their views and insights have also fed into the analysis.

The right to compensation in Ukraine

The right to compensation for damage and destruction of certain categories of housing has been introduced in Ukraine’s legal framework with Law №2923-IX, in May 2023, and further developed by Resolutions 381 and 600, regulating compensation for damaged and destroyed property respectively.^{iv} As a result, the State Register of Damaged and Destroyed Property was created to record instances of properties affected by the conflict. The law is currently implemented through the state eRecovery (єВідновлення) programme, which allows the owners of properties to receive funds to repair the damage resulting from the war, or seek new homes by utilizing housing certificate or cash payment to reconstruct a home on the owner’s land when their former ones are destroyed. The programme is closely linked to the online State digital platform Diia, through which applications are submitted.

A critical pathway to durable solutions

The continued impact of the war on housing

Since February 2022, Ukraine’s housing sector has been consistently affected by the war, as a mix of air strikes with drones and missiles, as well as artillery shelling in frontline areas, have

resulted in massive damage and destruction close and far from the active fighting. As of February 2026, as much as 14 percent of

Priority issues identified by compensation commissions

In a workshop with over 30 compensation commissions from Ukraine in September 2025, NRC asked them which were the three most important areas that should be urgently addressed, and these were the priorities they identified.

Issues related to property rights and documentation

Lack of documentation is a barrier to applying for compensation for both damaged and destroyed property. Commissions provide basic guidance or refer people to legal providers, including Free Legal Aid Centres (FLACs).

Issues with interim and final verification

Lack of clear verification guidance has led to differences in how commissions interpret categories and to discrepancies and inconsistencies in conclusions recorded in the Register of Damaged and Destroyed Property.

Difficulties in categorising property damage

Commissions continue to face challenges categorising property as damaged or destroyed in acts of technical inspections. It is not always clear whether the property is damaged or destroyed, and many commissions report of instances where they rejected applications requesting people to apply for the other category.

Ukraine's total housing stock was damaged or destroyed, affecting over 3 million families.^v Since then, such attacks have continued to increase resulting in more destruction and civilian casualties.

Damage to a home is an important trigger for displacement, often pushing those affected to wanting to leave.^{vi} Once evacuated, IDPs are then faced with the challenges of finding temporary and longer-term accommodations for themselves and their families, which can also be extremely challenging. For example, an average of half of all IDPs spend over 33% of their monthly income on rent, putting them at high risk of eviction.^{vii} As such, IDPs are often found to be resorting to negative coping strategies, such as burning through their savings or accumulating debt, in order to afford rent while also meeting their basic needs.^{viii}

Solutions from the start and a pathway to sustainable recovery

Access to compensation for damaged and destroyed housing represents a critical pathway of support that helps move people from the shock of conflict and displacement to stability and recovery in a sustainable way. This is for instance the case for those returning to areas that were regained by Ukrainian armed forces during the counteroffensive of late 2022 and early 2023.

Durable solutions for IDPs are only possible if they are able to exercise their HLP rights in full. In order to do so, they must be supported in accessing safe and adequate housing solutions already from the emergency phase.

Main barriers faced by people in Ukraine

As of March 2026, the eRecovery programme provided more than 74.523 billion UAH (appx. 1.7 billion USD) to over 181 354 families in Ukraine.^{ix} Out of the many options that exist for people whose housing and property have been affected by the war, compensation remains the largest source of direct funding for repairs.^x However, consistently fewer people than expected are applying through the mechanism.^{xi}

Beyond the question of awareness and information sharing, that underpin the effectiveness of many state programmes, access to compensation for damaged and destroyed housing remains fragmented and characterised by challenges and barriers when it comes to certain affected populations.

Currently, people applying to eRecovery face issues along three main categories: legal, operational, and financial.

While these are barriers that are primarily faced by those applying for compensation, it is also important to recognise the crucial role that commissions undertake in verifying and processing requests, and the challenges they face. This role can only be fulfilled with the necessary expertise, human capacity, and technical resources. However, they are often under-resourced, supported by the goodwill and resourcefulness of authorities and communities, but unable to fully meet existing needs. Perception of the programme as reliable is critical for its adoption and ultimately for its success. If the trust of affected people is undermined by these challenges, they will turn to less sustainable or unsafe options to rehabilitate their homes and find housing solutions.

Legal Barriers

Legal barriers to obtaining compensation for damaged and destroyed housing are rooted in some of the legal requirements for an application to be valid, and commissions' ability to verify them. These are often the result of overlapping and competing responsibilities, duplication of different interventions, and requirements around the registration of properties in the State Register of Property Rights over Immovable Property. Currently, many of the people that are denied access to compensation are not lacking a right to compensation itself but rather are unable to prove that right in the exact form the system requires.

Verification of ownership titles

The formal registration of properties through the necessary processes and with the required ownership titles and documents is a critical prerequisite in order to access compensation. NRC's legal assistance teams continue to provide support to conflict-affected and displaced communities in order to restore property deeds and other necessary legal documentation.

One of the main challenges that is often raised is difficulties around the verification of people's documentation. In many cases ownership titles were never established by owners, which can lead to particularly complex cases. For instance, it is often very difficult to establish ownership where people had so-called '*rozpyska*' (a handwritten agreement about transition of ownership rights). While less complex, restoring documentation that has been lost as a result of an incident or during displacement can also be a lengthy and expensive process. In many cases, it requires resorting to courts and notaries, which add the need for guidance and expert advice in how to navigate these processes.

In some areas of Ukraine, there have also been cases where individuals prematurely renounced their ownership rights prior to the entry into force of the law introducing the right to compensation.^{xiii} In many instances, such decisions were taken due to limited awareness of the forthcoming compensation mechanisms or misunderstanding of the legal implications of renouncing ownership. As a result, affected households may find themselves excluded from compensation procedures or face additional legal complexities when attempting to restore or confirm their ownership rights.

Properties in Occupied Territories or affected by the conflict before 2022

Restoration of the property deeds and verification of the ownership rights can be particularly challenging for people with properties in the Russian-occupied territories of Ukraine (OTs), or people who originally resided in OTs and their heirs, due to physical access limitations, the loss of many original archives as a result of conflict and occupation, and lack of pre-2013 data about the ownership rights in the State Register of Property Rights to Immovable Property. This is further compounded by the lack of mechanisms and funding supporting the ownership rights for properties in OTs, together with the lack of commissions dedicated to those cases.

The loss of access to Bureaus of Technical Inventory (BTIs) due to their destruction (for example, in Kupiansk and Dvorichna, Kharkiv Oblast) or occupation (for example, in Lysychansk and Severosodonetsk, Luhansk Oblast) can be an additional barrier. With the lack of clear regulation of this issue in the procedure for state registration of property rights, as well as the lack of consolidated court practice, entire towns and communities are currently deprived of the

adequate opportunity to register their property rights arising prior to 2013, and consequently, of the opportunity to claim compensation.

Owners whose homes were damaged or destroyed as a result of hostilities between 2014 and 2022 in conflict-affected areas of eastern Ukraine also face barriers in accessing compensation. These cases were primarily addressed under the Procedure for the Provision and Determination of Monetary Assistance to Victims of Emergencies, established by Resolution of the Cabinet of Ministers №947 (2013) and amended by Resolution №767 (2020), which extended the mechanism to conflict-related destruction.^{xiii} However, the scheme remains limited in scope and effectiveness, with compensation capped at relatively low levels, complex procedures to verify damage, and lengthy administrative processes conducted by local commissions. As a result, many affected homeowners still struggle to obtain adequate and timely compensation.

Co-ownership and missing persons

Another significant legal challenge concerns restricted access to compensation for destroyed housing in cases where one of the co-owners is “absent.” As a result of the war, there are numerous cases in which a co-owner has no information about the whereabouts of, or means of contact with, other co-owners. While the legislature has partially addressed this problem in relation to damaged housing, it remains unresolved for cases involving destroyed property.

As a result, the present co-owner faces barriers in accessing compensation. This is particularly the case if information about the “absent” co-owner’s property rights is not recorded in the State Register of Property Rights over Immovable Property, as it is then

not possible to submit a compensation claim. Also, in the absence of the other co-owner, it is impossible to terminate ownership of the destroyed property and, consequently, to make use of the compensation certificate obtained. In its current form, the existing legal approach imposes a disproportionate administrative burden on homeowners that is inconsistent with the principle of reasonableness and undermines equal access to compensation for affected owners.

Ownership for residents of state and municipal housing

Particular attention should be given to people living in state or municipally owned apartments that they do not formally own. Some local authorities do not process applications to transfer these apartments into residents’ private ownership, while current rules prevent this transfer if the housing does not meet sanitary or technical standards. This means that once an apartment is destroyed or seriously damaged, residents may no longer be able to become its legal owners and access compensation.

Operational Barriers

Operational barriers include all challenges and limitations that commissions face when attempting to consider an application for compensation. This is particularly the case for commissions covering areas that are in the vicinity of intense fighting, where movement is restricted due to the security situation. There can also be issues around the interim and final verification of the repair work and expenditure of the funding provided through the programme.

Commissions and legal aid actors increasingly observe that damaged housing cases can become more difficult to process than destroyed housing cases. Destroyed housing is often easier to classify administratively and

may proceed through certificate-based pathways, while damaged housing frequently requires repeated inspections, technical assessments, repair calculations, and reassessments where conditions worsen over time.

Collecting and verifying evidence in areas of active conflict

To document the destruction of property located in areas of possible or active hostilities, an inspection may be conducted on-site if there is no immediate threat to life and safety and the required safety measures can be ensured, or through remote inspection.^{xiv} Commissions are not always able to physically travel to high-risk areas to directly assess the extent of the destruction in specific applications due to direct risk to life and health of its members. This means that remote inspection is the only modality enabling the consideration of compensation claims in these areas. This is particularly concerning as most damaged and destroyed properties in Ukraine are primary residences and the vast majority of them are located in frontline areas.^{xv}

As a workaround to direct physical access, commissions have looked at a range of different options to still be able to verify applications. The two most frequently mentioned methods include the use of photos and drone footage. A recent change in legislation from July 2025 allows commissions to remotely inspect destroyed housing.^{xvi} As such, local authority representatives, or people still living in the area, are able to send photos to members of the commission so that they can assess the damage. Similarly, drone footage can be used in a similar way. Both of these types of evidence are then cross-referenced with other sources in order to arrive at a verification and decision. Recently, some commissions have also begun

considering the use of satellite footage to obtain more material for them to work with.

Limitations in remote inspections

Remote inspections are often characterised by their own specific challenges. Institutional and capacity constraints limit effective use of remote evidence, as local authorities and commissions report insufficient technical capacity to systematically analyse drone and satellite imagery. Legal uncertainty around the use of drone footage can also contribute to appeals and reduced trust in the process. This is particularly impactful as commissions can apply overly cautious standards, partly as a result of the lack of nationally standardised guidance on how remote visual evidence should be weighted in relation to other forms of evidence. Moreover, the procedure for conducting remote technical inspections of destroyed or damaged housing has been significantly complicated as a result of recent changes.^{xvii} In particular, the technical requirements and the requirements for the content and quality of images further restrict access to this modality, reinforcing it as a practical barrier for applicants.

Workarounds still present their own distinct challenges and do not necessarily address the broader question of verification in inaccessible areas. Commissions are often faced with limited technical capacity and resources to collect evidence remotely, while the use of drones can bring an additional share of questions in terms of the potential risk that it poses for affected populations. In particular, aerial activity in some areas can attract unwanted attention or increase perceived risks for local residents. The use of drones to collect footage and evidence also introduced a range of interrelated challenges. Firstly, the quality and standardisation of visual evidence often remain inconsistent, as the angles, weather conditions and other

technical aspects can vary noticeably depending on the operator and equipment used. Secondly, evidentiary reliability and authenticity can be complex to assess. Commissions report experiencing difficulties verifying when images were taken and whether they accurately reflect post-destruction conditions.

Most importantly, inconsistent practices remain in assessing evidence obtained through remote inspections. Some authorities consider satellite imagery sufficient, while others reach the opposite conclusion. Additionally, owners of apartments in multi-story residential buildings are unable to have the entire building recognised as destroyed. As a result, people pursue multiple and parallel procedures, creating an unnecessary workload for commissions. While the adoption of digital pathways, as done with the *Diia* app, is a critical tool to increase the reach of the programme, this also results in potential barriers for people with limited access to the internet, smartphones, or digital literacy. These can include vulnerable groups such as older adults, people with disabilities, or those living in rural or remote areas. While it remains possible to register in person through Administrative Service Centres (ASC) or local authorities, they are not always easy to access for people with mobility issues or in areas with damaged or limited infrastructure and transport options. This is particularly the case in communities where ASCs are not physically present.

Limits in coordination and complementarity

Duplication of assistance provided by the state and humanitarian actors can further stretches the limited funding that exists to respond to housing needs. The Shelter Cluster in Ukraine has introduced the use of the Shelter Information Damage Assessment and Response Database (SIDAR), which includes

information on property damaged by conflict to inform the provision of assistance and coordination.^{xviii} This system can also be used by local authorities to get more information on humanitarian activities that are taking place in a certain settlement. In terms of compensation applications, commissions need to consider all the assistance that has been provided in order to make a decision. While tools such as SIDAR exist, limited use by local authorities as well as humanitarians means that it is still difficult to deduplicate the support that is being provided, resulting in less efficient resource allocation. The possibility of providing compensation funding and humanitarian assistance to support repairs in a complementary way represents an important step forward in allowing people to recover access to HLP rights in a timely way. However, the actual implementation of this process remains complicated by limitations in information sharing practices.

Gaps in personnel and specific expertise

The human resourcing of commissions can also represent a challenge. Commissions often report a shortage of technical construction specialists amongst their members. This problem is particularly acute in cases where a decision must be made whether a house has been completely destroyed or can be repaired. In most cases, applicants are forced to engage external specialists to compile a technical report, which is a costly service and significantly limit access to compensation. In border and frontline communities, commissions also report a high turnover of their members, often due to security concerns, displacement, or staff shortages. As a result, they may be forced to operate with an incomplete composition, which can prevent them from conducting site

inspections and formally verifying damage. This can further delay the processing of applications and limit the ability of affected households to access compensation in a timely manner.

Ultimately, commissions have identified the lack of a harmonised and coherent approach across Ukraine as one of the key barriers when it comes to verifications. Often feeling isolated, they are trying to find innovative solutions without necessarily being aligned with broader systems and processes. To this end, NRC continues to engage with commissions throughout Ukraine to not only support their work but also to create spaces for exchange, alignment and innovation, such as the *All-Ukrainian Compensation Workshop* that NRC organises yearly with a broad number of commissions and authorities.

Financial Barriers

Financial barriers are often the most cited and most impactful when it comes to the eRecovery programme. Commissions often mention issues around the availability of funding, which is processed by the Ministry for Development of Communities and Territories of Ukraine, terms of payment, and the broader frameworks under which the mechanism functions. While not directly linked to the financial challenges, the length of time that passes between the submission of an application and the reception of the payment or the certificate is also a crucial issue that can further complicate the final verification process and the effective use of the funds.

Gaps in funding for compensation

Local authorities continue to struggle to access the necessary funding to support communities and families affected by the conflict, which is at a scale that has

completely surpassed current resourcing. As a result, many city councils struggle to deal with long waiting lists, and some are allocating money directly from their local budgets to be able to respond to more people. This is the case for instance where funds are used to repair common dwelling areas of residential buildings, which is a precondition to allow inhabitants of those buildings to apply for e-recovery. However, these are not sustainable approaches as public budgets are under increasing pressure and are not able to keep pace with housing needs.

Waiting times are particularly problematic when it comes to destroyed housing, where applicants receive a certificate or funds for construction. This is also the only type of compensation for which homes in areas of active fighting are eligible. Waiting times between positive decision and payment for categories A and B are either 5 days for the former and up to 3 months for the latter.^{xix} These different timelines are mostly due to the differing amounts and the availability of funding. As a result, in the case of destroyed housing, the waiting time increases to up to 6 months. To complicate matters further, recipients of the certificate for a new property are sometimes told that they have as little as 30 days to identify a property and use it, and even then, are not sure that they will receive the funds in time to pay for the new house.

Structural barriers limiting access and usage of compensation funding

Access to compensation is often severely limited by two interlinked factors: checklist prices, and upper limits on payable sums for repair categories A and B. Specifically, the lack of annual revisions of the prices, the growing costs of construction materials, and the constant erosion due to inflation, have reduced the real value of compensation.

After assessing the damage to a property, commissions assign funding for repairs based on a checklist with the established cost of building materials and works approved by the Cabinet of Ministers.^{xx} The total sum is limited by the extent of the damage and the category of the property. This has indirectly put commissions in the position of having to reject many applications, or for affected people to not be able to conduct all repairs as initially planned, as a result of the joint impact of static prices, growing costs and inflation.

Since their introduction in February 2023, checklist unit prices have increased by almost 25 percent as a result of cumulative inflation, meaning that 500,000 UAH worth of materials in December 2025 corresponded to roughly 400,000 UAH worth of materials in February 2023 when the checklist was initially introduced.^{xxi} While a revision has taken place in December 2025, the checklist unit prices were not reviewed for almost 3 years, despite requiring an annual review..^{xxii}

The revision of average costs of a specific unit decreased the gaps between set and actual prices, which is also around 25%, however, such revision does not allow to cover all costs associated with repairs since the total ceiling for categories A and B were not themselves increased. As such, people receiving funding for repairs are often unable to cover the full extent and face challenges when having to undergo the final verification and justify their expenses if not all repairs have been done.

As expressed by one local administration, the current checklist is also not comprehensive enough, and for instance does not cover the cost of clearing rubble, which is often necessary and expensive.^{xxiii} Similarly, some local administrations and commissions also struggle with its one-size-fits-all approach.

Regional differences in prices and costs mean that some areas will be disadvantaged compared to others, as they will only be able to cover smaller levels of repairs. Any update to the checklist should also consider regional differences.

Commissions also find themselves in the position of having to reject applications where the extent of the damage is under the threshold of destroyed property but over the 350,000 or 500,000 UAH ceiling of category B. This is becoming increasingly the case both as a result of growing costs for repairs, but also as weaponry becomes more advanced, harder to intercept, and more destructive.

Indirect financial barriers for applicants

The financial costs associated with restoring property documentation, such as notary services, court fees, and administrative charges, can represent a significant burden, particularly those that face economic hardship from displacement or being affected by the conflict. Access to notarial services also remains limited in many conflict-affected and remote areas. The shortage of functioning notaries often requires people to travel long distances to access these services, which further increases the financial and time burden associated with restoring property documentation.

Complex cases putting people at risk of falling through the cracks

As of December 2025, only 185,111 had applied for compensation through the programme.^{xxiv} While many have reportedly repaired the damage themselves, applied to different programmes, or planned to apply for compensation later, a substantial group was in need of legal support, missing the

necessary documentation, or unaware on how to apply.^{xxxv}

Much of the work that is being done in Ukraine around HLP focuses on raising awareness on the rights of people if and when affected by strikes, as well as directly supporting them in navigating the process of applying for compensation and providing complementary assistance, including coverage of related legal fees (technical passports, inheritance certificates, court fees for establishing ownership title etc). However, ever since the introduction of the eRecovery programme, NRC has been supporting the complex cases of people who are either unable to apply or are rejected during the process. These cases show that people have legal vulnerabilities due to their inability to access their HLP rights, that can then exacerbate the needs resulting from an attack or displacement.

Cases of inheritance

Heirs may find themselves in a legal limbo if the owner has terminated ownership of the destroyed property, as participation in the eRecovery program requires registration in the State Register of Property Rights. This situation may apply both to those who opted for housing certificates and to those who chose compensation for constructing a home on their own land. The number of such cases is likely to increase, particularly where owners terminated ownership but were unable to use the certificate (due to delays and long waiting lists with priority given to certain groups) or received only the first instalment for construction. In such cases, no effective remedy is currently available due to technical and legal limitations.

Cases of co-ownership

Co-ownership can also be challenging when one or more of the co-owners are unwilling to provide consent for repairs or for termination of ownership prior to the use of a certificate. Beyond co-ownership, access to compensation and HLP rights are often challenging for people owning apartments in large multistorey buildings. Resolution 381, which institutes the eRecovery programme, indicates that applications should be refused if they involve an apartment in a building which has damaged communal areas, such as entrances, foyers, landings and stairwells. As of December 2025, the issue of who is responsible for communal areas remains unresolved, and a critical blockage when it comes to access to compensation. Compensation can also be particularly complex to access for those whose property is part of a cultural heritage site.

Cases of multi-apartment buildings

An additional challenge derives from the different types of property titles and documentation that different owners might have within the same building. The complexity of these cases is particularly challenging for commissions whose resources and expertise are already stretched. Within the same multi-apartment building, different sections may be affected to different degrees and be subject to different ownership or housing arrangements. As a result, residents may face distinct eligibility conditions and timelines from application to repair. Additional barriers can also arise during the process, including further damage from subsequent attacks or changes in legal status such as inheritance.

Cases of tenants and renters

Ukraine's housing sector has traditionally been rooted in home ownership, with the vast



majority of Ukrainians owning their homes in 2025.^{xxvi, xxvii} Under the current framework, tenants are not eligible to access the eRecovery compensation mechanism, as applications can only be submitted by property owners. In many cases this is contributing to increased housing insecurity for displaced renters and further compounding their existing needs and vulnerabilities following a strike, for instance when the owner is unable or unwilling to apply for compensation. These cases are of particular concern as many IDPs are already struggling to cover their rents and often are unable to access sufficient income.^{xxviii} A sudden strike or violent incident can result not only in the loss of their current residence overnight, but also in further loss of the few personal items that were brought while becoming displaced, as well as additional psychological trauma and feelings of insecurity.

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Recommendations

There is a growing risk that access to compensation mechanisms primarily benefits the simplest cases, where documentation and administrative elements are already available, rather than those with the greatest needs but often complex. Addressing legal, technical, and procedural barriers is therefore essential not only for access to compensation, but also for equitable recovery.

To the Government of Ukraine:

- Commissions should be supported with **adequate resources, expertise and clear legislative frameworks** to provide IDPs and conflict-affected populations with effective and predictable access to their right to compensation. This support should include an **increased coordination and standardization of practices** through peer learning.
- Compensation should allow IDPs and conflict-affected populations to **fully complete repairs or promptly access alternative housing solutions**. This requires a revision of **compensation ceilings** for categories A and B; a regular revision of the **checklist prices for repairs**, in line with inflation rates and in correlation with the compensation ceilings; and a regular review of **coefficients used for the calculation of housing certificates**, alongside automatic recalculations of amounts based on updated regional coefficients.
- Ensure that IDPs and people still living **in areas of active hostility** have effective **access to their right to compensation** through strengthened evidence-gathering and verification practices. Greater standardisation of practices should be driven by a **national guidance on the use of remote visual evidence in damage verification**, including the adoption of clear national standards on the use and weighting of remote visual evidence such as photos, drone footage, and satellite imagery.
- Create a system that facilitates access to the right to compensation for IDPs and conflict-affected populations who are faced by **particularly complex legal challenges**. This should allow to address **co-ownership and inheritance barriers** by enabling claims for individual shares, simplifying consent and ownership-termination procedures, and allowing heirs to claim before ownership is formally registered, supported by standardised rules and clear guidance for commissions.

To the donor community:

- Support the Government of Ukraine in **increasingly providing access to HLP rights and compensation** for damaged and destroyed housing as a key pathway to durable solutions to displacement. This should include investing in **local duty-bearers**, such as commissions and other local authorities, to ensure that they receive the necessary human and financial resources, as well as clear legal frameworks.

- Provide **sustained and predictable financial support** for the eRecovery programme as a central mechanism for the right to safe and adequate housing. The greatest barrier to HLP rights remains **limited funding for the programme**.
- Complement financial contributions with **technical and advisory support to the Government of Ukraine**, including assistance to strengthen legal frameworks, administrative procedures, and implementation capacity related to compensation for damaged and destroyed housing. Such support can enhance accessibility, consistency, and accountability of the mechanism, and contribute to durable solutions for displaced populations.
- Support **pilot approaches and learning initiatives** aimed at addressing complex or unresolved compensation cases in order to inform **scalable and evidence-based improvements** to the compensation framework.

To the humanitarian community:

- Provide **operational and capacity-development support** to commissions to strengthen access to provide IDPs and conflict-affected populations with effective and predictable access to their right to compensation. This should include an increased prioritisation of areas regularly affected by shelling and active hostilities.
- Strengthen **complementarity, coordination, and information-sharing** between humanitarian shelter, housing, and legal protection assistance and the eRecovery programme, where appropriate, including by ensuring that humanitarian support does not unintentionally create barriers to future access to compensation or recovery pathways
- Prioritise the **provision of legal assistance, documentation support and referrals** to Shelter actors for **IDPs and conflict-affected populations facing complex legal challenges**. This should include systematic documentation of the challenges faced across these cases to inform collective learning and ongoing advocacy with relevant duty-bearers.
- Strengthen **coordination and information-sharing approaches with compensation commissions and relevant authorities and humanitarian shelter actors**, particularly on repair activities and coverage, to strengthen deduplication and complementarity between humanitarian assistance and state-led compensation. This should include the systematic use of SIDAR as a tool to prevent or reduce duplication of different and overlapping pathways of support.

Endnotes

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- ⁱ For more details: Resolution of the Cabinet of Ministers of Ukraine No. 947 of 18 December 2013 (as amended by the Resolution of the Cabinet of Ministers of Ukraine No. 767 of 2 September 2020), [link](#), *f* the Resolution of the Cabinet of Ministers of Ukraine No. 767 “On Payment of Monetary Compensation to Victims Whose Homes (Apartments) Were Destroyed as a Result of a War-Related Emergency Caused by the Armed Aggression of the Russian Federation” of 2 September 2020, [link](#).
- ⁱⁱ United Nations, *Kakhovka Dam destruction inflicted US\$14 billion damage and loss on Ukraine*, [UN Ukraine](#).
- ⁱⁱⁱ The World Bank Group, *Ukraine Fifth Rapid Damage RDNA5*, February 2026, [link](#).
- ^{iv} For more details: *Law №2923-IX* ([link](#)), May 2023; Resolution of the Cabinet of Ministers of Ukraine No. 381 ([link](#)), amended on 25 March 2026; Resolution of the Cabinet of Ministers of Ukraine No. 600 ([link](#)), adopted on 24 May 2024.
- ^v The World Bank Group, *Ukraine Fifth Rapid Damage RDNA5*, February 2026, [link](#).
- ^{vi} International Organization for Migration (IOM), Feb 19 2025. DTM Ukraine — Housing, Land and Property in Ukraine: Residential Damage, Property Rights and the eRecovery Programme — (February 2025). IOM, Ukraine, [link](#).
- ^{vii} International Organization for Migration (IOM), Oct 27 2025. DTM Ukraine — Protracted Displacement and Precarious Housing — October 2025. IOM, Ukraine, [link](#).
- ^{viii} Data from consecutive rounds of Multi-Purpose Cash Assistance provided by NRC in Ukraine between 2024 and 2026.
- ^{ix} Ministry for Recovery, Infrastructure and Transport of Ukraine, *Results of the eRecovery program as of the morning of March 10, 2026*, [link](#).
- ^x REACH, *Enablers and barriers in access to repair and compensation for housing damaged by war*, May 2025, [link](#).
- ^{xi} International Organization for Migration (IOM), Feb 19 2025. DTM Ukraine — Housing, Land and Property in Ukraine: Residential Damage, Property Rights and the eRecovery Programme — (February 2025). IOM, Ukraine, [link](#).
- ^{xii} For more details: *Law №2923-IX* ([link](#)), May 2023.
- ^{xiii} For more details: Resolution of the Cabinet of Ministers of Ukraine No. 947 of 18 December 2013 (as amended by the Resolution of the Cabinet of Ministers of Ukraine No. 767 of 2 September 2020), [link](#), *f* the Resolution of the Cabinet of Ministers of Ukraine No. 767 “On Payment of Monetary Compensation to Victims Whose Homes (Apartments) Were Destroyed as a Result of a War-Related Emergency Caused by the Armed Aggression of the Russian Federation” of 2 September 2020, [link](#).
- ^{xiv} For more details: Resolution of the Cabinet of Ministers of Ukraine No. 473 of 19 April 2022, [link](#).
- ^{xv} International Organization for Migration (IOM), Feb 19 2025. DTM Ukraine — Housing, Land and Property in Ukraine: Residential Damage, Property Rights and the eRecovery Programme — (February 2025). IOM, Ukraine, [link](#).
- ^{xvi} Government of Ukraine, *eVidnovlennia: Commissions to remotely inspect destroyed housing*, July 2025, [link](#).

^{xvii} For more details: Resolution of the Cabinet of Ministers of Ukraine No. 815 of 7 July 2025 (as amended on 29 October 2025), [link](#).

^{xviii} Shelter Cluster, *Shelter Information Damage Assessment & Response (SIDAR)*, June 2023, [link](#).

^{xix} Under the eRecovery Programme, category A damages include minor repair, with compensation up to UAH 200,000. Category B include larger repairs with compensation up to UAH 350,000 for an apartment and UAH 500,000 for a private house. Source: [Government of Ukraine](#).

^{xx} Government of Ukraine, *Terms of eVidnovlennia programme simplified for citizens with jointly owned property: Government's decision*, November 2025, [link](#).

^{xxi} The Global Economy, Ukraine: Consumer Price Index (CPI), accessed in August 2026, [link](#).

^{xxii} For more details: Resolution of the Cabinet of Ministers of Ukraine No. 1646 of 12 December 2025, [link](#).

^{xxiii} NRC interview with the City Council of Odesa, July 2025.

^{xxiv} Transatlantic Dialogue Center (TDC), May 14, 2026. Secondary Real Estate Markets and Alternatives in a Post-War Recovery Context. [link](#).

^{xxv} REACH, *Enablers and barriers in access to repair and compensation for housing damaged by war*, May 2025, [link](#).

^{xxvi} REACH, *Enablers and barriers in access to repair and compensation for housing damaged by war*, May 2025, [link](#).

^{xxvii} International Organization for Migration (IOM), Oct 27 2025. DTM Ukraine — Protracted Displacement and Precarious Housing — October 2025. IOM, Ukraine, [link](#).

^{xxviii} International Organization for Migration (IOM), Oct 27 2025. DTM Ukraine — Protracted Displacement and Precarious Housing — October 2025. IOM, Ukraine, [link](#).