

#13



ASSOCIATION  
FOR COMMUNITY  
SELF-ORGANIZATION  
ASSISTANCE



## **ANALYTICAL DIGEST**

**"RED LINES" IN THE FIGHT AGAINST THE VIRUS:  
HOW NOT TO "NULLE" THE LOCAL  
GOVERNMENT REFORM**

**WHY DISINFECTION OF STREETS AND ROADS IS  
WASTE OF MONEY**

**COVID-19 RESISNACE "HOT LINES"  
HELP, BUT NOT EVERYONE**

*Digest presents brief overviews of analytical notes and articles prepared by Association on the topical problems during implementation of local self-government reform, self-organizartion development and forms of participatory democracy at the local level in Ukraine.*

*Analytical surveys consist of problems analysis and recommendations to local, regional and central government.*

# "RED LINES" IN THE FIGHT AGAINST THE VIRUS: HOW NOT TO "NULLE" THE LOCAL GOVERNMENT REFORM

## INTRODUCTION

As of April 11, 2020, more than 2,500 cases of COVID-2019 coronavirus infection have been laboratory confirmed in Ukraine, including 73 fatal ones. Given the rapid increase in the incidence rate, the Cabinet of Ministers of Ukraine (CMU) and the Verkhovna Rada of Ukraine (VRU) have taken a number of decisions on urgent measures to combat the spread of the virus and mitigate its socio-economic consequences.

Among other things, these decisions provided for the reduction of the fiscal burden for the quarantine period and the redistribution of budget funds. Some of these measures were negatively perceived by local governments and the expert community, in particular as undermining the financial capacity of local communities and the principles of decentralization in general.

On April 2-7, 2020, the Association for community self-organization assistance interviewed experts on local self-government and decentralization of power in order to identify the main "red lines" in the fight against the virus, the intersection of which could hamper local government reform in Ukraine. A total of 23 semi-structured interviews were conducted (list of respondents is available at the end).

## WHAT MAIN MEASURES OF STATE POLICY WERE TAKEN?

On March 11, it was adopted the Resolution of the Cabinet of Ministers of Ukraine № 211, which by April 3, 2020 established quarantine throughout Ukraine and introduced a number of restrictive measures. In particular, visits to educational institutions by its applicants and holding all mass events in which more than 200 people participate.

Subsequently, the quarantine was extended until April 24, 2020 inclusive, and the restrictions were gradually strengthened. In particular, citizens are prohibited from going outside without a mask and without documents, as well as visiting parks and recreation areas. There were even ideas to impose a state of emergency, but there were no sufficient grounds for this yet. Instead, there is an emergency regime, introduced on March 25.

During March-April 2020, the parliament and the government passed a number of laws and bylaws, primarily aimed at combating COVID-19. However, some of their norms have significantly affected local self-government.



Thus, the Law № 540-IX from 30.03.2020 “On Amendments to Certain Legislative Acts of Ukraine Aimed at Providing Additional Social and Economic Guarantees in Connection with the Spread of Coronavirus Disease (COVID-19)” amended the Tax Code of Ukraine. These changes exempt individuals and legal entities for a certain period from land fees and real estate tax in part of non-residential premises. That is, from the payment of two important local taxes.

It is clear that these temporary measures are intended primarily to mitigate the effects of quarantine on businesses that have been forced to cease operations. But at the same time, due to these innovations, local budgets will not receive significant financial resources, which in turn will negatively affect their financial capacity. According to experts of the Association of Cities in Ukraine, the loss of local budgets will amount to 6.3 billion hryvnias (UAH). Instead, the law does not provide for any compensatory mechanisms at the expense of the state budget.

The Law also amended the transitional and final provisions of the Law of Ukraine “On Local Self-Government in Ukraine”. They provided the opportunity to hold meetings of collegial local governments in the form of video or audio conferences, which was not the case before. The advantages of this solution are that local councils can continue their work and make important decisions for the community. However, due to digital inequality, not all local government representatives are able to use these forms of work.

It was also developed the bill №3279 on amendments to the Law “On the State Budget of Ukraine for 2020”, which in its original version provided for a reduction in funding of the State Fund for Regional Development by UAH 7.5 billions and the Energy Efficiency Fund by UAH 1.6 billions and a reduction of UAH 2 billions support for amalgamated territorial communities. Thus, in addition to limiting the own revenues of local financial self-government, the state has also managed to reduce state support, which further undermines the principles of financial decentralization.

Resolution of April 8, 2020 № 263 The Cabinet of Ministers of Ukraine amended the Procedure and conditions for granting a subvention from the state budget to local budgets for the implementation of measures for socio-economic development of certain territories. These changes provide, in particular, the priority of the subvention for the implementation of measures to combat coronavirus infection. However, the changes did not affect the mechanism of distribution of this subvention, which still allows the deputies of Ukraine to decisively influence the formation of the list of projects implemented through the subvention.

Unfortunately, quarantine measures are likely to delay the consideration of amendments to the Constitution of Ukraine on decentralization of power. An analysis of the agenda of the parliament and the government shows that no action in this direction is planned in the near future. At the same time, work on the development of a new model of administrative-territorial organization is actively underway.



The measures taken to counteract the spread of the coronavirus did not take long to wait for the reaction of political forces and key stakeholders in the development of local self-government. In particular, several factions opposed amendments to the state budget in terms of reducing local government funding and, as a result, ending decentralization reform. Consideration of amendments to the state budget by the Verkhovna Rada of Ukraine is scheduled for an extraordinary plenary session on April 13, 2020.

Former Prime Minister of Ukraine (2016-2019) V. Groysman called on the authorities to support local self-government, not to cut local budgets and thus not to curtail the decentralization reform. He mentioned that the reform of local self-government was launched in 2014 in no less difficult conditions.

The Association of Cities in Ukraine, which did not take into account most of the remarks and proposals to the Law № 540-IX of March 30, 2020, called it “discriminatory” and robbing local budgets.

The All-Ukrainian Association of Communities appealed to the Verkhovna Rada and the Cabinet of Ministers of Ukraine regarding the proposed amendments to the State Budget 2020, which does not support the reduction of state budget support for decentralization, regional and local development, formation of community infrastructure and completion of construction.

Today, local governments are at the forefront of the fight against the pandemic, ensuring the work of the medical, transport and social spheres. Therefore, the state support of local authorities is extremely important: financial, methodological, informational, coordination. However, the state is going by cutting financial revenues to local budgets and reducing regional development programs. Unequivocally, such actions can negatively affect the development of municipal government in Ukraine and the pace of decentralization reform.

## EXPERT ASSESSMENTS

### **Do experts see the threat of slowing down or curtailing local government reform due to the spread of the virus?**

*“There are threats, but with political will, they can be overcome. And to a greater extent, they are not associated with the coronavirus.”*

In particular, in this context, they identified the following main threats to reform:

**1. Postponement of local elections.** Due to the difficulties in prediction of epidemiological situation in the world, about 20 countries have already decided to postpone both national and local elections. The Ukrainian political and expert community is also discussing the possibility of postponing the local elections to be held in October 2020. Many experts interviewed by the Association made such assumptions.

They see the reasons for the probable postponement in the possible extension of quarantine, as well as in the direction of anti-epidemic measures of the budget funds provided for the elections. The postponement of the elections, which, according to the Government's plan, were to take place on a new territorial basis, according to experts, will slow down the reform of local self-government in Ukraine.

*"In my opinion, there is a high probability that local elections may not take place this year. And if there are no elections, the reform will not be carried out as quickly as expected."*

*«... if we continue this quarantine, it may lead to the cancellation of our local elections."*

*"... the problem is lack of money. Because local government reform and elections need funding. And here, given the budget deficit, funds for the organization of election processes can be used to fight the epidemic.»*

**2. Deviation of the reform from the schedule.** Experts attribute the slowdown in local self-government reform to the work of central and local authorities in a limited mode. Respondents noted that the Verkhovna Rada would simply not have time to pass the necessary laws for reform under quarantine.

*"The biggest threat is that we are out of the calendar plan for legislative support. We aimed to ensure a new administrative-territorial system before the local elections, which stipulates that two legislative acts are extremely important to be adopted - one in April, the other - no later than early June. And now it is under threat, because the Council is still working in a limited mode and this, in fact, is now a key threat to reform."*

At the same time, some respondents pointed out that in the **presence of political will**, the Verkhovna Rada is quite capable of providing the necessary legal framework to complete the reform. They mentioned, in particular, positive voting in quarantine for draft laws on the land market and on improving some mechanisms for regulating banking.

*"To a greater extent, the legislative changes that are needed can be made regardless of whether we have quarantine or not. This was confirmed by the vote for the introduction of the land market ... The Verkhovna Rada can pass laws, the Cabinet of Ministers of Ukraine - decisions. They are not bothered by anything here. "*



*"Unfortunately, this stage, which we call the paperwork of decision-making, is shifting towards decisions concerning the receipt of IMF tranches, the fight against coronavirus. And now, in April, we can see that the Verkhovna Rada, even if it is meeting, the promoting of decentralization reform and administrative-territorial reform is out of focus."*

Respondents also noted that the slowdown in local government reform could be explained by a shift in government priorities, which **focused exclusively on combating the epidemic.**

*"In this case, the health and life of citizens becomes a priority, and because of this, there are restrictions on human rights and movement today. First we need to work to alleviate this epidemic, and then - about local self-government. Here I absolutely agree with the actions of the Government and local self-government. And here the violations of the law are understandable."*

*"Of course, there are such threats, because local governments are engaged exclusively in measures to combat infection, and all other development issues have not even receded into the background."*

**The low capacity of local councils to work remotely** can also negatively affect the pace of decision-making. Parliament passed a law that allows local councils to hold sessions and meetings of the executive committee remotely. However, the low level of digital readiness of some local governments can be a barrier to the use of such forms of work.

*"The problem arises in local decision-making. A decision has already been made that allows deputies to meet remotely. But there may be a problem - not everyone in the community has the knowledge and equipment to get together."*

The pace of reform may also be affected by the **cessation of discussions on the configurations of future amalgamation processes in communities.**

*"Obviously, there are unfavorable conditions for community consultations today, if we talk about April. It is hoped that at least the paperwork to be agreed upon will be done at least in May. And these consultations will continue in a live format after the end of quarantine. But I obviously see that this key process of forming new ATCs has slowed down."*

**3. Centralization of financial resources as a bad signal for communities.** Experts also drew attention to the problem of the negative impact of anti-epidemic measures not only on the financial capacity of local communities, but also on their desire to join the reform or continue it.



*"I see the trend of centralization of state and local finances - this is the first. Secondly, I see a tendency to abandon specialized development subventions. These are SFRD subventions and ATC infrastructure subventions. It is obvious that these funds are directed to the fight against the coronavirus, and the priorities in state and local government have changed.*

*"Local self-government received some additional financial resources and began to build its communities (author - due to decentralization). Now they can get rid of these financial resources and, accordingly, they will lose the desire to continue this reform. The inspiration to develop their communities on the ground, so to speak, will disappear. This can be a big brake, because it will be quite difficult to unite people around an idea again in a year, for example".*

Some respondents suggested that support for the reform could be **curtailed by relevant international technical assistance projects, which could lead to a slowdown.**

*"As for material support, such type of support from donor structures may cease, without which progress in implementing reforms may become problematic."*

**4. The growth of conflict in communities, which public authorities may not be able to cope with in difficult epidemic conditions.** Experts attribute the increase in social tensions in communities mainly to the future departure from the principle of voluntary association of communities, as well as to protests against the closed process of developing long-term plans. Respondents drew attention to the fact that in the conditions of quarantine the tools of protection of community residents' rights and interests are extremely limited.

*"Problems can also arise from the standpoint of conflicts and opposition of local governments, RSAs in the context of completing the reform. Because, in principle, those who wanted, they have already amalgamated voluntarily. The voluntary stage has already been completed and the transition to the administrative stage will continue, where the established ATCs will be redesigned and community centers will be relocated. There may be internal resistance here, which in the current rather difficult conditions the state may not be able to cope with."*

*"We had pickets in ... the region when the regional administration formed ATC contrary to the vision of communities. For example, the existing community was wiped off the face of the earth. The moment of opposition to certain illegal decisions is impossible to do now. "*

**5. Quarantine measures can lead to the collapse of democracy at the local level.** Respondents observe a tendency to reduce the level of transparency and accountability of local governments.



According to them, this distorts the principles of its reform. However, in the face of threats to life and health, citizens may be willing to give up their constitutional rights, which can be actively used by local authorities.

*“One of the tasks of local self-government reform is decentralization of powers, democratization of processes at the community level. There is a point that this will not happen now - not to democratization and decentralization. Authoritarian methods of resolving issues in times of crisis can become temporary.”*

*“The collapse of democracy is a threat. Public control is complicated and there are few ways to influence the decision-making process.”*

*“Our mayor started holding sessions without mass media and activists. People may like it (author - government officials). This secrecy. There is a risk that local councils will get used to closed sessions under the guise of protecting the lives of citizens. People can give up their rights to save lives.”*

It should be also mentioned that **some experts in public policy measures to combat the spread of COVID-2019 do not see threats to local government reform.** They explain their opinion by the fact that the reform is at such a stage that its collapse is impossible. They also noted that the Cabinet of Ministers and the Ministry of Regional Development, together with the expert community, are continuing consultations on the reform and are actively working online.

*“I do not think that anything can lead to the collapse of the reform now. It is simply at the stage when we have 1,040 communities in the country, so it is impossible to collapse it. Any action against it has no practical meaning. Unless we can speak about absolutely any exceptional actions there, for example, the address to the Constitutional Court. I don't think anyone will decide to do that. There is no threat, of course.”*

*“Everyone has been working online for the last month, and on the contrary, this online connection organized by the Ministry of Community and Territorial Development is even more effective, because we see that the long-term plans have passed. And the online survey on the formation of the subregional level has already been completed in the regions. We see a large number of people's deputies on those online connections. When we held live meetings, we never had such a presence of people's deputies. In my opinion, if there is political will, a significant part of these developments can be implemented, and they will save budget funds.”*

*“No, there is no direct threat here. On the contrary, I see that work has intensified in some areas. There is a problem with the fact that the Verkhovna Rada is stuck in our country, does not pass the laws that are absolutely necessary for this reform. The ministry, the working group - everyone is working hard.”*



"We see that discussions about the district level are taking place in a remote format. What needs to be done to further implement the reform seems to be going according to plan. And moreover, proves its effectiveness. And at the moment of this pause, experts may have the opportunity to work on the district level and get more chances to reach decision-makers."

## "Red lines" and acceptable measures to combat the virus

*"Here I have a formula - you can slow down, and it will be justified, but you can not stop the reform. You can change the forms of work."*

During the survey, respondents were asked to outline the "red lines" by crossing which the authorities could harm local government reform. They were also asked to name the acceptable measures and restrictions that can be taken in the context of combating the spread of COVID-2019 and which will not undermine the reform.

### "Red lines»

#### 1. Sabotage of the reform.

*"What is absolutely impossible to do is to sabotage the reform agenda that has been set. In what way? Life will show whether it is possible to complete the amalgamation process and move on to the electoral process. It is very difficult to speak now. However, if the pace of amalgamation is insufficient to hold elections in October, it will be necessary to decide - whether we have a priority to hold state-level elections in one type - the formation of ATCs at the local level and the preparatory stage to hold them at district levels. Even if a decision is made to postpone the elections to the spring, we will have confidence that the process of forming affluent communities will be completed and that by then we will ensure the formation of the subregional level. Under such conditions, we can talk about the planning and coherence of the reform in the light of the pandemic. But if we say now - let's not hold elections, but also do not prepare in these conditions, then this is exactly the intersection of the "red line".*

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*"In no case can the formation of a new administrative-territorial system be stopped. It is impossible to curtail the work that is being done today according to long-term plans, to form a subregional level. For me, it is a big question now to amend the Constitution of Ukraine in such conditions. But it is possible to continue the reform without changes to the Constitution."*



*"There are still questions of more than 100 ATCs that passed last year's elections - they have not been transferred to direct relations with the budget. This is just a direct blow to the reform, because they went through the whole process and were deprived of the rights granted by Ukrainian law. It also needs to be resolved so that at least from July 1, they can enter into inter-budgetary relations, especially since the budget is still being reviewed."*

## **2. Adoption of unbalanced decisions that undermine the budgetary capacity of local self-government.**

*"Changes that were made to the tax system for the quarantine period. Here, the state from the «gentleman's shoulder" at the expense of local governments improves the situation of our business. This was a completely wrong decision. Its submission had to be made with the participation of local self-government. I think not all our businesses have lost their capacity and profitability now. And they are generally exempt from paying for land today. There is no logic here, and local governments, which spend money on fighting the epidemic, have lost these revenues."*

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*"Exemption from individual taxes, from land taxes. And here you can not row under one comb, because we have some classes of economic activities of manufacturers and traders who have only benefited from this decision. As their profitability increased, so did the demand for their products. These are, for example, food traders, these are pharmaceutical companies in the first place. And, of course, the exemption from the land of farms (large farmers), but this is in no way related, because the sowing campaign continues. And yet they do not suspend their business, which, again, in the short term in 2020 will increase its profitability due to the coronavirus."*

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*"In my opinion, the state does not need to get into the pockets of local self-government. Communities began to bring order that had not existed for decades. It is not necessary to say on all TV screens that Ukraine is ready for an epidemic. We need to say with whose hands it is ready."*

## **3. Collapse of programs of state financial support for community development.**

*"In my opinion, the infrastructure subvention is vital, because after the quarantine is lifted, it will be necessary to start the economy. It is impossible to develop the economy without infrastructure and roads. If depressed regions are left without funding for roads, they will remain depressed and uninteresting in terms of investment attractiveness. In my opinion, the funding of communities is not so great as to take away from them at the moment these unfortunate several billion hryvnias, even less."*



*"In my opinion, the decentralization of finances was the biggest incentive for local governments to get involved in the reform. If the authority is transferred to the OTG, there must be some financial basis. In my personal opinion, of all the financial instruments to support local self-government, the infrastructure subvention is the most effective."*

#### **4. Postponement of local elections.**

*"It would be wrong to impose a state of emergency. Elections are coming soon. But behind the scenes they are already saying that they may not be. I am categorically against postponing the election. This will definitely undermine decentralization completely."*

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*"It all depends on the situation with the disease, but local elections cannot be canceled. The talk that the elections will not take place next autumn, I think that these talks can begin only if the quarantine lasts at least until August and, accordingly, no one has time to prepare at any level."*

#### **5. Closedness of the process of finalization of long-term plans.**

*"Some regional state administrations thought that they would be able to "push" some formats (author - ATC configurations), which did not even appear during the consultations. We are in favor of online meetings in the regions and the government, so that we can discuss long-term plans inclusively. So that at the last stage the region does not submit something that does not correspond to what was discussed."*

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*"It is impossible for long-term plans to be adopted quietly, without discussions with the public. And so there were many contradictions. And today the public will not be able to influence it. People will not have the opportunity to get together and the only opportunity left is to write letters. And writing letters is not the most effective way to protect the rights of territorial units."*

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*"We need to find a compromise in the reform and agreed long-term plans, but this has not been achieved yet. Because provoking conflicts is something that the state authorities could not cope with."*

#### **6. Curtailment of health care reform and health care financing**

*"If we talk about the "red lines", it is the cost of health care and medical reform. Under no circumstances should medical reform be suspended due to coronavirus. Moreover, I think it needs to be intensified. This is the "red line".*



## 7. Reduction of labor costs of employees of budgetary institutions, regardless of the field in which they work.

*"The fact is that today the fight against the epidemic and all measures of public defense, health care actually fall on the managers of middle and lower levels of local government. Both the incentives that exist today and that motivation are at a critical level today. It does not encourage people to do their job well, I'm not talking about the material support of medical workers."*

### Permissible measures and restrictions

1. A number of experts pointed out the expediency of postponing local elections in case of deterioration of the epidemiological situation in the country.
2. Simplification of procedures for procurement of medicines.
3. Possible measures to save local budgets by reducing the cost of salaries of employees of budgetary institutions during the forced downtime.

*"Public sector employees who do not perform their daily duties, such as technical staff of educational institutions, coaches, cultural workers, continue to receive salaries in accordance with the tariff. I don't think it's right, I think that in the period of downtime or forced downtime, there are two qualifications: employees need to be charged either the average salary or 2/3 of the salary.»*

## RECOMMENDATIONS OF EXPERTS TO GOVERNMENTS OF ALL LEVELS

*"I would, above all, advise everyone to calm down."*

*"Maintain common sense and balance, do not panic. I think we should get sick of populism and panic."*

The Cabinet of Ministers of Ukraine, the Ministry of Development of Communities and Territories of Ukraine, other executive bodies

*Regarding the continuation of local government reform in the context of the spread of COVID-2019*

1. Continue to hold expert meetings, discussions and consultations on the formation of the basic and subregional levels of administrative-territorial organization in online formats. Whenever possible, involve all stakeholders in the meetings.



2. Initiate consultations at the regional level on finalizing draft long-term plans, taking into account the recommendations of the Cabinet of Ministers. Whenever possible, introduce online consultations with community leaders on those ATC configurations that are most controversial and conflicting. Instruct the regional state administration to calculate the capacity of ATC configurations to be considered in such community consultations.

3. Prepare action plans for the implementation of the reform in the conditions of continued quarantine and possible postponement of local elections. To involve the profile committee of the Verkhovna Rada of Ukraine, experts, associations of local self-government bodies in the development of the plan. The plan is to outline measures that can realistically be implemented under quarantine conditions. For example, appropriate provision of regulatory conditions for the continuation of the reform, quality discussions of the developed documents.

4. Involve local governments and their associations, as well as relevant experts in the development of draft decisions that provide for the curtailment of financial programs to support communities. Ensure the preparation of alternative action plans designed to address potential risks. Include in these plans compensatory mechanisms and sources to cover losses of local budgets.

5. Ensure continued health care reform. Intensify work on explaining to the population the key tasks and stages of reform.

6. Provide for the transition from July 2020 of more than 100 ATCs formed in 2019 to direct inter-budgetary relations with the state budget (subject to state budget sequestration).

7. Do not use disproportionate measures to combat the epidemic, which limit the constitutional rights of citizens.

8. To direct funds from the state budget for the construction of infrastructure facilities, which will create additional jobs, as well as promote intensive economic development and attract investment after the removal of quarantine measures. Do not support regional development projects that do not contribute to the disclosure of the economic potential of the territories.

9. To make changes to the State budget in part of continuation of financing of projects of regional development at the expense of SFRD, first of all to direct means on completion of construction of objects with 50% readiness.

*Regarding the improvement of interaction with local self-government in the context of introduction of anti-epidemic measures.*

1. Develop algorithms of action - protocols for counteracting the deterioration of the epidemic situation for local governments. The protocols should clearly and step by step define the measures that should be taken by local governments to control the spread of the disease, interaction with medical institutions, monitoring compliance with the rules of self-isolation of citizens returning from abroad, and so on.
2. Develop recommendations for local governments on possible measures to overcome the negative socio-economic consequences of the epidemic.
3. Pay more attention to the training of local governments in the algorithms of activity in the crisis and post-crisis period, the principles of anti-crisis communication. It is advisable to involve international technical assistance projects in the development of educational programs.

### **The Verkhovna Rada of Ukraine**

1. To amend the Law № 540-IX in terms of limiting revenues to local budgets, taking into account the recommendations of local governments and budget policy experts.

### **Local governments**

1. Taking restrictive anti-epidemic measures, to act within the framework of the current legislation and not to exceed the powers of the authorities, not to violate the Constitution of Ukraine.
2. Focus on creating local targeted programs that will focus on health care and social protection.
3. Establish constructive cooperation with the Centers for Primary Health Care, secondary medical institutions to coordinate efforts to combat the pandemic.
4. Use online interaction services to establish communication with the public and disseminate information on disease prevention.



## List of interviewed experts

Abramyuk Igor

Babyuk Igor

Bezgin Vitaliy

Boyko Valentin

Wenzel Victor

Gaiduchyk Iryna

Gerasymchuk Igor

Golynska Olesya

Drozd Natalia

Kozina Vira

Koliushko Igor

Kolotvin Pavlo

Levchenko Oleg

Moshnyagul Alexander

Orlovskiy Oleksii

Pazyuk Sergey

Popov Eugeniy

Romanova Valentina

Romanovich Sergey

Seitosmanov Aider

Tkachuk Anatoliy

Fedchenko Lesya

Yamkovy Yuriy



## **WHY DISINFECTION OF STREETS AND ROADS IS A WASTE OF MONEY**

A few weeks ago, Deputy Health Minister Viktor Lyashko, Ukraine's chief state sanitary doctor, said that in the framework of quarantine disinfected roads and closed parks "not so much influence to the epidemiological process as to the psychological process." In other words, he acknowledged that the measures were aimed at intimidating the population rather than actually destroying the coronavirus.

If everything is clear with parks and squares in general, and such a psychological effect has cost communities almost nothing, then the active disinfection of open public spaces is at least questionable. After all, its implementation potentially requires considerable funds.

### **What does the legislation say about street disinfection?**

According to the Law "On Protection of the Population from Infectious Diseases", disinfection measures are taken to destroy pathogens of infectious diseases (disinfection) and their vectors - insects (disinsection) and rodents (deratization) in the human environment.

The procedure for disinfection measures, as well as the composition of disinfectants is established by the Ministry of Health (MOH), taking into account the characteristics of infectious diseases, factors of infection transmission, etc. By the way, the Ministry of Health did not have any orders or recommendations for disinfection of streets in order to counteract the spread of COVID-19.

The Resolution of the Cabinet of Ministers №211, which introduced quarantine measures, does not say anything specific about the disinfection of streets and other open spaces. The only thing it obliged the local state administrations was to "organize disinfection measures in residential, industrial, educational, sanitary and other premises, buildings and structures." There is not a word about the streets here.

Thus, neither the legislation of Ukraine nor the bylaws contain any provisions that would recommend local governments to disinfect streets, squares and other open spaces in order to prevent the spread of COVID-19. And even more so they were obliged to do so.

[Reference to the original source \(ukrainian\):  
https://www.pravda.com.ua/columns/2020/05/27/7253395/](https://www.pravda.com.ua/columns/2020/05/27/7253395/)



## What is the opinion of experts?

The World Health Organization, in response to questions about places which need disinfection, said: *"In open spaces such as streets or open market places, large-scale spraying or fumigation against the COVID-19 virus or other pathogens is not recommended. Streets and sidewalks are not considered to be ways of infection COVID-19. Spraying with disinfectants, even outdoors, can be harmful to human health and cause irritation or damage to the eyes, breath or skin."*

The New York Times, in the publication "Does Broad Disinfection Kill the Coronavirus? Discussion Questions," quotes experts and scientists as assessing the appropriateness of spraying disinfectants on the streets.

For example, Michael Osterholm, director of the Center for Infectious Diseases and Policy Research at the University of Minnesota, believes that *"there is no scientific basis for all these spraying programs ... At best, it's wasteful, and at worst, we just throw disinfectants into the environment."* According to him, such measures are taken only to reassure people - citizens see that the government cares about their protection.

The US Centers for Disease Control and Prevention states on its website that *"the transmission of the new coronavirus to humans from a virus-infected surface has not been documented."*

The French High Council for Public Health does not recommend preventive spraying of chlorine-containing substances to communities, as this has a negative impact on the environment and can lead to pollution of rivers and lakes.

A similar position was taken by the French Health Agency (ARS) in the capital region of Ile-de-France. When the Paris City Hall asked him for clarification on the effectiveness of street disinfection, the agency replied that the benefits were minimal. The French health authorities put forward the following argument: given the *"low resistance of the virus on the surfaces"* and the general quarantine, *"the viral load in the environment can be considered insignificant."*

A spokesman for the UK Government's Department of Health and Welfare also said that *"expert advice is that disinfection of outdoor areas will not be a resource efficient use"*.

Thus, experts still tend to believe that street disinfection is not effective in combating COVID-19 and even draw attention to the negative impact of disinfectants on the health of people with chronic respiratory diseases and the environment in general.



## What is in Ukrainian communities?

It is worth noting that not all Ukrainian communities were inspired by pictures from China and some European countries on the total disinfection of the streets, and before allocating funds for these activities, tried to understand the issue on their own.

Thus, the Rozhysche City Council of the Volyn Region on the official website thoroughly explained to the community why it does not disinfect the streets. The officials supported their position with references to authoritative scientific publications and official sources.

However, a significant number of local governments have reacted quite actively to the spread of the coronavirus, trying to disinfect streets, roads, squares and other open public places.

The Association for community self-organization assistance tried to investigate how much money was spent on such actions. The Chernivtsi region, which is the smallest region of Ukraine, but at the same time has the largest number of registered cases of COVID-19, was taken as an example.

The results of procurement of street disinfection services through the Prozorro system were analyzed, requests for information were sent to 37 local councils of Chernivtsi region (cities + ATC), to which only 19 of them provided a response.

According to the results of the analysis, it was found that in 16 communities of Chernivtsi region for the disinfection of roads, sidewalks, pedestrian and park areas were allocated more than 700 thousand UAH of budget and sponsorship funds. In fact, this is at least (!) for this small area, as many communities did not provide information. Including Chernivtsi, where the disinfection of streets at a certain stage was carried out very intensively.

Some communities did not carry out such disinfection, such as Konyatyn and Ust-Putyl ATCs. Konyatyn village council explained this by the lack of paved sidewalks and roads in the community. In Yurkovetska and Volokivska ATC disinfection works were carried out at the expense of local fire protection. In three more - Ostrytska, Vanchykovetska and Zastavnivska - disinfection was carried out at the expense of sponsors.

The amounts that communities allocate for disinfection of streets and other public spaces are different. According to the obtained data, the largest amount was UAH 150,000 in Starozhynets ATC, and the smallest - UAH 5,054 in Vashkovets rural ATC.

In some communities, the amounts allocated for dubious road disinfection measures accounted for almost half of the amounts sent to hospitals. Thus, the Storozhynets City Council allocated UAH 150,000 for road sanitation, while the Storozhynets Center for PHC was allocated UAH 10,000 for the implementation of measures to localize and



eliminate the coronavirus pandemic (COVID-19), and the Council allocated UAH 450,000 for similar measures to the Storozhynets Central Regional Hospital.

Novodnistrovska City Council, which allocated UAH 133,000 for measures to disinfect public spaces, sent funds to the Sokyryany district budget in the form of a subvention from the local budget in the amount of UAH 300,000 for the implementation of measures to prevent and combat coronavirus disease (COVID) -19).

In Tereblechenska, Magalska rural ATCs, Hertsaivska city ATC, disinfection was carried out not only at the expense of the local budget, but also with the help of sponsors - funds and equipment were provided by entrepreneurs, local government officials and residents.

Thus, without clear recommendations and algorithms of action, Ukrainian communities have allocated and continue to allocate significant funds from local budgets for disinfection of streets and roads.

However, in the context of the economic crisis and significant budget losses incurred by communities due to the coronavirus epidemic, funding for ineffective street disinfection measures can be seen as a waste. Such measures also carry corruption risks, as it is difficult to keep track of how much work has been done and how much disinfectant has been used.

In these circumstances, the Ministry of Health should investigate in detail the need for disinfection measures on the streets and provide clear recommendations to local governments on their implementation.



## COVID-19 RESISNACE "HOT LINES" HELP, BUT NOT EVERYONE

Telephone "hot lines" (hotlines) should be considered one of the most convenient channels of communication between the authorities and the public. The Law on Citizens' Appeals states that citizens may apply to the authorities orally by means of telephone communication through certain contact centers and telephone hotlines. The task of the hotlines is to promptly respond to the complaints and suggestions of citizens. Especially in critical situations such as the Covid-19 pandemic.

In 2020, our daily lives changed. The COVID-19 pandemic has affected all areas of our lives. During this period, the effective work of hotlines, which provide information and advice on COVID-19, is very important.

On January 30, 2020, the Public Health Center of the Ministry of Health announced (1) that the government's hotlines had been tested for the situation with the spread of COVID-19. He also said that an "hot line" in the format of 0800 for consulting citizens will soon be launched. Almost a year has passed since then. But do Ukrainian citizens really have the opportunity to receive advice and assistance?

The Minister of Health personally inspected the work of the Ministry of Health's hotline after receiving a positive test for COVID-19. On November 15, in his video address, he stated (2) that he was going to go the way of a "normal patient" and evaluate the work of the "hot line" of counteraction to the COVID-19 of the Ministry of Health. According to him, he does not have a family doctor and he wants to make an online declaration to get further help. The Minister called the hotline during a video message. The operator answered immediately - did not have to wait. She provided telephone numbers where you can get a remote doctor's consultation.

In his conclusions about the patient's journey, he said that the problem of signing declarations with family doctors online should be solved. He also noted that it would be convenient for the operator to immediately transfer the patient to a doctor who provides useful advice to patients.

On the same day, the Minister described the second step of his "path to the patient" (3), stating that he had received a doctor's consultation on his state of health and had no questions about it at this stage.

We also decided to check the work of the hotline, which was addressed by the Minister, on our own. We asked a similar, relevant question for us: what to do if your family doctor is ill? After contacting the hotline of the Ministry of Health on coronavirus disease, we did not have to wait long on the line - they answered quickly. The operator introduced herself and asked how she could help. We immediately explained the situation: the family doctor was ill, and we need a doctor's consultation about coronavirus, what to do in this case, how to get a new doctor?



The operator immediately explained everything clearly. In this case, you need to call the registry office of the clinic where the declaration was made and report that your family doctor is currently ill. In this case, you must appoint a new doctor for the duration of your family doctor's hospital stay. After receiving the answer, we thanked the operator, and she asked if there were any further questions. When we answered that there were no more questions, the operator thanked for the request and said goodbye. The conversation was quick and pleasant. We did not have to wait long for an answer, the operator immediately answered the question and was polite.

But is everyone really lucky to get a quick answer? What problems did Ukrainians face when calling the All-Ukrainian Ministry of Health regarding COVID-19 issues and regional lines?

On social networks, we found many publications in which citizens complain about the problems they have encountered by calling the Ministry of Health's coronavirus hotline, the government hotline and regional lines. Social media users complain about the lack of response, the long wait for a response and the message that the line is not working on weekends and non-working hours. So far, almost a year after the start of the pandemic, citizens are facing problems with calls to coronavirus hotlines.

It is worth mentioning only some responses of Ukrainians on social networks about their experience of applying to TGL:

*"The covid-19 hotlines (4) are INEFFICIENT*

*What do we have. The contact person has severe symptoms on the 4th day.*

*The doctor on the phone says to come to her on the direction, and then go to another clinic to take the test. Do not have your own car, is it for a person with a temperature of 39 and concomitant fatigue to ride public transport?*

*474750 regional hotline on covid issues, works Mon-Fri 9-18, the handset is not taken. The line is responsible for having doctors make a call for the laboratory assistant to come home. When I called, it turned out that they do NOTHING, do not call anyone, and give the phone number of the hotline of the Ministry of Health 0800602019*

*1545 government hotline on covid issues - waiting on the line, everything is busy for a long time. When I called, they say that the doctor decides at his discretion about taking test to call the Ministry of Health and also gave the number 0800602019*

*0800602019 said that they do not decide anything, they can issue a call 103 on the 7th day of the illness to take test".*



*"Today I called (5) on the only COVID hotline in our region (it is 103) there I was given the phone of Regional Department of the Citizens' Appeals and already there the Department of Health. And nobody picked up the phone there, that's how our hotline works."*

*"LOL (6) - the hotline of the Ministry of Health of Ukraine and Maksym Stepanov - how can you help ??!! ... you call the Hotline of the Ministry of Health Covid, and you are told that you called on the weekend (quarantine on the weekend for sure) on weekdays we work from 9 to 18))))"*

Given the above stories and our own experience, it can be assumed that the work of hotlines to counter Covid-19 has the same problems as other lines of central executive bodies. Experts from the Association for community self-organization assistance (7) recently presented a study (8) of the work of hotlines of ukrainian ministries, public services and other bodies. And control appeals, which were made to assess the quality of the "hot lines", allowed the expert group to identify the following major shortcomings in their work:

- inability to call. Hotlines are unstable, ie one applicant manages to call and apply or solve a problem, another fails due to the busy line or lack of response;
- inadequate quality of organization of hotlines work and mostly low level of standards of their work. Hotlines operators are not always welcomed and introduced, or call their operator number. They do not always delve deeply into the problem raised by the applicant and approach the handling of telephone calls rather formally;
- consistently low effectiveness of telephone calls, which for the most part do not help the applicant to resolve the issue raised in the appeal. A significant number of responses were stubborn replies, which did not help to solve the problem, which was stated in the appeal.

By the way, in the rating of telephone hotlines, which was compiled based on the results of the above study, the hotline of the Ministry of Health took only 21st place out of 30. It should be noted that the hotline of the Ministry of Health on Covid-19 was not in focus. however, the results of the study clearly showed that the ministry still has something to work on in order to increase the efficiency of working with telephone calls from citizens.

It is also worth noting that citizens also complain about the work of regional hotlines. Given the policy of decentralization of power and the transfer of most powers to the local level, it is important that local and regional authorities closest to the citizens respond promptly and efficiently to citizens' telephone calls.

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