

THE RECOVERY SPENDING WATCHDOG

No. 15, November 2024

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Legal regulation



Legal regulation and related topics

During the [sixth meeting of the Strategic Investment Council](#), the following priority directions for recovery were approved:

- ✓ social services (residential stock reconstruction, education and science, healthcare, social protection);
- ✓ infrastructure reconstruction (energy, including protection of energy facilities, transport, water supply and sewerage);
- ✓ demining and civil protection (including the construction of shelter infrastructure based on the Finnish model)

The Ministry for Communities and Territories Development of Ukraine presented [tools for digitalising urban planning](#): the State Urban Planning Cadastre and Electronic Pricing System. Earlier, the Unified State Register of Addresses was launched, and address verification is ongoing. These tools still need time to be created and filled, but their launch will increase transparency in the reconstruction area.

Legislative changes have been made to improve IDPs' access to housing (see the special topic of the issue)

The law “On the State Budget for 2025” was adopted by Parliament, and there is no resumption of funding for Ukravtodor within the special fund and money for reconstruction is limited mainly to financing under IFI programs. The planned amounts may be exceeded if there is the ability to effectively and timely finance recovery programmes

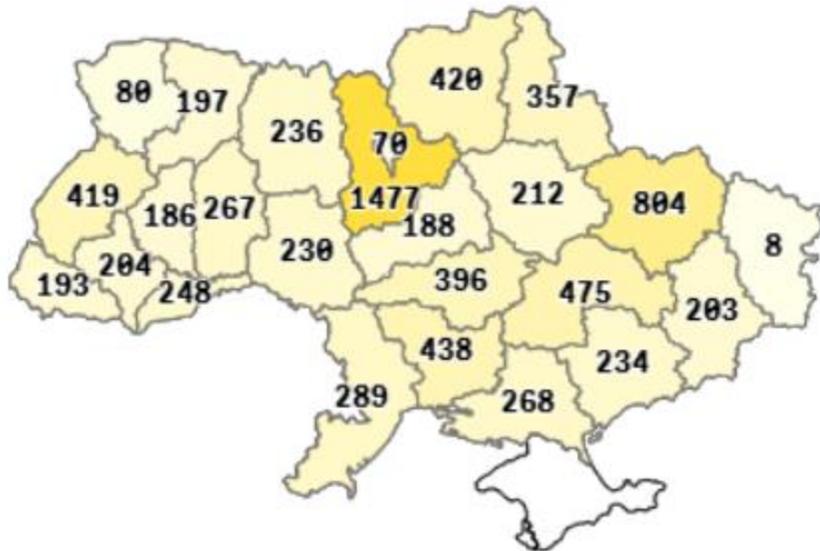


Reconstruction progress and funding



DREAM – the experiment is expected to be continued

The number of construction and reconstruction projects at DREAM



[The experimental resolution of the Cabinet of Ministers of Ukraine](#) on the implementation of DREAM provided for the duration of the experiment for two years, i.e. until November 15. Instead, the resolution was not extended, and the law was not adopted

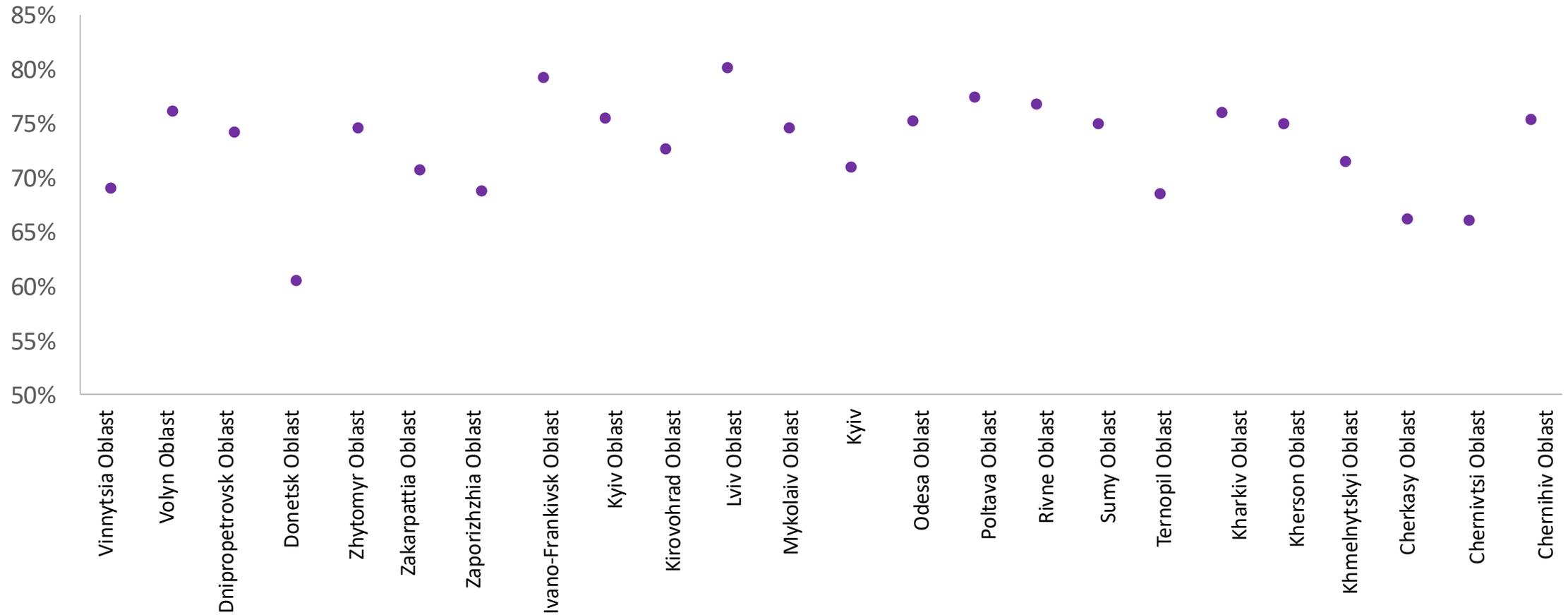
Amendments to the Budget Code should be introduced, which will likely expand the possibilities for using **DREAM** from a restoration platform to a public investment management (PIM) tool

Data on construction and reconstruction projects:

- **8,143 projects** are active and pending **7,643 projects** as of **1 November**: the project registration rate has slowed down slightly, as there are no new funding programmes
- **UAH 524 billion** is required for financing, of which only **UAH 91.3 billion** is confirmed (**UAH 479 billion** and **UAH 87.2 billion**, respectively, as of **1 November**)
- The number of active projects increased to **4,551 (4,247 as of 1 November)**
- The number of completed projects is 16, with funding of UAH 471 million

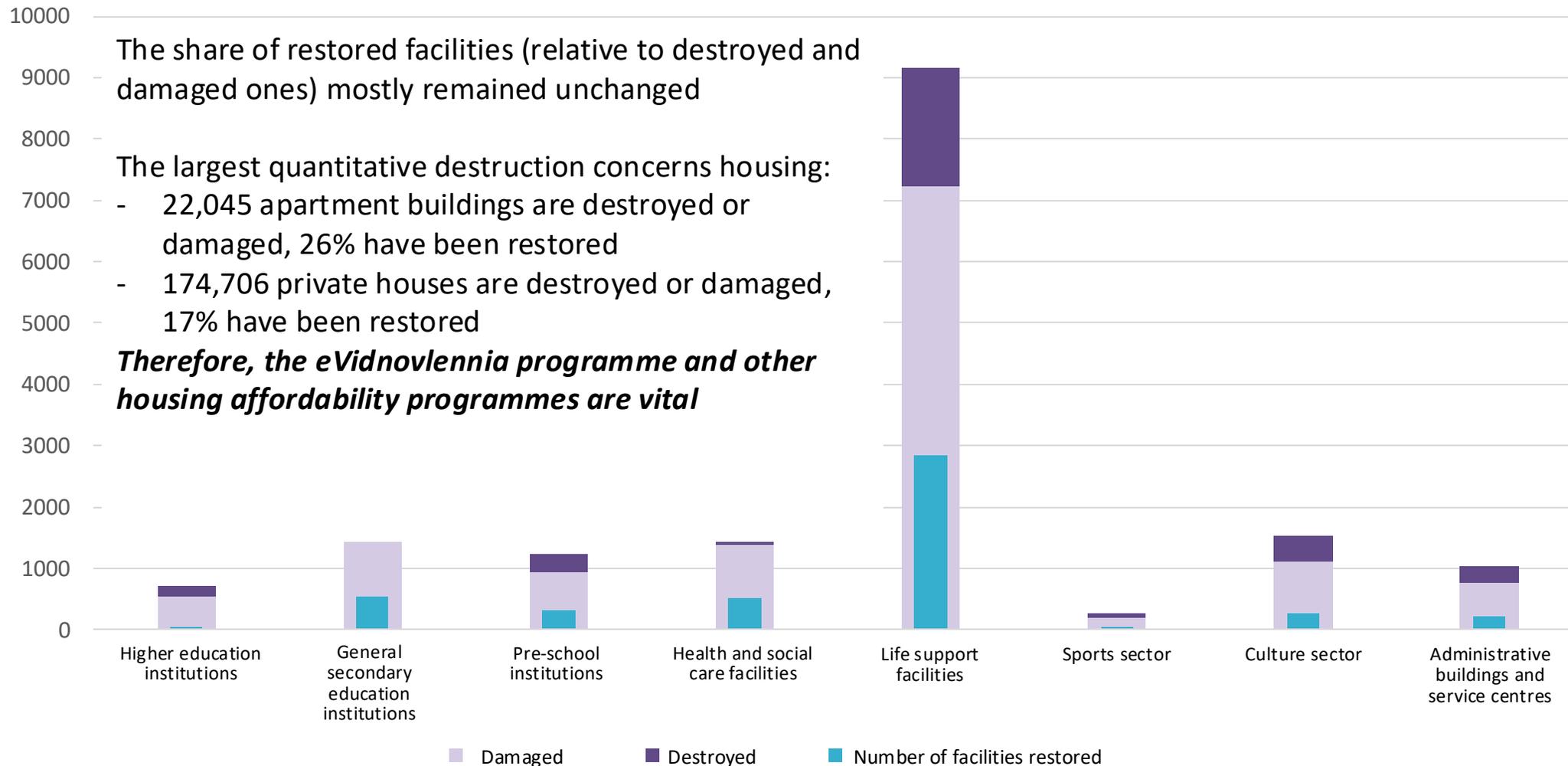
Filling in projects with information and truthfulness of data on DREAM is the responsibility of the initiators, but there are frequent cases of errors based on incomplete information

Submitted projects filled with information (average), %.



As before, recovery is not keeping pace with the destruction. The pace of destruction has accelerated over the month, but so has the pace of recovery

The number of damaged, destroyed and restored facilities



The Accounting Chamber of Ukraine (ACU) presented a report on the audit of the effectiveness of the Fund for the Elimination of the Consequences: not everything is well

The Accounting Chamber of Ukraine (ACU) has issued a report, “Territorial Communities in War: Restoration of Social and Critical Infrastructure,” which presents the results of the effectiveness of subventions to communities from the Fund for Elimination of the Consequences of Armed Aggression for 2023 – 6 months of 2024.

- Out of UAH 9.3 billion of subventions allocated in 2023 to finance 336 projects, almost UAH 5.9 billion was not absorbed and returned to the budget. At the same time, only 73 of 172 projects expected to be completed in 2023 were actually completed
- 16.8% of the UAH 7.7 billion allocated for the continued implementation of 199 projects in 2024 was absorbed in 6 months. In the first 6 months of the year, only 10 projects out of the planned 130 were completed

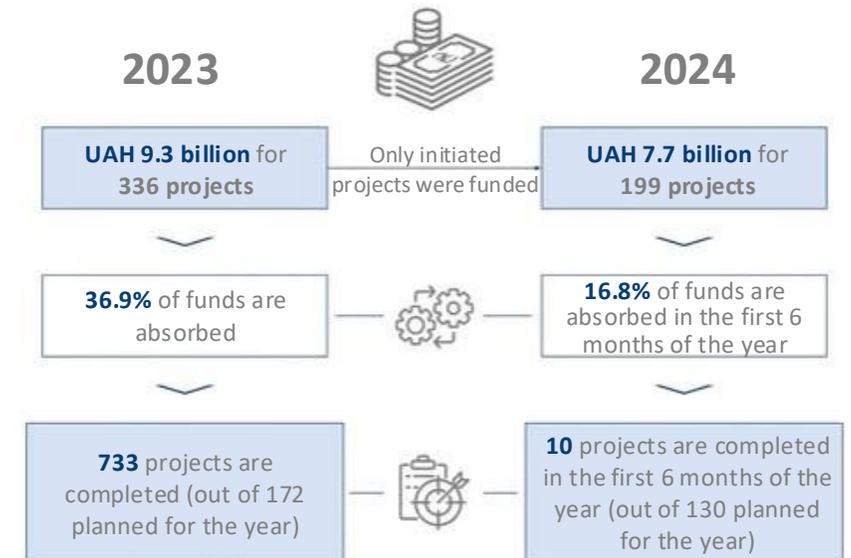
According to the report, the reasons for the poor absorption of funds are the following:

- time-consuming approvals of draft local budget programme passports; poor-quality or outdated design estimates, lack of electricity supply at the facilities; lack of construction specialists due to mobilisation measures; poorly performed works; prolonged public procurement processes; improper management of subvention funds by individual managers

The audit also revealed cases of overpricing of construction materials and non-compliance with competition, openness and transparency.



RESULTS OF PROJECTS (MEASURES) TO RESTORE THE SOCIAL AND CRITICAL INFRASTRUCTURE OF TERRITORIAL COMMUNITIES AT THE EXPENSE OF SUBVENTIONS ALLOCATED FROM THE FUND FOR THE ELIMINATION OF THE CONSEQUENCES OF ARMED AGGRESSION



2024: Expenditures on programs related to the recovery are made from the special fund

Key Spending Unit	adjusted annual plan, million UAH	fulfilled over 10 months, million UAH
Total expenditures	4,377,146.99	3,350,377.36
Ministry for Communities and Territories Development of Ukraine, including	13,764.01	8,182.01
Providing compensation for destroyed real estate facilities*	4,436.30	3,216.50
Implementation of Part 2 of the investment project “Restoration Project of Winterisation and Energy Resources”*	1,912.90	-
Providing compensation for restoration of certain categories of real estate – eVidnovlennia	2,870.49	2,870.49
Repairing Essential Logistics Infrastructure and Network Connectivity (RELINC)*	37.14	-
Developing water supply and water drainage system in Mykolaiv*	155.45	50.27
State Agency on Energy Efficiency and Energy Saving of Ukraine	54.10	38.24
Ministry for Communities and Territories Development of Ukraine (general state expenditures), including*	18,002.61	8,975.97
Subventions for the implementation of the project “Housing Repair for People’s Empowerment” (HOPE)	248.40	-
The Fund for the Elimination of the Consequences of Armed Aggression	946.19	-
Subvention for the implementation of projects (objects, events) focused on the elimination of consequences of armed aggression	7,768.13	7,768.13
Subvention for the implementation of projects under the Emergency Loan Programme for the Reconstruction of Ukraine	2,346.55	92.76
Subvention for the implementation of projects under the Ukraine Recovery Programme	4,498.98	331.25
Subvention for Kharkiv City Consolidated Territorial Community for extending the third subway line in Kharkiv	722.01	-
Subvention from the state budget to the budget of Dnipro City Consolidated Territorial Community to complete the construction of the subway in Dnipro	658.92	183.52
Subvention for restoring critical infrastructure facilities within the framework of the joint project with the International Bank for the Reconstruction and Development Project “Urban Infrastructure Development Project – 2”	640.95	460.19

2024: Expenditures on programs related to the recovery are made from the special fund

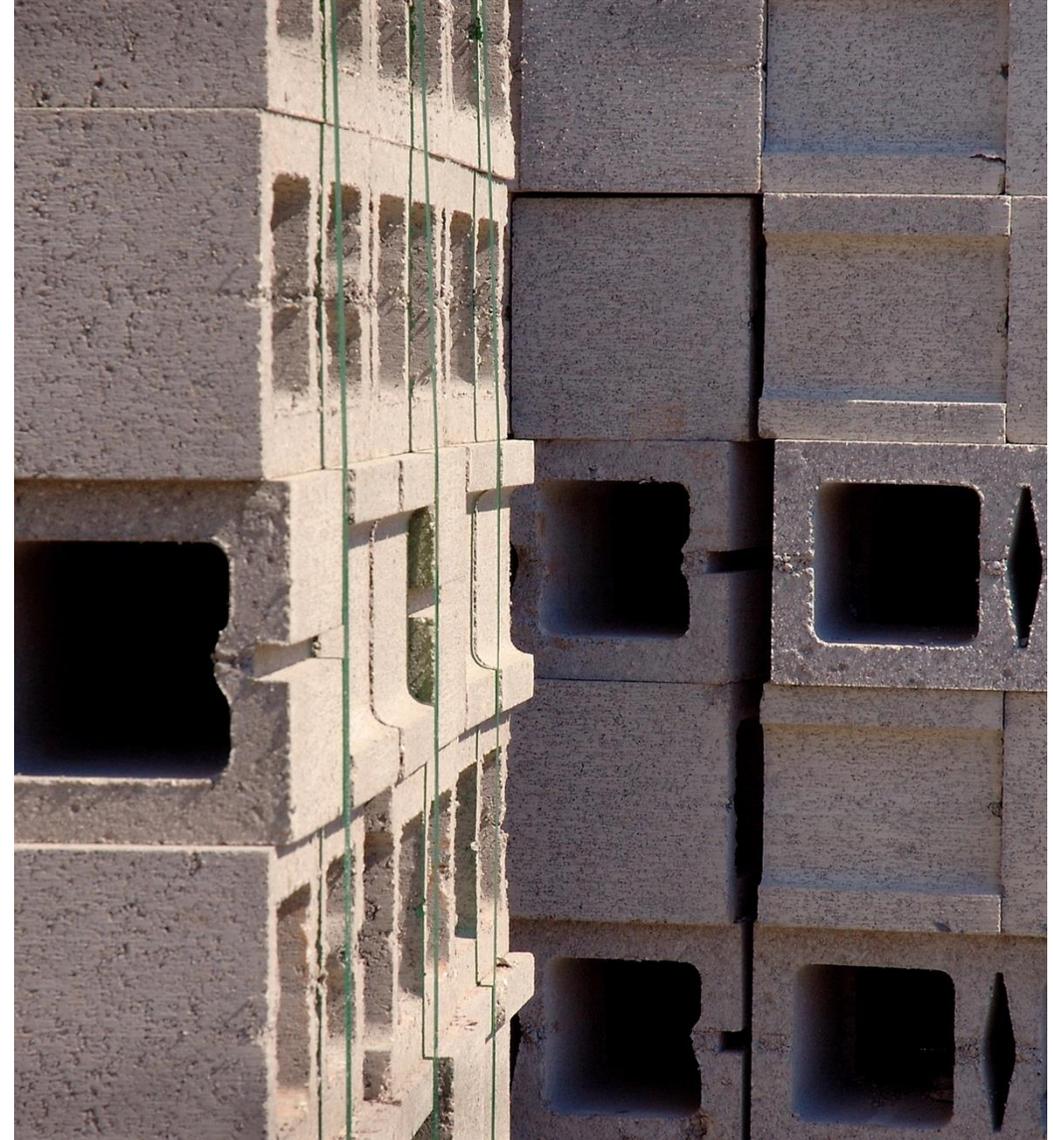
Most of the recovery expenditures of the Ministry for Communities and Territories Development of Ukraine and the Agency for Restoration under budget programmes are expenditures of the special fund of the state budget, which are financed by various IFI programmes

The initial annual plan is significantly lower than the adjusted annual plan

The implementation of individual programmes is due to the fact that the distribution and receipt of funding are interrelated

Key Spending Unit	adjusted annual plan, million UAH	fulfilled over 10 months, million UAH
TOTAL	4,377,146.99	3,350,377.36
The State Agency for Restoration and Infrastructure Development of Ukraine	70,261.37	47,083.98
Network development and maintenance of public motorways of state importance	18,353.86	14,191.83
Infrastructure development and recovery*	3,711.97	1,015.79
Implementation of an experimental project for main water supply system construction*	5,149.68	5,149.68
Construction, repair and other engineering and technical measures for the protection of critical infrastructure facilities in the fuel and energy sector of the critical infrastructure*	4,510.27	3,544.33
Construction and recovery of residential and civil infrastructure facilities, public buildings and structures*	1,477.75	172.26
Recovery of settlements, affected by the armed aggression of the Russian Federation*	2,226.18	-
Ensuring the implementation of infrastructure rehabilitation projects under the Support for the Ukraine Early Recovery Programme*	9,322.28	3,849.88
Repairing Essential Logistics Infrastructure and Network Connectivity (RELINC), key motorway connections*	16.05	1.40

Analysis of reconstruction procurement



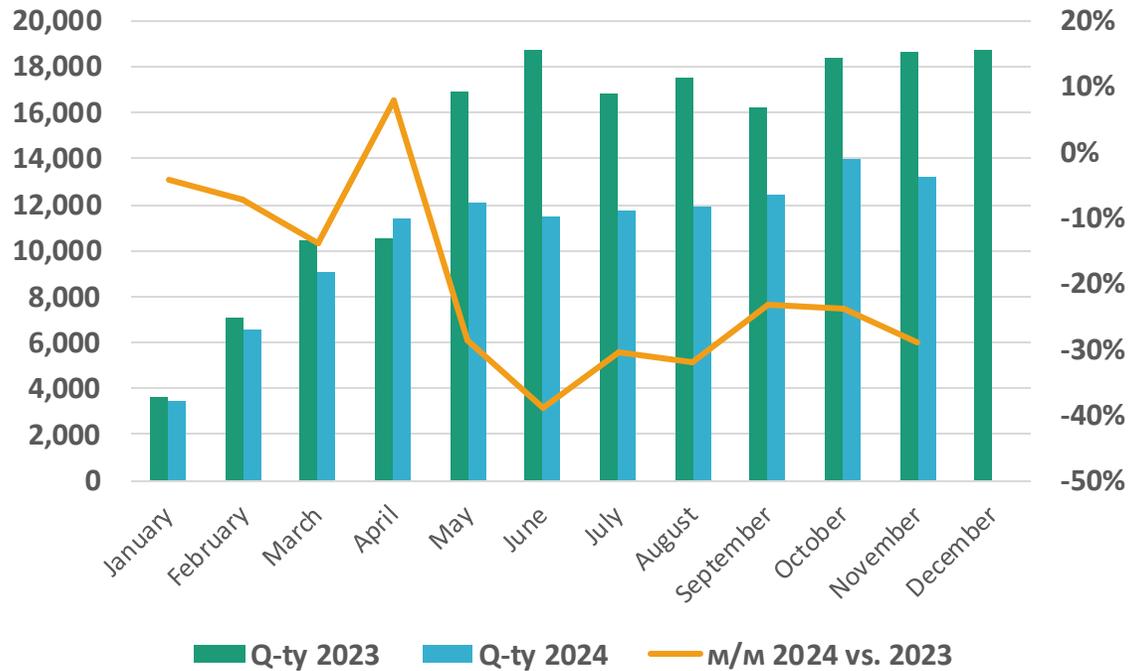
Key procurement figures in January – November 2024*

- In January – November 2024, 125.5 thousand construction procurements were announced. Of these, 93.5% (117.3 thousand) were completed, 4.4% did not start, 1.5% were cancelled, and 0.6% are still ongoing.
- The amount of procurement in the first 11 months of the year exceeded UAH 240 billion, including the current amount of procurement in October – UAH 23.0 billion, November – UAH 20.7 billion (excluding contracts for which the current value has not yet been determined).
- The three largest procurements of November are the construction of three lines of catchment system on the Pivdennyi Buh River with a total cost of UAH 7.4 billion.
- October and November are the months with the highest number of procurements this year. 14 thousand procurements were completed in October and 13.2 thousand in November. In the previous six months, 11.3–12.2 thousand procurements were made per month.
- 807 procurements announced during the past months are ongoing. 657 started in November, 110 in October and 40 in previous months.
- Electronic System was used for 20.8 thousand completed procurements (17.7%) with a total value of UAH 148.7 billion (61.9%).
- Defence procurements in January – September amounted to UAH 22.2 billion, which is 9.3% of the total construction procurement. More than half of this amount is due to tenders, announced in March. Current defence procurement remains limited to UAH 164 million in October and UAH 217 million in November.

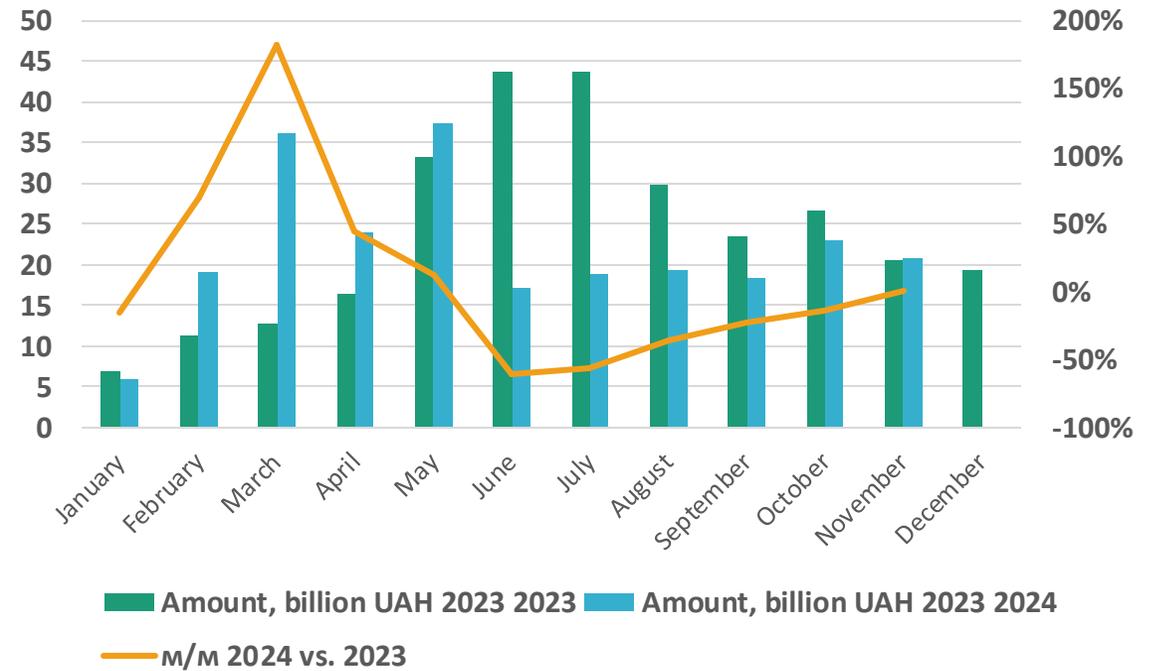


The number and amount of procurements in 2024 vs 2023

The number of completed construction procurements



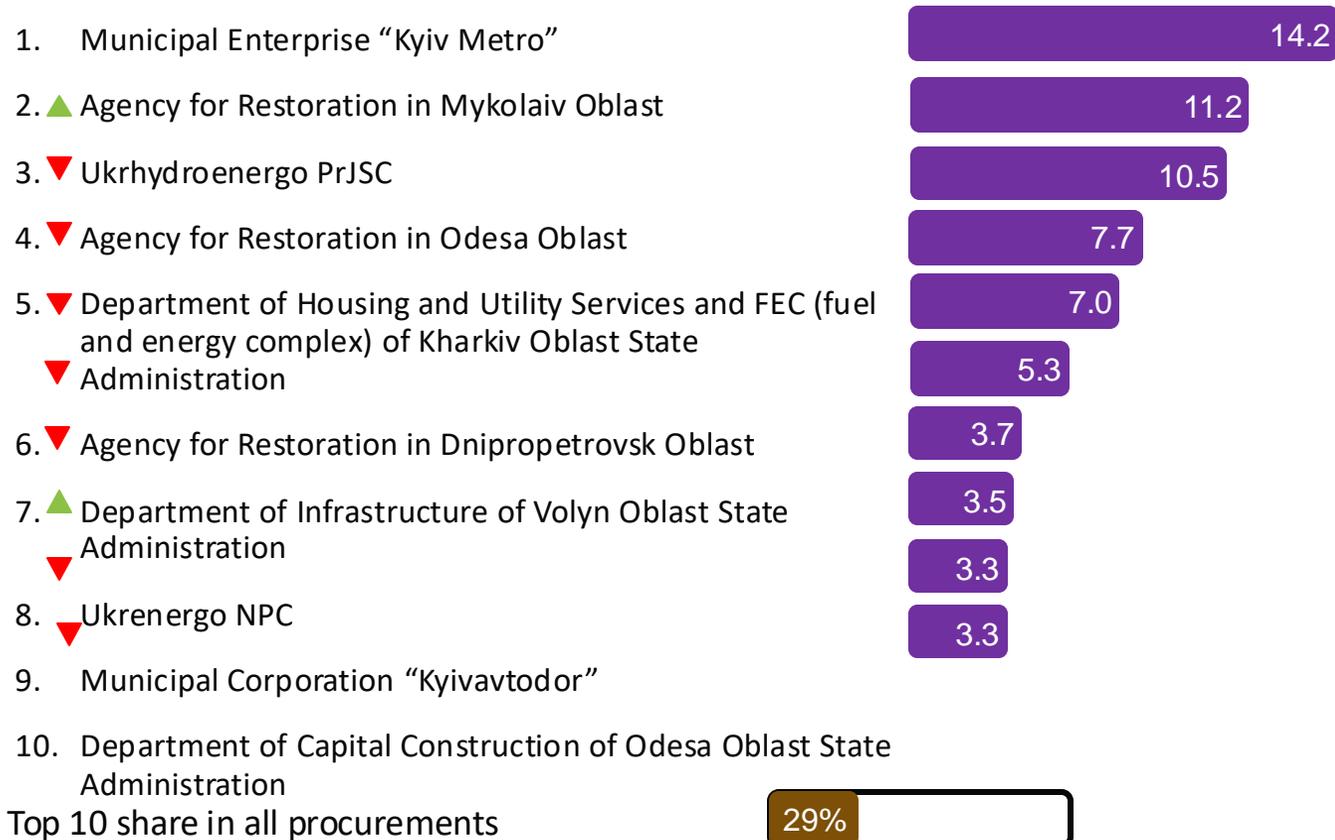
The amount of completed construction procurements



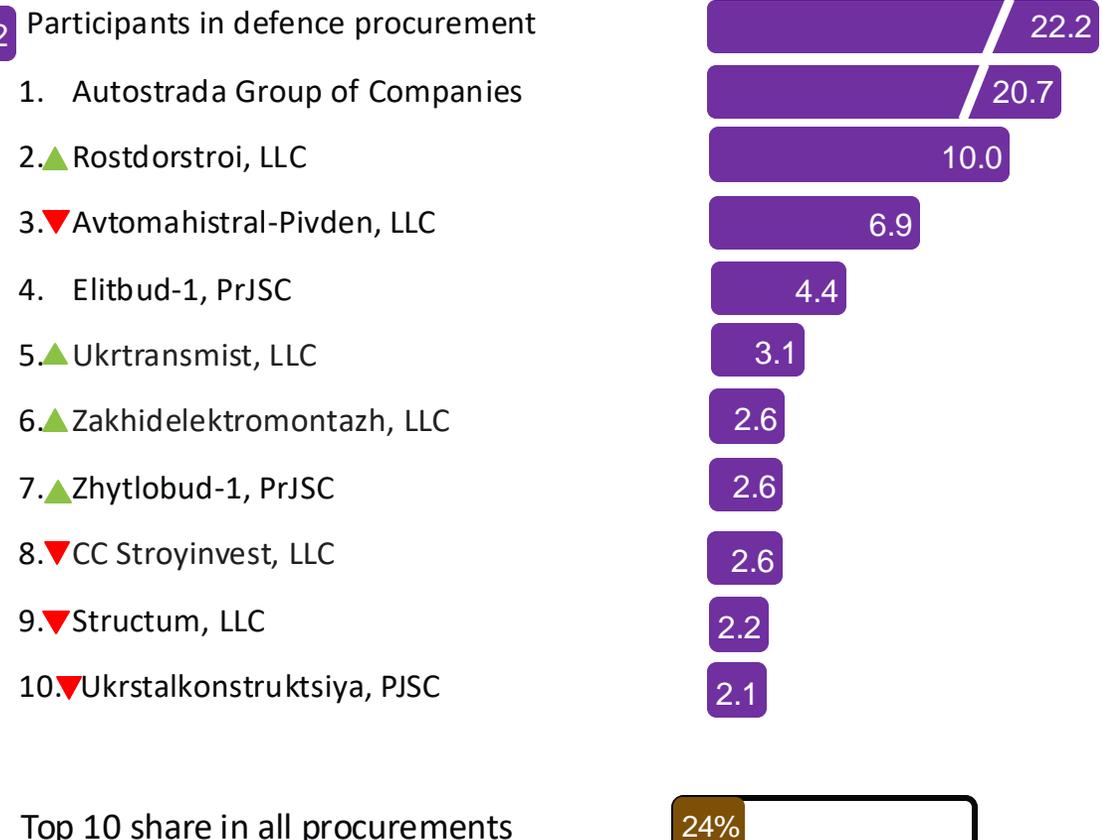
* - as of 16 December 2024

Procurement leaders – January – November 2024

Top 10 organisers (billion UAH)



Top 10 winners (billion UAH)



The largest construction tenders

No.	Procurement Description	Organiser	Winner	Value of Procurement, billion UAH
1.	Construction of a subway line	Municipal Enterprise “Kyiv Metro”	Autostrada Group of Companies	13.8
2.	Construction for Dnistrovska PSPP protection	Ukrhydroenergo PrJSC	Elitbud-1, PrJSC	4.2
3.	Construction of a catchment system on the Pivdennyi Buh River (site III)	Agency for Restoration in Mykolaiv Oblast	Rostdorstroi, LLC	2.6
4.	Construction of a catchment system on the Pivdennyi Buh River (site II)	Agency for Restoration in Mykolaiv Oblast	Ukrtransmist, LLC	2.5
5.	Construction of the main water supply system for Kryvyi Rih	Agency for Restoration in Dnipropetrovsk Oblast	Highway-South	2.4
6.	Construction of a catchment system on the Pivdennyi Buh River (site I)	Agency for Restoration in Mykolaiv Oblast	Autostrada Group of Companies	2.3
7.	Reconstruction of the Chernobyl NPP – Slavutych power line	Ukrenergo NPC	Structum, LLC	2.2
8.	Construction of the main water supply system Khortytsia – Marhanets	Agency for Restoration in Dnipropetrovsk Oblast	Autostrada Group of Companies	2.1
9.	Restoration of the Metro Bridge in Kyiv	“Kyivavtodor”	ONUR Group	2.0
10.	Construction of a military memorial cemetery	National Military Memorial Cemetery SE	Consortium “Building UA”	1.8

On 4–6 November, the Agency for Restoration and Infrastructure Development in Mykolaiv Oblast held tenders for the construction of three lines of the catchment system on the Pivdennyi Buh River with a total cost of **UAH 7.448 billion**

XXX Largest construction tenders in January – September 2024

XXX Largest construction tenders in October – November 2024

92% of procurements in the electronic system are non-competitive

Number of Participants Number and % of Procurements Amount (bln) and % of Procurements Number and % of Procurements Amount (bln) and % in November procurements in November

1 participant	16,475	79.1%	107.0	71.9%	1,120	92.1%	4.0	82.1%
2 participants	2751	13.2%	22.6	15.2%	75	6.2%	0.6	12.5%
3 participants	955	4.6%	11.2	7.5%	17	1.4%	0.3	5.3%
4 participants	354	1.7%	5.5	3.7%	3	0.2%	0.002	0.05%
5 participants	156	0.7%	2.1	1.4%	1	0.08%	0.0005	0.01%
6 participants	68	0.3%	0.21	0.14%	-	-	-	-
7–13 participants	63	0.3%	0.17	0.11%	-	-	-	-
Total completed procurement using the electronic system	20,822	100.0%	148.7	100.0%	1,216	100.0%	4.9	100.0%

- The competitiveness of procurement keeps declining. 79.1% of procurements using the electronic system remain non-competitive. Among all procurements, 96.3% are non-competitive. In September, these figures were even higher – 92.1% and 99.3%, respectively. That is, **only 1 out of 138 procurements in November was competitive**.
- In November, there were only 13 procurements with 5+ participants, including only one in the electronic system.
- As of 16 December, 150 complaints had been registered for October procurement and 29 for November procurement.

Topic of the issue: Social housing for IDPs



Issue

In the early 1990s, housing privatisation took place in Ukraine, which was a blessing for the population, who received private property but left the state without social housing

Inherited from the USSR, there were queues for apartments, which only grew over the years

New housing that was built using state or local budget money for certain categories of people could be privatised

Housing subsidies until recently did not include rent, but only housing and utility bills, which distinguished the Ukrainian system of support for low-income households from the EU experience in particular

The need for social housing was not resolved after the outbreak of the war in 2014, and many IDPs during the full-scale war only made the problem more critical

As of 2021, there were about 3,000 apartments considered social housing, while at the beginning of the full-scale war, the number of IDPs exceeded 5 million

As a result, IDPs were accommodated in dormitories, schools and gyms

Later, modular towns were built (at the expense of donors)

Surveys of IDPs show that housing is a major challenge for them:

- ✓ Some [surveys](#) show this to be the biggest challenge
- ✓ The results of the International Organisation for Migration (IOM) [survey](#) “indicate serious problems with the provision of affordable, safe and secure housing that IDPs continue to face, and which are likely to become more critical as winter approaches”

Therefore, it is good that the government and parliament have started to pay more attention to the issue of housing for IDPs

Social housing. Legal framework



Social housing is regulated by:

- the Law of Ukraine “On the Housing Fund for Social Purposes”
- the Law of Ukraine “On Amendments to the Law 'On the Housing Fund for Social Purposes' on Conditions for Providing Internally Displaced Persons with Social Housing”

The housing from the housing fund for social purposes in Ukraine includes:

- apartments in multi-apartment residential buildings;
- manor (single-family) houses;
- residential premises in social dormitories, which are provided to citizens for the period of their stay on the social housing register, provided that such housing is their only place of residence.

Social housing for IDPs is provided based on a standard social housing lease agreement

Legal regulation

Over the past few months, there have been changes in the legislative regulation of housing for IDPs

In particular, **Law No. 4080-IX**:

- Dormitories belonging to vocational or higher education facilities may be transferred to IDPs for the period of martial law and three years afterwards (not a perfect solution, as pupils and students could return to offline learning after martial law, but there will be limited opportunities to do so)
- Inventory of housing for IDPs and the creation of an Information and Analytical System of Real Estate Objects for the Accommodation of Internally Displaced Persons is the right decision, but it requires effective implementation and coordination of efforts

Law No. 4114-IX provides for the **priority right of IDPs to receive compensation for damaged housing**. However, it appears that IDPs from TOT are still limited in this right

The draft law “On the Basic Principles of State Housing Policy” was developed in particular to develop the social housing policy, but needs to be finalised



The draft law “On the Basic Principles of State Housing Policy”

Defines the basic principles, objectives and mechanisms of Ukraine’s housing policy aimed at ensuring the right to housing, efficient use of the housing stock and social support

This is a framework draft law to replace the Housing Code inherited from the USSR

Among the important things about the draft law are the following:

- ✓ Defines the legal and organisational basis for ensuring the right to housing
- ✓ Introduces mechanisms for providing affordable and social housing
- ✓ Guarantees access to housing for socially protected categories, including internally displaced persons (IDPs) and survivors of emergencies
- ✓ Provides for mechanisms to provide temporary or permanent housing assistance
- ✓ Promotes the expansion of the state and municipal housing stock through the construction, reconstruction and acquisition of housing
- ✓ Introduces public-private partnerships to expand housing opportunities
- ✓ Provides state support through long-term loans and subsidies for the construction or purchase of housing
- ✓ Provides financial support for affordable housing through grants and tax incentives
- ✓ Creates a unified information system for housing management to ensure transparency and monitoring of the right to housing

Housing for IDPs

According to the International Organisation for Migration, as of October 2024, there are [3.6 million IDPs in Ukraine!](#)

IDPs and their family members have the right to temporary social housing at the place of actual residence. The accommodation is provided from a special housing stock formed by local authorities.

Accommodation is provided for up to 1 year, but the period of stay can be extended.

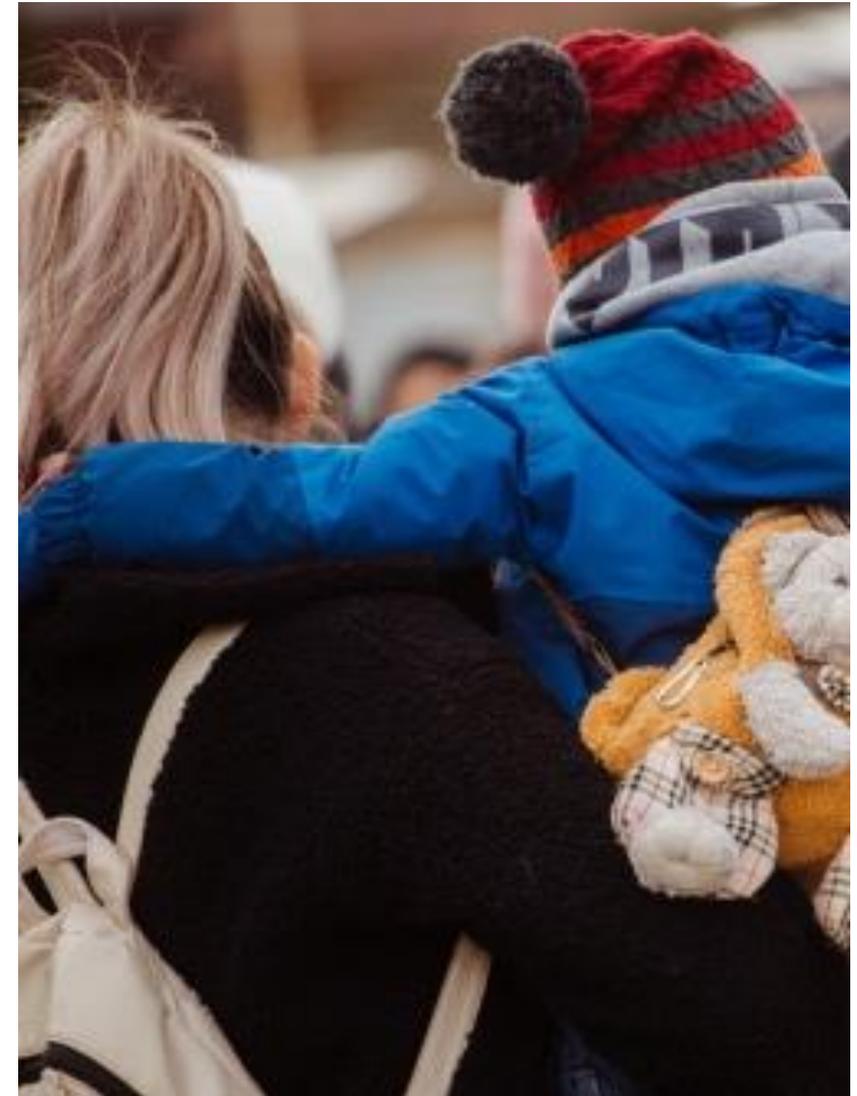
The minimum area for 1 person is 6 m².

The priority right to be provided with housing from the stock is given to the following categories:

- multi member families;
- families with children;
- pregnant women;
- disabled;
- pensioners.

To receive housing, **you need to be registered as a citizen** who needs housing.

The amount of monetary compensation from the state for persons who provide free housing to IDPs is **UAH 14.77 per person/day.**



Programmes and services

Ukraine Facility

- 450 million euros for housing for IDPs and their families, military and fallen defenders
- 600 million euros for compensation for destroyed housing

eOselia

- IDPs can purchase housing (for up to 10 years at 7% per annum in UAH)
- 19 IDP families have used this service as of October 2024

eVidnovlennia

- Since May 2023, IDPs whose housing was damaged by hostilities in the government-controlled territory of Ukraine have been receiving compensation and certificates

VidnovyDim

- Energy Efficiency Fund programme, implemented using EU funds
- It works for condominiums and finances the restoration of buildings affected by the war

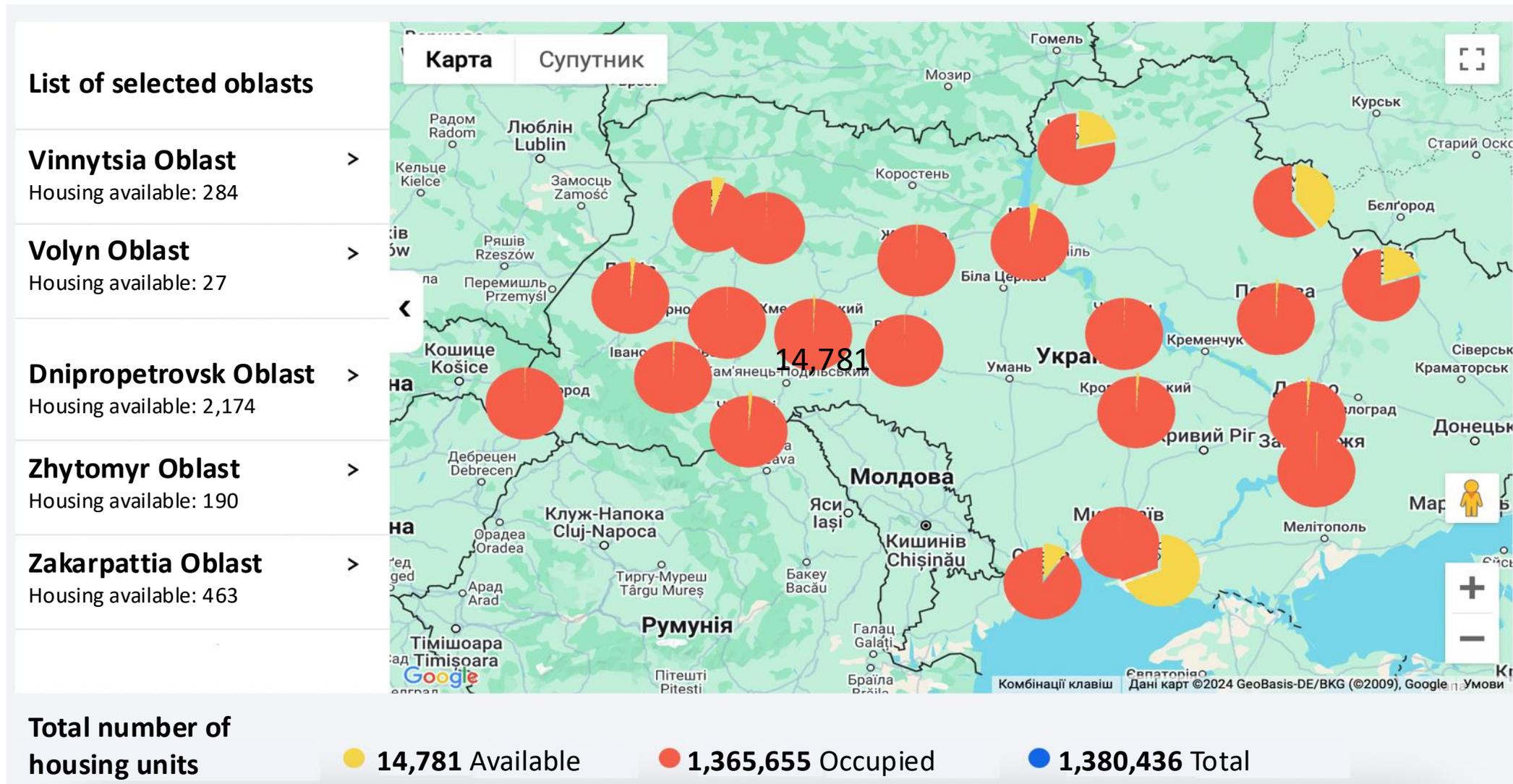
Prykhystok

- Free accommodation search service for IDPs
- More than 1 million Ukrainians have found temporary housing in almost 3 years of activity

Dopomahai

- Service for searching, providing and sponsoring free accommodation for IDPs
- In almost 3 years of functioning, 18,420 people have found temporary accommodation, and there are still 5,882 available places

'WHERE THEY WAIT FOR YOU' is a project of the Ministry of Digital Transformation, the Office of the President and Ukrzaliznytsia



Examples of NGOs/CFs/IOs providing housing for IDPs

CF Enjoying Life provides housing for IDPs in Kyiv Oblast, provided they are employed in local communities.

CF Housing for IDP conducts audits of land plots for potential new development, provides qualified audits of unfinished and non-residential premises to complete or renovate housing for IDPs

The UN Refugee Agency (UNHCR)

Construction of modular houses for IDPs in Kyiv, Chernihiv and Sumy Oblasts.

The Ukrainian Red Cross

Construction of a modular town for IDPs in Sumy Oblast. Funding comes from Switzerland and the Netherlands



Next steps

1. Drafting legislation to update the Housing Code inherited from the USSR

The government is already working in this area: the draft law “On the Basic Principles of Housing Policy”

2. Public-private partnership

Involvement of local and international private companies in financing social housing (for instance, renovation of abandoned buildings or construction of new buildings) and development of a white and affordable rental market

3. State subsidies for housing construction or purchase

Allocation of state subsidies for down payments or partial compensation of housing costs

4. Digitalisation

Creating a unified information system for housing management to ensure transparency and monitoring of the right to housing



Investigative journalism

Disclaimer. Please note that investigative journalism may not take into account all possible nuances and may be biased in certain cases. It is recommended that the information received be treated with caution and not used to make final conclusions without further research and fact-checking.

Investigative journalism over the past month*

Top 5 media by number of investigations concerning reconstruction



НАШІ ГРОШІ



General features of investigative journalism concerning procurement

- As procurement activity has picked up, investigations into violations during reconstruction have also become more frequent.
- The most frequent topics covered in the media are possible violations in procurement, initiation of criminal cases and verdicts thereon.
- Another topic for the media is imperfections in procurement procedures and ways to correct them. This topic has the potential for further development.
- As procurements become more competitive, the number of reports about tenders being tailored for a specific participant or rejection of 'not approved' bids is increasing.

Top 5 news of the month by topic

6 December НАШІ ГРОШІ
A shelter for a lyceum in Kharkiv Oblast worth UAH 78 million was ordered from the Lithuanian government: **overpayment for certain construction materials of UAH 4.3 million**

4 December НАШІ ГРОШІ
Construction of an outpatient clinic in Odesa Oblast worth UAH 52 million ordered from the EU: **overpayment for certain construction materials of about UAH 2.5 million**

20 November НАШІ ГРОШІ
A shelter for a lyceum in Odesa Oblast was ordered for UAH 115 million. Some materials are two to three times more expensive than the market price. **A possible overpayment may amount to UAH 15 million**

9 November СУСПІЛЬНЕ
A gymnasium in Zhytomyr Oblast terminated the contract with the contractor for the construction of a school shelter and **announced another tender for UAH 14.3 million**. This is the seventh procurement for the construction of this shelter in the Prozorro system.

8 November НАШІ ГРОШІ
Shelter for a destroyed school in Kherson Oblast worth UAH 68 million may be **overpaid by at least UAH 5 million**

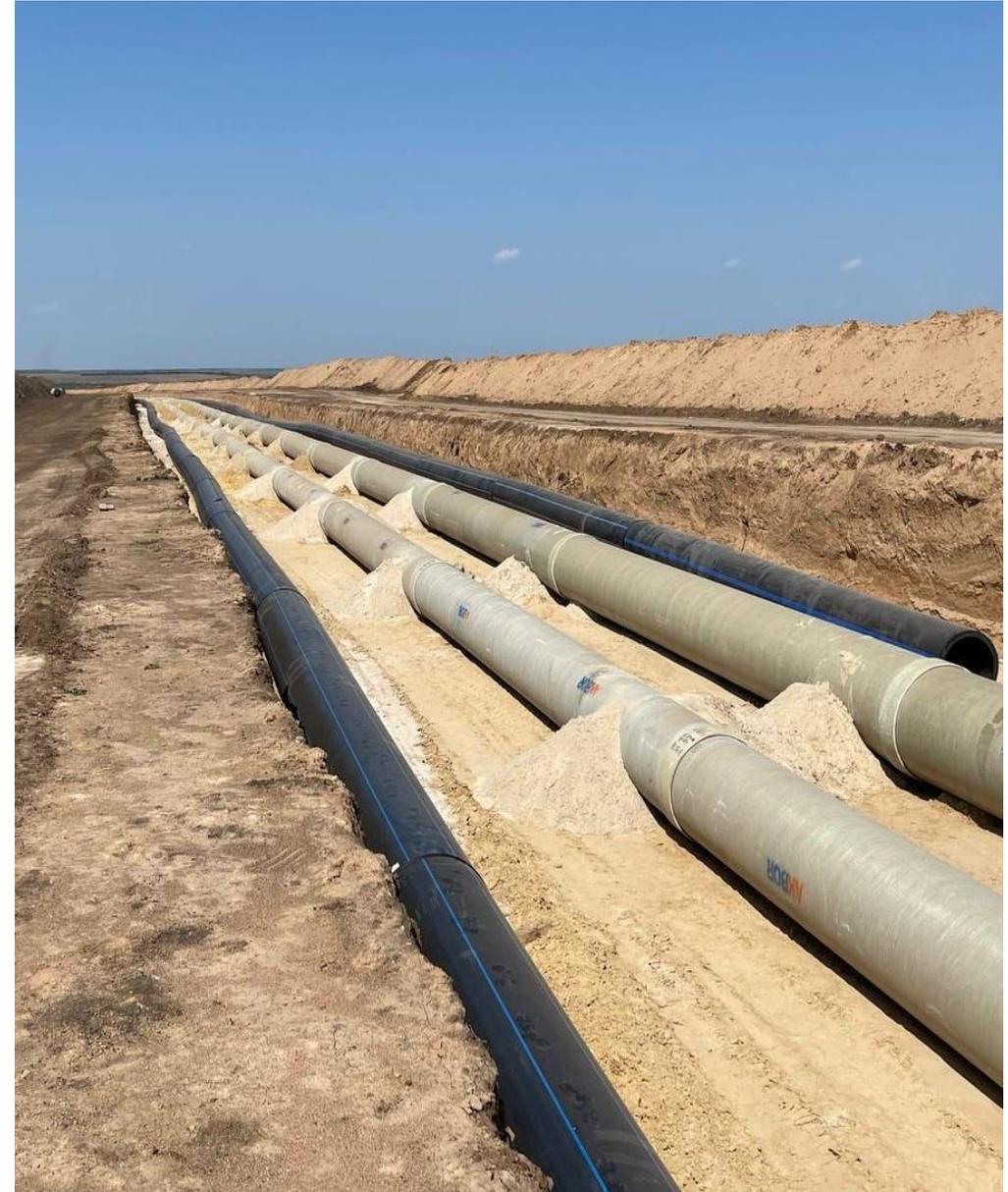
* - for the period from 5 November to 18 December 2024

Monitoring of specific areas

Healthcare

Education

Demining



Healthcare

- [As of mid-December 2024](#), **1,938 (+253 over the past month and a half) medical facilities were damaged, and another 297 (+71 over the past month and a half) were completely destroyed and beyond repair.**
- The greatest losses were suffered by healthcare facilities in Kharkiv, Donetsk, Mykolaiv, Kyiv, Chernihiv, Dnipro, Kherson, and Zaporizhzhia Oblasts.
- Over this time, **576 (+25 over a month and a half) healthcare facilities have been fully restored in different Oblasts of Ukraine, and 372 (+22 over a month and a half) have been partially restored.** Most facilities have been restored in Mykolaiv, Dnipro, Kyiv, Kharkiv, Kherson and Chernihiv Oblasts.
- For 2025, the [DREAM platform has selected 15 priority investment projects](#) worth over UAH 2.6 billion from 12 oblasts of Ukraine.
- The joint project of the Ministry of Health and the World Bank, **“Health Enhancement and Lifesaving” (HEAL Ukraine)**, has **UAH 2.7 billion** planned for the restoration and reconstruction of **6 medical facilities.**
- The [DREAM platform](#) already has **549 healthcare facilities (+42)** under construction and overhaul.
- [In November – December, there were +119 projects](#) with a total budget of UAH 7.6 billion (7.8% of **financial coverage**). The largest number of projects is in Cherkasy (20), Khmelnytskyi (15) and Kharkiv (10) Oblasts.



Education

- **Over the 33 months** of the full-scale invasion, **3,798 educational institutions have been damaged, and another 365 have been completely destroyed.**
- Educational institutions in Kharkiv, Donetsk, Kyiv, Kherson, Mykolaiv, Luhansk, Sumy and Chernihiv Oblasts suffered the most.
- Since then, 53 higher education institutions, 534 secondary schools, and 324 pre-schools have been restored in different Oblasts of Ukraine.
- The United Nations Development Programme (UNDP) Ukraine, with financial support from the Government of Germany and in cooperation with the Ministry of Education and Science of Ukraine, analysed the state of educational infrastructure and prepared a **concept for the reconstruction of Ukrainian schools.**
- The main focus is on building shelters and emergency exits, providing winter heating, promoting universal design, and taking a gender-responsive approach.
- **The New School model** includes renovation of the school building, reform of the food system, implementation of safety and energy efficiency principles, and a modernised approach to the educational process, sports and leisure, and landscaping.
- There are already **1,999 educational facilities (+133)** on the **DREAM platform**, which are currently under construction or undergoing major repairs.
- **In November – December, there were +225 projects** with a total budget of UAH 5.7 billion (30.4% of **financial coverage**). The largest number of projects is in Sumy (29), Donetsk (20) and Khmelnytskyi (20) Oblasts.



Demining of Ukraine (data as of 13 December 2024)

- The SES is preparing a 2025 [Humanitarian Demining Plan](#) for the de-occupied territories (20 km from the line of contact).
- [Demine Ukraine Forum](#): By the end of 2024, government and private operators have 151 vehicles for humanitarian demining, and the number of deminers has increased to more than 4,000.
- Compensation to farmers for demining services: [39 auctions](#) have already been held in [Prozorro](#). UAH 1 billion has been allocated for the programme through 2025.
- In November, farmers received another 25,000 hectares of demined land.
- Since the beginning of 2024, [pyrotechnics have examined more than 309 thousand ha](#), of which more than 280 thousand ha have been returned.
- Most of the land was examined in Kherson (251.1 thousand ha over the year; 20.7 thousand ha in November), Kharkiv (22.5 thousand ha; 1 thousand ha) and Mykolaiv Oblasts (20.9 thousand ha; 4.4 thousand ha).
- There are currently [69 mine action operators](#) in Ukraine, and about 60 more are in the process of certification.
- Ukraine is [expanding the production of demining equipment](#): the Croatian company DOK-ING is localising the production of demining equipment and has already opened an office; in addition, the first Ukrainian demining vehicle, “Zmii” (Snake), has been developed and certified.

Examined: 178.9 thousand ha (+13.4 thousand ha)

Destroyed > 208.4 thousand (+4.4 thousand) of explosive hazards

Demined:



2,7. thousand
km of railway
(+ 31.6 km)



1.1
thousand
km of motor
roads



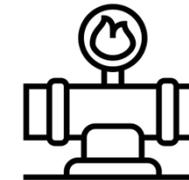
517.5 km of
power lines
(+4.9 km)



(+19.8 km)
463.3 ha of
forests
(+24.4 ha)



25.8 ha of water
areas



82.1 km of gas
pipelines



Thank you for your attention!

THE RECOVERY SPENDING WATCHDOG

