The severity of humanitarian access constraints in Ukraine varies greatly between oblasts and has evolved over time. Even though changes to the front lines have recently slowed, the conflict and related access constraints remain dynamic. Access constraints are highest in Luhansk and Donetsk oblasts, where safety and security risks resulting from active ground conflict and the destruction of infrastructure severely limit the movement of humanitarians and civilians. Access constraints are also high in other oblasts with the presence of Russian forces, namely Kharkiv, Kherson, Mykolaiv, and Zaporizhzhia. Humanitarians in these oblasts face the security risks of operating near active ground conflict and the difficulty of operating in areas controlled by Russian forces.

Key nationwide access considerations:

- **Active ground conflict** limits the movement of civilians and humanitarians near the front lines, particularly in Donetsk and Luhansk oblasts, where the conflict has intensified in the past weeks.

- **Access to areas controlled by Russian forces and non-government-controlled area (NGCA) authorities** is very limited, especially in areas that have come under the control of Russian forces since the 24 February invasion.

- **Shelling and air strikes** are most pronounced in places where ground fighting is still active, but the risk of air strikes remains a nationwide concern. 21 of 26 oblasts have experienced shelling or an air strike since April 2022 (ACLED accessed 10/06/2022). In areas with heavier shelling, civilians risk their safety whenever they leave their homes to go to an aid distribution point. For humanitarian staff, especially international responders, organisations’ safety policies can cause some transportation methods and localities to be off limits.

- **The presence of mines and unexploded ordnance (UXO)** restricts the movement of civilians and humanitarians, even after the end of ground conflict.

- **Fuel shortages and high fuel prices** affect the response nationwide, particularly for local volunteer organisations that pay for their own fuel. These organisations are also facing a decrease in donations from the public as income and employment opportunities decrease (KII 05/06/2022 a; KII 09/06/2022 a).

See the full map on page 8.

Sources: ACAPS; ISW (16/06/2022); ACLED (accessed 26/06/2022)

**About this report**

This report provides an oblast-level analysis of access constraints in Ukraine to inform humanitarian responders and provide a comparison of access dynamics across different oblasts. This analysis is based on a severity model developed by ACAPS using the internal data collection of publicly available secondary sources as at 20 June 2022. Key informant interviews also complement this model.

The access constraints analysed in this report include the access of people to humanitarian aid, the access of humanitarian responders to the affected population, and security and physical constraints.
### Methodology

The data behind this report has been extracted from publicly available sources and unpublished sources that have been circulated within the response. The narrative presented is based on data analysis, secondary data review, and key informant interviews. The access severity scores were calculated using the oblast-level data collection of events related to access constraints. ACAPS predefined 75 types of events and grouped them into 35 sub-indicators, nine indicators (I), and three pillars (P). The following pillars and sub-indicators are scored on a range of 0–5, resulting in the final access severity score:

**Pillar 1: Access of people in need to humanitarian aid**

1. Denial of the existence of humanitarian needs or entitlements to assistance
2. Restriction and obstruction of access to services and assistance

**Pillar 2: Access of humanitarian responders to the affected population**

3. Impediments to entering the country (bureaucratic and administrative)
4. Restriction of movement within the country (impediments to freedom of movement and administrative restrictions)
5. Interference with the implementation of humanitarian activities
6. Violence against humanitarian personnel, facilities, and assets

**Pillar 3: Security and physical constraints**

7. Active insecurity or hostilities affecting humanitarian assistance
8. Presence of landmines, improvised explosive devices (IEDs), explosive remnants of war (ERW), and UXO
9. Physical constraints in the environment (such as obstacles related to terrain, climate, and infrastructure)

Temporary sub-indicators – such as active hostilities, statements denying humanitarian needs, and time-sensitive events (including checkpoints, the diversion of aid, weather, and fuel scarcity) – are considered for 45 days from the day they were reported. For other sub-indicators, a final data validation process is conducted to ensure they are still relevant.

Rather than using a threshold system, as in ACAPS Global Humanitarian Access Overviews, scores were assigned on a continuous numerical scale, allowing for decimals and giving a more nuanced result.

For oblasts containing areas under the control of Russian forces or NGCA authorities, the indicator ‘Impediments to entering the area’ (I3) has been assigned the highest score.

### Limitations

The analysis relies on available data, which is unlikely to be comprehensive in a dynamic conflict situation such as Ukraine. Reported data may come with some delay, meaning some published data may no longer be applicable at the time of analysis. Data was collected through a review process to check that selected sub-indicators for a given oblast were still relevant. Because of the evolving situation and the amount of data collected, some inaccuracies likely remain.

Detailed information on access constraints in areas controlled by Russian forces is lacking. Access constraints in these areas, especially for Kherson and Zaporizhzhia oblasts, may be underscored, as some relevant sub-indicators may not have been selected because of a lack of reported events.

Crimea and Sevastopol were not given access scores, as gathering enough information and producing a reliable score were not feasible given their contexts. Russia has occupied these oblasts since 2014, and entering from Ukraine has been impossible since then.
OBLASTS WITH HIGH ACCESS CONSTRAINTS

The oblasts with the highest access constraints are the ones where active ground conflict is currently taking place: Donetsk, Kharkiv, Kherson, Luhansk, Mykolaiv, and Zaporizhzhia. Most of Kherson and Luhansk oblasts, one-third of Donetsk oblast, one-third of Kharkiv oblast, and two-thirds of Zaporizhzhia oblast are under the control of Russian and NGCA forces (ISW 27/06/2022). Access constraints in these oblasts are the highest because of a combination of safety and security risks and damaged and destroyed infrastructure. In territories controlled by Russian or NGCA forces, restrictions on humanitarian operations are even higher, with very few humanitarian responders allowed to operate. There are also several reports of the detention of humanitarian workers in these territories (AWSD accessed 08/06/2022).

Humanitarian access in oblasts with the highest access constraints

### Humanitarian access severity scores (out of 5) for oblasts with the highest access constraints

<table>
<thead>
<tr>
<th>OBLAST</th>
<th>ACCESS OF PEOPLE IN NEED</th>
<th>ACCESS OF HUMANITARIANS</th>
<th>SECURITY AND PHYSICAL CONSTRAINTS</th>
<th>SEVERITY SCORE</th>
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<td>4.00</td>
<td>3.23</td>
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</tbody>
</table>

Below are the ten most reported access events in Donetsk, Kharkiv, Kherson, Luhansk, Mykolaiv, and Zaporizhzhia oblasts between 1 May and 20 June 2022:

- physical prevention of the use of services and assistance
- scarcity of fuel or other energy sources affecting humanitarian action
- violence affecting civilians’ movement
- confirmed contamination of an area (with mines or UXO)
- telecommunications cut-off
- suspected contamination of an area
- different authorities in control of territory
- movement restrictions affecting humanitarians, such as road closures and other impediments to entry
- restricted access to aid as a result of violence
- physical impediments to travelling to the affected location (ACAPS accessed 24/06/2022).
Access of people in need to humanitarian aid

Active ground conflict (I2) has constrained access for the affected population in conflict-affected oblasts. The risk of shelling limits the free movement of civilians towards aid distribution points. Shelling from Russian forces has hit queues for humanitarian aid or evacuations, causing civilian deaths (OCHA 08/04/2022). People with limited mobility, such as people with disabilities and the elderly, face further constraints and have a harder time accessing aid from distribution points (Amnesty 13/06/2022).

Forced relocation (I2): there are reports of the forced relocation of civilians from areas controlled by Russian and NGCA forces. In some cases, Russian forces only allowed civilian evacuations towards Russia, with civilians eventually accepting the relocation once conditions became dire (Reuters 19/04/2022; KI 18/04/2022). As at 21 June, 1.3 million Ukrainian refugees had crossed into Russia since 24 February. The proportion of voluntary and involuntary movements is unclear (UNHCR accessed 21/06/2022; Ukrinform 21/05/2022).

Evacuations (I2): there are no established evacuation corridors from Kherson oblast (which Russian and NGCA forces almost completely control) and NGCAs of Zaporizhzhia oblast (roughly two-thirds of the oblast). Road travel for individuals is possible but with high safety and security concerns (CF SSS 27/05/2022; OCHA 09/06/2022). Evacuations from Sievierodonetsk (Luhansk oblast) are no longer possible after the bridges connecting the city to the government-controlled areas (GCAs) were destroyed on 13 June. 12,000 civilians remain in the city, which has been under the control of Russian forces since 25 June (The Guardian 13/06/2022; ABC News 15/06/2022; BBC 26/06/2022).

Forced conscription into NGCA forces (I2): in Donetsk and Luhansk NGCAs, men have gone into hiding to avoid forced conscription into NGCA forces, keeping them unable to personally access services and the humanitarian aid being distributed (Left Bank Analytics 06/05/2022; The Guardian 28/04/2022).

Access of humanitarian responders to the affected population

The movement of humanitarians (I4) is restricted in eastern and southern oblasts, with access being extremely constrained in territories controlled by Russian forces and NGCA authorities. In the parts of Donetsk and Luhansk that were already NGCAs before 24 February, access is possible for accredited organisations, including international organisations, already present prior to 24 February, with limited capacity to expand operations (OCHA 21/04/2022). In other areas, aid delivery by community responders occurs on a case-by-case basis, depending on local agreements with Russian forces (KII 06/04/2022 a; KII 07/04/2022 b; KII 07/04/2022 c). INGOs and UN agencies have reported implementing response activities in these areas, although it is unclear how they gained access (OCHA accessed 23/06/2022). Mariupol, for example, was under siege for more than two months, with no humanitarian supplies allowed in. The siege ended on 20 May, when Russian forces took full control of the city. Humanitarian access has remained restricted, and, according to the Ukrainian authorities of the city, the humanitarian aid being distributed by Russian and NGCA authorities is insufficient (BBC accessed 30/05/2022; OCHA 21/06/2022; Mariupol City Council 07/06/2022).

Violence against personnel, facilities, and assets (I6): humanitarians working in oblasts affected by active ground conflict have reported this type of violence. The conflict has killed three aid workers, injured one, and led to the kidnapping of 28 others in Mariupol (Donetsk oblast), Lysychansk (Luhansk oblast), and Berdiansk (Zaporizhzhia oblast) (AWSD accessed 08/06/2022). These figures do not include casualties among volunteers and other responders that are not members of aid organisations. There have been volunteer and responder deaths, injuries, and detentions, but the exact numbers are unknown (Insecurity Insight 25/03/2022; RFE/RL 28/04/2022; Suspilne News 17/05/2022; KI Twitter 02/06/2022; TCH 21/04/2022).

Confiscation and diversion of aid (I5): there have been several reports of Russian forces confiscating and diverting aid. For example, on 31 March, Russian forces confiscated 14 tonnes of aid destined for Melitopol. In Kherson oblast, Russian forces collected a portion of goods as a condition of letting aid pass (ECHO 01/04/2022; Left Bank Analytics 07/04/2022). Civilians leaving Melitopol (Zaporizhzhia oblast) also reported Russian soldiers collecting bribes from evacuating civilians (Zaporizhzhia RMA 23/05/2022).

Security and physical constraints

Active ground conflict (I7) is preventing humanitarians from accessing people in need and implementing response operations. For instance, in Mykolayiv oblast, access to areas near the front lines is difficult because of active fighting and constant shelling (KII 06/06/2022). Access to the remaining GCAs of Luhansk is very constrained because of active fighting, and Sievierodonetsk is unreachable from GCAs since all connecting bridges have been destroyed (The Guardian 13/06/2022; ABC News 15/06/2022; OCHA 15/06/2022). In Donetsk city (Donetsk NGCA), shelling has been reported near housing for humanitarian staff (OCHA 15/06/2022). In Kharkiv oblast, access to Kharkiv city has improved since Russian forces were pushed back on 12 May (KII 08/06/2022 b; CNN 13/05/2022). Russian forces are still present in Kharkiv, Kopiansk, and Izium raions, meaning higher localised constraints remain (KII 10/06/2022 a).

The presence of mines and UXO (I8), even after fighting has ended, is a major concern, especially along the front lines. They affect the free movement of humanitarians and civilians and lead to civilian casualties (ACLED 07/04/2022; RFE/RL 15/04/2022; AOAV 10/05/2022).
**Damage to infrastructure (I9):** damages to water, electricity, and gas infrastructure have limited civilians’ access to those services, especially in Donetsk and Luhansk oblasts. Disruptions to telecommunications have also been reported, potentially preventing civilians from receiving information on humanitarian aid or communicating their needs. One million people in Luhansk oblast are without water because of damages to the water supply system. The entire oblast is without gas supply, and repairs are impossible while fighting continues (OCHA 09/06/2022). In the GCAs of Donetsk and Luhansk oblasts, the conflict has severely affected water, electricity, and gas supplies, as well as telecommunications, which are functioning at a very limited capacity (CF SSS 27/05/2022). Damages to healthcare facilities from shelling have also heavily affected the provision of health services (OCHA 15/06/2022). Damages to road infrastructure have diminished the availability of reliable road transportation routes for humanitarian cargo and the evacuation of civilians (CF SSS 27/05/2022; KII 12/06/2022 a). As at mid-May, conflict had destroyed 23,573km of road and 289 bridges across the country (Ukrinform 14/05/2022).

**Other considerations**

**Local response capacity:** many staff members of local NGOs are among those displaced from areas affected by active ground conflict, negatively affecting the response capacity of local organisations (KII 11/04/2022 a). Volunteers from local organisations are also returning to their prior employment to support their livelihoods, getting burned out, or getting hired by international organisations (KII 04/05/2022 b; KII 04/05/2022 d; KII 19/04/2022 b; KII 05/05/2022 b).

**OBLASTS WITH MODERATE ACCESS CONSTRAINTS**

<table>
<thead>
<tr>
<th>Oblast</th>
<th>Access of People in Need</th>
<th>Access of Humanitarians</th>
<th>Safety and Security Constraints</th>
<th>Severity Score</th>
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</thead>
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<td>2.42</td>
<td>1.3</td>
</tr>
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<td>Kyiv</td>
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<td>1.69</td>
<td>2.40</td>
<td>1.9</td>
</tr>
<tr>
<td>Kyiv City</td>
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<td>0.63</td>
<td>0.5</td>
</tr>
<tr>
<td>Sumy</td>
<td>1.50</td>
<td>0.52</td>
<td>3.43</td>
<td>1.8</td>
</tr>
</tbody>
</table>

Sources: ACAPS; ISW (16/06/2022); ACLED (accessed 26/06/2022)
Humanitarian access in Chernihiv, Kyiv, and Sumy oblasts is of particular interest because Russian forces were present in those areas between 24 February and early April, leading to an increase in initial access constraints during that period. Constraints have decreased since April, but moderate access constraints remain. Kyiv oblast has the highest access severity score among these oblasts, mostly because of the reported impact of road damage and mine presence on the movement of humanitarians following the withdrawal of Russian troops from the area. The reported deaths of volunteers and damages to schools also factor in driving up Kyiv oblast’s access severity score. Access constraints in Sumy oblast mostly stem from a large presence of mines and UXO, road damages, and fuel scarcity (I8 and I9).

**Access of people in need to humanitarian aid**

**Damages to public infrastructure (I2):** shelling has damaged public buildings, such as schools, colleges, healthcare centres, and hospitals (CNN 02/04/2022; KRMA 07/04/2022; BBC accessed 20/06/2022; Ukrayinska Pravda 14/03/2022).

**Movement restrictions (I2):** in Kyiv oblast, civilian movement within 1km of the border with Belarus is forbidden except for local settlements. Humanitarians are exempt from these restrictions. Ukrainian military movements in Chernihiv oblast cause access disruptions to remote communities near the Russian border as some areas become closed off (KII 12/06/2022 a).

**Access of humanitarian responders to the affected population**

**Violence against humanitarian responders (I6):** recorded incidents against humanitarian responders, particularly volunteers, during active ground conflict and the presence of Russian forces in Chernihiv, Kyiv, and Sumy oblasts contributed to increasing the access severity score in these oblasts.

**Security and physical constraints**

**Mines and UXO (I8):** the presence of mines and UXO is a threat to civilians and humanitarians even after the end of hostilities and continues to cause casualties (KRMA 05/04/2022; AFU Facebook 28/02/2022).

**Fuel costs (I9):** rising fuel costs affect the response capacity to areas such as Chernihiv, especially for community responders who have had to decrease the frequency of their travels. The strain on people’s personal finances resulting from employment loss has also decreased the number of donations and the capacity of volunteers to participate in humanitarian efforts (KII 05/06/2022 a).

**Shelling and air strikes (I7):** despite the end of active ground conflict, regular shelling continues in Sumy and Chernihiv oblasts, hampering the free movement of civilians and humanitarians and damaging civilian infrastructure. Air strikes hit Kyiv on 5 June (OCHA 09/06/2022).

**Infrastructure damage (I7):** road travel remains a challenge, especially in Chernihiv oblast, where many damaged and destroyed bridges and roads have yet to be repaired or replaced by temporary passages (CF SSS 27/05/2022; KII 05/06/2022 a).

**NATIONWIDE ACCESS CONSTRAINTS**

According to the ACAPS Ukraine Access Events dataset, the most common constraints to access events reported across Ukraine since May 2022 (excluding the ones mostly found along the front lines and in NGCAs) are fuel scarcity, violence affecting the movement of civilians, mine and UXO contamination, and physical impediments to the movement of humanitarians. The risk of sporadic air strikes exists nationwide. Increasing transportation costs and the decreasing availability of responders to deliver assistance are increasingly straining the response of local organisations and volunteers.

**Access of people in need to humanitarian aid**

People’s access to information: among IDPs, especially those without internet access, there is a lack of access to information on available assistance programmes and support options (CF SSS 27/05/2022). In conflict-affected oblasts, family and friends transmit most information on available assistance through social media. The situation has the potential to leave people who lack internet connectivity and with limited social circles, especially older people, without access to information on where to receive assistance, resulting in their decreased access to assistance (REACH 03/06/2022). Surveyed populations in Rubizhne (Luhansk) and Mariupol (Donetsk) highlighted concerns around the lack of information in conflict-affected areas (REACH 10/05/2022). Countrywide, the type of information IDPs need the most is on how to register for or request assistance (REACH 14/06/2022).

**Access of humanitarian responders to the affected population**

There have been efforts to simplify and facilitate procedures for humanitarian organisations following the initial disruption and uncertainty caused by the 24 February invasion. New laws and decrees have provided clarifications on requirements for humanitarian organisations wishing to enter and operate in Ukraine.
Security and physical constraints

Fuel shortages (I9) affect the implementation of humanitarian operations across the country, with fuel needs for humanitarians being highest in eastern Ukraine (Logistics Cluster 25/05/2022). High fuel prices are particularly impactful for smaller and informal organisations where responders pay for their own fuel (CF SSS 27/05/2022). Fuel availability is better in Kyiv, Lviv, and Odesa cities than in the rest of the country, as they receive some supply from neighbouring countries (KII 13/06/2022). Aside from a lack of fuel, local responders have noted a lack of vehicles, including small cars, for transporting aid (CF SSS 27/05/2022).

Mines and UXO (I8) are present in at least 16 of the 25 analysed oblasts – i.e. all except the westernmost oblasts. Incidents involving mines and UXO were also reported in Chernihiv, Kharkiv, Kherson, Kyiv, Sumy, Zaporizhzhia, and Zhytomyr oblasts, as well as in Kyiv city (ACLED accessed 10/06/2022). The presence of mines and UXO was already a cause for concern along the pre-24 February contact line in Donetsk and Luhansk oblasts (OCHA 05/04/2021).

Shelling and air strikes (I7) represent a risk countrywide and continue to be reported even in areas without active ground conflict. Since April 2022, 21 of 26 oblasts in Ukraine have experienced shelling and air strikes, with the most affected being Dnipropetrovsk, Donetsk, Kharkiv, Kherson, Luhansk, Mykolaiv, Sumy, and Zaporizhzhia (ACLED accessed 10/06/2022; OCHA 09/06/2022). On 27 June, a missile strike hit a shopping mall in Kremenchuk (Poltava oblast), killing at least 18 people (Ukrinform 28/06/2022).

Damaged rail infrastructure (I9): railways are crucial in evacuating civilians and transporting humanitarian goods and personnel. Russian air strikes have targeted critical railway infrastructure, such as electrical substations, disrupting rail services (AP News 05/05/2022; CNN 10/05/2022). On 5 June, a Russian air strike hit a railcar repair facility in Kyiv. On 15 June, World Central Kitchen reported a missile striking a train in eastern Ukraine, destroying one wagon containing humanitarian food assistance (NPR 05/06/2022; Andrés Twitter 15/06/2022). As at mid-May, 6,300km of rail and 41 rail bridges had been damaged since the start of the invasion (Ukrinform 14/05/2022). The level of damage has resulted in some international organisations not allowing rail travel in Ukraine for their staff.

Visa-free entry (I3): on 14 March, Presidential Decree 132/2022 established a 90-day visa-free entry for employees of international medical or humanitarian organisations, foundations, programmes, and other organisations arriving with an invitation from the Cabinet to provide humanitarian assistance (DRC 23/03/2022; President of Ukraine 14/03/2022). The required procedures to allow staff to remain past 90 days are currently unclear. As access into Ukraine is only possible through road and rail borders, some staff also require visas for whichever neighbouring country they are transiting through.

Martial law (I3, I4, I5) was first enacted on 24 February 2022 when the invasion started and was renewed on 18 May for an additional 90 days (Verkhovna Rada of Ukraine 23/05/2022). The provisions of martial law include bans on constitutional amendments and on elections and referendums, expanded government powers for search activities, the monitoring of media communications and property seizures, and a ban on exiting the country for most Ukrainian men ages 18–60 (UATV 24/02/2022; TWP 09/03/2022). Martial law has affected local humanitarian organisations’ ability to directly import aid for humanitarian programmes because completing foreign monetary transactions requires formal permission (COAR 25/03/2022; CSO Meter 05/05/2022). It did simplify custom clearance and procedures for importing goods for humanitarian purposes (COAR 25/03/2022).

Registration (I3): between 24 February and early May, the registration of new NGOs in Ukraine was halted. During this period, the formal hiring of staff was impossible for unregistered organisations. Since early May, registration has been possible in a simplified manner, requiring five documents and an administrative fee. Some organisations have turned to local legal assistance to smoothly navigate the registration process (KII 28/04/2022 a; GoU/OCHA 27/04/2022).

Border crossings (I3): wait times for cargo trucks crossing the border from Romania or Poland remain long. On 17 June, wait times from Poland varied between seven and 22 hours depending on the specific crossing points. From Romania, long wait times continue to be reported at the Siret-Porubne border crossing, which is used for humanitarian aid transport (Logistics Cluster 08/06/2022; National Tax Administration accessed 17/06/2022).

Diversion of aid (I5): some responders have reported having a part of their aid diverted towards the military when crossing the border into Ukraine. Smaller-scale responders have also reported avoiding using the Government’s humanitarian hubs out of fear of losing track of their relief supplies (KII 25/03/2022 a; KII 04/05/2022 a; KII 04/05/2022 b; KII 06/05/2022 b).

Rising prices and local shortages of goods affect the operations of humanitarian organisations that rely on locally purchased products (KII 25/04/2022 a). As volunteers return to their prior occupations to meet their own livelihood needs and the wider population’s ability to donate money decreases, local organisations face decreasing financial and response capacities (KII 05/06/2022 a; KII 09/06/2022 a).
MAP: HUMANITARIAN ACCESS SEVERITY IN UKRAINE

Access severity score as at 29 June 2022:
- Extreme access constraints
- Very high access constraints
- High access constraints
- Moderate access constraints
- Low access constraints

Conflict events between 1 May and 17 June 2022:
- Battles
- Explosions or remote violence
- Violence against civilians
- Territories not controlled by the Government of Ukraine as at 27 June 2022

Sources: ACAPS; ISW (16/06/2022); ACLED accessed 26/06/2022
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