



A Flawed Path to Peace: The Weaknesses of the Proposed U.S.–Russia Framework for Ukraine

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Previously, Kozyreva spent three years at BuzzFeed News, where she investigated the business dealings of former President Donald Trump's inner circle and was part of the FinCEN Files project, a 2021 Pulitzer Prize finalist in international reporting.

Kozyreva has reported on the 2014 Revolution of Dignity, Russia's annexation of Crimea, and military conflict in eastern Ukraine for the journalist-owned Ukrainian broadcaster Hromadske. She also co-founded posipaky.info, a watchdog platform tracking the business interests of members of parliament. At *Ukrayinska Pravda*, she reported on the 2016 U.S. presidential race and co-authored investigations into questionable funding streams and offshore accounts used by Ukrainian politicians to pay American lobbyists.

Since the start of Russia's full-scale invasion of Ukraine, Kozyreva has reported on the war for *The Telegraph*, *Sky News*, the *Pittsburgh Post-Gazette*, and *The New York Times*.

Introduction

A recently leaked 28-point proposal from the U.S. government—developed in coordination with Russian input and now circulating among Kyiv, Moscow, and European capitals—has been put forward as a potential peace framework to end the war in Ukraine. Yet the proposed U.S.–Russia “peace deal framework” appears less aimed at ending the war in Ukraine than at reordering the global security landscape. That undertaking could take years, if not decades, and would require concessions not only from Ukraine and Russia but from NATO members and Ukraine’s other allies. Its complexity, vague, and open-ended language creates loopholes that invite broad interpretation and potential manipulation.

The proposed peace deal framework, as drafted, questions Ukraine’s sovereignty and effectively holds the country hostage to negotiations on Putin’s long-term concern, NATO enlargement. It does not explain what constitutes “reliable” or “robust” guarantees for Ukraine, who would provide them, or on what timeline they would take effect. U.S. guarantees lack specificity, while guarantees from the EU and the coalition of the willing are not mentioned at all. The document also offers no sense of what happens if talks collapse, stall indefinitely, or are subverted by one side. Unresolved, these gaps introduce structural vulnerabilities that Russia could exploit (as it did under the Budapest memorandum), raising fundamental concerns about the plan’s underlying strategic intent and practical viability. This would make a near-term settlement neither achievable nor realistic.

A European counterproposal to the plan, drafted by the United Kingdom, France, and Germany, addresses some of its most obvious inconsistencies. It still does not, however, resemble a Russia–Ukraine bilateral agreement to end the war. The text continues to incorporate matters that belong squarely to global governance, assigning “homework” to major international institutions such as the World Bank and even to blocs of states not party to the conflict, including the G8. For example, provisions on Russia’s reintegration into the global economy and prospective U.S.–Russia business cooperation lie entirely outside the scope of a peace settlement between Moscow and Kyiv. Including them not only exceeds the mandate of a bilateral agreement but also creates new leverage for Russia, effectively making Ukraine’s peace dependent on the success or failure of unrelated geopolitical business negotiations. In its current form, the proposal risks making peace in Ukraine contingent on long-term global processes that fall outside the scope of a war-ending agreement and remain beyond the control of Ukraine or its key partners.

The remainder of this paper reviews each of the proposal’s twenty-eight points alongside the European counterproposal. For every provision, it identifies gaps, contradictions, and structural risks that could weaken the credibility of a future peace settlement. It then offers analysis and clear recommendations on how to proceed.

1. “Ukraine’s sovereignty will be confirmed.”

European counterproposal: “Ukraine’s sovereignty to be reconfirmed.”

Recommendation and Analysis:

Delete this provision. The first point of the plan states that Ukraine’s sovereignty “will be confirmed.” Confirmed how, on what timeline, and according to what criteria is never specified. In fact, Ukraine is already a sovereign nation recognized under international law; therefore, Russia violated that sovereignty by launching an invasion. The notion that Ukraine’s sovereignty requires “confirmation” or “reconfirmation” is

both misleading and problematic, as it implies that Ukraine's sovereignty is somehow in question, a claim Russia has repeatedly used to justify its aggression.

2. “A comprehensive non-aggression agreement will be concluded between Russia, Ukraine, and Europe. All ambiguities of the last 30 years will be considered settled.”

European counterproposal: (No major changes.)

Recommendation and Analysis:

This point should either be deleted or elaborated. The proposal for “a non-aggression agreement between Russia, Ukraine, and Europe” raises immediate structural concerns: it is unclear how Washington could credibly commit to the peace plan’s 10-point “U.S. guarantee” while remaining outside the non-aggression agreement with Russia, Ukraine, and Europe. Excluding the United States from a non-aggression agreement weakens the enforceability of that guarantee and limits Washington’s ability to influence compliance, oversight, and responsibilities.

Additionally, the provision stating that “all ambiguities of the last 30 years will be considered settled” is legally and politically questionable. Moscow could use this language to legitimize past territorial claims or evade accountability for previous violations of international law.

3. “It is expected that Russia will not invade neighboring countries and NATO will not expand further.”

European counterproposal: (Provision deleted.)

Recommendation and Analysis:

This point should either be deleted or elaborated. The language should be revised to state that Russia is obligated, not merely “expected,” to refrain from invading its neighboring states. The framework must explicitly list those countries and outline concrete repercussions for the invasion of any one of them. The current text offers neither deterrence nor consequences and does not identify which neighbors are covered.

The framework also asserts that “NATO will not expand further,” even though any decision on enlargement requires agreement from all 32 member states and cannot be dictated by a separate political arrangement.

4. “A dialogue will be held between Russia and NATO, mediated by the United States, to resolve all security issues and create conditions for de-escalation in order to ensure global security and increase opportunities for cooperation and future economic development.”

European counterproposal: “After a peace agreement is signed, a dialogue between Russia and NATO will convene to address all security concerns and create a de-escalatory environment to ensure global security and increase the opportunity for connectivity and future economic opportunity.”

Recommendation and Analysis:

Delete this point, as it makes the resolution of the war dependent on separate Russia–NATO negotiations. This creates an external dependency that sidelines Ukraine and undermines the plan’s stated purpose, an immediate ceasefire and long-lasting peace. Another clause states that “dialogue will be held between Russia and NATO mediated by the United States,” but the United States, as NATO’s largest member, cannot serve as a neutral mediator in a dispute in which it is directly involved. The stated aim of this dialogue is to resolve “all security issues” and establish “conditions for de-escalation,” a process that could stretch for years.

Nowhere does the document outline consequences should negotiations stall. The absence of these conditions leaves the proposal open to delay, manipulation, and further pressure on Ukraine.

5. “Ukraine will receive reliable security guarantees.”

European counterproposal: “Ukraine will receive robust Security Guarantees” (emphasis added).

Recommendation and Analysis:

This point should either be elaborated on by the parties or deleted. “Security guarantees” for Ukraine are left undefined. The document does not explain what constitutes “reliable” or “robust” guarantees, who would provide them, or on what timeline they would take effect.

6. “The size of the Ukrainian Armed Forces will be limited to 600,000 personnel.”

European counterproposal: “The size of Ukraine’s military to be capped at 800,000 in peacetime.”

Recommendation and Analysis:

A durable and safe timeline, such as “during the next 10-20 years,” should be added. The provision limiting the size of the Ukrainian Armed Forces to 600,000 personnel lacks a clear timeframe for implementation and fails to cite a source for this figure, leaving it open to potential exploitation by Russia as a pretext for future aggression. It is also unclear whether volunteer battalions or units operating under the Ministry of Internal Affairs, which are not formally part of the Armed Forces, would be counted toward this limit. This ambiguity raises further questions about the practicality and enforceability of the restriction.

7. “Ukraine agrees to enshrine in its constitution that it will not join NATO, and NATO agrees to include in its statutes a provision that Ukraine will not be admitted in the future.”

European counterproposal: “Ukraine joining NATO depends on the consensus of NATO members, which does not exist.”

Recommendation and Analysis:

Delete this point. The clause stating that “Ukraine agrees to enshrine in its constitution that it will not join NATO” is problematic. The President of Ukraine cannot unilaterally commit to a constitutional change, which requires a parliamentary supermajority and a national referendum.

The second part of the point, which seeks to bind NATO, is also questionable. NATO’s treaty contains no mechanism for a “blacklist,” and attempting to create one would set a problematic precedent. Any amendment to NATO’s statute would also require unanimous approval by all member countries, a process that could significantly delay implementation and potentially prolong the conflict if a ceasefire has not been achieved.

8. “NATO agrees not to station troops in Ukraine.”

European counterproposal: “NATO agrees not to permanently station troops under its command in Ukraine in peacetime.”

Recommendation and Analysis:

Clarify that exceptions for training exercises would be permitted. The point stating that “NATO agrees not to station troops in Ukraine” implicitly prohibits NATO from conducting any training exercises for Ukrainian forces on Ukrainian soil. This restriction would impose additional logistical and financial burdens on Ukraine, as troops would need to be trained abroad, creating both cost and operational challenges.

9. “European fighter jets will be stationed in Poland.”

European counterproposal: (No change.)

Recommendation and Analysis:

Delete this provision. It bears no direct relevance to the war in Ukraine and introduces unnecessary strategic risk. This vague formulation creates a loophole for misinterpretation and could be seized upon by Moscow as a pretext for future aggression.

10. “The U.S. guarantee:

- **The U.S. will receive compensation for the guarantee;**
- **If Ukraine invades Russia, it will lose the guarantee;**
- **If Russia invades Ukraine, in addition to a decisive coordinated military response, all global sanctions will be reinstated, recognition of the new territory and all other benefits of this deal will be revoked;**
- **If Ukraine launches a missile at Moscow or St. Petersburg without cause, the security guarantee will be deemed invalid.”**

European counterproposal: (Removes the clause stating that “if Ukraine launches a missile

at Moscow or St. Petersburg without cause, the security guarantee will be deemed invalid” and adds that the U.S. guarantee “mirrors Article 5.”)

Recommendation and Analysis:

Clarify the guarantors, including the role of the “Coalition of the Willing” and the EU, define compensation and consequences, and specify the conditions and mechanisms for any military response to prevent misinterpretation and future exploitation.

The section on “U.S. guarantees” lacks specificity, while guarantees from the EU are not mentioned at all. The plan does not clarify what compensation the United States would require in return for its commitments. Additionally, the clause promising a “decisive coordinated military response” if Russia invades Ukraine is vague and provides no clear guidance on timing, scale, scope, or which countries would participate in that response.

It is also unclear why the section on U.S. guarantees includes a pledge to impose “all global sanctions” and revoke “recognition of the new territory,” measures that are international in scope rather than solely American and cannot be dictated by a bilateral peace plan signed only by Ukraine and Russia.

The document states that security guarantees would become invalid “if Ukraine launches a missile at Moscow or St. Petersburg,” even though no Ukrainian missile has ever reached either city; past long-range strikes have involved drones. It is equally unclear why only Moscow and St. Petersburg are singled out, and why no parallel provision is included for strikes on Ukrainian territory. The text then repeats the point in a separate clause—“if Ukraine invades Russia, it will lose the guarantee”—creating redundancy and further confusion about the intended thresholds for voiding the guarantees.

The European counterproposal’s reference to a provision that “mirrors Article 5” is not equivalent to NATO’s Article 5.

11. “Ukraine is eligible for EU membership and will receive short-term preferential access to the European market while this issue is being considered.”

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Delete this point. The assertion that “Ukraine is eligible for EU membership” merely states an existing fact and does not belong in a bilateral Ukraine–Russia peace plan. Accession to the EU is merit-based and is not the result of an external agreement.

In practice, several member states, including Hungary and, at times, Slovakia, have obstructed Ukraine-related decisions, creating uncertainty about the viability and durability of such preferential access.

12. “A powerful global package of measures to rebuild Ukraine, including but not limited to:

- **The creation of a Ukraine Development Fund to invest in fast-growing industries, including technology, data centers, and artificial intelligence.**
- **The United States will cooperate with Ukraine to jointly rebuild, develop, modernize, and operate Ukraine’s gas infrastructure, including pipelines and storage facilities.**
- **Joint efforts to rehabilitate war-affected areas for the restoration, reconstruction and modernization of cities and residential areas.**
- **Infrastructure development.**
- **Extraction of minerals and natural resources.**
- **The World Bank will develop a special financing package to accelerate these efforts.”**

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Delete this point. Reconstruction is not a matter for a Russia–Ukraine peace agreement, and its inclusion risks confusing or misrepresenting the broader international rebuilding effort. The “powerful global package of measures to rebuild Ukraine” addresses issues far beyond the scope of a bilateral agreement. Reconstruction of Ukraine is a global, multi-year undertaking that cannot realistically be codified in a single Ukraine–Russia proposal, which offers only vague descriptions of the reconstruction process and the tools that would supposedly be used. It is also unclear why the United States would commit only to “rebuild, develop, modernize, and operate Ukraine’s gas infrastructure, including pipelines and storage facilities,” or which countries would participate in the “joint efforts to rehabilitate war-affected areas” referenced in the text. The language leaves fundamental questions unanswered: Who would finance these efforts? Who would govern them?

The point also calls for the creation of a Ukraine Development Fund, even though such a fund already exists, raising further questions about the intent and coherence of the proposal. Similarly, the World Bank is tasked with “developing a special financing package,” despite no indication that the Bank has agreed to or is prepared to support these commitments.

13. “Russia will be reintegrated into the global economy:

- **The lifting of sanctions will be discussed and agreed upon in stages and on a case-by-case basis.**
- **The United States will enter into a long-term economic cooperation agreement for mutual development in the areas of energy, natural resources, infrastructure, artificial intelligence, data centers, rare earth metal extraction projects in the Arctic, and other mutually beneficial corporate opportunities.**
- **Russia will be invited to rejoin the G8.”**

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Delete this point. This clause improperly ties a peace framework to Russia’s potential reintegration into the

global economy and to future U.S.–Russia commercial cooperation. Decisions such as Russia’s return to the G8 or any bilateral U.S.–Russia economic agreements are independent geopolitical processes that require separate multilateral or bilateral negotiations and cannot be a precondition or outcome of peace in Ukraine. Moreover, the durability of the Ukraine peace settlement should not be predicated on the failure or success of a “long-term economic cooperation agreement for mutual development in the areas of energy, natural resources, infrastructure, artificial intelligence, data centers, rare earth metal extraction projects in the Arctic, and other mutually beneficial corporate opportunities” between the United States and Russia.

Linking these unrelated, long-horizon economic arrangements to a peace settlement in the ongoing war expands the scope of the agreement far beyond its mandate of the Russia-Ukraine war, creates artificial leverage for Russia, and introduces issues over which Ukraine and its partners have no unilateral control. For these reasons, the provision is misplaced, strategically unsound, and should be removed entirely.

14. “Frozen funds will be used as follows:

- **\$100 billion in frozen Russian assets will be invested in US-led efforts to rebuild and invest in Ukraine;**
- **The US will receive 50% of the profits from this venture. Europe will add \$100 billion to increase the amount of investment available for Ukraine’s reconstruction. Frozen European funds will be unfrozen. The remainder of the frozen Russian funds will be invested in a separate US-Russian investment vehicle that will implement joint projects in specific areas. This fund will be aimed at strengthening relations and increasing common interests to create a strong incentive not to return to conflict.”**

European counterproposal: “Ukraine will be fully reconstructed and compensated financially, including through Russian sovereign assets that will remain frozen until Russia compensates damage to Ukraine.”

Recommendation and Analysis:

Delete this point. The provision on “frozen funds” is among the most consequential elements of any potential peace agreement between Russia and Ukraine and requires substantial clarification. The draft should specify what constitutes “frozen funds,” where these assets are held, the total amount covered, and how they will be used, since ambiguity on any of these points could trigger future legal or political disputes. The document does not define whether it refers to the roughly \$300 billion in immobilized Russian sovereign assets held primarily in the EU (notably in Belgium and France), the frozen assets of sanctioned Russian oligarchs worldwide, or both. The text also references both the “use” of frozen funds and the idea that “European funds will be unfrozen,” without explaining whether “unfrozen” would mean seizure for Ukrainian benefit or releasing these assets back to Russia—an outcome that would fundamentally alter the nature of the agreement and create significant geopolitical friction.

The draft further states that \$100 billion of these assets would be “invested in U.S.-led efforts to rebuild and invest in Ukraine,” with the United States receiving “50 percent of the profits”. This raises several unresolved questions: Why would reconstruction be centralized under a U.S.-led mechanism when no bilateral framework exists to support such a structure, and current reconstruction efforts operate through decentralized, multilateral channels? How would such a mechanism function in practice when reconstruction is already underway through multiple international donors and institutions? The statement

that “Europe will add \$100 billion” is similarly unclear and does not specify whether these funds would come from the same pool of frozen sovereign assets, from oligarch assets, or from separate EU budgetary sources.

Further confusion arises from the reference to “the remainder of the frozen Russian funds,” with no indication of the amount, origin, or jurisdiction involved. U.S.–Russia business cooperation is a matter for separate negotiations and should not be a condition for peace in Ukraine. The claim that such economic cooperation would “create a strong incentive not to return to conflict” is speculative and unsupported. The provision, therefore, extends far beyond the mandate of a bilateral peace framework and should be removed.

15. “A joint American-Russian working group on security issues will be established to promote and ensure compliance with all provisions of this agreement.”

European counterproposal: “A joint Security taskforce will be established with the participation of the U.S., Ukraine, Russia, and the Europeans to promote and enforce all of the provisions of this agreement.”

Recommendation and Analysis:

The mandate, authorities, and scope of work for the Security taskforce must be clearly articulated. The clause establishing a U.S.–Russia working group closely mirrors the language used for the Peace Council. Both bodies are tasked with “monitoring” and “ensuring compliance,” yet neither exists. Creating two undefined, overlapping structures responsible for core enforcement functions adds ambiguity, weakens accountability, and risks delays during implementation. If either entity is intended to play a central role in compliance, it must be established and fully operational before any agreement is signed to ensure credible, immediate oversight.

16. “Russia will enshrine in law its policy of non-aggression towards Europe and Ukraine.”

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

This point should be edited to clarify which specific law is being referenced—whether federal, regional, constitutional, or another legal framework. The clause is drafted vaguely and does not specify what “law” is meant or omits any indication of the penalties that would apply for breaching this law, creating ambiguity and undermining the enforceability of the provision.

17. “The United States and Russia will agree to extend the validity of treaties on the non-proliferation and control of nuclear weapons, including the START I Treaty.”

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Delete this point. The provision has no direct relevance to Russia's war against Ukraine and creates additional risks for Ukraine's security by tying peace to the success or failure of agreements unrelated to the conflict. Moreover, the reference to the "START 1 Treaty" is unclear and appears erroneous, as that treaty expired decades ago and is not connected to the current war.

18. "Ukraine agrees to be a non-nuclear state in accordance with the Treaty on the Non-Proliferation of Nuclear Weapons."

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Delete this point. The provision has no direct connection to current developments in Russia's war against Ukraine and introduces additional long-term risks. It could allow Russia to invoke fabricated claims about Ukraine's "development" or "possession" of nuclear weapons as a pretext for future aggression. This point, therefore, adds vulnerability rather than contributing to a durable peace.

19. "The Zaporizhzhia Nuclear Power Plant will be launched under the supervision of the IAEA, and the electricity produced will be distributed equally between Russia and Ukraine — 50:50."

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

This point should either be deleted or elaborated. The provision fails to specify which country would retain control over the nuclear power plant, leaving a critical security question unresolved. Reportedly, a single nuclear facility has never before simultaneously operated on both the European and Russian power grids; attempting to do so would need complex modifications to split the power supply between two unsynchronized grids (European and Russian) and could pose a significant security risk by destabilizing the electricity supply. Relaunching the plant can also potentially require rebuilding the Kakhovka Dam—an extremely costly project and not an immediate priority.¹ The ambiguity and technical impracticalities make the point untenable in its current form.

20. "Both countries undertake to implement educational programs in schools and society aimed at promoting understanding and tolerance of different cultures and eliminating racism and prejudice:

- **Ukraine will adopt EU rules on religious tolerance and the protection of linguistic minorities.**
- **Both countries will agree to abolish all discriminatory measures and guarantee the rights of Ukrainian and Russian media and education.**

¹ Dominic Culverwell, "Splitting Europe's largest nuclear plant between Russia, Ukraine in peace deal won't work, experts say," *Kyiv Independent*, November 26, 2025, <https://kyivindependent.com/splitting-europes-largest-nuclear-plant-between-russia-ukraine-wont-work-experts-say/>.

- **All Nazi ideology and activities must be rejected and prohibited.”**

European counterproposal: “Ukraine will adopt EU rules on religious tolerance and the protection of linguistic minorities.”

Recommendation and Analysis:

This point should either be deleted or elaborated. The provision should remove the reference to “Nazi ideology” and clarify what is meant by “discriminatory measures” and by “guaranteeing the rights of Ukrainian and Russian media and education.” If left as written, these provisions are likely to become sources of friction.

Ideological differences and conflicting historical narratives have long been central points of tension between Russia and Ukraine. Introducing provisions that attempt to regulate ideology, historical interpretation, or cultural policy within a peace agreement would only expand the list of potential triggers for future disputes during and after the peace process and could also offer Russia new pretexts for renewed aggression.

This point also inconsistently refers to obligations for Ukraine while avoiding explicit reference to Russia, relying instead on the vague formulation “both countries” rather than naming the parties. It is additionally unclear why Russia (unlike Ukraine) would not be required to “adopt EU rules on religious tolerance and the protection of linguistic minorities.” Such asymmetry undermines the credibility and fairness of the provision, creates selective interpretation, and risks embedding long-term sources of instability within the agreement.

21. “Territories:

- **Crimea, Luhansk and Donetsk will be recognized as de facto Russian, including by the United States.**
- **Kherson and Zaporizhzhia will be frozen along the line of contact, which will mean de facto recognition along the line of contact. Russia will relinquish other agreed territories it controls outside the five regions.**
- **Ukrainian forces will withdraw from the part of Donetsk Oblast that they currently control, and this withdrawal zone will be considered a neutral demilitarized buffer zone, internationally recognized as territory belonging to the Russian Federation. Russian forces will not enter this demilitarized zone.”**

European counterproposal: “Ukraine commits not to recover its occupied sovereign territory through military means. Negotiations on territorial swaps will start from the Line of Contact.”

Recommendation and Analysis:

Maintain the European counterproposal, which is significantly less contentious than the original version.

The original provision should be deleted, as it remains unclear which countries (aside from the United States) would recognize Crimea, Luhansk, and Donetsk as de facto Russian territory, or whether any of them were consulted before such a clause was drafted. The vague language also raises concerns about how such “recognition” would be implemented, monitored, and enforced.

Referring to “Kherson and Zaporizhzhia will be frozen along the line of contact” introduces its own risk. There is no line of contact in Kherson and Zaporizhzhia as the cities of Kherson and Zaporizhzhia are not occupied, while the Kherson and Zaporizhzhia regions are only partially occupied by Russia.

The clause stating that “Russia will relinquish other agreed territories it controls outside the five regions” is similarly undefined and unenforceable without clear mechanisms for identifying the “agreed” territories and the terms of withdrawal.

The point on “withdraw from the part of Donetsk Oblast” is deeply problematic as it proposes Ukrainian withdrawal from a heavily fortified and strategically advantageous part of Donetsk Oblast, when the plan states that this “withdrawal zone” would become “a neutral, demilitarized buffer zone, internationally recognized as territory belonging to the Russian Federation.” The claim that Russian forces would not enter this zone does little to reduce the long-term strategic risk of creating ambiguous territorial arrangements that Russia could later exploit.

22. “After agreeing on future territorial arrangements, both the Russian Federation and Ukraine undertake not to change these arrangements by force. Any security guarantees will not apply in the event of a breach of this commitment.”

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Clarify the meaning of “future territorial arrangements” or delete this point entirely. The language vaguely refers to “future territorial arrangements” and states that “both the Russian Federation and Ukraine undertake not to change these arrangements by force.” It is unclear whether these “arrangements” refer to outcomes defined within this document, to a separate agreement, or to future negotiations. Such ambiguity creates space for conflicting interpretations and could allow Russia to exploit the undefined term as a pretext for future territorial claims or pressure.

23. “Russia will not prevent Ukraine from using the Dnieper River for commercial activities, and agreements will be reached on the free transport of grain across the Black Sea.”

European counterproposal: (No change.)

Recommendation and Analysis:

Clarify or reconsider any provisions related to “using the Dnipro River” or “free transport of grain across the Black Sea.” Ensuring the export of Ukrainian grain is vital for both Ukraine’s economy and global food security, but tying this issue to an agreement with Russia carries substantial long-term risks. During the early years of Russia’s full-scale invasion, Ukraine entered a grain transport arrangement that ultimately enabled Russia to exert control over key parts of the Black Sea. Russia later systematically violated that agreement. Only after regaining initiative through naval drones and establishing independent maritime corridors was Ukraine able to restore grain exports on its own terms. Re-entering a similar arrangement

risks creating a new mechanism for Russia to claim supervisory authority over Black Sea routes and the Dniro River, potentially undermining Ukrainian sovereignty and giving Moscow fresh leverage or even a future pretext for renewed aggression.

24. “A humanitarian committee will be established to resolve outstanding issues:

- **All remaining prisoners and bodies will be exchanged on an ‘all for all’ basis.**
- **All civilian detainees and hostages will be returned, including children.**
- **A family reunification program will be implemented.**
- **Measures will be taken to alleviate the suffering of the victims of the conflict.”**

European counterproposal: (Minor wording changes.)

Recommendation and Analysis:

Strengthen and clarify the provisions related to reparations, humanitarian mechanisms, and victim-focused measures. Specifically, the agreement must establish a clear and enforceable compensation mechanism to ensure that Russia is held financially accountable for damages caused by its aggression.

The mandate, composition, and participating countries of the proposed “humanitarian committee” should be explicitly defined. The phrase “measures will be taken to alleviate the suffering of the victims of the conflict” requires clarity, including the specific measures envisioned, the categories of victims covered, and implementation mechanisms. Additionally, the scope of the family reunification program should be elaborated to clarify whether it applies only to abducted children or also to adults who were forcibly displaced or separated from their families in occupied territories. The text should also refer specifically to “prisoners of war,” rather than the broader and legally ambiguous term “prisoners.”

The lack of clarity opens the door to legal ambiguity, selective interpretation, and potential manipulation in future negotiations or enforcement.

25. “Ukraine will hold elections in 100 days.”

European counterproposal: “Ukraine will hold elections as soon as possible after the signing of the peace agreement.”

Recommendation and Analysis:

Delete this point. Under the Ukrainian Constitution, elections cannot be held under martial law, and they may take place only after martial law has been lifted for at least three months. Imposing an obligation to hold elections before a full ceasefire is secured creates added risk for Ukraine’s long-term stability. Conducting a national vote in an active or only partially frozen conflict environment would pose significant security threats and could become a major destabilizing factor rather than a step toward sustainable peace.

26. “All parties involved in this conflict will receive full amnesty for their actions during the war and agree not to make any claims or consider any complaints in the future.”

European counterproposal: “Provision will be made to address the suffering of victims of the conflict.”

Recommendation and Analysis:

Delete this point. Leading international humanitarian-law scholars and human-rights organizations maintain that war crimes, crimes against humanity, and genocide fall under universal jurisdiction.

27. “This agreement will be legally binding. Its implementation will be monitored and guaranteed by the Peace Council, headed by President Donald J. Trump. Sanctions will be imposed for violations.”

European counterproposal: (Substitutes “penalties” for “sanctions.”)

Recommendation and Analysis:

Clearly define the “sanctions” and/or “penalties” that will apply in cases of non-compliance. The Peace Council, if it is to serve as the primary oversight body, must be established and fully operational well before the agreement is signed to ensure effective monitoring from day one. Entrusting implementation and monitoring to a body that does not yet exist introduces significant uncertainty and risks delaying the actual peace process. Relying on a non-existent institution to enforce compliance also undermines credibility and leaves a critical enforcement mechanism undefined. Furthermore, the text fails to specify what types of sanctions would be imposed in the event of violations, leaving enforcement vague and potentially unenforceable.

28. “Once all parties agree to this memorandum, the ceasefire will take effect immediately after both sides retreat to agreed points to begin implementation of the agreement.”

European counterproposal: (Adds that “Ceasefire modalities, including monitoring, will be agreed by both parties under US supervision.”)

Recommendation and Analysis:

Clarify the ceasefire provision by explicitly defining withdrawal points and clearly identifying the signatory parties. This section is foundational to any credible agreement and must be unambiguous. As currently drafted, the ceasefire clause is vague and imprecise. It does not specify the timeline of the ceasefire or the “agreed points” to which forces on both sides are expected to withdraw, leaving a critical operational element undefined.

The text also blurs the identity of the actual signatories: although framed as a Russia–Ukraine peace plan, it assigns obligations not only to the parties to the conflict but also to the United States, the European Union, the G8, and even the World Bank—entities that cannot be presumed to be parties to a bilateral ceasefire agreement.