

Letter from Ukraine

*Holding Informed Risk Threshold
Conversations in the Face of Rapidly
Escalating Threats*

ILS visited Ukraine in August 2026 to undertake Risk Advisory work for a client operating in the context for several years.

During the two-week visit, one of our Senior Risk Advisors utilised several means of overland transport to travel to multiple cities and field locations across Ukraine.

This Risk Focus draws from their experiences and insights.

In the brief window of our visit to Ukraine, we witnessed how new Russian Force (RF) **capabilities**, coupled with a greater **willingness** to strike civilian infrastructure, have expanded risk exposure for NGOs.

As frontline dynamics stagnate and Ukrainian Force (UF) strike campaigns intensify, RF have greatly expanded their campaign of attacks on civilian warehouses, fuel stations, border crossings, the rail network, shopping malls and supermarkets.

This campaign has continued to accelerate in the summer and early Autumn, with August recording the **first attacks on fuel stations west of the Dnipro River** and September witnessing seven attacks on fuel stations in Kyiv.

A "*spiral of escalation*" is increasing risk exposure for NGOs:

- Fuel stations struck in Kyiv: 0 to 7*
- Strikes on border crossings: 0 to 8
- Strikes on shopping malls: 4** to 21
- Strikes on UZ rail network: 6 to 19

New RF weapons platforms and tactics - including a far greater willingness to target civilian transport and other infrastructure - has greatly increased the window of vulnerability for NGO staff and civilians.

**Jan-June compared to July-Sept '26; all figures are approximate.*

***Strikes were assessed to be the result of collateral exposure, as opposed to direct, deliberate targeting.*

Quote source: Philip P. O'Brien, *Weekend Update #202: Zelensky Tweets, Substack.*

Rapidly escalating strike threats across frontline, near-frontline, mid-range and long-range domains are testing the ability of established humanitarian security risk management frameworks to adapt to the rapidly escalating inter-state conflict.

Staff across several organisations operating in highly challenging near-frontline environments **questioned the effectiveness of current risk mitigation measures**, deconfliction mechanisms, and the protections provided by a principled adherence to neutral and independent postures.

These discussions reflected a broader crisis of confidence over whether humanitarian security approaches, largely developed during post-Cold War intra-state conflicts, remain **fit for purpose** in a rapidly escalating inter-state conflict.

While some organisations have expressed confidence in digital tools that help map and reduce near-frontline risk exposure, others questioned whether meaningful mitigation remains possible when state actors are willing and able to deploy increasingly sophisticated long-range weapons at scale.

Humanitarian organisations committed to operating in Ukraine, particularly near the frontline, should consider whether existing risk appetite statements adequately reflect both staff perceptions of risk *and* verified reporting of rising levels of conflict activity.

Reviewing risk appetite requires **meaningful engagement** with staff at all levels.

While some organisations may be ready to revisit these conversations at the HQ-level, others may benefit from an independent facilitator, particularly as staff face the challenge of risk habituation in the fifth year of the war.

These risk appetite conversations remain difficult to navigate in the face of rapidly evolving threats. Nevertheless, an ongoing effort to align risk thresholds across teams and ensure a common understanding of organisational '**red lines**' remains fundamental to Duty of Care.

The organisations best positioned to navigate the coming months will be those willing to have these conversations now, before Ukraine enters what is likely to be another challenging winter campaign against critical infrastructure.

One of the clearest lessons from Ukraine is that risk management frameworks **cannot remain static** while conflicts evolve.

As organisations continue to operate in increasingly complex environments, there is a growing need to regularly reassess assumptions, revisit risk thresholds, and ensure that security strategies remain aligned with operational realities.

At ILS, we support organisations facing these challenges across some of the world's most demanding contexts.

👉 Get in touch to discuss how we can support your team.