**The contributions of Ukraine on the draft General Recommendation on Racial discrimination**

Paragraphs 44—47 of the draft General Recommendation on Racial Discrimination in the Enjoyment of the Right to Health (hereinafter referred to as the General Recommendation) contain provisions on the need for states to ensure that data on racial disparities in health are collected. This is specified in paragraph 44 of the General Recommendation, “they should collect and monitor anonymized disaggregated quantitative and qualitative data, based on demographic and health indicators. Data should be disaggregated by any information about race, colour, descent, or national or ethnic origin and indigeneity, in conjunction with gender, age, disability, migratory and any other status”.

It should be noted that the implementation of such a recommendation will face difficulties as it contradicts national legislation both in Ukraine and in a few other European countries. Since 2002, Ukrainian legislation does not provide for the requirement to fix or collect data on the ethnicity of citizens of Ukraine (Resolution of the Cabinet of Ministers of Ukraine of September 12, 2002 № 1367 “On approval of samples of civil status records, descriptions of Civil Status Acts”, Rules 28 of State Registration of Civil Status Acts in Ukraine as amended in 2003, Resolution of the Cabinet of Ministers of Ukraine of November 10, 2010 № 1025 “On Approval of Samples of Civil Status Records, Descriptions and Samples of Certificates of State Registration of Civil Status Acts”). The State Statistics Service of Ukraine also does not carry out statistical accounting of persons belonging to national minorities and indigenous peoples. Thus, the only tool used by the Ukrainian state to collect data on ethnic composition is the All-Ukrainian Census, which was last conducted in 2001 and by its nature does not contain any data on health. Given such circumstances, it seems appropriate to take these circumstances into account when formulating the General Recommendation.