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RRR4U

Monitoring implementation of the IMF program and EU assistance

SPECIAL TOPIC

***“(Not) on time? Unfreezing prices and tariffs
in energy and utilities”***





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Summary

After the July scandal with anti-corruption bodies, the Ukrainian authorities abruptly shifted their stance and resumed fulfilling their commitments. President Zelensky stressed that fighting corruption and moving towards the EU must remain priorities. The government also finally appointed the head of the Bureau of Economic Security (BES). All this became an important signal to European partners and a way to preserve Ukraine's joint path to the EU together with Moldova.

Talks about a new cooperation programme with the IMF are ongoing, though there are no official details yet. The main problem is that the current agreement assumed a quick end to the war and the start of reconstruction, but those forecasts did not come true. It is expected that Ukraine's unfulfilled obligations will be carried over into the new programme, while the IMF itself may be more demanding of the Ukrainian authorities.

The government updated Ukraine's Plan for the Ukraine Facility and agreed on changes with the European Commission. Some reforms were decided to be accelerated, in particular the sale of state-owned banks and changes in the energy sector. The EU Council is expected to approve the updated Plan by the end of September, and in that case, starting from Q3 2025 Ukraine will report according to the new schedule. **In this presentation we use the version of the Ukraine Plan valid as of August, which does not yet reflect these changes.**

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Monitoring of the implementation of structural benchmarks under the IMF programme



Completed
on time



Completed,
but not on
time



In
progress



Not completed



Status of IMF program implementation

The **ninth review of the IMF program is expected to take place in November–December**. The fulfilment of quantitative performance criteria and structural benchmarks as **of the end of September 2025** will be assessed. In total, the authorities must fulfil **nine structural benchmarks** by the end of September.

At the same time, [according to RBC-Ukraine](#), as of August 11, 2025, the IMF mission will already be working at the end of August. In particular, the issue of either **revising the program in December or concluding a new program** will be discussed.

There are no official details yet, but there is a high probability that we will see a new program with the IMF by the end of the year. Some of the unfulfilled structural benchmarks from the current program may be included in the new program with the IMF.



Status of implementation of the benchmarks to be assessed during the ninth review



Completed — 4 (benchmarks 42, 44, 46, 56)



Not completed — 1 (benchmark 55)



Completed with a delay — 1 (benchmark 45)



In progress — 3 (benchmark 47, 50, 57)



Structural benchmarks implementation map



The IMF program

Fiscal sector/
Financial sector



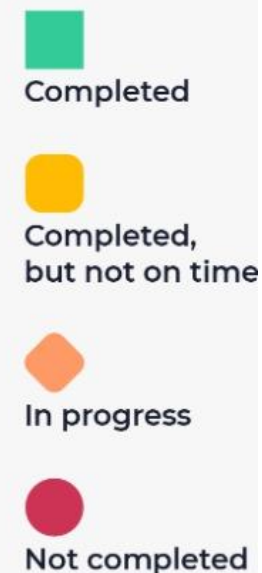
Monetary and
Exchange Rate



Governance/
Anti-Corruption



Energy/SOE Corporate
Governance





Ukraine implemented the first five structural benchmarks before the first programme review (June 2023)

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Benchmark 1 Changes to the 2023 budget — defence funding (end of April 2023)

Parliament approved the government's proposed amendments to the 2023 State Budget to provide for more and sustainable funding for defence and security, as well as funds for urgent reconstruction. In particular, spending on the reserve fund was doubled. The structure of administrators has also been optimised and two ministries have been merged into a single Ministry of Community, Territorial and Infrastructure Development, to which the Fund for the Elimination of the Consequences of Armed Aggression has been transferred.

Benchmark 2 Restricting spontaneous changes to the budget law and restoring medium-term planning (end of May 2023)

To this end, a draft law was registered in parliament which, among other things, allowed the Rada to consider only those changes to the state budget that had received an expert opinion from the Ministry of Finance, and also restored medium-term budget planning. In June, the budget committee updated the text, which subsequently became law (see benchmark 10 for more details).

Benchmark 3 Preparation of a tax reform plan for the roadmap of the National Revenue Strategy (end of May 2023)

The Ministry of Finance has prepared a corresponding action plan, as evidenced by the IMF's first programme assessment document. However, this plan is not publicly available. The document should serve as the basis for the preparation of the National Revenue Strategy (see Benchmark 20).

Benchmark 4 Registration of a draft law on restrictions on state guarantees (end of May 2023)

The relevant changes are intended to promote higher debt sustainability of the state. Provisions for the implementation of this benchmark were included in draft law 9346 together with provisions for the implementation of benchmark 2 (see benchmark 10 for more details).

Benchmark 5 Transparency and accountability of funds in special accounts of the NBU with UNITED24 (end of May 2023)

In April 2023, parliament passed a law (3035–IX) to improve the transparency and accountability of accounts opened with the NBU by administrators of funds for charitable assistance and donations. This primarily concerned accounts on the UNITED24 platform. Thus, a legislative framework for the transparent collection and expenditure of funds from state charity accounts was finally established.



Status of implementation of benchmarks 6-9

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Benchmark 6 Preparation of a strategy for transition to a flexible exchange rate (end of June 2023)

On 29 June 2023, the NBU Board approved the Strategy for Easing Foreign Exchange Restrictions, Transition to Greater Exchange Rate Flexibility and Return to Inflation Targeting. The public version of the Strategy [was published on](#) 7 July.

Benchmark 7 Restoration of pre-war taxation (end of July 2023)

At the end of June 2023, the Verkhovna Rada adopted [a](#) corresponding [bill](#). However, this law reinstated inspections only for producers of excisable goods, gambling businesses, and financial companies. Other businesses could operate without inspections.

On 9 November, parliament passed [a bill](#) in its second reading expanding the circle of taxpayers who may be subject to scheduled documentary audits from 1 December 2023. At the same time, the President of Ukraine signed [Law 3453-IX](#) in early December, but it only came into force on 8 January 2023.

Benchmark 8 Reform of corporate governance of the TSO: transfer of the Ministry of Energy's stake and amendment of the charter

(end of July 2023)

The first part of the benchmark was completed on 22 September, when the CMU [transferred](#) the corporate rights of LLC "GTS Operator of Ukraine" to the Ministry of Energy. The second part was completed only at the end of October, when the Ministry of Energy approved the updated charter of the GTS Operator, as agreed with the Energy Community Secretariat. The document [appeared](#) on the company's website on 31 October.

Benchmark 9 Resumption of declarations by officials (end of July 2023)

In September 2023, parliament passed [a bill](#) stipulating that the register of declarations would remain closed for another year. Declarants could voluntarily make their data publicly available. The public and international partners reacted negatively to this news. As a result, the President of Ukraine vetoed the law and submitted his proposals, which would open the register of declarations immediately.

On 20 September 2023, parliament reconsidered the above-mentioned bill and adopted it with the President's proposals. [Law 3384-IX](#) entered into force on 12 October 2023. On 10 December 2023, the NACP [announced](#) that the Register of Declarations was now open to the public.



Status of implementation of benchmarks 10-13

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Benchmark 10 Restoring medium-term budget planning, developing a debt strategy and limiting risks under state guarantees (end of September 2023)

In July, Parliament adopted [the necessary amendments to the Budget Code \(BC\)](#) to improve the predictability and transparency of fiscal policy in the medium term.

Benchmark 11 Submission of a medium-term budget forecast and fiscal risk report in the documents accompanying the draft State Budget for 2024 (end of September 2023)

On 15 September 2023, the government submitted to Parliament [a draft law](#) on the State Budget for 2024 with a large list of explanatory documents. The package included the following documents: planned KPIs for budget programmes in 2022-2026; forecasts of budgetary and macroeconomic indicators for 2025-2026; priority fiscal policy objectives; and expenditure ceilings for the period 2022-2026.

Benchmark 12 Strengthening financial monitoring of politically exposed persons (PEPs) (end of September 2023)

On 17 October 2023, the Verkhovna Rada adopted [a draft law](#) that effectively restores the lifetime status of politically exposed persons (PEPs). At the same time, it strengthens the responsibility of banks for unjustified refusal to provide financial services to users. [Law 3419-IX](#) entered into force on 29 October 2023.

Benchmark 13 Strengthening banking supervision (end of September 2023)

The implementation of this benchmark will bring banking supervision in Ukraine into line with European Union directives.

Point I: On 21 April 2023, the National Bank of Ukraine [separated](#) the Department for Monitoring Bank-Related Persons and the Department for Integrated Banking Supervision.

Point II: The NBU introduced supervisory panels without public communication. The supervisory panels are to advise the Supervisory Committee and additionally analyse its decisions independently, facilitate horizontal communication between stakeholders, and highlight particularly important issues.

Paragraph III: On 29 July 2023, the NBU [resumed](#) scheduled on-site inspections of banks and non-bank institutions in a remote format so as not to expose its employees to danger.



Status of implementation of benchmarks 14-17

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Benchmark 14 Tax and customs authorities must prepare a reform plan (end of October 2023)

The State Tax Service (STS) and the State Customs Service (SCS) were supposed to prepare action plans by the end of October, which would then be integrated into the overall National Revenue Strategy. On 23-27 October, representatives of the STS and SCS met with IMF representatives to discuss progress. The second review of the IMF programme showed that this Benchmark was achieved on time and in full.

Benchmark 15 Update and publication of the Medium-Term Public Debt Management Strategy (end of October 2023)

On 27 October, the Ministry of Finance adopted [a](#) separate [Strategy](#), which clearly outlines plans to conduct a public debt management operation and intentions to adopt an updated Strategy thereafter. The document states that the Ministry of Finance plans to take these steps with the aim of: "(i) gradually restoring Ukraine's debt sustainability, (ii) maintaining liquidity and reducing the state budget deficit during the IMF programme period, and (iii) creating the necessary conditions for the commercial sector to participate in Ukraine's post-war reconstruction in order to restore Ukraine's market access as soon as possible."

Benchmark 16 Simplifying the system of declaration of public officials (end of October 2023)

[The draft law](#) on the resumption of declarations, adopted in September 2023, provides that the NACP will ensure access to and automatic transfer of data from other registers and databases to the declaration form. At the same time, the automatic filling in of existing data does not exempt the declarant from the obligation to indicate in the declaration all information known to them, even if it is not available in other databases.

Benchmark 17 Reform of corporate governance of the TSO: appointment of the Supervisory Board (end of October 2023)

On 31 October, the Government [approved](#) the composition of the company's Supervisory Board: three independent members and one state representative, thus fulfilling this Benchmark on time. However, the appointment of another state representative to complete the five-member board remains an open issue.

According to [the Charter](#), the Supervisory Board of the GTS Operator should consist of five members, three of whom should be independent. As of the end of April 2024, five members had not been appointed and no statements had been made by the Government on this matter.



Status of implementation of benchmarks 18-21

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Benchmark 18 Better management of public investment (end of December 2023)

In line with the change in approaches to PIM, in December the CMU adopted a protocol decision on the draft [Roadmap for Reforming Public Investment Management](#), which aims to ensure "the formation of a context, vision of the main principles and directions for building a comprehensive, sustainable and effective public investment management system that ensures the planning of investment projects based on strategic priorities and a medium-term budgetary framework, their selection in accordance with unified and transparent procedures and clear criteria, and their implementation within the planned time frame and financing."

Benchmark 19 Approval of the National Revenue Strategy until the end of 2023 (end of December 2023)

The National Revenue Strategy aims to create conditions for increasing domestic budget revenues. To this end, Ukraine needs to strengthen its capacity to collect tax and customs revenues. On 27 December 2023, [the government approved](#) the National Revenue Strategy, meeting the conditions for the IMF programme's Benchmark in a timely manner.

Benchmark 20 Strengthening the institutional independence of the SAPO (end of December 2023)

On December 08, 2023, the Verkhovna Rada adopted the relevant draft law. [Law 3509-IX](#) entered into force on January 1, 2024. It aims to: improve the procedure for competitive selection of heads and prosecutors of the SAPO; strengthen the SAPO's ability to regulate its own organisational structure and activities; clarify the powers of the Head of the SAPO; establish a Specialised Disciplinary Commission of SAPO prosecutors; and conduct regular audits of the SAPO's activities with the participation of external experts with international experience.

Benchmark 21 Budget amendments to create new sources of revenue (end of February 2024)

Based on the conclusions of the working group on revenues established in December 2023, the government was to prepare short-term measures to increase revenues by at least 0.5 per cent of GDP, with a view to making the necessary changes to the 2024 budget if necessary.

The measures proposed by the Ministry of Finance to mobilise additional revenues envisage an increase in budget revenues of UAH 44.2 billion. The measures include increasing revenues from military and excise duties and introducing monthly advance payments of corporate income tax by companies engaged in retail fuel sales.



Status of implementation of benchmarks 22 - 25

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Benchmark 22 Concept note on the 5-7-9 programme for greater support to SMEs (originally end of September 2023, postponed to end of March 2024)

In December 2023, [the government adopted amendments](#) to the resolution on support under this programme, narrowing the provision of compensation for investment projects and working capital for non-priority sectors to small and medium-sized enterprises only (large companies may continue to receive support for working capital in priority sectors). In March 2024, the government submitted a concept for the 5-7-9 programme to the IMF, but it has not been made public or officially approved.

Benchmark 23 Optimise and improve the efficiency of the High Anti-Corruption Court (end of April 2024 (postponed from end of March 2024))

On April 24, 2024, the Verkhovna Rada adopted [Draft Law 11130](#), which provides that cases in the court of first instance shall be heard by a single judge. It also stipulates that cases may be heard by a three-judge panel only at the request of the accused in certain categories of crimes.

The law came into force on May 16, 2024.

Benchmark 24 Restart of the BES (end of June 2024)

On 20 June 2024, the Verkhovna Rada adopted draft law 10439, the text of which has been agreed with international partners. On 28 June, it was signed by the president.

Next, a professional, independent head of the BES must be selected and the process of reforming the institution must begin. The law provides for a change in leadership and the re-certification of all employees of the bureau. The head will be selected by a commission of six members, three of whom will be appointed by international experts and three by the Cabinet of Ministers.

Benchmark 25 Preparation of a methodology for assessing tax incentives (end of September 2024, postponed from the end of July)

The review of tax incentives should be a step towards broadening the domestic revenue base without raising tax rates.

The Ministry of Finance of Ukraine approved the necessary methodology by Order 474 of 27 September 2024 "On Approval of the Methodology for Assessing Tax Policy Instruments that Lead to Tax Expenditures."



Status of implementation of benchmarks 26 - 29

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Benchmark 26 Assessment of fiscal and quasi-fiscal losses from SOEs (end of September 2024)

The Ministry of Finance submitted appendices to the draft State Budget for 2025, presenting quasi-fiscal losses from SOEs, as well as a report on fiscal risks, which provides an assessment of quasi-fiscal losses and the results of stress testing of SOEs.

Benchmark 27 Adoption of amendments to the Customs Code of Ukraine in line with best international practices (end of October 2024)

As stated in the Memorandum, amendments to the Customs Code of Ukraine must be aligned with EU standards. The State Customs Service must continue to report to the Ministry of Finance. As businesses often complain about corruption in the State Customs Service, one area for change should be to strengthen staff integrity and introduce a management selection process based on a transparent competition involving international experts. It is also noted that other reforms in 2024 include (i) modernising the framework for administrative liability for customs violations and (ii) developing criteria for assessing the impact of the State Customs Service's Anti-Corruption Programme. Parliament adopted two draft laws that together comply with the above provisions: [10411](#) and [6490-d](#).

Benchmark 28 Medium-term budget planning: analysis and update (end of October 2024)

According to information from the Ministry of Finance, with technical assistance from the IMF, a report was prepared presenting a diagnostic review of pre-war policies and practices for medium-term budget planning compared to best practices. As of 30 October, the text of the report had not been made public, but we are recording this benchmark as "completed".

Benchmark 29 NBU assessment of risks to financial stability under adverse scenarios and preparation of contingency plans (end of October 2024)

According to NBU officials, the benchmark has been completed, the assessment has been carried out, and plans have been prepared. Although there has been no public communication on this, the IMF has assessed this indicator as completed.



Status of implementation of benchmarks 30 - 33

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Benchmark 30 Audit of the financial condition of the TCE before and after February 2022 (originally scheduled for the end of June 2024, postponed to the end of October 2024)

As of early September, according to the Cabinet of Ministers' Reform Matrix, the indicator is considered fulfilled, but information or reports on the audit are not publicly available. In addition, on 20 December 2024, the IMF approved the 6th review of the Extended Fund Facility (EFF) programme, stating in its report that Ukraine had successfully completed the audit of the financial condition of the TCE.

Benchmark 31 Improving the management of state-owned enterprises (originally end of August 2024, postponed to end of October 2024)

In the Memorandum, the Ukrainian side noted its intention to improve the efficiency of SOE management through further reform of SOE corporate governance in close cooperation with international partners. Thus, a law on corporate governance of state-owned enterprises was adopted (in February 2024), the financial condition and fiscal risks of state-owned enterprises in state property policy were assessed, and in early October 2024, [the Ministry of Economy presented a draft State Property Policy](#).

Benchmark 32 Action plan and schedule for the implementation of the Roadmap for Reforming the Public Investment Management System (end of December 2024)

This benchmark is essentially a continuation of steps to improve the efficiency of public investment management, the roadmap for reforming which was adopted in accordance with structural benchmark 18. It is envisaged that the relevant documents will establish a link between PIP management and medium-term budget planning.

To implement this benchmark, the government has adopted [an action plan and a schedule for implementing the roadmap](#) for developing public investment management procedures, as well as [criteria for prioritising public investment projects](#) for 2025.

Benchmark 33 Adoption of amendments to the law to reform the Accounting Chamber of Ukraine (end of December 2024)

[The](#) relevant [draft law](#) was adopted in the first reading on 19 September 2024 and in its entirety on 30 October 2024. The adopted draft law meets the requirements set out in the Letter of Intent in the IMF programme.



Status of implementation of benchmarks 34–37

Full reviews of implementation are available here: rrr4u.org/analytics

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Benchmark 34 Strengthening the functional independence of the NEURC (end of December 2024)

On 27 December 2023, the NEURC [approved](#) a draft law "On Amendments to Certain Laws of Ukraine Regarding Strengthening the Independence of the Regulator in the Energy and Utilities Sectors." With this decision, the Regulator began implementing [the Action Plan](#) to Ensure the Independence of the NEURC. Law [3915-IX](#) of 21 August 2024 amended Law [3354-IX](#) "On Law-Making Activities", exempting the NEURC from the requirement to register its decisions with the Ministry of Justice of Ukraine. This resolved the conflict with Part 6 of Article 14 of the Law on the NEURC ("The decisions of the Regulator are not subject to state registration by the Ministry of Justice of Ukraine"). However, the Law "On Law-Making" has only entered into force, but most of its provisions, in particular those concerning the functional independence of the NEURC, will come into force one year after the termination of martial law.

Benchmark 35 Complete the formation of the supervisory board of Ukrenergo, where the majority of the seven members will be independent (end of December 2024)

[On](#) 26 November, the Cabinet of Ministers approved four candidates selected for the positions of members of the supervisory board of Ukrenergo: Patrick Roland Greichen, Luigi De Francisci, Jørgen Eide, and Jan Henrik Montell as independent members. On 11 December, the Cabinet of Ministers [approved](#) the new composition of the Ukrenergo Supervisory Board, consisting of seven members, including state representatives Yuriy Boyko, Anatoliy Huley and Oleksiy Nikitin.

Benchmark 36 Preparation of principles for bank recovery (end of December 2024)

According to our information, the NBU has submitted to the IMF draft amendments that need to be adopted for the approval of the new methodology, and this has been counted as the implementation of a structural benchmark.

Benchmark 37 New risk assessment methodology for supervisory purposes (originally end of June 2024, postponed to end of December 2024)

In the government's Reform Matrix, the NBU reports on the implementation of this structural benchmark. According to our information, the new methodology was approved on time, without public reporting.



Status of implementation of benchmarks 38-41

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Benchmark 38 Establish a new administrative court to replace the liquidated KDAC (initially end of July 2024, postponed to end of December 2024)

On February 26, 2025, the Parliament, in fact, with a delay of almost 2 months, fulfilled the structural benchmark and adopted as a whole the draft law [12368-1](#) on the establishment and functioning of the Specialised District Administrative Court as a court of first instance to consider administrative cases involving state bodies such as the NAPC, the NBU, the ESBP and the Specialised Administrative Court of Appeal, which will act as a court of appeal for these disputes. On March 24, 2025, the President signed the above draft law. The High Qualification Commission of Judges of Ukraine (HQCJ) was to announce a competition for judges within one month after the law came into force.

Benchmark 39 Amendments to the Budget Code on the integration of the PIM into the budget process, mandatory prioritisation and provision of IT solutions (end of January 2025)

On 16 January, the relevant amendments to the Budget Code were adopted by parliament ([draft law 12245](#)). However, since the Memorandum identifies the adoption of amendments to the Budget Code as a structural Benchmark, we consider this Benchmark to have been achieved. The President signed the amendments to the Budget Code in March.

Benchmark 40 Preparation of a strategy for the NSSMC (end of January 2025)

The Memorandum with the IMF provided that the NSSMC would develop a reorganisation strategy, conduct an assessment of its work with the participation of international partners, update the Code of Ethics and, together with the NBU, improve capital flow regulation by the end of 2024. The seventh review of the IMF programme noted that all components of benchmark 48 had been implemented, except for the assessment of the NSSMC's performance. As a result, the benchmark was deemed unfulfilled and the assessment was moved to a new separate benchmark 49. Later, the unfulfilled benchmark 48 was renumbered to benchmark 40.

Benchmark 41 Adoption of the methodological framework underlying the PIM process (end of February 2025)

On 16 January, the relevant amendments to the Budget Code were adopted by parliament ([draft law 12245](#)) – Benchmark 39, and on 28 February (the last day of the Benchmark implementation period), in accordance with these amendments, the CMU adopted the main regulatory acts governing the stages of public investment management reform implementation.



Benchmark 42 New tax reporting requirements for digital platform operators
(end of April 2025)

Sector: fiscal sector

Status: completed

The government has confirmed to the IMF its commitment to streamlining the simplified taxation system in the medium term, which currently provides ample opportunities for tax evasion.

Back in August 2024, the Ministry of Finance discussed with digital platform operators the concept of introducing reporting on their users' income. The Ministry of Finance wants to establish for digital platform operators, such as online services offering taxi services, property rentals, marketplaces and applications for the sale of goods and services, to collect certain information about users of such digital resources and to submit an annual report to the State Tax Service of Ukraine on the income they receive from certain types of activities.

Such measures are aimed at improving tax administration and expanding the tax base, thereby increasing the amount of taxes collected.

The new requirements in the form of a draft law were approved by the Cabinet of Ministers on 29 April. Draft law 13232 was registered in the Verkhovna Rada on 30 April 2025.

**Benchmark 43** Appoint a permanent head of the State Custom Service

(end of December 2025)

Sphere: fiscal sector

Status: in progress

In accordance with Structural Benchmark 28, amendments to the Customs Code were adopted, which, among other things, provided for the need to hold a competition with the participation of independent experts to select a permanent head of the State Customs Service. The relevant amendments were signed by the President on 17 October 2024.

The head of the State Custom Service was initially supposed to be appointed by the end of June 2025, but by that date, no competition for the position had even been announced.

The impossibility of implementing the benchmark was clear as early as May. Therefore, following the IMF Mission's visit in May 2025, it was agreed that the first priority for the 8th review of the Programme would be to prepare a customs reform plan. On 17 June, the government announced that it was preparing such a plan.

At the same time, the deadline for the implementation of the benchmark itself – the appointment of a permanent head of the State Custom Service – was postponed from the end of June to the end of December 2025 during the eighth review of the program.

On August 4, [the government announced an open competition](#) for the head of the State Customs Service. A commission of international and Ukrainian representatives has also been established to select the head.

**Benchmark 44** Submit the Budget Declaration for 2026-2028 on time

(end of June 2025)

Sector: fiscal sector

Status: completed

Restoring medium-term budget planning is one of the key priorities of the IMF Programme. That is why quite a few benchmarks are dedicated to its restoration and effective implementation.

In particular, medium-term budget planning is addressed in Benchmarks 10, 11, 25, and 29.

This is because restoring medium-term budget planning increases the predictability, transparency and effectiveness of fiscal policy.

In January, the Ministry of Finance sent an instructional letter to all budget administrators. The Ministry of Economy is working on assumptions for the macroeconomic forecast for 2026-2028.

In March and April, the Ministry of Finance moved towards preparing the Declaration, received the first forecast estimates, and is forecasting the main budget indicators in accordance with [the](#) preparation [schedule](#). Accordingly, the assumptions for the main parameters on which the indicators of the Declaration are based were agreed upon, the Ministry of Economy provided separate forecast indicators for economic development, and the Ministry of Finance is holding coordination meetings with the main budget administrators.

The Government approved the Budget Declaration for 2026-2028 at its meeting on 27 June. Thus, the structural benchmark has been met. The next step will be the submission of the 2026-2028 Budget Declaration by the Government to the Verkhovna Rada of Ukraine for consideration.



Benchmark 45 **Appoint a new head of ESBU**
(end of July 2025 (postponed from end of February 2025))

Sector: fiscal sector

Status: completed, but not on time (not completed as of the end of February 2025)

This benchmark is a continuation of the previous one on rebooting the Bureau of Economic Security (BES). While the earlier benchmark required only the entry into force of the relevant law, the new one is aimed at the implementation of the BES reform. The BES must focus on major economic and financial crimes, and its analytical capacity must be strengthened. The law should also establish reliable mechanisms to ensure transparency, accountability, and integrity.

The new head of the BES will approve the procedure for staff certification and set up a certification commission within three months of appointment. Measures in the area of anti-money laundering and counter-terrorist financing, as well as cooperation with the State Financial Monitoring Service, should also be used to further support the detection of tax crimes and smuggling. This requires strengthening the analytical capacity of the authorities and improving information exchange.

The new head of the BES was supposed to be selected by the end of February 2025. Ukraine failed to meet this benchmark on time, as the competitive process was still at an early stage. In the seventh IMF review, the deadline for the benchmark was extended to July 2025. At the end of June, Oleksandr Tsyvinskyi won the competition, but the Cabinet of Ministers refused to appoint him in violation of the law. The government eventually appointed Tsyvinskyi as Director of the BES on 6 August 2025. Thus, the benchmark was completed with a delay (not on time).



Benchmark 46 Approval by the Strategic Investment Council
of the Unified Project Portfolio

(end of August 2025)

Sphere: fiscal sector

Status: in progress

In the IMF Program, one of the reforms and changes that is receiving great attention is the reform of the public investment management system. It has already been given a number of structural beacons, starting with the adoption of the reform roadmap in December 2023.

The reform is designed to introduce a holistic, effective and transparent system of public finance management at the national and regional levels.

In September 2024, a pilot Single Project Pipeline (SPP) was formed, which was formed very quickly.

Now, in accordance with the new structural beacon added during the 8th revision of the Program, an updated Unified Project Pipeline must be approved by the end of August. This must be done by the already established Strategic Investment Council.

In June, the Cabinet of Ministers approved [The Medium-Term Plan of Priority Public Investments for 2026-2028](#), which is closely linked to the Budget Declaration for these years. The new Single Project Pipeline was approved by the Government Strategic Investment Council on August 26, 2025. Therefore, the beacon has been implemented.



Benchmark 47 The Ministry of Finance, the State Tax Service, and the State Custom Service will develop an operational plan to update the IT strategy

(end of September 2025)

Sector: Fiscal sector

Status: In progress

This structural Benchmark provides that the Ministry of Finance, together with the State Tax Service and the State Custom Service, will develop an operational plan for the implementation of an updated IT strategy. The strategy should include important steps towards digitalisation necessary for the implementation of the National Revenue Strategy adopted at the end of 2023.

The plan will define steps for the digital transformation of the State Tax Service and the State Customs Service, with a focus on modernising and consolidating IT systems.

Today, individual measures to prevent tax evasion and minimise the tax burden are of limited effectiveness, as the State Tax Service and the State Customs Service use different IT systems that do not allow for the exchange of information between the different registers and databases of the two services. In 2019, the CMU adopted a resolution on the creation of a unified IT system for the State Tax Service and the State Migration Service, but this has never been implemented.

At the same time, the need for consolidation remains high.

**Benchmark 48** Adoption of sectoral strategies in line with the reformed**PIM system**

(end of December 2025)

Sector: Fiscal sector

Status: In progress

During the seventh review of the Programme, another structural Benchmark was added regarding the implementation of public investment management reform.

In accordance with decisions already adopted by the government, by the end of 2025, ministries must ensure the adoption of sectoral strategies that will define priorities for public investment projects.

This is important because clear sectoral priorities need to be defined and agreed upon to ensure the effective use of limited funds for public investment projects. In line with the principles of the new PIM system, there needs to be a link between strategies and budgeting.

The government has already taken important decisions to implement sectoral strategies. According to available information, the process of developing relevant strategies has already begun. At the same time, DREAM is awaiting updates for the needs of public investment management.

In June, the CMU approved [the Medium-Term Plan for Priority Public Investments for 2026-2028](#), which is closely linked to the Budget Declaration for these years.



Benchmark 49 Systemic state-owned banks fall within the remit of the Ministry of Finance. Non-systemic state-owned banks are not recapitalised at the expense of the state
(on an ongoing basis)

Sector: financial sector

Status: completed, but additional action may be required

Three state-owned banks are registered with the CMU representing the state (Oschadbank, Ukreximbank, Privatbank). Ukrgasbank and Sens Bank are owned by the state through the Ministry of Finance. In practice, the functions of a shareholder of state-owned banks are mainly performed by the Ministry of Finance, although key decisions are made by the Government on the recommendation of the Ministry of Finance.

During the full-scale war, Sens Bank (formerly Alfa), PINbank (First Investment Bank) and Motorbank were nationalised. Sens Bank was sold to the state for 1 hryvnia by the Deposit Guarantee Fund as part of a market exit procedure due to sanctions against its owners. The other two banks were transferred to the state by decision of the High Anti-Corruption Court.

Currently, the benchmark has been completed: all banks in state ownership, except for PINbank and Motor Bank, are systemic, and the Ministry of Finance is responsible for managing systemic banks either directly or through decisions of the Government developed by the Ministry of Finance. As of August 1, 2025, PinBank and Motor Bank had capital of less than UAH 200 million and therefore violated the prudential ratio N1 and were also loss-making in 2024. If the banks do not return to profitability, the NBU will need to transfer them to the Deposit Guarantee Fund for resolution in order to achieve the benchmark. On February 4, the state-owned shares of PinBank were transferred to the Ministry of Development for possible transfer to Ukrposhta to form a financial inclusion bank. This could resolve the issue of the bank's profitability, but for this to happen, the President must sign the relevant draft law 13018-d, which has remained unsigned for almost three months as of 30 August. Motor Bank showed a slight profit in the first half of 2025.



Benchmark 50 Independent verification of compliance and integrity of members of the NSSMC
(end of August 2025, postponed from end of June 2025)

Sector: financial sector

Status: in progress



To strengthen the institutional framework and effectiveness, and to address delays in the start of the compliance and integrity review (structural Benchmark 48 not completed), the NSSMC will conduct an independent compliance and integrity review of the Chair and members of the NSSMC.

On 21 May, a meeting with the IMF mission took place at the NSSMC. The parties discussed several important issues: independent compliance review of individual Commission staff members with legal requirements, capital flow management (CFM) measures, and priority areas for financial market infrastructure development.

Ukraine failed to meet this Benchmark on time, and in the updated programme, its deadline was moved to the end of August 2025. Work on the implementation of the relevant Benchmark continues. [According to](#) media reports, constant delays and missed deadlines could result in the replacement of Ruslan Mahomedov as Chair of the NSSMC. There is no public information on the implementation of this structural benchmark — it is likely that it may once again remain unfulfilled.



Benchmark 51 Preparation and submission to parliament of a draft law
on critical risks posed by third parties in the financial sector
(end of September 2025)

Sector: financial sector

Status: in progress

The benchmark aims to extend the NBU's rules to companies that provide services critical to the functioning of banks. Among other things, this refers to the smartphone banking model, where the bank's operations (such as Monobank) are closely linked to non-banking companies that are currently not subject to regulation. It is proposed to extend the NBU's requirements for business reputation and professional competence to these companies.

According to the latest Memorandum on Economic and Financial Policy, the NBU was supposed to prepare a concept for the supervision of critically important third parties in March, but the deadline for the implementation of the benchmark was postponed from May to September. However, communication about the NBU's efforts in this direction remains limited.



Benchmark 52 Preparation of a roadmap for financial market infrastructure reforms to attract private capital
(end of October 2025)

Sector: financial sector

Status: in progress

The roadmap is to be prepared by the NBU and the NSSMC. The roadmap will identify measures for:

- further coordination and development of project portfolios in the public, private and public-private sectors;
- interaction with market participants on market instrument reforms;
- prioritising new market instruments, including securitisation, mortgage bonds, syndicated loans and loan sub-partnerships;
- reforming existing investment mechanisms (including JIIs — joint investment initiatives) and lending instruments (such as factoring and leasing).

This roadmap provides a framework for the development of a deep and efficient financial market in Ukraine. It aims to attract private capital through modern financial instruments, strengthen cooperation between the public and private sectors, and modernise the investment environment. This is critical for economic recovery and sustainable growth in the post-war reconstruction context.



Benchmark 53 Introduction of European and international property valuation standards in agreement with IFIs

(end of December 2025)

Sector: financial sector

Status: in progress

Local valuation standards are outdated and need to be harmonised with European (TEGOVA) and international (IVS) standards. This will strengthen confidence in real estate and bank collateral valuation among both businesses and public authorities, and facilitate cross-border transactions.

The unification of valuation standards is a prerequisite for transparent asset circulation and the development of financial markets. It creates the conditions for better collateral quality, reduced risks in the banking sector and more active participation of international investors.

Steps to implement the benchmark:

- Submission of amendments to the Valuation Act to parliament by the end of August 2025.
- Adoption of the law by the end of December 2025.
- Preparation of an implementation roadmap, including transitional provisions, regulatory support, training for valuers of financial assets (banking, insurance assets, collateral) and the creation of a register of financial asset valuations.



Benchmark 54 Submit legislative amendments to bring securitisation and mortgage bonds into line with international standards and best practices
(end of March 2026)

Sector: financial sector

Status: in progress

Legislative changes need to be prepared to align the framework for securitisation and mortgage bonds with international standards. Such instruments are key to enabling institutional investors to invest in Ukrainian assets while adhering to strict risk constraints. This will open access to long-term capital, enhance market confidence, and foster the development of domestic investors.



Benchmark 55 Cancel the "Lozovyi's amendments " and allow the SAPO to manage requests for extradition and mutual legal assistance (Slide 1/2)
(postponed to the end of July 2025, postponed from December 2024)

Sector: governance/anti-corruption

Status: not completed

The Structural Benchmark provides for amendments to the CPC, in particular regarding:

- enabling the Prosecutor General to delegate to the SAPO the management of requests for extradition and mutual legal assistance in connection with the investigation of corruption offences;
- abolishing the mandatory closure of pre-trial investigations due to the expiry of the pre-trial investigation period after notification of suspicion (the so-called "Lozovyi's amendments");
- granting the investigating judge the power, after the expiry of the time limit and at the request of the accused or victims, to promptly urge prosecutors to take a decision on the pre-trial investigation (either to close the proceedings or to complete the pre-trial investigation) or to refuse to grant the request.

The issue of repealing the "Lozovyi's amendments" has long been on the Ukrainian agenda. The ambassadors of the G7 countries, in [a letter](#) dated November 2023 to the Speaker of the Verkhovna Rada, noted the need to abolish the restrictions in the CPC on the time limits for pre-trial investigation prior to notification of suspicion, "in order to prevent premature closure of cases."

In December 2023, the Verkhovna Rada only partially repealed the "Lozovyi's amendments". It is therefore not surprising that [the Memorandum with the IMF of 17 June 2024](#) was supplemented with a benchmark on the repeal of the "Lozovyi's amendments".

**The "Lozovyi's amendments" refer to a series of amendments to the Commercial Procedure Code, the Civil Procedure Code, the Criminal Procedure Code, as well as to the Code of Administrative Procedure of Ukraine and other regulatory and legal acts proposed by People's Deputy Andriy Lozovyi.*



Benchmark 55 Cancel the "Lozovyi's amendments " and allow the SAP to manage requests for extradition and mutual legal assistance (Slide 2/2)
(postponed to the end of July 2025, postponed from December 2024)

Sector: governance/anti-corruption

Status: not completed

At the end of December 2025, the Government registered a new draft law [12367](#) in the Verkhovna Rada aimed at repealing the "Lozovoy amendments". In addition, three alternative draft laws were registered ([12367-1](#), [12367-2](#), [12367-3](#)). At the same time, on 16 January, the parliament did not support the inclusion of any of the above-mentioned draft laws in the agenda.

It is worth noting the different positions taken by the interested parties on the above-mentioned draft laws:

- Business associations (the Union of Ukrainian Entrepreneurs, the Federation of Employers of Ukraine, etc.) and the Ukrainian Chamber of Commerce and Industry [called on](#) the Verkhovna Rada not to support any of the above-mentioned draft laws and proposed to initiate a broad discussion with business representatives, experts and the public to develop balanced changes that would improve access to justice without creating additional risks for business;
- Instead, NABU and SAPO [supported](#) an alternative draft law [12367-3](#), which, in their opinion, is aimed at improving the effectiveness of pre-trial investigations and ensuring the inevitability of punishment for corruption offences, and called on MPs to support it in the first reading and as a whole.

It should be noted that the deadline for the implementation of the benchmark has already been postponed twice. The current Memorandum with the IMF stipulates that Parliament must adopt the relevant amendments to the CPC by August 01, 2025. At the same time, it is highly likely that the Ukrainian side will not be able to meet this benchmark. [According to Forbes Ukraine](#), the repeal of the "Lozovyi's amendments" may be included in the new programme with the IMF.



Benchmark 56 Publish a report on the results of the external audit of the NABU (postponed to end July 2025, ot fulfilled by end February 2025)

Sector: governance/anti-corruption

Status: completed

The issue of an external audit of the NABU has been on the Ukrainian agenda for quite some time. Both the International Monetary Fund and the European Commission have repeatedly pointed out the need for it. In the [Memorandum on Economic and Financial Policy of 5 December 2018](#), the Ukrainian side promised to complete the external audit of the NABU by the end of July 2019. However, this promise was never flfilled.

Under the current programme, Ukraine also had problems with the NABU audit. It was originally supposed to be completed by the end of September 2024. Instead, in early September, the Cabinet of Ministers only [approved](#) the composition of the Commission for the Audit of the NABU (which was defined as a preliminary measure in the [Memorandum of 04.10.2024](#)). The audit of the NABU could not be completed by the seventh revision of the programme, so the deadline for its implementation was postponed to the end of July 2025.

At the same time, on May 02, 2025, the CMU website published a report on the results of the external independent assessment (audit) of the NABU for the period from March 2023 to November 2024.

Robert Westbrooks, Chairman of the Commission, [commented](#) on the results of the audit: *"We assessed NABU's performance as reasonably effective in its investigations and international cooperation. Overall, we assessed the NABU's performance as moderately effective and made recommendations to further improve its performance."*

More details on the findings of the NABU's external audit can be found [here](#).



Benchmark 57 Review the process of selecting and appointing members of supervisory boards of state-owned enterprises and adopt relevant amendments to subordinate legislation of the CMU (end of August 2025)

Sector: SOE corporate governance

Status: in progress



The corporate governance reform at state-owned enterprises (SOEs) continues. In March 2024, the President signed the [Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine on Improving Corporate Governance" \(3587-IX\)](#), which launched a new stage of the reform. The next step is its full implementation. In particular, the government has adopted a [procedure for assessing](#) whether SOEs achieve the goals from the owner's expectations, a [procedure for reporting](#) by supervisory boards, and a [procedure for evaluating](#) their performance.

In the [Memorandum on Economic and Financial Policy of 21 March 2025](#), the Ukrainian side committed to review the procedures for selecting and appointing members of SOE supervisory boards in consultation with IMF experts and international partners and to amend the relevant bylaws of the Cabinet of Ministers (Resolutions 142 and 143 of 10 March 2017).

The first phase of the review will focus on improving the efficiency of the Nomination Committee (NC), in particular by standardising recruitment documentation and increasing the transparency of NC decisions. At the same time, a roadmap for more substantial medium-term reforms in the selection of members of SOE supervisory boards will be adopted in line with international best practices, taking into account the status of the SOE and the results of the selection. In particular, the roadmap will be aimed at: a) streamlining and centralising the selection process for supervisory board candidates, in particular through a monitoring process agreed with the IFIs; b) clearly defining and delineating the roles and responsibilities of key decision makers; c) improving the efficiency of each stage of the process and thus reducing the time to complete the selection; d) ensuring that supervisory boards have the right composition, taking into account the profile of the SOE and the required competencies; and e) improving the onboarding process for new board members.

[According to Forbes Ukraine](#), corporate reform of SOEs, in particular the transparent selection and appointment of members of supervisory boards and managers of state-owned companies, may be included in the new programme with the IMF.



Benchmark 58 Complete and publish an external assessment of the NEURC with the involvement of the Energy Community Secretariat (end of December 2025, *postponed from end of October 2025*)

Sector: energy

Status: in progress

The benchmark aims to strengthen the independence and accountability of the NEURC. Ukraine has committed to developing an accountability framework for the NEURC, which includes regular external assessments of the Regulator's governance and independence.

Thus, in accordance with this structural benchmark, the Government of Ukraine must ensure support for regular external evaluations of the NEURC's independence and governance systems every 2–3 years. The first external evaluation is expected to be carried out by the Energy Community Secretariat, completed and published by October 2025. It will also be important to take into account and implement the recommendations received.

At the end of February 2025, at the RRR4U event, Andrej Juriš, Head of the ECRB Department of the Energy Community Secretariat, [confirmed](#) his readiness to conduct such an assessment, which will cover various aspects of independence as enshrined in EU legislation, both as reflected in national legislation and in practice. On March 26, representatives of the National Commission for the Regulation of Energy and Power Generation of Ukraine [met](#) with a delegation of the Energy Community Secretariat, where they discussed the Regulator's further steps in creating a favorable regulatory environment for the liberalization of energy markets and the implementation of Ukraine's international obligations.

The IMF, within the framework of the 8th review of the program, [emphasized](#) the critical importance of strengthening the independence and accountability of the National Commission for the Regulation of Energy and Power Generation of Ukraine. In the Memorandum on Economic and Financial Policy, the Government of Ukraine committed to ensuring the development of a legislative framework for the implementation of a system of regular external assessments of the regulatory capacity and institutional independence. The relevant draft law should be adopted taking into account the recommendations of the Energy Community Secretariat. In order to align this process with the legislative schedule, the IMF agreed to postpone the structural beacon for the publication of the external assessment of the National Commission for the Regulation of Energy and Power Generation of Ukraine from the end of October to the end of December 2025.

On August 21, the Energy Community Secretariat [published](#) a report by the Energy Market Observatory of Ukraine, which noted the risk of paralysis of the National Commission for the Regulation of Energy and Utilities of Ukraine due to the minimum required number of members (from July 1, 2025, it operates with 4 members out of the 7 required). The CMU's delay in appointments threatens the independence of the Regulator, investor confidence, and harmonization of legislation with the EU.

Monitoring the implementation of the indicators of the Ukraine Plan



Completed
on time



Completed,
but not on
time



In
progress



Not
completed





Status of implementation of the Ukraine Plan

RRR4U

- Only on August 22, Ukraine received a tranche from the EU for fulfilling the indicators of the first quarter: **EUR 3.05 bn instead of the planned EUR 4.48 bn** as three indicators were not met at the moment of reporting
- **2 indicators of the first quarter and 3 indicators of the second quarter have not yet been met.** But, on August 27, the government launched transparent international tenders for concluding production sharing agreements, and the Parliament approved the draft law on Vocational Education, which is the President's signature.
- **The government** will most likely submit **a report** to the European Commission on the implementation of indicators for the second quarter in **the first week of September** - again, the money will come later

At the end of August
5 indicators were not met

- ✗ 4.3. Increase the staffing of the VAKS
- ✗ 9.1. Reform of the territorial organization of the executive branch

Q1

The amount of loss is EUR 840 m
(losses for two indicators, money for the ARMA law will be received on the results of the new report)

- ✗ 3.5. Changes regarding the review and verification of judges' declarations of integrity
- ✗ 3.8. Reform of digitalization of enforcement proceedings

Q2

- ✓ 7.1. Reform of the vocational education system
- ✓ 13.4. Launch of transparent international PSA tenders

The amount of loss is EUR 700 m
(subject to signing of the law on vocational education)



Meanwhile, the Government has made changes to Ukraine Plan

- On August 1, **the Cabinet of Ministers made [amendments to Ukraine Plan](#)**, as provided for by the Ukraine Facility rules.
- The relevant changes **must be approved by the European Commission and the EU Council** (which is expected by the end of September).
- Three indicators were **brought forward**
 - Law on the sale of state-owned banks – moved from Q1 2026 to Q3 2025 (completed)
 - National Waste Management Plan – moved from Q1 2026 to Q3 2025 (already completed)
 - Law for the Electricity Integration Package – moved from Q4 to Q3 2025 (passed first reading)
- Two indicators **were split** into several with different implementation timelines
 - Creation of a new court for administrative cases = Law on the establishment of the Specialized District Administrative Court and the Specialized Administrative Court of Appeal, start of transparent selection of judges in Q3 2025 + establishment of the new court for administrative cases in Q4 2025
 - Railway Transport Law = Law on Railway Traffic Safety and Interoperability in Q4 2025 + Law on the Railway Transport Market in Q4 2026
- **Eleven indicators were postponed**



Complex indicators were postponed

- The selection procedure for civil service - from Q3 to Q4 2025.
- Digitalization of civil service and human resources management – from Q1 to Q2 2026.
- Law to improve the resolution of problem loans – from Q1 to Q2 2026.
- Separation of PSO and non-PSO activities in SEs – from Q3 to Q4 2025.
- Renewal of the law on state aid – from Q3 to Q4 2025.
- Legislation from military to civilian life to be changed to the law on veterans' policy - from Q4 2025 to Q3 2026.
- Deregulation Action Plan – from Q3 to Q4 2025
- Law on permitting procedures for renewable energy sources - from Q3 to Q4 2025
- Lifting the moratorium on increasing tariffs for heat and hot water – from Q4 2025 to Q4 2026.
- Support for district heating – from Q3 to Q4 2025.
- Merchant Shipping Law – from Q2 to Q4 2026



Map of implementation of UKRAINE PLAN indicators





Status of implementation of the indicators of the UKRAINE PLAN for the Q2 2024

Full reviews of the implementation are available here: rrr4u.org/analytics

RRR4U

INDICATOR 2.2 Approval of the digitalisation plan for the State Customs Service

In accordance with the provisions of the NSD, the Ministry of Finance adopted [the Long-Term National Strategic Plan](#) for Digital Development, Digital Transformation and Digitalisation of the State Customs Service in February 2024.

INDICATOR 2.3 Approval of the Budget Declaration for 2025-2027

The Budget Declaration was finally approved on 28 June 2024, on the last working day of the quarter. This is likely due to the fact that a positive decision by the IMF Executive Board on the fourth review of the Programme was awaited. Thus, the macro indicators on which the budget indicators of the Declaration for 2025-2027 are based differ from the IMF's macro forecast. The Budget Declaration contains forecast revenues, one of the components of which is an additional package of tax measures. As there is no certainty regarding the amount of international support, it remains limited, which has forced the government to envisage a reduction in expenditure on almost all functions except defence in 2025, and on defence as well in the following two years.

INDICATOR 2.7 Approval of the Action Plan for the implementation of the Roadmap for Public Investment Management Reform

Improving the quality of public investment management (PIM) will allow for more economical and efficient use of public funds in a context of limited budget resources. One of the steps should be to unify PIM approaches and introduce competitive selection of projects for budget financing.

The Action Plan for the implementation of the Roadmap for PIM reform was approved [in June 2024](#).

INDICATOR 4.2 Appointment of a new head of the National Agency for Corruption Prevention

On 13 November 2023, the official website of the Cabinet of Ministers of Ukraine published [an announcement on the conditions and terms of the competition](#) for the position of Head of the National Agency for Corruption Prevention (NACP).

Following the results of the competitive selection process, Viktor Pavluschyk was appointed Head of the National Agency for Corruption Prevention by Order of the Cabinet of Ministers of Ukraine 162-r of 27 February 2024.



Status of implementation of the UKRAINE PLAN indicators set for the Q2 2024

Full reviews of implementation are available here: rrr4u.org/analytics

INDICATOR 6.2 Entry into force of the Law on Corporate Governance of State-Owned Companies

In February 2024, parliament passed a law improving corporate governance in Ukraine. In March, it was signed by the president and entered into force on the day of its publication. Under the adopted law, state-owned companies must have supervisory boards with clearly defined powers and responsibilities, and the government must develop a state property policy. A compliance, risk management and internal audit mechanism has also been introduced.

INDICATOR 8.3 Entry into force of legislation revising the legal basis for the activities of the ESBU

On 20 June, the Verkhovna Rada adopted draft law 10439, the text of which has been agreed with international partners. On 28 June, it was signed by the president and came into force. The new legislation will pave the way for the renewal of the ESBU's management and detectives through transparent competitions. This will provide an opportunity to transform the bureau into an effective body that will prevent economic crimes and schemes that cause damage to the budget.

INDICATOR 10.1 Development and approval of an Integrated National Energy and Climate Plan

On 25 June, the NEP was [approved](#) by a resolution of the Cabinet of Ministers of Ukraine, and the text [was published](#) on the website of the Ministry of Economy. In October, the English version of the NEP [was published](#).

INDICATOR 10.15 Adoption of a Strategy for the Thermal Modernisation of Buildings for the Period until 2050 and an Action Plan for its Implementation

In accordance with [the order](#) of the Cabinet of Ministers of 29 December 2023 1228-r, the Strategy for the Thermal Modernisation of Buildings in Ukraine until 2050 was approved, the concept of the State Targeted Economic Programme for the Support of Thermal Modernisation of Buildings until 2030, and the Operational Action Plan for its implementation in 2024-2026, which sets out a long-term plan for the gradual renovation of Ukraine's building stock, taking into account energy-saving technologies.

INDICATOR 12.8 Adoption of a strategy for mine action until 2033 and a system for prioritising areas subject to demining

The Mine Action Strategy until 2033 and the Operational Plan for 2024-2026 were adopted by [the CMU Resolution](#) on 28 June 2024.



Status of implementation of the indicators of the UKRAINE PLAN for the Q3 2024

Full reviews of implementation are available here: rrr4u.org/analytics

INDICATOR 4.1 Increase in the number of employees of the Specialised Anti-Corruption Prosecutor's Office

To achieve this indicator, the Specialised Anti-Corruption Prosecutor's Office was to be given the opportunity to increase its staff from 10% to at least 15% of the staff of the National Anti-Corruption Bureau. To implement this indicator, the Verkhovna Rada of Ukraine adopted draft law 10060 of 08.12.2023, which stipulates that the total number of employees of the Specialised Anti-Corruption Prosecutor's Office shall be 15% of the maximum number of employees of the central and territorial offices of the National Anti-Corruption Bureau of Ukraine established by law.

INDICATOR 4.4 Entry into force of amendments to the Criminal Code and the Criminal Procedure Code

The indicator was not met on time. On 29 October 2024, the Verkhovna Rada adopted draft law 12039 as a basis and as a whole, and on 31 October 2024, the law was signed by the President and entered into force on 1 November 2024.

INDICATOR 4.6 Approval of the action plan for the implementation of the Asset Recovery Strategy for 2023–2025

As part of this indicator, the Cabinet of Ministers of Ukraine was supposed to adopt and publish an Action Plan for the Implementation of the Asset Recovery Strategy for 2023–2025. As a result, on 13 August 2024, [the Cabinet of Ministers of Ukraine](#) approved the previously prepared Action Plan for the Implementation of the Asset Recovery Strategy for 2024–2025 [by Order 759-r](#).

INDICATOR 7.6 Approval of a comprehensive Demographic Development Strategy until 2040

On 30 September, the government adopted a Demographic Development Strategy until 2040. The next step towards its implementation is the adoption of a detailed Action Plan.

INDICATOR 8.1 Adoption of an Action Plan for Deregulation

In early September, the government approved [an updated action plan for deregulation](#). It includes 99 measures, most of which are planned to be implemented this year. The plan mainly provides for the abolition of a number of permits that, according to the plan's developers, are outdated or irrelevant. It also provides for the support of a number of deregulation bills, including those on state control (5837) and foreign economic activity (5167). There are also a number of measures to improve existing regulations.



Status of implementation of UKRAINE PLAN indicators set for the Q3 2024

Full performance reviews are available here: rrr4u.org/analytics

INDICATOR 9.5 Entry into force of legislation amending the State Regional Development Strategy for 2021-2027

On 13 August, the Government adopted [an updated SRDS](#), which identifies new challenges as well as strategic and operational objectives.

At the same time, [the Action Plan](#) for the implementation of the SRDS was not updated, although logically it should also have been amended.

INDICATOR 10.8 Entry into force of amendments to the Criminal Code and the Criminal Procedure Code

The NEURC approved the following procedures and requirements:

- [Procedure](#) for acquiring, suspending and terminating the status of data transfer administrator (Resolution 2613 of 27 December 2023);
- [Procedure](#) for the functioning of insider information platforms (Resolution 137 of 16 January 2024);
- [Requirements](#) for ensuring integrity and transparency in the wholesale energy market (Resolution 614 of 27 March 2024) (On 23 August 2024, the NEURC [published](#) draft amendments to the Requirements, the collection of comments and proposals lasted until 9 September, and an open discussion will take place on 31 October);
- [Procedure](#) for submitting information on commercial transactions with wholesale energy products (Resolution 618 of 27 March 2024).

On 2 October, the Cabinet of Ministers of Ukraine [approved](#) the technical specifications for the development of an information system to ensure the performance of the NEURC's functions, thereby completing this indicator.

INDICATOR 15.1 Adoption and entry into force of the Law of Ukraine on the prevention, reduction and control of industrial pollution

At the end of April 2024, the Ministry of Environmental Protection and Natural Resources published [a draft](#) concept note for discussion. The collection of comments and proposals [lasted](#) until 30 May. According to the position expressed by the Ministry of Environmental Protection during the public discussion held on 14 May 2024, [the purpose and objective](#) of the memorandum is to summarise all existing deviations from EIA procedures in a single document, to determine the body responsible for deciding on such deviations, the period of application of the deviations and to provide justification for their application.

On 18 September, the Ministry of Environmental Protection and Natural Resources [published](#) the final version of the Concept Note defining the scope of deviations from the EIA and SEA rules.

INDICATOR 13.1. Adoption of the Law of Ukraine "On Amendments to the State Programme for the Development of the Mineral Resource Base of Ukraine for the Period until 2030"

As part of the reform to improve planning and ensure optimal conditions for attracting strategic investors, one of the steps is the adoption of the Law of Ukraine "On Amendments to the State Programme for the Development of Ukraine's Mineral Resource Base for the Period until 2030".

On 18 December, the Verkhovna Rada [adopted](#) in the second reading and as a whole the updated state programme for the development of Ukraine's mineral resource base until 2030. Thus, the indicator is considered fulfilled.



Status of implementation of the UKRAINE PLAN indicators set for the Q4 2024

Full reviews of implementation are available here: rrr4u.org/analytics

INDICATOR 2.1. Approval of the strategic plan for the digitalisation of the State Tax Service

Within the framework of this indicator, the adoption of a Strategic Plan for the Digitalisation of the State Tax Service was envisaged, taking into account the recommendations set out in the National Revenue Strategy until 2030.

At the end of 2024, the Ministry of Finance published [a Plan](#) containing the measures previously mentioned in the NSD. Integration with the DAC7 international information exchange system should also be ensured.

Stakeholders should pay attention to ensuring the monitoring of the implementation of the State Tax Service initiatives specified in the document, as the assessment of the effectiveness of this [Plan](#) is currently the responsibility of the State Tax Service together with the Ministry of Finance and the Ministry of Digital Transformation.

INDICATOR 3.6. Legislation to improve the bankruptcy regime has entered into force

The indicator is part of the reforms to regulate insolvency and enforce court decisions.

The new legislation should focus on preventing bankruptcy and restoring the solvency of debtors, timely detection of signs of crisis in enterprises, identifying additional opportunities for restoring the solvency of companies, and making information on insolvency prevention and early warning mechanisms available to companies.

On 19 September 2024, the Verkhovna Rada adopted the relevant law (draft 10143 of 12 October 2023). On 22 September, the law was signed by the President. The law entered into force on 23 January 2025.

INDICATOR 6.1. Adoption of a state property policy and ranking of state-owned companies

In March 2024, a law updating the rules for managing state-owned enterprises came into force (indicator 6.2). On 29 November 2024, the government approved [the State Property Policy](#).

The policy sets out the basic principles for managing state-owned enterprises and the procedure for dividing them into those that will remain in state ownership to ensure the objectives of state policy and those that will be privatised, liquidated or reorganised for partial privatisation. It also defines the category of enterprises that will remain in state ownership during martial law.

On 27 December 2024, the Government approved [by protocol decision](#) the lists of state-owned enterprises by category.

INDICATOR 7.5. Approval of two strategies: the Strategy for Reforming Psychoneurological and Other Residential Institutions and Deinstitutionalisation of Care for Persons with Disabilities and Older Persons, and the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024-2028

The indicator is part of the reform to improve social infrastructure.

The Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment was approved by Cabinet of Ministers Order 1201-r of 26 November 2024. The Strategy for Reforming Residential and Psychoneurological Institutions for Adults was approved by the Cabinet of Ministers on 24 December 2024, 1315-r.



Status of implementation of UKRAINE PLAN indicators set for the Q4 2024

Full performance reviews are available here: rrr4u.org/analytics

INDICATOR 8.7. Entry into force of legislation on the resumption of market surveillance and control measures for non-food products, including product safety checks

In order to restore market surveillance and control measures for non-food products, including product safety checks, Cabinet of Ministers [Resolution 261 of 08.03.2024](#) "On Amendments to the Resolutions of the Cabinet of Ministers of Ukraine of 13 March 2022 303 and 550 of 3 May 2022".

INDICATOR 9.6. Entry into force of legislation for the development of urban planning at the local level

In order to implement this indicator, the Cabinet of Ministers of Ukraine developed [Resolution 254 of 05.03.2024](#) "Some issues of the implementation of a pilot project on the creation of a Unified State Register of Administrative-Territorial Units and Territories of Territorial Communities, a Unified State Register of Addresses, Register of Buildings and Structures as part of the Unified State Electronic System in the Field of Construction".

Another act of the CMU, namely [Resolution 909 of 09.08.2024](#), regulated the implementation of a pilot project on the introduction of an urban development cadastre at the state level.

[Resolution 1111 of the CMU dated 26.09.2024](#) introduced the concept of an administrator of the Urban Development Cadastre and an electronic system for the pilot project and defined their powers.

The digitisation of urban planning services, in particular the project to introduce a digital Urban Planning Cadastre at the state level, is important because it effectively consolidates previously scattered urban planning documentation that existed on paper in various local government bodies.

INDICATOR 10.2. Introduction of a market-based concept for renewable energy

On 1 March, the Cabinet of Ministers approved [Resolution 232](#), which provides for improving the procedure for holding auctions to allocate support quotas for renewable energy sources.

On 13 August, the Cabinet of Ministers [issued](#) a corresponding order [establishing](#) an additional annual support quota for 2024 in the amount of 110 MW.

On 29 November, the Cabinet of Ministers [approved](#) a schedule for auctions to allocate renewable energy support quotas for 2025, as well as indicative renewable energy support quotas until 2029.

INDICATOR 10.10. Ensuring the independence of the NEURC

The regulator [has developed](#) an Action Plan to ensure its independence in accordance with Ukraine's international commitments.

On 27 December 2023, the NEURC [approved](#) the draft Law of Ukraine "On Amendments to Certain Laws of Ukraine to Strengthen the Independence of the Regulator in the Energy and Utilities Sectors." With this decision, the Regulator began implementing [the Action Plan](#).

Law [3915-IX](#) of 21 August 2024 amended Law [3354-IX](#) "On Law-Making Activity", exempting the NEURC from the requirement to register its decisions. This resolved the conflict with Article 14(6) of the Law on the NEURC. However, the Law "On Law-Making" has only entered into force, but most of its provisions, in particular those concerning the functional independence of the NEURC, will come into effect one year after the termination of martial law.



Status of implementation of the indicators of the UKRAINE PLAN for the Q4 2024

RRR4U

Full performance reviews are available here: rrr4u.org/analytics

INDICATOR 11.1. Adoption of an updated National Transport Strategy of Ukraine for the period until 2030

The strategy aims to achieve the following objectives, which are in line with the requirements of the UKRAINE PLAN::

- restoring and developing a competitive and efficient transport system integrated into the Trans-European Transport Network (TEN-T);
- high-quality passenger transport and unimpeded mobility;
- safe, environmentally friendly and energy-efficient transport with a view to decarbonisation;
- institutional capacity, human capital and effective management.

The National Transport Strategy of Ukraine for the period up to 2030 and the operational plan for its implementation in 2025-2027 were approved by the Cabinet of Ministers on 27 December 2024 ([Resolution 1550](#)).

INDICATOR 11.2. Adoption of a Strategy for the Development and Expansion of Border Infrastructure with European Union Member States and Moldova by 2030

On 24 December 2024, the CMU approved the Strategy and the operational plan for its implementation in 2024-2030 [by Order 1337-r](#).

The Strategy aims to build 17 and modernise 29 border crossing points with EU countries and Moldova. Ukraine also aims to conclude a joint control agreement with each EU neighbouring country. The project is to be extended to all road checkpoints. In addition, the first railway rolling stock scanners in Ukraine are to be purchased and put into operation. Doubts about the feasibility of this measure arise from the reconstruction of Ukrainian railway tracks to European standards. While approximately 3 km of tracks were reconstructed in 2024, this figure is expected to reach 100 km in two years. Given the high cost and chronic lack of funding, the implementation of this measure may prove difficult.

INDICATOR 12.1. Adoption of the Strategy for the Development of Agriculture and Rural Areas for the Period until 2030

The government approved [the final version](#) of the Strategy on 15 November 2024.

The Strategy aims to achieve food security, ensure the sustainability of the agricultural sector and promote the efficient use of land.

INDICATOR 12.5. The Law on the State Agricultural Register entered into force

The indicator is part of a reform aimed at improving the official public electronic register of farms.

On 19 September 2024, the Verkhovna Rada adopted the law, which was signed [by](#) the President on 17 October.

INDICATOR 13.1. Adoption of the Law of Ukraine "On Amendments to the State Programme for the Development of the Mineral Resource Base of Ukraine for the Period until 2030"

As part of the reform to improve Ukraine's investment attractiveness, one of the steps is the adoption of the Law of Ukraine "On Amendments to the State Programme for the Development of Ukraine's Mineral Resources Base for the Period until 2030".

On 18 December, the Verkhovna Rada [adopted](#) in the second reading and as a whole the updated state programme for the development of Ukraine's mineral resource base until 2030.



Indicator 1.1. Entry into force of legislation on civil service pay reform (Q1 2025)

Sector: Public Administration Reform

Status: Completed, but not on time

For years, the pay system in the civil service was pretty messed up. A big chunk of it was variable, which made it hard to predict how much you'd get, and how much you got depended on your boss. The large variable component also encouraged the retention of vacant positions in order to pay bonuses from savings in the wage fund. This policy for determining the level of remuneration in the civil service is not in line with best international practice.

Indicator 1.1 provides for the entry into force of legislation (**including subordinate legislation**) that complies with the principles of public administration set out in the Organisation for Economic Co-operation and Development (OECD) SIGMA programme. The reform provides for:

- the introduction of remuneration based on a functional classification of positions;
- a clear division of wages into a fixed or guaranteed part and a variable part;
- reducing the length-of-service allowance from 50% to 30%.

Some of the relevant changes for 2024 have already been implemented [by the CMU Resolution "Issues of remuneration of civil servants based on job classification in 2024"](#): accordingly, in 2024, the approaches to remuneration based on grades were changed and the variable component of remuneration was reduced. At the same time, these changes must be systematically defined by law: the relevant draft law [8222](#) was adopted as a basis on 28 July 2023, and was passed in its entirety on 11 March 2025 and sent to the President for signature on 17 March.

The President [signed the draft law](#) only on 3 June. The entry into force of the law allowed the government to adopt two resolutions on 6 June:

- [On the approval of the Procedure for the formation of the wage fund for civil servants in state bodies](#)
- [On amendments to the resolution of the Cabinet of Ministers of Ukraine 1409 of 29 December 2023](#)

Therefore, the indicator has been implemented, but with a delay.



Indicator 4.3. Increase the staffing of the High Anti-Corruption Court (SLIDE

1/4)

(Q1 2025)

Sector: fight against corruption and money laundering

Status: not completed

UKRAINE PLAN proposed increasing the number of judges in the High Anti-Corruption Court (HACC) by resuming the work of the Public Council of International Experts (PCIE). To implement this measure, the number of HACC judges must be increased by 60% and the number of HACC staff by 40%.

This indicator should be considered in close conjunction with others related to strengthening the capacity of anti-corruption institutions to ensure that they are able to cope with their workload within a reasonable time frame without being overburdened.

At the beginning of the court's establishment in 2018, the High Council of Justice (HCJ) approved the staffing level of the HACC at 39 judges, including 12 judges in the Appeals Chamber.

In 2023, the HCJ received a request from the Head of the HACC to increase the number of HACC judges. In accordance with the procedure, the HCJ, having heard the positions of the SJA and the HACC, [decided to temporarily determine](#) (until the approval of staffing standards for courts and the implementation of new calculations based on them) the number of judges in the HACC at 63 positions, of which 21 are judges of the Appeals Chamber.

As for increasing the court staff, the High Council of Justice planned to increase the number of staff from 326 [to 414](#) in 2024, which still does not meet the target of 40%.

In November 2023, a competition for 24 positions in the High Anti-Corruption Court began, but it was delayed, in particular due to the expiry of the powers of the then composition of the High Qualification Commission. At the end of April 2024, [a new composition of the High Qualification Commission](#) was formed. Based on [the results](#) of the first stage of the qualification assessment "Exam" for the HACC, **only 7 participants successfully continued their participation** and were admitted to the next stage – "Dossier review and interview".

Following the assessment of the dossiers and interviews [by the High Qualification Commission and the PCIE on 17 February 2024, it was established](#) that **two of the seven candidates** met the criteria and would continue to participate in the competition for the High Anti-Corruption Court. **On 19 March 2025, the High Qualification Commission [approved two winners of the competition](#)** for vacant positions of judges in the High Anti-Corruption Court.



Indicator 4.3. Increase the staffing of the High Anti-Corruption Court (SLIDE 2/4) (Q1 2025)

Sector: fight against corruption and money laundering

Status: not completed

In addition to the competition for the selection of judges to the High Anti-Corruption Court as a court of first instance, the High Council of Justice, by its decision of 23 January 2025, also [launched a competition](#) for vacant positions of judges in the Appeals Chamber of the Court.

For the purposes of this competition, 10 positions were vacant. The deadline for submitting documents and applications for participation in the competition [was postponed by](#) the HCJ from April to June.

According to [information](#) from the High Qualification Commission of Judges, as of 17 March 2025, 25 positions remained vacant in the High Anti-Corruption Court (almost 40% of the established maximum number of judges), including 10 positions in the Court of Appeal (not including two judges to be approved by the High Council of Justice by its decision of 19 March 2025).

However, ultimately, **it is unrealistic to achieve this indicator within the timeframe set out in UKRAINE PLAN, as has been highlighted repeatedly in previous monitoring reports.**

The indicator can only be considered fulfilled if the EU takes a flexible approach to assessment, evaluating the formal decision to increase the number of judges and staff of the High Anti-Corruption Court without actually filling the vacancies.

[The report](#) of the Accounting Chamber on ensuring the functioning of the HACC, approved on 19 December 2024, once again highlighted the problem of staff shortages. According to the report, during the period of the Court's operation, from September 2019 to November 2024, the number of pending criminal proceedings doubled, while the number of cases examined increased 2.2 times.

The report also directly pointed to [the risk of failure to achieve the indicator](#) for increasing the staffing of the High Anti-Corruption Court due to the lengthy competition for judges' positions.



Indicator 4.3. Increase the staffing of the High Anti-Corruption Court (SLIDE 3/4)
(Q1 2025)

Sector: fight against corruption and money laundering

Status: not completed

To fix the issues with the previous rounds of selection for the High Council of Justice, Ukrainian MPs put forward draft law [13114](#) in March 2025.

It proposed to ease the conditions for candidates for the position of judge through the following steps:

- expanding the list of potential participants in the competition;
- the High Qualification Commission of Judges was proposed to independently determine the passing score for successfully passing the exam on the history of Ukrainian statehood (compared to the existing requirement at the level of the law to score at least 75% of the maximum score);
- the requirement to conduct an interview with the competition commission should only apply to candidates for positions in local courts; for other courts, the commission should make a recommendation on appointment or refusal of appointment based on the results of its own meeting;
- It is proposed to abolish the requirement to prevent candidates from re-entering the competition. Currently, the relevant law establishes a rule preventing such candidates from participating in the competition for one year. This rule should apply for the period of martial law in Ukraine and for one year thereafter.

At the same time, some **controversial provisions** have been included in the draft law. In particular, the eligibility criteria for persons who previously worked in the NABU and SAPO have not been reduced. Their length of service in these bodies should exceed 10 years, rather than 5 years as proposed for other bodies in the amendments. In addition, questions arise regarding the complete restriction of access to information about persons undergoing military service or those who are in occupied territories or areas where hostilities are taking place. Such a restriction can only be applied to information that is sensitive during a period of martial law.

In its [conclusion](#), the relevant committee supported the draft law and **proposed that it be included in the agenda of the Verkhovna Rada**. In addition, the Committee granted the HQC's request to halve the deadline for submitting amendments and proposals to the draft law. The HQC's motivation was to start selecting candidates for the HACC, and the provisions of the draft law provide for the possibility of expanding the list of potential participants, which could increase the chances of a successful selection.

However, **the Verkhovna Rada failed to vote on the inclusion of this draft law in the agenda three times** at its meetings, so **there was no** chance that it would be adopted before the start of the new competition for the High Anti-Corruption Court.



Indicator 4.3. Increase the staffing of the High Anti-Corruption Court (SLIDE 4/4)
(Q1 2025)

Sector: fight against corruption and money laundering

Status: not completed

Instead, on 14 May 2025, the Verkhovna Rada adopted Draft Law [12331-2](#), which included provisions from Draft Law [13114](#) that simplify the procedure for applying for and participating in competitions for judicial positions. In particular, the provision requiring candidates for the High Council of Justice, appellate courts, and the Supreme Court to pass a final interview with the High Qualification Commission of Judges was removed. The draft law also provided for changes in the determination of successful completion of the exam on the history of Ukrainian statehood. Previously, the exam was considered passed if the candidate scored 75% or more correct answers. The new rules provide that the passing score for this exam will be determined by the High Qualification Commission independently. Finally, a provision was approved allowing candidates who failed the qualification assessment or did not appear for it to reapply for the competition (previously, there was a one-year ban on reapplying for the competition).

The President of Ukraine was able to sign Bill [12331-2](#) only on 3 June 2025. In order for the simplifications for the new competition for the High Council of Justice to take effect, the next competition was postponed. Thus, on 3 June 2025, the High Qualification Commission of Judges announced [a new competition](#) to fill 23 vacant judge positions. Of these, 10 are to be selected for the Appeals Chamber and 13 for the court of first instance.

A special feature of this recruitment is that participants applying for the competition can apply for both a vacant position in the Appeals Chamber and a position among the judges of the court of first instance on a ranking basis. Participants with the highest scores will have the opportunity to become judges in the Appeals Chamber.

The deadline for submitting documents for participation in the competition is from 7 July to 6 August 2025 (inclusive).

As of 28 July 2025, 41 candidates had applied to participate in the competition, which is still half the number of candidates who participated in the previous competition, which resulted in the selection of two judges for vacant positions. However, potential candidates have just over a week left to submit their applications for the competition.

Thus, the indicator remains **unfulfilled** as of the end of July.



Indicator 4.7. Entry into force of the law on reforming the ARMA (Q1 2025)

Sector: fight against corruption and money laundering

Status: completed, but not on time

To implement this indicator, it is proposed to adopt a law reforming the National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes (ARMA), with subsequent entry into force. The law should focus on:

- a transparent and merit-based selection procedure for the agency's head, including a check for integrity and professionalism that inspires confidence;
- an independent external performance evaluation system;
- a transparent procedure for the management and sale of seized assets under the agency's control.

Back in 2023, draft law [10069](#) was registered to amend certain legislative acts of Ukraine to improve the effectiveness of activities in the field of identification, search and management of assets, which was criticised by [the public](#) due to the excessive powers granted and the risk of duplication of functions with the State Property Fund of Ukraine.

On 2 January 2025, the CMU submitted draft law [12374](#) to the Verkhovna Rada, proposing to reform ARMA. Alternative draft laws [12374-1](#) and [12374-2](#) were also submitted. Among the advantages of the draft laws are the regulation of control over the activities of the ARMA and the competitive selection of its management, but these draft laws are not in line with the vision of reform outlined in UKRAINE PLAN, as was also pointed out by [the public](#).

In addition, draft law [12389](#) of 08.01.2025 has been registered in the Verkhovna Rada, which proposes to define the specific features of ARMA's title to seized assets under its management.

On 12 February 2025, draft law [12374-d](#) was adopted in the first reading in the session hall of the Parliament. After the draft law was reviewed by the relevant committee of the Verkhovna Rada, most of the proposals taken into account paved the way for the implementation of the ARMA reform in accordance with the agreements within the UKRAINE PLAN.

Following discussions between the authorities and civil society, the parties reached a compromise on the most pressing issues, which enabled the Verkhovna Rada of Ukraine to draft a bill for the second reading and adopt it in its entirety on 18 June 2025.

However, the law adopted by the Rada was also delayed in promulgation — the Speaker of the Verkhovna Rada signed the law on 15 July 2025, and the President of Ukraine signed it on 27 July 2025.

On 30 July 2025, Law of Ukraine [4503-IX](#) entered into force, which means that **the relevant indicator was implemented with a delay**. At the same time, funding for this indicator will only be possible after the European Commission has approved the next quarterly report submitted by Ukraine.



Indicator 6.6. Adopt a roadmap for the separation of public service obligations (PSOs) and other activities
(Q1 2025)

Sector: management of public assets

Status: completed, but not on time

The Government must adopt and publish a roadmap for the mandatory structural separation of activities related to the performance of public service obligations (PSOs) and activities not related to the performance of PSOs for all state-owned companies entrusted with PSOs. This roadmap should be based on the current level of accounting methods required and include operational measures for separating the accounts of enterprises at different stages of implementation of the necessary changes. The roadmap will describe how the separation of accounts for activities related and unrelated to the performance of special obligations will be carried out in all priority state-owned companies from the list approved by a protocol decision of the Cabinet of Ministers.

[The action plan for the separation of activities of public sector entities entrusted with special responsibilities from the performance of such responsibilities and activities not related to their performance](#) was approved by the Cabinet of Ministers on 4 April 2025.



Indicator 7.2. Entry into force of the law on pre-school education (Q1 2025)

Sector: Human Capital

Status: Completed

Today, one of the obstacles to business activity is the lack of labour. At the same time, studies show that the level of women's participation in the labour force remains lower than in many developed countries. One of the reasons is the lack of access to quality pre-school education.

That is why one of the indicators of UKRAINE PLAN is a reform aimed at improving access to quality pre-school education in order to attract women with pre-school-age children to the labour market.

The reform consists of one step: the entry into force of the Law on Preschool Education, which must comply with the EU Council Recommendation of 22 May 2019 on high-quality early childhood education and regulate the following issues:

- guaranteed access to pre-school education for children of early and pre-school age;
- fair rules for the functioning of educational institutions in the market for educational services in the field of pre-school education;
- decent working conditions for employees in the field of pre-school education;
- rules for the functioning of a flexible and effective network of pre-school education service providers.

The relevant law was already adopted by parliament in June 2024. It regulates the issues identified in the Plan for Ukraine, which can be considered as fulfilment of this indicator. The law entered into force on 1 January 2025.

**Indicator 7.11. Adoption of the Strategy for the Development of Culture in****Ukraine****(Q1 2025)****Sector:** Human Capital**Status:** Completed

Ukraine lacks a comprehensive policy for the development of Ukrainian culture, while relevant issues can now be classified as security issues. These issues have been raised several times during public consultations on the preparation of UKRAINE PLAN.

Thus, in accordance with the Plan, the government has committed itself to adopting a Strategy for the Development of Culture in Ukraine. The Ministry of Culture and Strategic Communications (MKSP) [has](#) already [begun work](#) on the draft.

As defined by the MCSC, the Strategy will be a medium-term policy planning document containing a thorough analysis of the current state of affairs and setting out the strategic goals, priorities, directions and tasks of the state in the field of cultural policy for the period up to 2030.

In the summer, the MCSC invited experts and scientists to provide recommendations for the future draft Strategy. [The first discussions](#) on the draft Strategy took place in December.

In February 2025, the MCSP held several public discussions on the Strategy. In March, the text of the Strategy was finalised. The CMU adopted [the Strategy for Cultural Development](#) on 28 March 2025, i.e. on time.



Indicator 9.1. Entry into force of legislation on reforming the territorial organisation of executive power

Slide 1/3

(Q1 2025)

Sector: decentralisation and regional policy

Status: not completed

Legislation to implement this indicator should focus on reforming local state administrations (LSAs) into prefectural-type bodies in order to establish a comprehensive system for ensuring the rule of law in the activities of local self-government bodies and coordinating the territorial bodies of central executive authorities in the implementation of state policy at the local level.

The relevant draft law [4298](#) was registered on 30 October 2020, but a year later, after three revisions of the draft, its consideration was postponed until the second reading.

In February 2024, the Committee on State Administration, Local Self-Government, Regional Development and Urban Planning [recommended the updated draft law for second reading](#), in particular, restoring the status of civil servants to the heads of local self-government bodies and their deputies, updating the procedure for appointing and dismissing heads of local self-government bodies, and introducing a system for monitoring the legality of local self-government decisions.

At [a meeting](#) of the Committee on State Administration, Local Self-Government, Regional Development and Urban Planning **on 21 March 2025, a decision was adopted on the need to finalise draft** Law of Ukraine [4298](#). This decision was also supported by [the Association of Ukrainian Cities](#) and [the All-Ukrainian Association of Communities](#).

Instead, **on 20 March 2025**, a group of Ukrainian MPs submitted draft law [13124](#), "Draft Law on Amendments to the Law of Ukraine 'On Local State Administrations' and Certain Other Legislative Acts of Ukraine on Reforming the Territorial Organisation of Executive Power in Ukraine," which was supported by [the AUC](#).



Indicator 9.1. Entry into force of legislation on the reform of the territorial organisation of executive power

Slide 2/3

(Q1 2025)

Sector: decentralisation and regional policy

Status: not completed

As a second practical alternative to draft law [4298](#), MPs registered draft law [13150](#) of 3 April 2025 on amendments to certain legislative acts of Ukraine regarding ensuring the legality of the activities of local self-government bodies and officials.

On 14 April 2025, a group of MPs registered an alternative bill [13150-1](#) on amendments to certain laws of Ukraine on ensuring the legality of acts of local self-government bodies and coordinating the activities of territorial bodies of central executive authorities.

On 29 April 2025, the Verkhovna Rada Committee on Organisation of State Power, Local Self-Government, Regional Development and Urban Planning recommended that the Verkhovna Rada adopt draft law [13150](#) as a basis and reject the rest.

On 13 May 2025, the Verkhovna Rada included draft law 13150 in its agenda and adopted it in the first reading, with the provisions of the future law to be finalised by the Committee before the second reading. Currently, the most heated debate in preparation for the second reading concerns the Unified State Register of Local Self-Government Acts.

On 11 July 2025, the Centre for Expertise on Multilevel Governance, operating within the Secretariat of the Congress of Local and Regional Authorities of the Council of Europe, prepared its own [opinion](#) on this issue.

European standards do not provide clear recommendations for or against the creation of such a database, and the experience of European countries in this area varies significantly. Despite the general trend towards greater transparency and accountability in the activities and decision-making processes of authorities at all levels, including the local level, and the fact that the introduction of such a register can be seen as part of this trend, the Opinion stresses that **if the register is not set up properly, it may conflict with certain commitments that Ukraine has undertaken by ratifying the European Charter of Local Self-Government.**



Indicator 9.1. Entry into force of legislation on reforming the territorial organisation of executive power

Slide 3/3

(Q1 2025)

Sector: decentralisation and regional policy

Status: not completed

Therefore, the Conclusion goes on to say that, **if a decision is made to introduce the Register, the Congress recommends that the Ukrainian side take the following measures:**

- ensure that acts are automatically published in this Register. If central authorities or any other institutions are able to block or delay publication, this could be considered ex ante supervision and would be contrary to the provisions of the Charter.
- make the process of such publication as simple and easy as possible for local authorities.
- ensure compliance with the principle of proportionality enshrined in Article 8(3) of the Charter: the frequency and depth of supervision should be proportionate to the importance of the interests that the supervision is intended to protect, rather than based on the ease of access to information about decisions taken at local level.

In addition, the Opinion also recommends that:

- if a Register is created, **the obligation to publish local authority decisions in it should replace the obligation to transmit them to the supervisory authority.**
- the content and administration of the Register should comply with the provisions of the General Data Protection Regulation (GDPR).
- persons carrying out supervision should undergo appropriate training and further training and be subject to appropriate control to prevent abuse of power.

Thus, the Verkhovna Rada should take this Opinion into account when preparing the draft law for the second reading and, if a decision is made to create a Unified Register, also comply with the above recommendations.

As of the end of July, preparations for the second reading of the draft law are still ongoing, and **the indicator remains unfulfilled.**



Indicator 9.4. Entry into force of legislation on public consultations on public policy
(Q1 2025)

Sector: decentralisation and regional policy

Status: completed

The indicator provides for the entry into force of the Law of Ukraine "On Public Consultations" with its application within 12 months from the date of termination or cancellation of martial law in Ukraine. The law will launch a legal mechanism for conducting public consultations during the formation and implementation of state policy and the resolution of issues of local importance, which will create the conditions for coordinated, effective and efficient political decision-making.

[The](#) relevant [draft law](#) was adopted in June 2024. In October, [the law](#) was finally signed by the President.

The adopted draft law provides for the obligation of executive bodies, local self-government bodies and entities with public authority to conduct public consultations during the development of regulatory acts.

Such consultations may take the form of electronic consultations, round tables and discussions.

As envisaged in UKRAINE PLAN, it is proposed that this draft law enter into force 12 months after the termination or cancellation of martial law.



Indicator 12.3. An automated public monitoring system for land relations has been put into operation. A mass land valuation has been carried out (Q1 2025)

Sector: agri-food sector

Status: completed

The indicator provides for the introduction of an automated land relations monitoring system and mass land valuation.

The necessary regulatory framework for both components of the indicator was adopted in 2023. Public [monitoring](#) of land transactions has been operating on a limited basis since 2021 and should be fully operational by the end of March,

According to NACP monitoring, the provision on mass land valuation was duplicated in the State Anti-Corruption Programme, but was subsequently amended. In line with the updated task, the State Geocadaastre reported on [the approval of the technical specifications for mass land valuation by the Ministry of Agrarian Policy and Food in October 2024](#). At the end of 2024, [a mass appraisal was carried out](#) and further improvements are planned for this year. [The results of the appraisal](#) are currently publicly available.

At the end of March, [a portal for an automated public monitoring system](#) for land relations was launched and, as of 28 April, is operating in test mode with limited functionality.



Indicator 12.7. A long-term plan for the development of Ukraine's irrigation system has been approved
(Q1 2025)

Sector: agri-food sector

Status: completed

The irrigation system development plan sets an ambitious goal: the plan will use the full economic benefits method, consistent with water resource management based on a basin approach, based on environmental impact assessment and strategic environmental reform.

[The long-term plan for the development of Ukraine's irrigation complex until 2050 and the action plan for its implementation until 2030](#) were approved at a government meeting on 25 March 2025.



Indicator 13.5. Updating the electronic office of the subsoil user (Q1 2025)

Sector: management of critical raw materials

Status: completed

In order to implement the reform, the State Service of Geology and Subsoil Use must update the electronic office of subsoil users, digitise secondary geological information and ensure the issuance of digital special permits for subsoil use.

On 28 March 2023, the Ministry of Environmental Protection and Natural Resources approved the Regulations on the electronic office of subsoil users, which define the general principles of its operation. On 19 May 2023, the Cabinet of Ministers [approved](#) the Procedure for maintaining, operating and accessing information of the unified state electronic geoinformation system for subsoil use, developed in accordance with Law 2805-IX of 1 December 2022. As of the end of October 2024, according [to](#) the State Geological Service, the GIS service, online registration of forms for geological work and research, and reporting forms for accounting for mineral reserves are operational, while the service for generating e-extracts from the register of special permits is in the implementation phase. However, [according to](#) experts, the e-cabinet has its shortcomings and, as long as martial law remains in force in Ukraine, will not allow the use of all the announced functions.

In terms of digitisation, the first phase of the project with the EBRD [has been implemented](#): the necessary technical equipment and software have been purchased, and the first 6,000 geological reports have been scanned and published on an interactive map. In total, 60,000 geological reports and graphic appendices are to be digitised and the metadata translated into English. According to [a report](#) by the State Geological Service, by the end of October 2024, the expected implementation of the second phase with the support of the EBRD, USAID and Microsoft will allow the spatial location of deposits and their quantitative and qualitative characteristics to be seen. On 21 March, [it was announced](#) that as part of the implementation of the Roadmap to the Memorandum of Strategic Partnership with the EU in the field of raw materials, the State Geological Service, together with the EBRD, is working on the launch of the second phase of digitising secondary geoinformation and placing it on the State Geoportal. The materials will become part of the "data room" and can be used by Ukrainian and international investors for analysis with a view to further nominating those subsoil use objects for open tenders and auctions.

[The work plan](#) for 2025 includes, among other things, finalising the creation of the Unified State Electronic Geoinformation System for Subsurface Use (EDGS), expanding the functionality of the State Geoportal, and improving the e-cabinet. At the beginning of 2025, work [was ongoing](#) to update the e-cabinet for subsoil users with additional functionality (access to the state register of special permits and the possibility of obtaining an electronic special permit, as well as access to digitised geological information). On 20 January, a presentation of the functionality was [made](#) to representatives of the European Commission.

On 1 April, the State Register of Special Permits for Subsurface Use [began](#) commercial operation ([order of the State Geological Service](#)). Special permits are issued in the form of an extract from [the Register](#) in electronic form, generated by the electronic office of the Unified Geoinformation System, the electronic office of the subsoil user, and the electronic offices of the Unified Environmental Platform "EcoSystem". Thus, the indicator is considered to be fulfilled, despite the fact that access to the resource is temporarily restricted during the period of martial law, with the exception of law enforcement agencies, state authorities and local self-government bodies.



Indicator 14.1. Approval of a new plan for the allocation and use of radio frequencies in Ukraine
(Q1 2025)

Sector: digital transformation

Status: completed

The Cabinet of Ministers' resolution on amendments to the Cabinet of Ministers' resolution "On approval of the plan for the distribution and use of radio frequencies in Ukraine" is to come into force. The resolution shall determine the radio technologies permitted for use in Ukraine, specifying the radio frequency bands and radio services to which they correspond, as well as the deadlines for the termination of their development and use, and a list of promising radio technologies for implementation in Ukraine, specifying the radio frequency bands and radio services to which they correspond, as well as the conditions for their implementation in accordance with the acquis.

The government adopted the necessary resolution 1253 "On Amendments to the Plan for the Allocation and Use of Radio Frequency Spectrum in Ukraine" on 1 November 2024, so the indicator can be considered fulfilled.



Indicator 14.2. Entry into force of legislation to strengthen the cyber defence capabilities of state information resources and critical information infrastructure

(Q1 2025)

Sector: digital transformation

Status: completed, but not on time

Regulatory acts must come into force to align with the NIS and NIS2 Directives.

The acts should focus on the following key areas:

- regulating the mandatory implementation of measures aimed at creating an adequate legal framework for the prevention, detection and suppression of acts of aggression in cyberspace in the context of Russia's war against Ukraine;
- strengthening the level of protection of state information resources and critical information infrastructure against cyber attacks;
- comprehensively improving the regulatory framework in the field of cybersecurity and information protection to strengthen the capabilities of the national cybersecurity system to counter cyber threats.

The relevant law 4336-IX came into force on 20 April 2025, three weeks after the deadline.



Indicator 14.3. Approval of a plan of measures for the transition of public services to electronic form by 2026
(Q1 2025)

Sector: digital transformation

Status: completed

To this end, it is necessary to develop and adopt a Cabinet of Ministers Resolution approving the action plan for the transition of public services to electronic form by 2026, with subsequent entry into force.

The action plan should focus on the following key areas:

- recovery;
- education
- health care;
- services for veterans;
- services for the military;
- customs;
- social sphere.

Currently, the Ministry of Digital Transformation has asked government agencies to collect suggestions and come up with recommendations that will be the basis for developing the plan's measures and initiatives.

On 24 February 2025, the Ministry of Digital Transformation sent a draft order of the Cabinet of Ministers of Ukraine "On the approval of the action plan for the transition of public services to electronic form by 2026" to the relevant authorities for approval.

On 21 March 2025, at its meeting, the CMU approved [the Action Plan](#) by order.



Indicator 15.2. Entry into force of the Law "On the Basic Principles of State Climate Policy"
(Q1 2025)

Sector: green transition and environmental protection

Status: completed

The adoption of a framework climate law is important in view of the need to bring legislation into line with EU law, in particular Regulation (EU) 2021/1119, which sets the framework for achieving climate neutrality, and Regulation (EU) 2018/1999 on the governance of the Energy Union and mitigating the effects of climate change, as well as to implement the action plan for the implementation of the European Commission's recommendations presented in the Report on Ukraine's progress under the EU Enlargement Package 2023, approved by the Cabinet of Ministers on 9 February 2024, 133-r.

On 8 October 2024, the Verkhovna Rada of Ukraine adopted in its entirety the Law "On the Basic Principles of State Climate Policy" (registered under [11310](#)), submitted by the Cabinet of Ministers at the end of May 2024, and on 25 October, the Law was signed by the President.

The Law [entered into force](#) on the day following the day of its publication (30 October 2024), except for Article 14 on planning state climate policy at the regional and local levels, which shall enter into force one year later, and Article 21 on financing measures aimed at achieving the objectives of state climate policy, which shall enter into force one year after the abolition or termination of martial law.

Thus, the indicator is considered to be fulfilled.



Indicator 15.5. Approval of the Action Plan for the creation of a national greenhouse gas emissions trading system
(Q1 2025)

Sector: green transition and environmental protection

Status: completed

The development and submission by the Ministry of Environmental Protection and Natural Resources in June 2024 of a draft order approving the action plan for the creation of a national greenhouse gas emissions trading system ([ETS](#)) [is provided for in](#) the Government's priority action plan for 2024.

On 5 June, the Ministry of Environment [published](#) a draft Cabinet of Ministers order "On the approval of the Strategy for the implementation of a greenhouse gas emissions trading system in Ukraine for the period until 2033", and proposals and comments were collected until 5 July. At the same time, an interdepartmental coordination process was underway, with [comments](#) on the draft order being provided by the National Securities and Stock Market Commission.

In addition, on 30 May 2024, the Cabinet of Ministers [approved](#) the Strategy for the Formation and Implementation of State Policy in the Field of Climate Change for the Period until 2035 and approved an operational plan of measures for its implementation in 2024-2026. One of the tasks for achieving goal 2 on mitigating climate change and ensuring a socially just and economically efficient transition to low-carbon development of the state is to develop and submit to the Cabinet of Ministers a draft law on the principles of functioning of the STV (planned for 2025) and the implementation of the STV (pilot project) (planned for 2026).

On 8 January, the Verkhovna Rada [adopted](#) a law reinstating the mandatory system for monitoring, reporting and verifying greenhouse gas emissions. This is an important step towards the creation of a ETS.

In November, the Ministry of Environment [published](#) a draft action plan for the establishment of the ETS on its website. On 30 December, the Ministry of Environment announced the completion of the public consultation process and reported that no comments or suggestions on the draft order had been received from the public.

On 21 February 2025, the Government [approved](#) the plan for the implementation of the ETS. Thus, the indicator is considered to have been achieved on time.



Indicator 3.5. Entry into force of legislation on the review of judges' integrity declarations and the procedure for their verification (Q2 2025)

Sector: judicial system

Status: not completed

In order to achieve this indicator, the law and acts of the High Council of Justice must come into force, according to which the integrity declarations of judges and the procedure for their verification must be revised.

To this end, the Ministry of Justice has prepared and the CMU has submitted to the Verkhovna Rada a draft law [13165](#) of 09.04.2025.

In its conclusion, the Committee on European Integration points out that the draft law does not take into account the requirements of the UKRAINE PLAN, in particular that the updated integrity check should provide for an extension of the time period covered by the check, which is not currently the case in the draft law.

Instead, an alternative draft law [13165-2](#) was submitted to the Verkhovna Rada on 25 April 2025. The challenges of this draft law are similar to those of [13165](#), and in some respects are even more contrasting.

As noted by the European Commission in its 2024 Report, the updated system should provide for a temporary but substantive vetting procedure for higher court judges, involving independent experts. Also, as follows from [the conclusion](#) of the Verkhovna Rada Committee on Ukraine's Integration into the EU, *"it can be concluded that it does not contain any mechanisms that would ensure a temporary and at the same time substantive procedure for vetting higher court judges with the involvement of independent experts within the framework of the updated integrity declaration system."*

The draft law also does not take into account the requirements for extending the time period for which the special verification is carried out. In addition, the draft law poses risks of restricting access through publication on the official website of the High Council of Justice. Finally, the provision exempting from liability for intentional failure to submit or declare information appears to be unjustified.

On 3 June 2025, the Verkhovna Rada supported draft law [13165-2](#) in the first reading. The draft law is currently being prepared for the second reading. **As of the end of August, the indicator remains unfulfilled.**



Indicator 3.8. Improving the execution of court decisions. The law on the digitalization of enforcement proceedings has entered into force (Q2 2025)

Sector: judicial system

Status: not completed

The indicator is considered fulfilled in the event of the entry into force of the law on the enforcement of court decisions on property and non-property obligations and the further digitalization of enforcement proceedings.

In the context of the enforcement of court decisions in Ukraine, a Roadmap will first be developed to reform the enforcement of court decisions and improve the activities of public and private enforcement agents, taking into account the current situation, and a package of draft laws will be adopted to improve the enforcement of court decisions on property and non-property obligations and further digitalization of enforcement proceedings. This will, in particular, allow:

- expand the functionality of the automated enforcement system;
- to introduce interaction between the Unified Register of Debtors and other registers in order to prevent the alienation of property by the debtor;
- improve automated seizure of debtors' funds, etc.

On November 20, 2024, the Verkhovna Rada adopted draft law No. [9363](#) dated June 7, 2023 in the first reading. The draft law provides for expanding the capabilities of the automated enforcement system, establishing interaction between the Unified Register of Debtors and other registers, and introducing automated seizure of funds.

At the same time, on August 21, 2025, the Verkhovna Rada rejected draft law No. [9363](#).



Indicator 5.4. Improvements in the resolution of non-performing loans (NPLs)
(Q2 2025)

Sector: financial markets

Status: completed

A strategy for resolving non-performing loans, developed in accordance with current EU legislation, must be approved. The strategy should focus on the following key areas:

- strengthening prudential requirements for the recognition and resolution of non-performing loans;
- sharing info on problem loans and other relevant market data between financial institutions and public authorities to improve how problem loans are dealt with;
- reviewing potential obstacles and developing measures to improve the framework for restructuring and resolving non-performing loans.

The strategy for resolving non-performing loans has been approved as a separate section of the Credit Development Strategy.



Indicator 7.1. Entry into force of the law on vocational education
(Q2 2025)

Sector: human capital

Status: not completed

Today, the labor market lacks qualified labor. At the same time, reconstruction will require professionals who can work in the construction sector. The return of the military and their integration into the labor market will also require modern vocational education programs. Therefore, one of the indicators of the Plan of Ukraine is the adoption and entry into force of the law on vocational education. People who have acquired new skills will also return from abroad, and therefore it will be important to continue implementing a system for recognizing such skills.

That is why it is determined that the law on vocational education should define fair rules for the functioning of educational entities in the market of educational services in the field of vocational education. It should also expand the institutional capacities of educational entities in providing formal and non-formal vocational education. It is also about the importance of regulating the relations between vocational education institutions, national/local and international stakeholders for the sustainable development of human capital in Ukraine.

[The draft law on vocational education](#) submitted by the Ministry of Education and Science in April 2024 did not comply with all these provisions. Therefore, an updated version of the draft law was prepared. The Verkhovna Rada adopted the draft Law of Ukraine “On Vocational Education” ([No. 13107-d](#)) as a basis on April 16, 2025. The draft law provides for the introduction of financial and personnel autonomy, the introduction of supervisory boards in institutions, support for dual education, the development of curricula with the participation of business, and simplification of licensing procedures for vocational education institutions. According to information from the Verkhovna Rada, consultations with representatives of the European Commission on the compliance of the draft law with EU law were completed on time.

On August 21, the draft law was finally adopted by deputies and sent to the President for signature on the same day. As of August 27, the draft law had not yet been signed by the President, and therefore the indicator was not met.



Indicator 7.10. Adoption of a CMU resolution on the procurement of social services
(Q2 2025)

Sector: human capital

Status: completed

There is a growing need for various social services in Ukraine, yet the system for providing such services remains largely outdated and inefficient. In 2023, the Ministry of Social Policy launched a pilot project to procure social care services, but this is only a small part of the changes that are needed. At the same time, budgetary funding is limited and must therefore be spent efficiently.

That is why the government is planning changes to the procurement of social services to increase their accessibility and effectiveness.

It is important that the adopted resolution is fiscally neutral and does not require additional funding, and should provide for:

- a transition from institutional funding to a results-oriented model of social service procurement;
- the introduction of a mechanism for purchasing individual social services from registered public and private social service providers based on established social service standards and criteria for providers.

The CMU adopted the relevant resolution on 25 June 2025. The text of the resolution is not yet available.



Indicator 8.4. Adoption of an SME strategy and an action plan for its implementation
(Q2 2025)

Sector: business environment

Status: completed

On 30 August, the government approved [the Strategy for the Recovery, Sustainable Development and Digital Transformation of Small and Medium-sized Enterprises for the period until 2027](#) and the Operational Plan for its implementation. The Strategy sets out four strategic objectives for recovery and business facilitation, promotion of innovation and green transition, development of education and entrepreneurial culture, and strengthening competitiveness in the domestic and foreign markets.

The programme's targets include increasing exports of goods to €60 billion by 2027, of which €35 billion will go to the EU through an increase in the number of SME exporters to 35,000. It also aims to reduce unemployment to 11% and increase the share of sales through e-commerce to 20%. In the field of science and education, the plan is to increase the science intensity of GDP to 0.7% through an increase in spending on scientific activities to €470 million and 1.7 million entrepreneurs who have upgraded their qualifications fully or partially at public expense.



Indicator 9.2. Study on the necessary measures to grant territorial communities the status of legal entities

(Q2 2025)

Sector: decentralisation and regional policy

Status: completed

This indicator does not provide for the adoption of specific legislative acts. It refers to the approval and publication on the Ministry of Recovery's web portal of a study on the measures necessary to grant legal personality to territorial communities.

In particular, the study should examine the impact of granting legal entity status to communities on the effectiveness of their internal organisation and management, as well as on strengthening their accountability and transparency in legal relations.

On 13 June, the Ministry of Community and Territorial Development of Ukraine [presented a study](#) entitled "[The community as a legal entity under public law](#)." The study reveals the grounds and consequences of granting this status to communities, as well as proposals for legislative changes to implement such a decision.



Indicator 10.4. Implementation of the Roadmap for the separation of the renewable energy surcharge from the transmission tariff (Q2 2025)

RRR4U

Sector: energy sector

Status: completed

According to [UKRAINE PLAN](#), the development of a roadmap for separating the renewable energy surcharge from the transmission tariff, including the identification of necessary legislative acts and implementation deadlines, has been entrusted to the NEURC (subject to agreement).

Essentially, this involves separating the costs incurred by the transmission system operator in performing its special obligations to increase the share of electricity generated from renewable energy sources into a separate component of tariff revenue, a special surcharge on the price of electricity, or another form.

On 31 October, the USAID Energy Security Project (USAID ESP) presented a Green Paper on restructuring the RES support financing scheme, proposing three alternative models for separating the RES surcharge. However, market participants opposed separating the green tariff support costs from the transmission tariff, pointing to even greater risks of the state failing to meet its obligations, even compared to the current payment crisis. In addition, [according to](#) Energorforma, this issue was also discussed at a working group meeting of the NEURC at the end of January 2024. According to participants, it was decided to maintain the current conditions for green tariff producers until 2030, but to separate the surcharge for the winners of green auctions held in 2024 without significant results. No specific decisions were made, and it was decided to continue the discussion.

On 18 February, the Government [approved](#) the Priority Action Plan for 2025, according to which the NEURC, if agreed, must submit a draft order in June 2025 approving a roadmap for separating the renewable energy surcharge from the transmission tariff. This roadmap should identify the necessary legislative acts and deadlines for implementing such separation.

Following the results of the review at the Government Committee meeting on 28 May 2025, [the](#) revised [draft order](#) on the approval of the Roadmap for the separation of the renewable energy surcharge from the electricity transmission tariff and the corresponding action plan, taking into account the comments provided, was sent by the NEURC for approval to the Antimonopoly Committee, the Ministry of Finance, the National Bank, the State Service for Special Communications and Information Protection, and the State Regulatory Service.

On 25 June, the Cabinet of Ministers [approved](#) the Roadmap for separating the renewable energy surcharge from the electricity transmission tariff and the action plan for implementing the Roadmap for separating the renewable energy surcharge from the electricity transmission tariff for 2025 and 2026. Thus, the indicator is considered fulfilled.



Indicator 13.3. Publication of a package of investment projects for the extraction of critical raw materials (Q2 2025)

Sector: management of critical raw materials

Status: completed, but not on time

It is necessary to publish a portfolio of investment projects in the extractive industry for critical raw materials, prepare and promote a list of subsoil plots offered through electronic auctions and production sharing agreements for solid minerals.

The Cabinet of Ministers of Ukraine Resolution 132 of 14 February 2023 [approved](#) a list of subsoil plots (deposits) of strategic importance for the sustainable development of the economy and the defence capability of the state, which will be made available for use through tenders for the conclusion of production sharing agreements. It is obvious that UKRAINE PLAN presupposes the need to update and revise this list so that other deposits can be offered through e-auctions.

On 15 August 2024, the State Service of Geology and Subsoil of Ukraine [published](#) for discussion a draft resolution of the Cabinet of Ministers "On the approval of the list of subsoil plots (deposits of mineral resources) of strategic importance for the sustainable development of the economy and the defence capability of the state, to be granted for use through auctions for the sale of special permits for subsoil use." In addition, in 2024, Ukraine's Critical Raw Materials Portfolio was [published](#) with a list of investment opportunities in this sector, as well as [a presentation](#) entitled "Ukraine: Mining Investment Opportunities".

On 4 March 2025, the State Geological Service [published](#) a new draft resolution of the Cabinet of Ministers "On the approval of lists of minerals and components of strategic and critical importance and lists of subsoil plots (mineral deposits) of strategic and (or) critical importance." The annexes include two lists of subsoil plots – those to be granted for use through e-auctions and those to be granted for use through a competition for the conclusion of a production sharing agreement (PSA). The second list almost completely duplicates the current CMU Resolution 132 of 14 February 2023, with the exception of one area (potassium salts), which is proposed to be replaced by another. On 9 April, a revised regulatory impact analysis [was published](#).

On 14 July 2025, the Cabinet of Ministers of Ukraine [approved](#) lists of critical and strategic minerals, as well as 60 subsoil plots for auctions and 26 plots for PSC tenders. In addition, the State Geological Service website [has published](#) a portfolio of investment projects for the extraction of critical raw materials, which is in line with the Ministry of Economy's [dashboard](#) for monitoring the implementation of the indicators of the UKRAINE PLAN. In addition, the KSE Institute, in cooperation with the Ministry of Economy of Ukraine, has updated and published [the 2025 Catalogue of Investment Projects in Ukraine](#), which includes 12 projects worth \$2.4 billion (graphite, titanium, beryllium, lithium, uranium, polymetals).



Indicator 13.4. Launch of international tenders for the conclusion of production sharing agreements (PSAs) and ensuring their transparency (Q2 2025)

Scope: management of critical materials

Status: completed with delay

It is necessary to launch international tenders for the conclusion of production sharing agreements (PSAs) using standard terms of these agreements, approved by the Cabinet of Ministers and made public. Transparency of tenders and PSAs themselves is ensured through open access to the terms and content of the agreements.

The Resolution of the Cabinet of Ministers of Ukraine dated February 14, 2023 No. 132 [approved](#) the list of subsoil areas (fields) that are of strategic importance for the sustainable development of the economy and the defense capability of the state, which will be provided for use through competitions for the conclusion of production sharing agreements. At the same time, there is no information yet on the resumption of the government's work on the model PSA. Publication of copies of contracts (agreements) on the use of subsoil, including PSAs, concluded after January 15, 2022, is already provided for by the requirements of the Law "On Ensuring Transparency in the Extractive Industries".

On April 8, the Cabinet of Ministers approved the proposals of the Interdepartmental Commission for the Organization of the Conclusion and Implementation of the PSA regarding the holding of a competition for the conclusion of an agreement on the distribution of hydrocarbons to be extracted from [the Mezhyhirsk](#) and [Svichansk oil and gas fields](#). The competition for both areas [will last](#) up to six months. In August, the terms of the competitions were [updated](#). The publication of the announcement of the competitions, which begins the 3-month countdown for the receipt of applications, was supposed to take place within 2 months after the adoption of the resolution, but has not yet been carried out. However, these competitions are not considered activities aimed at implementing the indicator.

On June 17, First Deputy Prime Minister and Minister of Economy of Ukraine Yulia Svyrydenko [announced](#) that the Interdepartmental Commission for the Organization of the Conclusion and Implementation of Production Sharing Agreements is preparing to announce a tender for the conclusion of a PSA on the Dobra lithium ore site. On July 14, 2025, the Cabinet of Ministers of Ukraine [approved](#) the lists of critical and strategic minerals, as well as 60 subsoil areas for auctions and 26 areas for PSA tenders. In turn, the first tender for the conclusion of a PSA was never announced, therefore we consider this indicator not fulfilled.

On August 18, the Cabinet of Ministers presented the draft Government Action Program. The document [plans](#) to develop and submit to the Cabinet of Ministers of Ukraine in December 2025 a draft law on ensuring a legislative mechanism for granting use of subsoil areas (deposits) of minerals under PSA terms (except for hydrocarbons) (Amendments to the Law "On Production Sharing Agreements").

On August 13, the Cabinet of Ministers [announced](#) a new competition for the conclusion of a hydrocarbon sharing agreement within the Mezhyhirsk area, and on August 27, the Government [announced](#) the start of a competition for the conclusion of a production sharing agreement on the Dobra area in the Kirovohrad region. According to the decision, a competition announcement will be published within two months, and applications will be accepted for three months, after which the winner will be determined. Given this, we consider the indicator to be fulfilled with a delay.



Indicator 15.6. Re-establishment of the MRV system (Q2 2025)

Sector: green transition and environmental protection

Status: completed

The indicator is aimed at implementing the reform to introduce market-based emissions pricing mechanisms.

To improve the MRV system, as well as to take into account the peculiarities of wartime, the Cabinet of Ministers [adopted](#) Resolution No. 1203 on 14 November 2023, which improves the requirements for monitoring, reporting and verification of greenhouse gas emissions in Ukraine. This Resolution amends Resolution No. 880 "List of Activities, Greenhouse Gas Emissions from Which Are Subject to Monitoring, Reporting and Verification", Resolution No. 959 "Procedure for Verification of the Operator's Report on Greenhouse Gas Emissions", Resolution No. 960 "Procedure for Monitoring and Reporting on Greenhouse Gas Emissions". As [noted](#), the amendments improve the MRV processes and simplify the requirements for operators for the duration of martial law. In particular, the deadline for submitting monitoring plans in case of changes is doubled; the "transition period" is extended; and the requirements for the laboratory are adjusted.

Back on 5 June, the Ministry of Environment [published a](#) draft order of the Cabinet of Ministers "On Approval of the Strategy for Implementation of the Greenhouse Gas Emissions Trading System in Ukraine for the Period up to 2033". Until 5 July, the Ministry of Ecology collected suggestions and comments. In addition, in November, a draft action plan for the creation of a national greenhouse gas emissions trading system (ETS) was published on the Ministry's website.

On 1 October, the Ministry of Ecology, together with GIZ, [launched](#) training sessions on MRV for plant operators, consultants, verifiers and other stakeholders. It is noted that the training sessions were initiated due to changes in the legislation on MWM that took place in 2023, as well as the lack of mandatory reporting in the relevant area during the war, which led to limited experience of facility operators. Therefore, the Ministry of Ecology decided to organise appropriate measures to ensure that all stakeholders understand the processes and fulfil their tasks.

On 21 November, the Verkhovna Rada approved in the first reading Draft Law No. [12131](#), which provides for the restoration of the mandatory IED system. On 8 January 2025, the Law [was adopted](#) in the second reading and in general. The law [came into force](#) on 1 February 2025, which ensures that the indicator is met.



Indicator 1.2. Entry into force of amendments to legislation on improving the procedure for entry into, service in and dismissal from public service (Q3 2025)

Sector: public administration reform

Status: in progress

Ukraine has been undergoing public administration reform for years, which is designed to promote a professional and effective civil service in Ukraine. Indicator 1.1 provides for improving the approach to remuneration in the civil service, while indicator 1.2 aims to improve the procedures for recruitment, promotion and dismissal from the civil service.

It is noted that the new legislation (including subordinate legislation) should enter into force by the end of the Q3 2025. It should comply with the OECD principles of public administration (SIGMA) regarding selection procedures based on professional competencies.

According to the amended by the government Ukraine Plan , this indicator is postponed to Q4 2025. This gives a better chance of completing it on time.



Indicator 2.8. Implementation of the Roadmap for Reforming the Public Investment Management System (Q3 2025)

Sector: public financial management

Status: in progress

Several IMF structural benchmarks are dedicated to reforming the public investment management system (PIMS), which Ukraine is successfully implementing on schedule. The roadmap was adopted in December 2023, with implementation planned for summer 2024.

Indicator 2.8 refers to the development and implementation of a digital recovery management tool for Ukraine that provides public access to data on recovery projects at all stages, including planning, financing, procurement, construction and commissioning, to ensure public and transparent monitoring of project implementation and better coordination of recovery efforts across sectors.

Today, it is clear that this tool will be DREAM (Digital Recovery Ecosystem for Accountable Management), a platform originally created for transparency and coordination of reconstruction and recovery efforts.

[A section on public investment projects](#) has already been created on the DREAM portal. However, for now, it is more about providing information on such projects rather than providing complete and detailed information on the stages of their implementation. The relevant next steps are currently being developed.

In June, the CMU approved [the Medium-Term Plan for Priority Public Investments for 2026-2028](#), which is closely linked to the Budget Declaration for these years.

Therefore, the plan is being implemented in accordance with the approved calendar. Therefore, this indicator will be fulfilled on time .



Indicator 3.1. At least 20% of judicial vacancies filled
(Q3 2025)

Sector: judicial system

Status: in progress

RRR4U



The indicator will be considered achieved if at least 20% of the judicial vacancies existing as of 16 October 2023 (total number of vacancies: 2,205) are filled on the basis of amended legislation that includes the following elements:

- simplified selection stages and shorter periods of mandatory training for judges;
- consistent application of clear and duly published criteria and methodology for assessing the professional competence and integrity of candidates for judicial office;
- involvement of the Public Integrity Council in assessing the integrity of candidates for judicial office where required by law.

According to the records of the High Qualification Commission of Judges of Ukraine, the situation with filling vacancies is as follows:

- the number of vacant judicial positions in courts as of 16 October 2023 was 2,205 (20% — 441 vacancies);
- the number of positions filled between 16 October 2023 and 24 July 2025 was 378.

Thus, according to the HQCJ, 63 more vacancies need to be filled in order to achieve indicator 3.1.



Indicator 3.2. Establishment of a new court for administrative cases (Q3 2025)

Sector: judicial system

Status: in progress

RRR4U



The indicator will be considered fulfilled if a new court is established to hear administrative cases involving state bodies, consisting of first and appellate instances, whose judges will be selected after verification of their integrity and professionalism with the involvement of independent experts.

To implement this indicator, draft laws [12206](#) on the activities of the High Court of Public Law Disputes, [12206-1](#) on the activities of the High Specialised Administrative Court, and [12206-2](#) on the activities of the High Administrative Court were submitted to the Verkhovna Rada.

On 3 December 2024, the Verkhovna Rada of Ukraine did not support any of the three draft laws. Proposals to refer these draft laws for a second first reading or to the legislative initiative bodies for further refinement were also not supported.

On 30 December 2024, the Government submitted another draft law [12368](#) to the Verkhovna Rada concerning the regulation of the activities and establishment of a new court for the consideration of administrative cases. In addition, an alternative draft law [12368-1](#) was also submitted.

Following consideration in Parliament on 9 January 2025, draft law [12368](#) was rejected, while [12368-1](#) was supported as a basis. In addition, on 18 February 2025, a comparative table of amendments for the second reading was submitted.

The draft law proposes the establishment of the Kyiv City District Administrative Court and, for the review of its decisions in the appellate instance, the Kyiv City Administrative Court of Appeal. Currently, the draft law does not meet the conditions for the implementation of the indicator, in particular because it proposes the establishment of two separate courts and does not contain provisions on the selection of judges for this court after verification of their integrity and professionalism with the involvement of independent experts.

Following this, on 26 February 2025, Parliament approved draft law [12368-1](#) in its entirety. Thus, Ukraine will establish the Kyiv City District Administrative Court as the court of first instance for disputes concerning the NACP, the NBU, the ESB, etc., and the Kyiv City Administrative Court of Appeal, which will serve as the court of appeal for such disputes.



Indicator 6.7. Assessment and, if necessary, amendment and entry into force of legislation on the separation of PSO and non-PSO activities in SOEs
(Q3 2025)

Sector: management of public assets

Status: in progress

This indicator is a logical continuation of indicator 6.6, which provides for the adoption of a roadmap for the separation of activities related to the performance of public service obligations (PSOs) and activities not related to the performance of PSOs by state-owned enterprises.

Thus, it is planned to separate accounts between PSO and non-PSO activities in state-owned enterprises to avoid cross-subsidisation. Thus, the first stage (indicator 6.6 to be implemented in the Q1 2025) provides for the adoption of a relevant Roadmap setting out the steps for the mandatory structural separation of activities related to the performance of special obligations and activities not related to the performance of special obligations for all state-owned companies engaged in PSOs.

Indicator 6.7 refers to the assessment of the legislation specified in the Roadmap and, if necessary, amendments will be made to it. This will be done to ensure that the appropriate separation of accounts between PSOs and non-PSOs is effective in all state-owned companies.

By the Q3 2027, the government should make sure there's an independent audit of state-owned companies involved in PSO to check how well the law is being followed.



Indicator 6.9. Lift the suspension of the State Aid Law, restore State aid control and harmonise the State Aid Law with the EU acquis (Q3 2025)

RRR4U



Sector: management of public assets

Status: in progress

In November 2024, the Government submitted draft laws [12179](#) and [12181](#) to the Verkhovna Rada for consideration, establishing liability for violations of state aid legislation. However, in July, the draft laws were automatically withdrawn due to a change in the Government.

In May 2024, the Verkhovna Rada reinstated the Law on State Aid to Business Entities regarding aid provided through the Entrepreneurship Development Fund. However, the main provisions of the Law on State Aid to Business Entities remain suspended for the duration of martial law.

In March 2025, the Antimonopoly Committee published [a draft law on the resumption of the provisions of the Law on State Aid](#) for public discussion, which ended without comment. The draft law proposes to resume the Law until the end of martial law in areas where there's no fighting and to make some changes to the main provisions of the Law.

At the same time, a dialogue is currently underway with the European Commission on the compliance of the draft law with EU law. We expect that the restoration of the rules will be a difficult process in parliament. The draft law has not yet been submitted to the Verkhovna Rada. According to available information, talks with the European Commission on postponing this indicator have already begun.

It is possible that the implementation of this indicator will be postponed during the government's negotiations with the European Commission. Otherwise, it seems unrealistic, although possible, that the relevant amendments will be adopted in time.



Indicator 8.2. Deregulation in selected sectors
(Q3 2025)

Sector: business environment

Status: in progress

Legislation needs to be adopted (legislation must enter into force) on deregulation and simplification of business conditions, focusing on the following areas:

- digitisation of permitting and licensing procedures through the implementation of a pilot project to introduce a unified state electronic system for permitting documents;
- reducing business inspections through the introduction of voluntary insurance and auditing;
- regulating the succession of permits and licences in the event of a change in the organisational and legal form of a business entity.



Indicator 8.8. Adoption of harmonised standards for three groups of industrial products (Q3 2025)

Sector: business environment

Status: in progress

European standards need to be adopted as national standards for three groups of industrial products (machinery, electromagnetic compatibility of equipment, low-voltage electrical equipment) by translation. The Ministry of Economy and the State Enterprise "Ukrainian Scientific and Research Centre for Standardisation, Certification and Quality" (by agreement) have been designated as responsible for implementation.

It should be noted that in 2018, the Ministry of Economic Development (now the Ministry of Economy) [approved](#) an order defining the list of national standards that are identical to harmonised European standards within the framework of the implementation of Directive 2014/30/EU on the harmonisation of the laws of Member States relating to electromagnetic compatibility. In addition, in 2025, the Ministry of Economy [approved](#) a number of amendments to the lists of national standards for the purposes of applying technical regulations, in particular:

- on machine safety (CMU Resolution 62 of 30 January 2013): orders 941 of 6 February, 1356 of 21 February, 1807 of 19 March, and 1880 of 25 March;
- on low-voltage electrical equipment (CMU Resolution 1067 of 16 December 2015): orders dated 6 February 941 and 18 March 1796.

In addition, the Government's Priority Action Plan for December 2024 [provides](#) for the adoption, by transposition, of national standards in three priority sectors of industrial production (machinery, electromagnetic compatibility of equipment, low-voltage electrical equipment) in preparation for the conclusion of the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACCA) (the so-called "industrial visa-free regime").



Indicator 10.14. Supporting the development of efficient and more sustainable district heating
(Q3 2025)

Sector: energy sector

Status: in progress

The indicator is aimed at increasing the efficiency of the district heating sector. In order to achieve this indicator, it is necessary to adopt and enter into force the Law of Ukraine "On Amendments to Certain Laws of Ukraine on Supporting the Development of Efficient and Sustainable District Heating".

It is worth noting [the approval](#) in November 2023 of the Concept of the State Targeted Economic Program for Energy Modernization of Enterprises - Thermal Energy Producers, which are in state or municipal ownership, for the period until 2030, which provides for increasing the efficiency of the functioning of district heating systems. In addition, on February 9, 2025, the Law "[On](#) Amendments to Certain Laws of Ukraine in the Spheres of Energy and Heat Supply Regarding the Improvement of Certain Provisions Related to the Conduct of Economic Activities and the Effect of Martial Law in Ukraine", adopted on January 14, came into force, which is aimed at settling debts, improving payment discipline, developing the market for renewable energy sources, and approximating Ukrainian legislation to EU standards.

[mentioned](#) in one of the news items that steps in reforming the district heating sector include further deepening cooperation with international partners, developing a roadmap, and implementing modern modernization financing mechanisms.

On May 5, the Ministry of Development and Reform [published](#) a draft Law "On Amendments to Certain Laws of Ukraine on Supporting the Development of Efficient and Sustainable District Heating." On August 18, the Cabinet of Ministers presented a draft Government Action Program. The document [plans](#) to develop and submit to the Cabinet of Ministers of Ukraine a draft law on amending certain laws of Ukraine on supporting the development of efficient and sustainable district heating by December 2025.

On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine Plan, which provide for the postponement of the indicator deadline to Q4 2025.



Indicator 12.4. Entry into force of legislation on state support for agriculture in Ukraine
(Q3 2025)

Sector: agri-food sector

Status: in progress

The indicator envisages the adoption of amendments to the Law on State Support for Agriculture. According to the indicator, the law will determine:

- New measures to support agriculture and its industries based on SWOT analysis
- New approaches to supporting small farm investments
- Financial support instruments with the participation of MFIs
- Using the State Agrarian Register to provide support

On April 21, the government submitted to the Verkhovna Rada a draft law on amendments to certain laws of Ukraine regarding the organizational principles of support in the agricultural sector. The draft law provides for the implementation of a number of provisions of the EU regulations on the common agricultural policy (CAP), the creation of an independent payment agency, the formation of a data system on the sustainability of farms (FSDN), and the implementation of the Integrated Administration and Control System (IASK) for agricultural support. On June 17, the Verkhovna Rada adopted as a basis an alternative [draft law 13202-1](#). According to the main committee, this draft law contains additional provisions compared to the government one, in particular regarding additional control over the spending of funds and increased responsibility for their misuse. On August 25, the draft law ftesx or second reading.was published.



Indicator 13.2. Publication of the report on the results of the verification of strategic mineral reserves in Ukraine (Q3 2025)

Sector: management of critical raw materials

Status: in progress

The indicator aims to improve planning and ensure optimal conditions for attracting strategic investors. To implement the indicator, the State Service for Geology and Subsoil should publish a report on the verification/reassessment of critical mineral reserves in Ukraine, taking into account international classification systems, and the results should be open to investors.

According to [the results of](#) the pilot phase of the project, supported by the EBRD and the European Commission in 2023, geological reports will become available through the interactive map “Geoinform Ukraine”, which represents 125 of the most important deposits. These materials can be used by investors for analysis with the aim of further nomination of such deposits for e-auctions. Currently, free access to the State Geological Portal is closed due to martial law. However, according to [the](#) State Geological Service of Ukraine on the results of 2024, the pilot project of the EBRD Roadmap (2023-2024) has been completed and 6,000 books of geological reports on 125 deposits and subsoil areas of strategic and critical mineral resources have been scanned. However, another 113 thousand units of geological report storage are subject to digitization. It is also known that the geological services of Ukraine and France, with the support of the Association of European Geological Surveys (EuroGeoSurveys), have prepared [a monograph](#) “Strategic Mineral Resources of Ukraine and Their Investment Attractiveness”, which contains cartographic materials, a description of EU and Ukrainian legislation, positive international examples of the implementation of mining projects, etc.

On June 17, Geoinform of Ukraine and the EBRD [signed](#) an Agreement on the start of the second stage of the implementation of the Memorandum on Technical Assistance for the Digitization of Secondary Geological Information, Development of IT Architecture and Functionality of the State Geological Portal. The 30-month project involves the purchase of equipment and software, scanning and digitizing 60,000 units of geological information for posting on the State Geological Portal. It is planned to create an English-language interface, translate abstracts of georeports, and develop interactive maps.

It is worth noting that at the end of January 2025, the State Geological Service [published](#) a draft resolution of the Cabinet of Ministers of Ukraine “On Amendments to the Classification of Mineral Reserves and Resources of the State Subsoil Fund”. The draft was developed with the aim of adapting (harmonizing) the national Classification to the provisions of the UN Framework Classification of Fossil Energy and Mineral Reserves and Mineral Resources 2019 (UNFC 2019). The activity [plan](#) of the State Service for Geoscience and Mineral Resources for 2025 provides for the implementation of an action plan for the assessment of reserves and maintaining balances according to international standards.



Indicator 15.4. Approval of Ukraine's second nationally determined contribution to the Paris Agreement (Q3 2025)

Sector: green transition and environmental protection

Status: in progress

To achieve this indicator, the Cabinet of Ministers must adopt a resolution approving Ukraine's second nationally determined contribution to the Paris Agreement. In addition, under the terms of the indicator, Ukraine's second NDC to the Paris Agreement must be more ambitious than the current Updated NDC of Ukraine. This commitment [is](#) also [enshrined in](#) the final and transitional provisions of the Law "On the Fundamentals of State Climate Policy".

Ukraine's updated NDC to the Paris Agreement was approved by Cabinet of Ministers [Resolution 868-r](#) on 30 July 2021, and the preparation process [has been ongoing](#) since 2018. The document is available [on the UNFCCC website](#). In addition, in July 2021, the Ministry of Environment published an analytical review of the Updated NIP in [Ukrainian](#) and English. In July 2023, a draft action plan for the implementation of the NIP [was published](#), setting out key measures to reduce greenhouse gas emissions.

As [reported](#) in March 2025 [by](#) Minister of Environmental Protection and Natural Resources Svitlana Grynychuk, the NIP 3.0 should set a medium-term target for reducing greenhouse gas emissions by 2035. At the same time, the new NDC should take into account the goal of achieving climate neutrality by 2050, as well as the impact of the war and future reconstruction (which will lead to an increase in emissions for some time). On 27 May, the Ministry of Environmental Protection and Natural Resources [held](#) a discussion on the draft of Ukraine's nationally determined contribution for 2035, where model scenarios for the NDC were presented.

On 11 June, the Ministry of Environmental Protection and Natural Resources [published](#) a draft Cabinet of Ministers resolution "On the approval of Ukraine's second nationally determined contribution to the Paris Agreement." The declared goal is to reduce greenhouse gas emissions in 2035 by 68-73% from 1990 levels. On 25 July, the Ministry of Environmental Protection and Natural Resources published [a report](#) on the results of public consultations on the draft order. However, as [noted](#), the Ministry did not take into account a significant portion of the proposals and comments received from stakeholders during the discussion process.

On August 18, the Cabinet of Ministers presented the draft Government Action Program. The document [plans](#) to develop and submit a draft CMU order on approval of Ukraine's Second Nationally Determined Contribution to the Paris Agreement by September 2025.



Indicator 2.6. Adoption of a medium-term public debt management strategy
(Q4 2025)

Sector: public financial management

Status: in progress

Several structural benchmarks of the IMF Programme are dedicated to public debt management strategies: 10 and 15 (completed in 2023,

Effective public debt management has enabled Ukraine to reduce its public and publicly guaranteed debt from 80% of GDP at the end of 2016 to 50% of GDP at the end of 2019, and to keep debt unchanged relative to GDP two years into the COVID-19 crisis. As a result, at the start of the full-scale war, Ukraine had a stable fiscal situation.

At the same time, as a result of Russia's full-scale war against Ukraine, public and state-guaranteed debt is rapidly approaching 100% of GDP. In 2024, Ukraine restructured its Eurobonds, as provided for in [the](#) current Public Debt Management [Strategy](#). The Strategy states that the government will prepare a new Public Debt Management Strategy after the restructuring.

Therefore, the approval of a new Strategy is a pressing issue. The Strategy adds predictability and transparency to public debt management and, accordingly, contributes to fiscal sustainability.



Indicator 2.9. Adoption and entry into force of amendments to Cabinet of Ministers resolutions on state financial control

SLIDE 1/3

(Q4 2025)

Sector: public financial management

Status: in progress

To achieve this indicator, amendments to Cabinet of Ministers resolutions or other legislative acts on public financial control should be adopted and enter into force, covering, in particular, the following areas:

- enabling the State Audit Service to ensure that the agency has the means to protect the EU's financial interests, in particular with regard to funds used under Component I of UKRAINE PLAN, in accordance with international auditing standards;
- strengthening measures to monitor procurement procedures.

The reform is expected to improve the efficiency and quality of the State Audit Service in line with European Union practices and SIGMA financial inspection principles.

Based on an analysis of the legal framework governing the functions of the State Audit Service and taking into account the SIGMA principles of public administration, legislative changes will be introduced to ensure a clearer definition of the mandate of the State Audit Service.

The institutional independence of the State Audit Service will be preserved.

On 27 March 2025, the Head of the State Audit Service of Ukraine, Alla Basalayeva, and the Head of the Audit Board of UKRAINE PLAN, Marek Belka, signed a Memorandum to ensure close cooperation between the two institutions.

It provides for the exchange of information, regulatory and methodological documentation, audit reports and other relevant documents on state financial control over expenditures related to the implementation of the UKRAINE PLAN, in particular in areas such as public procurement, compensation and credit payments.

To implement this indicator, [at the end of May 2025](#), the State Audit Service and Expertise France held the first Steering Committee meeting on improving the financial control system. The project will run until March 2026. Within this framework, Expertise France is helping Ukrainian auditors to transition to European financial control standards. In particular, this includes combating fraud and other financial irregularities that may affect the financial interests of the EU.



Indicator 2.9. Adoption and entry into force of amendments to Cabinet of Ministers resolutions on state financial control

SLIDE 2/3

(Q4 2025)

Sector: public financial management

Status: in progress

In addition to launching cooperation with Expertise France, [an](#) interagency [meeting](#) was held on 5 June 2025 to ensure control over UKRAINE PLAN funds. The meeting discussed the responsibilities of management, monitoring and control bodies for implementing UKRAINE PLAN to identify signs of double funding, fraud and other illegal activities involving EU funds.

On 9 July 2025, [a joint meeting](#) of representatives of the State Audit Service of Ukraine and the Audit Board of the UKRAINE PLAN was held in Kyiv. During the meeting, the current results of the State Audit Service's control activities regarding the use of European funds were presented, as well as future control plans for the near future.

In 2024, UAH 39 billion (or EUR 861 million) was allocated and already used under budget programmes to implement the investment targets of the UKRAINE PLAN. Almost 100% of these funds will be covered by state financial control measures through state financial audits, inspections, procurement checks and procurement monitoring.

Last year, auditors completed 310 SFC measures on budget funds that Ukraine receives under the European aid instrument UKRAINE PLAN. Currently, 78 measures are ongoing, and in the near future, about 148 control measures of varying complexity will be carried out.

Typical errors that led to violations include customers' lack of awareness that purchases were made with UKRAINE PLAN funds and non-compliance with the requirements of the Framework Agreement between Ukraine and the EU on special mechanisms for the implementation of EU funding for Ukraine under the UKRAINE PLAN. For example, double funding, which can be mistakenly interpreted as co-financing, as well as overestimation of the cost and volume of work and equipment, remain a problem.

At the request of the auditors, most of these violations were eliminated.

The State Audit Service has also developed a draft risk assessment model for the planning process to ensure the selection of control objects that have been allocated funds to implement the steps of the UKRAINE PLAN. The State Audit Service has also prepared and submitted to the Ministry of Finance of Ukraine proposals for the formation of an audit strategy for UKRAINE PLAN funds.



Indicator 2.9. Adoption and entry into force of amendments to Cabinet of Ministers resolutions on state financial control

SLIDE 3/3

(Q4 2025)

Sector: public financial management

Status: in progress

14 July 2025 The Ministry of Economy published letter [3323-04/48400-07](#) on procurement in accordance with the provisions of the Framework Agreement under the UKRAINE PLAN. The letter addresses the following issues:

1. Procurement under the UKRAINE PLAN and the VAT exemption mechanism.
2. Clarifications from the European Commission's Directorate-General for Enlargement and Neighbourhood (DG ENEST) on the rules for the eligibility of persons, entities and materials for supply.
3. Procurement under the UKRAINE PLAN related to the implementation of the public investment project to ensure quality, modern and accessible general secondary education "New Ukrainian School" in 2025.
4. Regarding procurement from various sources of funding, in particular related to the implementation of a public investment project to modernise workshops and laboratories in vocational and pre-vocational education institutions, ensuring energy efficiency, safety and inclusiveness of the educational space.
5. Regarding the draft amendments to Resolution 1178.

On August 21, 2025, [a board meeting was held](#) based on the results of the work for the first half of 2025. So, for the first half of 2025, 12 control measures were carried out, including: 1 audit, 1 state financial audit and 10 procurement inspections. The control covered financial and material resources of funds under the UKRAINE PLAN instrument for a total amount of over UAH 124 million and financial violations were identified that led to losses of financial and material resources under the UKRAINE PLAN instrument for an amount of over UAH 185 thousand, which were reimbursed in full.



Indicator 3.3. 20% of old disciplinary proceedings (cases) not considered as of the end of 2023 have been resolved (Q4 2025)

Sphere: judicial system

Status: completed

To count this indicator as completed, 20% of old disciplinary proceedings (complaints) pending as of December 31, 2023 must be resolved with the involvement of the Disciplinary Inspectors Service and based on the priority criteria for considering disciplinary complaints specified in clause 13.7 of the Regulations of the High Council of Justice (as amended on November 21, 2023 No. 1068/0/15-23), published on the official website of the High Council of Justice.

The implementation of the indicator is necessary for the consideration of accumulated complaints, the statute of limitations for which is expiring. This will ensure that judges are held accountable for committed and proven disciplinary offenses. Determining a list of priority cases for consideration and involving the Service of Disciplinary Inspectors in consideration will contribute to increasing the level of transparency in the implementation of disciplinary cases, ensuring predictability, and consistency of disciplinary practice regarding judges.

After the restoration of the disciplinary function in the Supreme Administrative Court (from November 1, 2023), as of the end of 2023, more than 14,000 complaints were distributed among the members of the Supreme Administrative Court. As of the end of 2023, the consideration of 2,125 complaints (15%) was fully completed, 12,106 complaints (85%) remained unconsidered.

The Service of Disciplinary Inspectors began its work on 23.12.2024. They are to consider disciplinary proceedings in which the Disciplinary Chamber has not adopted a decision to open a disciplinary case on the day the Service begins its work. Currently, according to the latest data from [the Supreme Court of Justice](#), there are about 11 thousand such complaints.

According to the automated office management system of the High Council of Justice, it was established that **as of the end of June 2025**, disciplinary inspectors of the High Council of Justice, in accordance with the requirements of paragraph 13.7 of the Regulations of the High Council of Justice, identified 77 complaints as priority (from those received by December 31, 2023) and of these, **18 complaints (23%) have already been considered**, which corresponds to the established target indicator.



Indicator 3.4. Qualification assessment (verification) was conducted to ensure predictability, consistency and openness of disciplinary practice regarding judges. (Q4 2025)

Sector: judicial system

Status: in progress

50% of judges who were required to undergo qualification assessment (verification) as of 30 September 2016 shall undergo such assessment in accordance with the established procedure and with the involvement of the Public Council of Integrity.

Implementing the indicator will provide an opportunity to verify the compliance of judges' qualifications with the position they hold.

It is worth recalling that for a long time the Supreme Judicial Council of Ukraine did not hold meetings on the procedure for evaluating the qualifications of judges for their position. They were resumed for a short time (less than a week) at the end of 2019 and were suspended due to the termination of the powers of the members of the second term of the Commission.

[The new composition of the Supreme Judicial Council of Ukraine](#) was elected in June 2023. The Public Integrity Council is involved in the interview stage, which should assist the Commission in establishing the compliance of a judge or candidate for the position of judge with the criteria of professional ethics and integrity.

According to the HQCJ, the number of persons appointed (elected) to the positions of judges as of September 30, 2016 was 6,958, of which as of July 24, 2025:

- 3 164 judges (45, 47 %) confirmed their suitability for the position they hold (successfully passed the initial qualification assessment, assessment for suitability for the position they hold, qualification assessment within the framework of the competition for the Supreme Court or the High Anti-Corruption Court);
- 140 judges (2.01%) are not qualified for their positions.
- A petition for dismissal was submitted to the High Council of Justice regarding 29 judges due to their refusal to undergo an assessment for suitability for the position held.

Thus, **for 3,304 judges (47.48 %)**, the qualification assessment has been completed to fulfill indicator 3.4.



Indicator 3.9. A system for collecting data on the execution of court decisions is in place.
(Q4 2025)

Sphere: judicial system

Status: in progress

To implement this indicator, a system for collecting data on the execution of court decisions must be put into operation.

A data collection system on the enforcement of court decisions is an important tool that should be used for monitoring and control. Low efficiency and traceability of the enforcement of court decisions [lead to](#) a reduction in the value of the judicial process and negatively affect the investment climate, as investors are not confident in the protection of their rights and interests.

Instead, the implementation of a data collection system on the execution of court decisions will allow tracking progress towards execution, analysing the reasons for non-execution of court decisions, identifying systemic problems, and will ensure greater transparency and control over the activities of the State Enforcement Service and other entities responsible for the execution of court decisions.



Indicator 4.8. Conducting the next National Risk Assessment
(Q4 2025)

Scope: fight against corruption and money laundering

Status: in progress

Risk Assessment must be prepared and conducted in accordance with the updated Methodology for Conducting the National Risk Assessment of Money Laundering and Terrorist Financing in Ukraine.

Previously, Ukraine had another obligation related to this indicator under the Ukraine Plan for obtaining transitional financing, which was fulfilled on time. This is the approval and entry into force of the Government Order on approval of a plan of measures aimed at preventing and/or minimizing the negative consequences of the risks identified based on the results of the third round of the National Risk Assessment in the field of preventing and countering the legalization (laundering) of proceeds from crime, the financing of terrorism and the financing of the proliferation of weapons of mass destruction for the period until 2026.

This indicator follows logically from the previous one, and the risk assessment conducted aims to develop solutions for the transparency and legality of financial transactions.

On 1 July 2025, a [meeting](#) of the Council on Preventing and Combating the Legalisation (Laundering) of Proceeds from Crime, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction was held.

The main focus was on the National Risk Assessment in the area of money laundering and terrorist financing. Participants discussed the stages and approaches to conducting the assessment, in particular updating the methodology in line with current challenges posed by the armed aggression of the Russian Federation, economic transformation and the development of digital financial technologies.

The purpose of the assessment is to identify, analyse and understand current threats that could be used to legalise proceeds obtained through criminal means or to finance terrorism. The results of the National Risk Assessment will form the basis for updating state policy in the field of counteraction and for the effective application of a risk-based approach.



Indicator 5.6. Entry into force of the Law on Improving State Regulation of Capital Markets and Organized Commodity Markets (Q4 2025)

Scope: financial markets

Status: completed

According to the indicator, the new law should bring capital markets regulation into line with IOSCO principles.

It is about increasing the capacity and independence of the NSSMC as a market regulator and strengthening opportunities for international cooperation. [The law](#), aimed at improving the regulation of the state capital market, entered into force on April 27, 2024, although some provisions will be put into effect on January 1, 2026 and January 1, 2028.

In the opinion of the Verkhovna Rada Committee on European Integration, the provisions of the Law generally comply with the IOSCO principles, despite comments on individual provisions. In the reform matrix, the indicator is marked as fulfilled



Indicator 7.4. Entry into force of legislation on the system of changes to implement the system of transition from military service to civilian life (Q4 2025)

Sector: human capital

Status: in progress

The Law of Ukraine on Amendments to Certain Legislative Acts of Ukraine on the Implementation of the Transition System from Military Service to Civilian Life is to enter into force, and resolutions of the Cabinet of Ministers have been adopted on approving the procedures and conditions for receiving services by participants in the transition system. The acts should focus on ensuring the creation of:

- rehabilitation and medical, in particular psychological, assistance;
- training, retraining and advanced training programs;
- necessary conditions for the employment of veterans as a separate category;
- measures to support veteran businesses.



**Indicator 7.8. Entry into force of the Law of Ukraine
"On the Basic Principles of Housing Policy"
(Q4 2025)**

Sector: human capital

Status: in progress

To implement this indicator, the Law of Ukraine "On the Basic Principles of Housing Policy" must come into force.

The law should focus on the following main areas:

- accessibility of housing for the most vulnerable categories of citizens should become the main principle in providing housing;
- creating various support mechanisms for citizens with different financial capabilities and defining criteria for access to them;
- regulation of the legal basis for the introduction of communal housing leases and communal housing leases with the right to buy out;
- creating a transparent system for registering citizens' housing needs to ensure a prompt response at the local level;
- creating a transparent framework for monitoring by the public, civil society and the international community.

To implement this indicator, draft law No. [12377 was submitted to the Verkhovna Rada of Ukraine on January 6, 2025](#). The draft law provides for:

- Establishing EU-compliant housing policy principles, including accessibility and barrier-free housing;
- Establishing the implementation of the principle of strategic planning of housing policy, in particular the need to create a State Housing Policy Strategy;
- Development of public-private partnership in the field;
- Definition of housing stock;
- Implementation of financial and credit mechanisms for citizens to acquire housing as their property;
- Establishing minimum requirements for consumer quality of housing;
- Formation of a Unified Information and Analytical Housing System.

On July 16, 2025, the Verkhovna Rada supported the said draft law in the first reading. The draft law is currently being finalized for consideration in the second reading. It is known that on August 13, the relevant Committee of the Verkhovna Rada reported on the processing of almost a quarter of the amendments (481 out of 1916 submitted) to draft law 12377, [approved](#) in the first reading.



Indicator 10.5. Adoption of legislation for the electricity integration package
(Q4 2025)

Sector: energy sector

Status: in progress

To implement the indicator, it is necessary to adopt legislation transposing the provisions of the Electricity Integration Package. The legislation to enter into force must align the national legislation of Ukraine with the Electricity Integration Package, which was included in the Energy Community acquis in December 2022.

On October 2, 2024, the Verkhovna Rada registered [draft law](#) No. 12087 “On Amendments to the Laws of Ukraine on the Integration of the Electricity Markets of Ukraine and the European Union”. The draft law is aimed at transposing the European Electricity Integration Package into Ukrainian legislation. On October 18, 2024, [an alternative](#) draft law No. 12087-1 was submitted. The initiative to submit the draft law was positively assessed by the Energy Community [Secretariat](#) and [the USAID](#) Energy Security Project.

On March 28, the Cabinet of Ministers [approved](#) the Action Plan to implement the recommendations of the European Commission presented in the Progress Report on Ukraine within the framework of the 2024 European Union Enlargement Package. Thus, according to the plan, by August 2025, it is planned to adopt and implement an integration package of EU law acts in the electricity sector.

At the end of January, the Ministry of Energy [considered](#) draft law No. 12087 and supported it with comments. On June 25, the Committee on Energy and Housing and Utilities [approved](#) a consolidated revised version of draft law No. 12087-d on the implementation of European energy law, increasing security of supply and competitiveness. It was recommended to include it on the agenda of the Verkhovna Rada and adopt it in the first reading.

On July 22, the draft Law No. 12087-d [was adopted](#) in the first reading. On August 8, the Cabinet of Ministers [approved](#) amendments to the Ukraine Plan, which provide for the postponement of the indicator deadline to Q3 2025.



Indicator 10.7. Appointment of a nominated electricity market operator (Q4 2025)

Sector: energy sector

Status: in progress

RRR4U

The indicator provides for the appointment of a nominated electricity market operator by the National Commission for the Regulation of Energy and Utilities of Ukraine by the end of 2025, which is one of the prerequisites for the full market coupling of the electricity markets of Ukraine and the EU.

Back in 2023, the NEURC began to actively [discuss](#) the issue of appointing a nominated market operator at meetings, where it was noted that so far the NEURC has no grounds to independently determine who will be the sole nominated participant for the European spot energy market and it is necessary to create opportunities at the legislative level for the NEURC to make appropriate changes to the specified License Terms.

Thus, currently, the national legislation has adapted norms on market coupling and the appointment of a nominated market operator. However, the draft law registered on October 2 in the Verkhovna Rada on the unification of the electricity markets of Ukraine and the EU [provides for](#) the functions, rights and obligations of the nominated market operator as an entity that ensures market coupling, requirements for the appointment of a nominated market operator, as well as additional powers of the Regulator regarding the nominated market operator.

In turn, JSC "Market Operator" [believes](#) that it should be recognized by the National Regulatory Commission for the Regulation of Energy and Utilities of Ukraine as a nominated market operator, since it already has observer status in the NEMO Committee. In particular, the List of Expectations of the owner of JSC "Market Operator" for 2025 [states](#) that the goal of the Company within the framework of market coupling is to obtain the status of nominated market operator (NEMO) and organize trading on the combined SDAC/SIDC markets.

On March 28, the Cabinet of Ministers [approved](#) the Action Plan to implement the recommendations of the European Commission presented in the Progress Report on Ukraine within the framework of the 2024 European Union Enlargement Package. Thus, according to the plan, by August 2025, it is planned to intensify the reform of the electricity market by adopting and implementing the EU integration package of acts in the electricity sector, including by appointing a NEMO.



Indicator 10.11. Determination of the special status of the NEURC (Q4 2025)

Sector: energy sector

Status: in progress

The indicator assumes the adoption and entry into force of amendments to the legislation that will define a special status to ensure the independence of the Regulator, as provided for in Directive 2009/72/EU and Directive 2009/73/EU.

On December 27, 2023, the NEURC [approved](#) the draft Law of Ukraine "On Amendments to Certain Laws of Ukraine on Strengthening the Independence of the Regulator in the Energy and Utilities Sectors". With this decision, the Regulator began implementing [the Action Plan](#) to Ensure the Independence of the National Commission for the Regulation of Energy and Utilities of Ukraine, which was developed to fulfill Ukraine's international obligations in the context of European integration, in particular, the recommendations of the Energy Community. The draft law, among other things, provides for clarification of the special status of the National Commission for the Regulation of Energy and Utilities of Ukraine as a central executive body.

The Energy Community Secretariat has repeatedly [pointed out](#) that the independence of the regulator from private individuals or public bodies is a key pillar of European energy legislation, however, the organization also [recognizes](#) that ensuring the independence of the National Commission for the Regulation of Energy and Power Generation of Ukraine may require amendments to the Constitution, which cannot be discussed in wartime conditions. Therefore, the Energy Community Secretariat is exploring with the Ukrainian side ways to strengthen the independence of the Regulator within the current constitutional framework.

At the end of February 2025, at the RRR4U event, the Chairman of the Committee on Energy and Housing and Utilities of the Verkhovna Rada of Ukraine, Andriy Gerus [expressed](#) The opinion is that the independence of the National Commission for the Regulation of Energy and Utilities is sufficiently ensured at the legislative level, but now it is worth focusing on the high-quality implementation of these norms.

In addition, the Government of Ukraine, [in accordance](#) with the Memorandum on Economic and Financial Policy following the 8th review of the EFF program, has committed to developing a legislative framework for accountability of the NEURC, which will provide for regular external assessments of the regulator's governance and independence. The law on the NEURC itself, with a provision on external assessment, should be adopted taking into account the recommendations of the Energy Community Secretariat. In turn, the IMF emphasizes the need for the rapid adoption of the draft law on strengthening the independence of the NEURC, and the structural beacon of the program for the publication of the external assessment by the Secretariat has been postponed from October to December 2025 to align with the schedule for the adoption of the law.

On August 18, the Cabinet of Ministers presented the draft Government Action Program. The document [provides for](#) the development and submission to the Cabinet of Ministers of Ukraine by August 2025 of a draft law on strengthening guarantees of independence in the exercise of the Regulator's powers in the energy and utilities sectors.



Indicator 10.12. Lifting the moratorium on increasing tariffs for heat and hot water
(Q4 2025)

Sector: energy sector

Status: in progress

The indicator provides for the lifting of the moratorium introduced by Law of Ukraine [2479-IX](#) of 27 July 2023 "On the peculiarities of regulating relations in the natural gas market and in the field of heat supply during the period of martial law and the subsequent restoration of their functioning" with the aim of achieving economically justified tariffs for heat and hot water. According to the Law, the moratorium on tariff increases is valid until the end of martial law and for six months after its completion.

On June 4, 2024, the Verkhovna Rada lifted the moratorium on increasing gas distribution tariffs for non-household consumers (enterprises, budget institutions, heat supply organizations, municipal facilities). Thus, after the adoption of the law, the moratorium remained only for household consumers.

In turn, [according to](#) the NBU Inflation Report of April 2025, this year tariffs for gas, heating and hot water are likely to remain unchanged. At the same time, they are expected to gradually approach economically justified levels from 2026. Uncertainty about the timing and scale of tariff increases creates risks for the inflation forecast: postponing decisions will reduce inflation, but worsen the financial condition of energy companies. In turn, rapid tariff growth may increase inflation and the need for subsidies.

On August 18, the Cabinet of Ministers presented the draft Government Action Program. The document [provides for](#) the settlement of the issue of establishing and applying tariffs for centralized water supply and centralized wastewater services through amendments to the Decree of the Cabinet of Ministers of Ukraine dated April 29, 2022 No. 502 (October 2025) and the Procedure for Tariff Formation (November 2025), the settlement of accounts payable of heat, water supply and wastewater enterprises through the preparation of a draft law and amendments to the Decree of the Cabinet of Ministers of Ukraine dated July 19, 2022 No. 812 (October 2025), and the definition of a mechanism for restructuring natural gas debt, which does not depend on the amount of debt from the difference in tariffs (until December 31, 2025).

On August 8, the Cabinet of Ministers [approved](#) amendments to the Plan of Ukraine, which provide for the postponement of the indicator deadline to the 4th quarter of 2026.



Indicator 10.13. Adoption of the State Targeted Economic Program for Energy Modernization of Heat Generating Enterprises for the Period Until 2030 (Q4 2025)

Sector: energy sector

Status: in progress

The indicator provides for the adoption by the Cabinet of Ministers of the State Targeted Economic Program for Energy Modernization of Thermal Energy Producers by 2030", which is aimed at:

- identifying measures to improve the sustainability, quality and accessibility of heating services;
- identifying measures to support decarbonization, reduce greenhouse gas emissions, and expand the use of renewable energy sources;
- ensuring the implementation of measures to strengthen governance and management skills for local authorities in the district heating sector.

In turn, the development of the State Target Economic Program for Energy Modernization of Enterprises - Thermal Energy Producers, which are in state or municipal ownership for the period until 2030 [is provided for](#) by 2027 by the Action Plan for the Implementation of the Energy Strategy of Ukraine for the Period Until 2050.

On November 28, 2023, the Cabinet of Ministers [approved](#) the Concept of the State Targeted Economic Program for Energy Modernization of Enterprises - Thermal Energy Producers, which are in state or municipal ownership, for the period until 2030, and also provided for the development and submission of a draft program.

On July 19, 2024, the Ministry of Infrastructure [published](#) the draft State Targeted Economic Program for Energy Modernization of Enterprises - Thermal Energy Producers, which are in state or municipal ownership, for the period until 2030. The collection of comments and proposals continued until mid-August 2024.

On August 18, the Cabinet of Ministers presented a draft Government Action Program. The document [provides for](#) the development and submission by December 2025 of a draft order of the Cabinet of Ministers of Ukraine on approval of the State Targeted Economic Program for Energy Modernization of Enterprises - Thermal Energy Producers, which are in state or municipal ownership, for the period until 2030.



Indicator 11.3. Adoption of the Law of Ukraine "On Railway Transport of Ukraine", entry into force of the final provisions of the Law (Q4 2025)

Sector: transport

Status: in progress

Two draft laws have been registered in the Verkhovna Rada: [12142](#) "On the system and specific features of the functioning of the railway transport market of Ukraine" from the Cabinet of Ministers and an alternative draft law [12142-1](#) from members of the Verkhovna Rada Transport Committee.

Both draft laws provide for the creation of a National Commission to regulate transport, the separation of Ukrzaliznytsia, and the admission of private rail operators to the railways. In addition, it is planned to establish a Railway Transport Service and a National Bureau for the Investigation of Transport Accidents, which will be responsible for transport safety and railway interoperability (the ability of railway transport to maintain safe traffic).

However, draft law 12142 does not specify the timing for the creation of the National Commission, and private rail operators will be allowed on the tracks in at least seven years: the law will only come into force five years after the end of martial law in Ukraine, and non-state entities will be able to operate on the 1,520 mm railway network two years later.

Draft law 12142-1 focuses on the reform of Ukrzaliznytsia, which should begin with its division into separate segments and the creation of separate companies (freight transport, passenger transport, infrastructure), which will have independent accounting of expenses and income. It was this version of the bill that was submitted for discussion with the business community and took into account their comments.

Both draft laws implement European directives and regulations into Ukrainian legislation, such as Directive 2012/34/EU on the establishment of a single European railway area, Directive (EU) 2016/797 on the interoperability of the railway system within the European Union, and Directive (EU) 2016/798 on railway safety.

In accordance with the amendments to the Ukraine Plan, the government proposes to divide this indicator into two: 1) Entry into force of the Law on Traffic Safety and Interoperability of Railway Transport of Ukraine with application within three years from the date of its adoption - Q4 2025, 2) Entry into force of the Law on the Railway Transport Market with phased application of its provisions. - Q4 2026.



Indicator 13.6. Publication of a report on current legislation in the field of ESG reporting (Q4 2025)

Sector: management of critical raw materials

Status: in progress

The indicator aims to approve and publish a study assessing the current legislation on the introduction of ESG reporting for the extractive sector and recommendations for addressing gaps in the legislation.

On 24 October 2024, the Ministry of Environmental Protection and Natural Resources [approved](#) the Ministry's Strategic Work Plan for 2024-2028, which, among other things, provides for the development and publication in the Q4 2025 (together with EU partners) of a report on current legislation on the introduction of mandatory environmental, social and governance (ESG) reporting as part of the introduction of ESG reporting for the mining and extractive sectors.

In turn, in early March 2025, a public discussion [was held](#) on the national Sustainable Development Reporting Strategy, a document that defines the future of Ukrainian business in the context of global environmental and social challenges. Summing up the discussion, participants agreed that one of the key areas of work is the harmonisation of Ukrainian legislation with European requirements. It was also noted that in the near future, the Ministry of Finance plans to set up an interdepartmental working group on the implementation of ESG reporting and to develop an operational plan for the implementation of the national Sustainable Development Reporting Strategy.

At the end of March, the Green Transition Office (an independent advisory body under the Ministry of Economy, implemented by DiXi Group) [presented](#) the first comprehensive study on the readiness of Ukrainian businesses to implement ESG practices.



Indicator 15.3. Approval of the Regulations on the Scientific and Expert Council on Climate Change and Ozone Layer Preservation (Q4 2025)

Sector: green transition and environmental protection

Status: in progress

The indicator provides for the adoption of a Cabinet of Ministers resolution "On the Approval of the Regulations on the Scientific and Expert Council on Climate Change and Ozone Layer Preservation."

On 8 October 2024, the Verkhovna Rada [adopted](#) Law of Ukraine 3991-IX "On the Basic Principles of State Climate Policy", which provides for the establishment of a Scientific and Expert Council on Climate Change and Ozone Layer Preservation as an independent advisory scientific and expert body to provide scientific support for the formation of state climate policy. The law also defines the tasks of the Scientific and Expert Council, which, together with its composition, must be approved by the Cabinet of Ministers within one year of the law coming into force.

On 18 February, the Cabinet of Ministers [approved](#) the Government's Priority Action Plan for 2025, which, among other things, requires the Ministry of Environmental Protection and Climate Change to develop and submit to the Cabinet of Ministers a draft resolution on the approval of the Regulations on the Scientific and Expert Council on Climate Change and Ozone Layer Preservation by October 2025. The development and submission of the resolution [is](#) also [provided for in](#) the Ministry of Environment's Work Plan with a deadline of the Q4 2025.

According to our information, as of May 2025, the Ministry of Environmental Protection has already developed a draft decision.



Indicator 1.4. Restoration and modernisation of the Unified Portal for Civil Service Vacancies (career.gov.ua)
(Q1 2026)

Sector: public administration reform

Status: in progress

The indicator provides for the restoration of the Unified Portal of Civil Service Vacancies (career.gov.ua). The portal should be fully operational and generate statistics on all vacancies and appointments.

Such a portal will promote transparency in public service employment and increase efficiency. The NADU is responsible for implementing the indicators.

In accordance with the amendments to the Ukraine Plan, which were approved by the government, it is proposed to postpone the modernization of the portal until Q2 2026.



Indicator 1.5. Full launch and use of the human resource management information system (HRMIS)

(Q1 2026)

Sector: public administration reform

Status: in progress

The indicator provides for the introduction and use of a human resources management information system (HRMIS) in all ministries and other central executive bodies and their territorial bodies.

The idea of introducing such a system is not new. Work on its implementation began back in 2018-2019. It is designed to reduce human resource management costs in executive bodies and make management processes more transparent, understandable and efficient.



Indicator 3.7 Entry into force of legislation on simplified insolvency procedures for MSMEs (Q1 2026)

Sector: judicial system

Status: in progress

Legislation on simplified insolvency procedures for micro, small and medium-sized enterprises (MSMEs) should enter into force.



Indicator 3.12. Entry into force of legislation ensuring transparent and merit-based selection of prosecutors for senior positions in the prosecution service
(Q1 2026)

Sector: judicial system

Status: in progress

According to UKRAINE PLAN, "enhancing the accountability and integrity of the prosecution service is key to combating abuse of power and pressure on businesses and investors by law enforcement agencies, which is widespread in Ukraine."

The indicator provides for the entry into force of legislation that will ensure transparent and merit-based selection of prosecutors for senior positions. This legislation will include:

- clear assessment criteria, including professional competence and integrity/ethics;
- a transparent, competitive and meritocratic selection procedure that includes verification of professional competence and integrity;
- strengthening the institutional capacity and powers of the Office of the Prosecutor General and the prosecutorial self-government, in particular the Council of Prosecutors, in the selection of prosecutors for senior positions.

On 24 June, the newly appointed Prosecutor General of Ukraine, Ruslan Kravchenko, publicly [supported](#) a transparent, merit-based selection of prosecutors for senior positions, as provided for in the EU's UKRAINE PLAN initiative and planned legislative changes, which include the adoption of a special law taking into account best European standards.

This process will be conducted in an open manner, with the involvement of international experts and after consultation with the Venice Commission.



**Indicator 5.1. Publication of the banking system
resilience assessment**
(Q1 2026)

Sector: financial markets

Status: in progress

The indicator provides for the publication of the resilience assessment of the 20 largest banks in terms of assets. If the necessary conditions are met, the assessment should include a stress test evaluating the bank's condition under a negative economic scenario and an independent asset quality review (AQR).

In December 2024, the NBU approved [the technical specifications](#) for the 2025 bank [assessment](#) and defined the details of its implementation. In May 2025, the NBU [approved the methodology for stress testing banks](#). The assessment procedure is in line with the indicator.



Indicator 5.2. Entry into force of legislation on the sale of state-owned banks
(Q1 2026)

Sector: financial markets

Status: completed

The indicator provides for the entry into force of amendments to the rules for the sale of state-owned banks. In particular, it is proposed to update Law 4524-VI, which defines the specifics of the sale of state-owned bank shares. The updated legislation should allow the sale of minority and majority stakes in banks and banks as a whole in accordance with the priorities set by international partners. In order to implement this indicator, [Law 3983-IX](#) on the specifics of the sale of state-owned shares in the authorised capital of banks came into force in October 2024. In the updated monitoring report of the Ministry of Economic Development, this indicator is marked as completed.



Indicator 5.5. Entry into force of legislative changes to improve the resolution of problem loans
(Q1 2026)

Sector: financial markets

Status: in progress

The indicator provides for the entry into force of legislative acts implementing the recommendations of the strategy for resolving non-performing loans (Indicator 5.4). The strategy has been approved as a section of the Lending Development Strategy.

Currently, the relevant recommendations have been partially implemented. In particular, the NBU has made changes to the definition of non-performing loans. However, the envisaged changes under the Bankruptcy Code have not yet been submitted to the Verkhovna Rada. The draft amendments to the Ukraine Plan propose to postpone the implementation of this indicator to the second quarter of 2025.



Indicator 8.5. Ensuring the resolution of issues related to connection to utility networks
(Q1 2026)

Sector: business environment

Status: in progress

The indicator assumes the entry into force of the Law on Amendments to Legislative Acts on Simplifying the Connection of Real Estate to External Engineering Networks and Improving Legal Regulation in the Field of Pipeline Transport. The law will contain:

- on a unified procedure for connecting to utility networks
- disclosure of information about engineering networks in electronic registers
- entering data on engineering networks and their protection zones into state property registers



Indicator 9.3. Better division of powers between local governments and executive authorities
(Q1 2026)

Sector: Public Administration Reform

Status: In progress

Legislation should come into force to ensure a better division of powers between local governments and executive authorities.



Indicator 12.6. Implementation of support through the SAR (State Agrarian Register)
(Q1 2026)

Sector: agri-food sector

Status: in progress

Previously, in the 4th quarter of 2024, Ukraine fulfilled indicator 12.3, which provided for the entry into force of the law on the State Agrarian Register. In particular, the Law of Ukraine "On the information and communication system "State Agrarian Register" was adopted, which determines the legal, organizational and financial principles for the creation and functioning of the information and communication system "State Agrarian Register" in order to protect the rights and interests of individuals and legal entities during the creation, storage, processing and use of register information in public electronic registers.

The next step in improving the official public electronic register of agricultural enterprises is the implementation of indicator 12.6, which provides that a report will be provided as a result, indicating that by the end of 2025, 80% of state support has been received through DAR.

In order to implement this indicator, on July 24, 2025, the information and communication system "State Agrarian Register" began [accepting applications](#) for financial support by farms.

Financial support is provided in an amount not exceeding 1 million hryvnia with the obligation to return budget funds for a period of up to 5 years.

Applications will be accepted from July 24, 2025 to August 22, 2025.



Indicator 15.8. Development of a strategy for implementing circular economy principles and an action plan for its implementation (Q1 2026)

Sector: green transition and environmental protection

Status: in progress

The indicator provides for the approval by the Cabinet of Ministers of a strategy for implementing circular economy principles and an action plan for its implementation. The strategy is expected to identify the potential opportunities and consequences of the transition to a circular economy in Ukraine for 5-10 pre-selected priority sectors and value chains, such as waste, textiles, plastics, batteries, electronics, agriculture, construction and repair, as well as metals and minerals. The responsible implementing body is the Ministry of Economy.

At the end of May 2024, the Ministry of Economy [hosted](#) a meeting of the interdepartmental working group on the development of the circular economy, where the results achieved and the further work plan for the development of the strategy were presented.



Indicator 15.9. Adoption of the National Waste Management Plan until 2033
(Q1 2026)

Sector: green transition and environmental protection

Status: completed

The indicator provides for the adoption of the Cabinet of Ministers' resolution "On Approval of the National Waste Management Plan of Ukraine until 2033". The document should focus on the following main areas:

- household waste management;
- hazardous waste management;
- infrastructure needs;
- analysis of the economic and financial sustainability of the action plan for the implementation of economic instruments to improve waste management;
- monitoring and control of waste management;
- strategic planning of waste management in Ukraine;
- introduction of waste management at the regional level.

At the same time, such a plan has already [been approved](#) by the order of the Cabinet of Ministers of Ukraine dated December 27, 2024 No. 1353-r. Thus, the indicator is considered to have been fulfilled. The National Waste Management Plan is subject to review every 4 years from the date of entry into force.

On August 8, the Cabinet of Ministers [approved](#) amendments to the Ukraine Plan, which provide for the postponement of the indicator deadline to Q3 2025.

RRR4U

SPECIAL TOPIC

“(Not) on time? Unfreezing prices and tariffs in energy and utilities”





Current status

Moratorium - applies only to the population

- Law No. 2479-IX prohibits, for the period of martial law (+6 months after), any increase in tariffs for:
 - **natural gas distribution** services ;
 - **thermal energy** (its production, transportation and supply);
 - **thermal energy and hot water supply** services .
- ...as well as a revision towards an increase **in natural gas prices** for household consumers, condominiums/housing complexes (boiler houses)
 - "Fixed" plan from Naftogaz (99.9% of the population) 7.96 UAH/m³ extended until 04/30/2026.
- 06/30/2023 canceled in part of tariffs for heat and hot water for non-domestic consumers
- On June 4, 2024, tariffs for gas distribution for non-household consumers (enterprises, budget institutions, heat supply organizations, municipal facilities) were canceled.
- By resolution No. 502 of April 29, 2022, the CMU “recommended” the application of the 2022 tariffs for **centralized water supply/wastewater disposal**



Current status (2)

In addition to the moratorium, there are **public service obligations (PSOs) in place**, which set regulated prices/tariffs on the markets:

Electricity (CMU Resolution No. 483 of June 5, 2019 as amended)

- households, dormitories, IDPs, religious organizations: 4.32 UAH/kWh (night tariff 2.16 UAH/kWh) until 31.10.2025
- supplier of last resort (SoLR): tariff 0.00 UAH/MWh until 31.12.2025
- participants: universal service suppliers (USSs), Guaranteed Buyer, Energoatom, Ukrhydroenergo; for SoLR – Ukrenergo
- on October 28, 2022, cancelled in the part related to DSOs' technological losses; on June 1, 2024, household electricity prices increased by 63.6%.

Gas (CMU Resolution No. 222 of March 6, 2022 as amended)

- households, gas distribution system operators (technological consumption/losses*), supplier of last resort (SoLR)
- electricity producers using natural gas (as per the Ministry of Energy list): 14 or 18 UAH/m³
- participants: Naftogaz Group companies, including extraction enterprises



Distance to cost-reflectivity

	Regulated price	Market price (retail)	Coverage level
Natural gas, UAH/m³	7.96	9.98-27* 29.7-30.7**	30-80% 26-27%
Electricity, UAH/kWh	4.32	~8.5-11***	39-51%
Heat supply, UAH/Gcal****	1752	2664 (3964,8: other consumers)	66% (44%)
Water supply*****			79%
Drainage*****			71%

* [Gasoteka](#) (commercial offers for August 2025, monthly tariffs)

** Calculations by DiXi Group based on the actual natural gas sales price [for July 2025](#), a 2% supplier markup, current tariffs of gas distribution system operators (GDSOs), incl. VAT

*** Calculations by DiXi Group based on: the volume-weighted average Day-Ahead Market (DAM) price for August, a 4% supplier markup on the DAM price, and current tariffs of TSO and DSOs

**** applicable and economically justified tariffs, according to NEURC monitoring of the heat energy market [for March 2025](#) (incl. VAT)

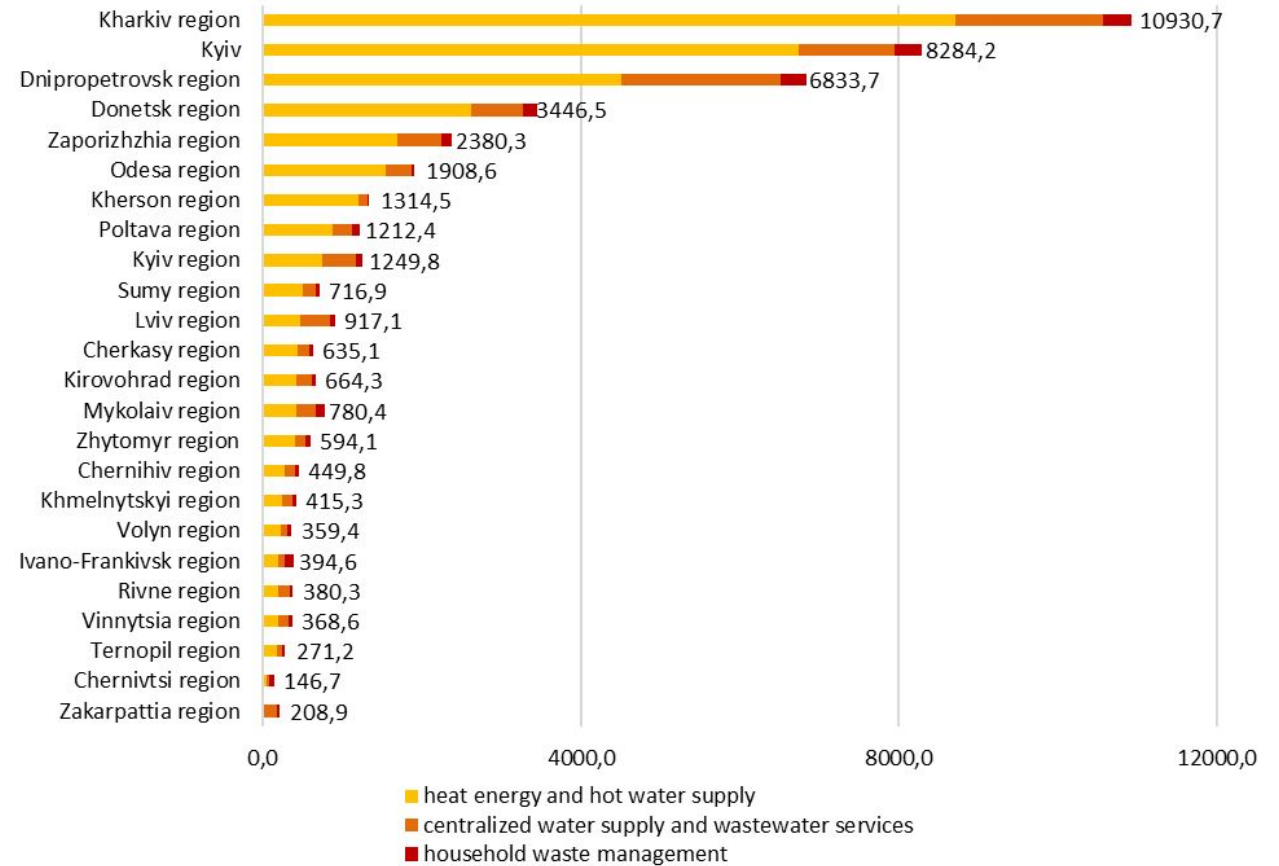
***** ratio of planned costs to actuals, according to NEURC monitoring of centralized water supply and centralized wastewater services [for Q1 2025](#)



Payment situation

Households

- [as of July 1, 2025](#), household debt for utility services amounted to **UAH 44.9 billion** (a decrease from UAH 47.1 billion at the beginning of the year);
- the largest debts are concentrated in **Kharkiv region** (UAH 10.9 billion), **the city of Kyiv** (UAH 8.3 billion) and **Dnipropetrovsk region** (UAH 6.8 billion);
- the main share of debt relates to **district heating and hot water supply** ($\approx 73\%$).



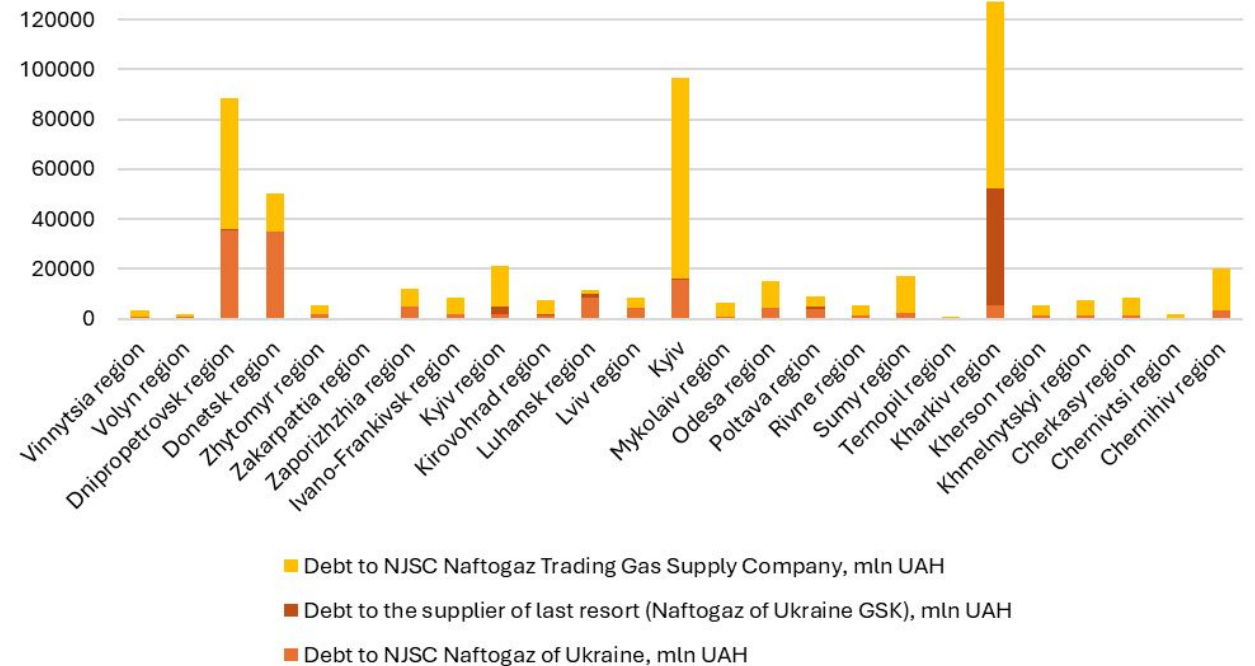


Payment situation (2)

As of early July 2025, the total debt of district heating companies for natural gas and of water utilities for electricity and its distribution amounted to UAH 126.8 billion.

District Heating Companies (DHCs)

- as of early August 2025, the debt of **heat energy producers for consumed natural gas** amounted to UAH 111.5 billion. In July 2025, it decreased by only 0.2% (from UAH 111.7 billion);
- in regional terms, the “leaders” are **Kharkiv region** (UAH 26.1 billion), **the city of Kyiv** (UAH 19.9 billion), **Dnipropetrovsk region** (UAH 18.2 billion), and **Donetsk region** (UAH 10.1 billion).

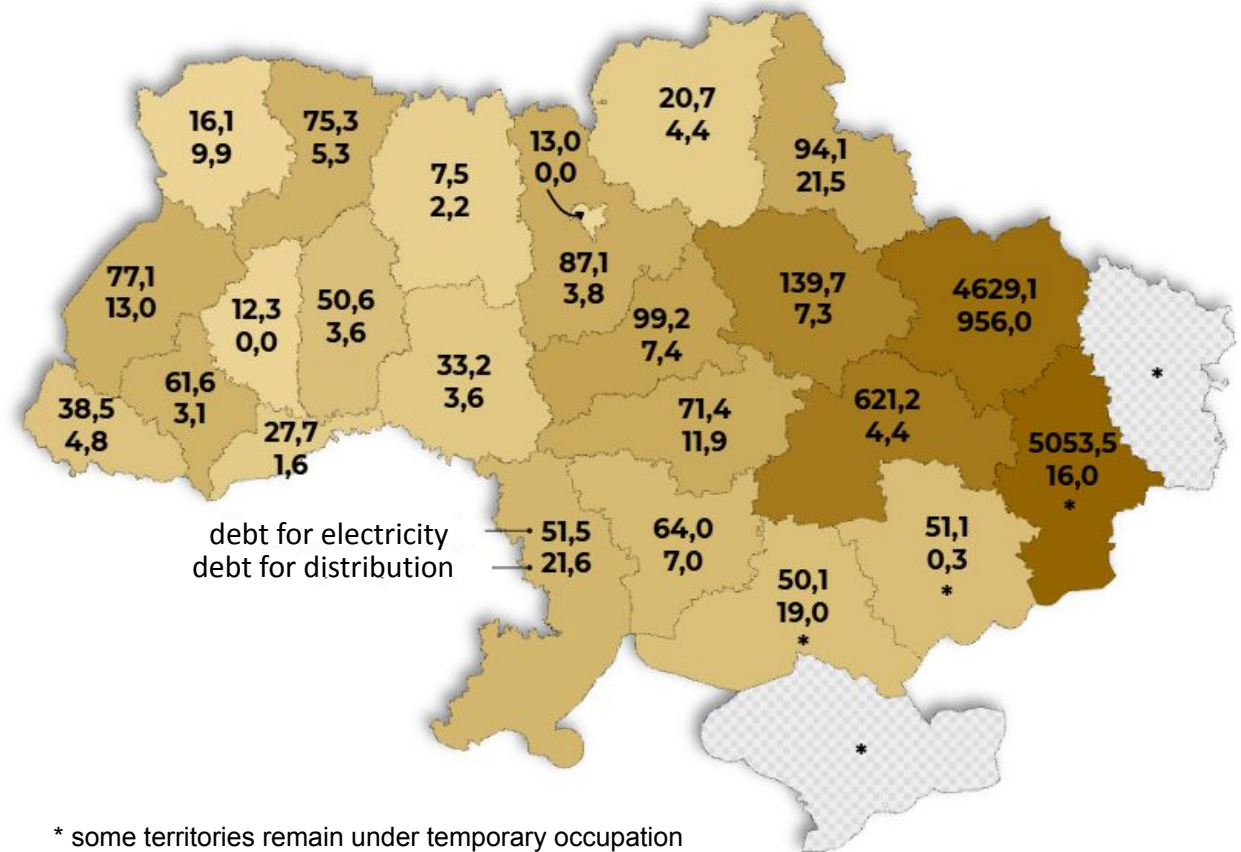




Payment situation (3)

Water utilities

- As of July 1, the debt of water supply and wastewater utilities for electricity and its distribution reached **UAH 12.6 billion**;
- the main share of **water utility debt** is concentrated in **Donetsk region** (UAH 5.1 billion) and **Kharkiv region** (UAH 5.6 billion);
- electricity costs exceeding planned expenditures by two times are observed among **4 licensees in water supply** and **8 licensees in wastewater services**.



Source: [Energy Map](#)



On the verge of survival

The main **problem of DHCs** is the continuously growing debt:

- to NJSC “Naftogaz of Ukraine” and Naftogaz Trading Gas Supply Company – **for natural gas used in the production of heat and electricity**; to gas distribution system operators (DSOs) - **for gas distribution services**; to electricity suppliers (in particular, universal service suppliers, USSs) - **for consumed electricity**; to water utilities - **for centralized water supply and wastewater services**, etc.;
- consumers **for the heat and hot water supply services** provided to them, in particular households, which represents a systemic and long-term problem.

Despite a stable 2024/2025 heating season, **DHCs are on the verge of survival** due to a number of systemic problems that remain unresolved.

Case: [Lozova \(Kharkiv region\)](#)

Since **August 15, 2025**, the accounts of the municipal enterprise Teplovodoservice have been **frozen due to debts to Naftogaz Trading exceeding UAH 8 million**. The main reason for the debt is the state's failure to pay compensation for tariff differentials (almost UAH 19 million).

As a result of the account freeze, the municipal enterprise lost the ability to carry out critically important preparatory works, settle with suppliers, and repair networks, which creates **a risk of disruption in heat and water supply, wastewater services, and even waste collection**.



Obligation

IMF program

- Ukraine has **committed to develop a roadmap for the gradual liberalization of gas and electricity markets** within six months after the end of martial law.
- This includes a **phased increase in tariffs to restore the sector's financial sustainability and stimulate competition**, while at the same time improving the housing utility subsidy system to ensure social protection.
- A comprehensive settlement of DHCs debts is envisaged once the wartime burden on the state budget decreases, through the **development of a new tariff methodology that reflects actual costs**.

Ukraine Facility

- Indicator 10.12 **Lifting the moratorium on increasing tariffs for heat and hot water** (Q4 2025) – the government's proposal to postpone to Q4 2026.
- Indicator 10.9 **Adoption of the Roadmap for the gradual liberalization of the gas and electricity market, to be implemented after the end of martial law** (Q2 2026)

CMU Action Program ([draft](#)):

- amendment to CMU Resolution No. 502 of 29 April 2022 (October 2025), amendments to the Procedure for tariff formation in centralized water supply and wastewater services (November 2025);
- settlement of accounts payable of district heating, water supply and wastewater utilities: draft law, amendments to gas PSOs (October 2025);
- a mechanism defined for restructuring natural gas debts, irrespective of the volume of tariff differential arrears (December 31, 2025).



Why important?

- **Financial sustainability of companies and network restoration:** the scale of destruction is enormous; without adequate tariffs there will be no investments or repairs, debts will continue to grow, and the risk of failing to ensure reliable passage through winter periods will increase.
- **Security:** stable heat, water, and electricity supply is a prerequisite for the functioning of hospitals, educational institutions, military units, and other critical infrastructure facilities.
- **Access to external financing:** progress in tariff reform is a signal to investors (including IFIs) about the sector's restored solvency.
- **Incentive for energy efficiency:** market-based prices create proper incentives for savings and modernization, particularly in district heating, while also opening opportunities for supplier choice and greater competition in energy markets.



Risks and safeguards

- **Inflation/social impact :** growth of administrative inflation; the NBU already takes this [into account](#) in forecasts -> requires clear communication, gradual implementation of changes, preferential energy efficiency programs, and most importantly – **targeted support for energy-poor households and the public sector.**
- **Accumulation of debts by district heating and water utilities:** leading to account freezes and potential disruption of heating seasons (e.g., Lozova case) -> **requires financial stabilization** through partial debt write-offs/restructuring and mobilization of donor funds for network modernization.
- **War-related risks:** new attacks may again disrupt demand/supply balance and the schedule of price adjustments -> requires **scenario planning and tailored approaches for network operators in frontline areas.**

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**Monitoring the implementation of the
IMF program and EU assistance**