

No. 24
February 2026

Monitoring implementation of the IMF program and EU assistance

SPECIAL ISSUE

***“Two years of the Ukraine Facility: results and
challenges”***





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Summary

There is a risk of delays in receiving more than **USD 3 bn from the World Bank**. Parliament needs to adopt four EU-integration bills in order to unlock the **Development Policy Operation (DPO)**.

The IMF Executive Board has approved a new four-year programme for Ukraine amounting to USD 8.1 bn. The programme **includes 12 structural benchmarks**, with tax-related measures likely to be particularly challenging to implement. Some of these benchmarks are inherited from the previous programme. At the same time, the programme also embeds a number of additional commitments by Ukraine that are not formally defined as benchmarks.

Unfulfilled indicators under Ukraine Plan continue to accumulate, leading to the loss of a significant amount of EU support and effectively putting key reforms at risk. As of the end of 2025, Ukraine failed to meet 14 indicators worth more than €3.9 billion. The majority of these commitments were not fulfilled in Q4 2025, with 10 missed indicators amounting to €2.5 billion.

Progress on most of these steps requires the adoption of legislation, highlighting the need to restore the full functioning of Parliament and better synchronise its work with the Cabinet of Ministers to regain the lost reform momentum. By the end of Q1 2026, Ukraine must fulfil 8 indicators, of which 5 are currently at risk of non-fulfilment, potentially further deepening the negative trend by March.

Laws for receiving assistance from the World Bank





World Bank Development Policy Operation - **Risks of Delay**

Development Policy Operations (DPO) - USD 3.35 bn in the first half of the year requires legislation

On public procurement ([No. 11520](#)) - adopted in the first reading in September 2024, the relevant committee on February 24, 2026, recommended an updated version of the draft law for the adoption in the 2nd reading (indicator of Ukraine Plan No. 8.6 with implementation in Q2 2027)

Safety and interoperability in railway transport in Ukraine ([No. 14174](#)) - adopted in the first reading in December 2025, preparation for the second reading (this is also an indicator of Ukraine Plan [No. 11.3](#) with the implementation in Q4 2025) - European safety management model

On the integration of the energy market ([No. 12087-d](#)) - adopted as a basis in July 2025, preparation for the second reading (indicator of Ukraine Plan [No. 10.5](#) with implementation in Q2 2025)

On the Single European Payments Area, SEPA ([No. 14237](#)) (or the improved bill being developed by the committee) and related bills ([No. 14326](#) - amendments to the Civil Code and [No. 14328](#) - amendments to the Administrative and Criminal Codes) - preparation for the first reading: “ [financial visa-free travel](#) ”

All draft laws are related to European integration



Monitoring the implementation of structural benchmarks under the IMF program





New IMF program - risks right from the start

The IMF Executive Board has decided on a new 4-year program for Ukraine in the amount of USD 8.1 bn

IMPORTANT: The program is an anchor for assistance from other partners (including the World Bank and the EU) - part of a USD 136.5 bn aid package.

USD 1.5 bn immediately after program approval due to implementation of prior actions (albeit revised):

- Adoption of [the State Budget for 2026](#), which meets the parameters of the Program
- [Resolution of the Cabinet of Ministers](#) that the evaluation of proposals in public procurement is carried out without taking into account VAT
- [A draft Labor Code](#) with an updated definition of hired labor has been submitted to parliament

12 structural benchmarks have been identified (partially inherited), but a number of **obligations** are spelled out in the text of the Memorandum (!), and **quantitative indicators** have also been defined.



Part of the benchmarks and commitments are a legacy from the previous program

<u>Previous program</u> - NOT executed benchmarks	<u>New program</u>
No. 40 Preparation of the NSSMC Strategy: end of January 2025.	No. 11: Reform of the National Securities and Markets Commission, end of December 2026.
No. 43 New head of State customs service: end of December 2025	No. 4: by the end of March 2026.
No. 48 Sectoral Public Investment Management Plans: end of December 2025.	Not a benchmark, but a commitment to a action plan for adopting strategies by the end of March, updating strategies by the end of 2026.
No. 53 New property valuation standards : end of December 2025.	Not a benchmark, but a commitment to adopt relevant legislative changes by the end of June 2026.
No. 55 Cancellation of the “Lozovoy amendments”: end of July 2025.	Missing
No. 58 External evaluation of the National Regulatory Commission of Ukraine for Energy and Utilities: end of December 2026.	Not a benchmark, but an obligation to make amendments to the Law on the National Commission for the Promotion of Energy and Utilities of Ukraine by the end of April, with an assessment by the end of November 2026.
No.54 Changes in securitization and mortgage bonds: end of March 2026	Not a benchmark, but an obligation to submit a bill in the Q1 2026.
No.51 Containing risks to critical third parties in the financial sector: end of June 2026	No. 7: by the end of June 2026.



Structural benchmarks for tax changes will be difficult to implement

- No. 1. Non-systemically important banks that will be transferred to state ownership will be transferred to the DGF: permanently , from the previous program
- No. 2. Strengthening the nomination process for members of the supervisory boards of state-owned banks: by the end of February 2026 - **not implemented**
- No. 3. Adoption of the package of tax measures for 2026–2027: by the end of March 2026 - **risk of delay**
- No. 4. Appointment of a new permanent head of State custom service: by the end of March 2026
- No. 5. Submission to the parliament of amendments to the Tax Code regarding the TCU: by the end of June 2026 - **risk of delay**
- No. 6. Approval of the updated strategy for state-owned banks: by the end of June 2026
- No. 7. Implementation of a framework for oversight of critical third party risks: by the end of June 2026
- No. 8. NACP to introduce new rules for verifying asset declarations based on a risk-based approach: by the end of June 2026
- No. 9. Publication of a technical analysis of the cost of quasi-fiscal obligations in the electricity, gas and heat supply sectors: by the end of July 2026
- No. 10. Development of a design for a centralized data repository for tax and customs administration: by the end of December 2026
- No. 11. Strengthening the decision-making structures and processes of the NSSMC: by the end of December 2026
- No. 12. Appointment of all members of the Accounting Chamber: by the end of December 2026



The Memorandum also sets out other important commitments (1)

In particular :

- Regular coordination of the parameters of the Budget Declaration and the State Budget
- Limiting opportunities for the use of the simplified taxation system for abuse: a bill by the end of 2026 to limit the practice of artificially splitting companies to maintain the right to stay below the thresholds set for preferential regimes; limit the ability for businesses to return to the simplified system after switching to the general taxation system.
- Other tax changes (without a deadline) include: (i) a comprehensive package of measures for the post-war period on carbon tax reform; (ii) an analysis and assessment of the taxation of extractive industries; (iii) the definition of principles for the taxation of virtual assets, consistent with EU rules, in particular on information exchange and OECD Global Forum initiatives.
- Further implementation of the public investment management reform: draft law by the end of March 2026 to improve the integration of the PIM into medium-term budget planning and fiscal risk management, in particular regarding: (i) the use and accounting of multi-year budget commitments and contingent liabilities for public investment projects; (ii) the identification of contingent liabilities that may arise within public-private partnerships; (iii) the management and disclosure of fiscal risks associated with public investments; (iv) the budgeting of public investments at the local level.



The Memorandum also sets out other important commitments (2)

In particular :

- Carrying out pension reform, but no timelines have been set: should not widen the deficit.
- Adoption of the draft law on investment funds ([No. 13246](#)) by the end of October 2026 as part of the implementation of the roadmap for the reform of the financial and capital markets infrastructure. The Memorandum also provides for other measures and deadlines for the implementation of the roadmap.
- A number of measures in the field of combating money laundering with implementation deadlines during 2026-2027.
- Important changes will occur in the area of corporate governance of state-owned enterprises: independent supervisory boards, charters, transparency, accountability, etc.
- By the end of June 2026, the CMU will adopt a roadmap for the gradual liberalization of the gas and electricity markets with an implementation plan after the lifting of martial law. It will identify the steps needed to reform the PSO to gradually liberalize market prices after the end of martial law, ensuring adequate protection of vulnerable consumers through a subsidy mechanism.

It is important that the memorandum provides:

- Maintaining the independence of the NBU.
- Further effective work of the BEB.
- Commitment to maintain the operational independence of the National Anti-Corruption Bureau of Ukraine (NABU), the Specialized Anti-Corruption Prosecutor's Office (SAP), and the High Anti-Corruption Court (HACC).



Structural benchmarks execution map



Monitoring the implementation of indicators of Ukraine Plan



Ukraine Plan: main updates as of February 2026

- Ukraine is significantly lagging in implementing reform indicators. In total, 14 indicators worth **over €3.9 billion were not met in 2025. Of these, 10 indicators for the fourth quarter worth €2.5 billion.**
- According to the results of the Q1 2026, **Ukraine may irretrievably lose almost €0.3 billion for the first time** due to failure to fulfil the indicator of Ukraine's Plan for increasing the staff of the High Anti-Corruption Court since last year.
- **Of the 8 indicators** that need to be completed by the end of the Q1 2026, so far **only 1 has been completed on time**, and **there are risks for 5** of them.

✖ Debts for the first three quarters of 2025 amount to ~ €1.5 billion

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Q1 2025:

~€0.3 bn

- 4.3. Increase the staffing of the HACC

Q2 2025:

~€0.7 bn

- 3.5. Changes regarding the review of judges' declarations of integrity and their verification (No. [13165-2](#))
- 3.8. Reform of digitalization of enforcement proceedings (No. [14005](#))

Q3 2025:

~€0.5 bn

- 10.5. Adoption of legislation for the electricity integration package (draft Law No. [12087-d](#))

✖ Fourth quarter of 2025 : 10 unfulfilled indicators for €2.5 billion

- **1.2.** Changes to legislation on civil service
- **4.8.** Conducting the next National Risk Assessment
- **6.7.** Assessment and, if necessary, changes to distinguish PSO from non-PSO in the SOE
- **6.9.** Lifting the suspension of the law on state aid
- **8.2.** Deregulation in certain spheres
- **10.3.** Improving permitting procedures for investments in renewable energy sources
- **10.7.** Appointment of a nominated electricity market operator
- **10.11.** Determination of the special status of the National Electricity Regulatory Commission
- **10.14.** Supporting the development of efficient and more sustainable district heating
- **11.3.** Entry into force of the law on traffic safety and interoperability of railway transport

~€ **2.5**
bn



Situation as of March 2

~€2.5
bn

! 8 - draft laws

1.2. No. [13478-1](#)

8.2. No. [14030](#)

10.14. No. [14067](#)

6.7. No. [13620](#)

10.3. No. [14271](#)

11.3. No. [14174](#)

6.9. No. [14345](#)

10.11. No. [14282](#)

! 2 - government decisions

4.8. **NRA**

10.7. **nominated electricity
market operator**



Map of implementation of Ukraine's Plan indicators

	IV 2025	I 2026	II 2026	III 2026	IV 2026
Public Administration Reform	1.2	1.5	1.4	1.3	
Public Financial Management / Management of Public Assets	2.6 2.9 6.7 6.9		6.3	6.4	2.4 2.5
Fight Against Corruption and money laundering / Judicial System	3.3 3.4 3.9 4.8	3.7 3.12	3.10 4.5	3.13	3.14 3.15
Business Environment / Human Capital	7.8 8.2	8.5	7.7 7.12 7.14 7.18	7.4	7.3 7.9
Energy Sector / Green Transition and Environmental Protection / Management of Critical Raw	10.3 10.7 10.11 10.13 10.14 13.6 15.3	15.8	10.6 10.9 15.7	10.16	10.12
Agri-food Sector / Transport	11.3	12.6	12.9		11.5 11.8
Decentralisation and Regional Policy		9.3	9.7		
Digital Transformation			14.4		
Financial Markets	5.6	5.1	5.3 5.5		



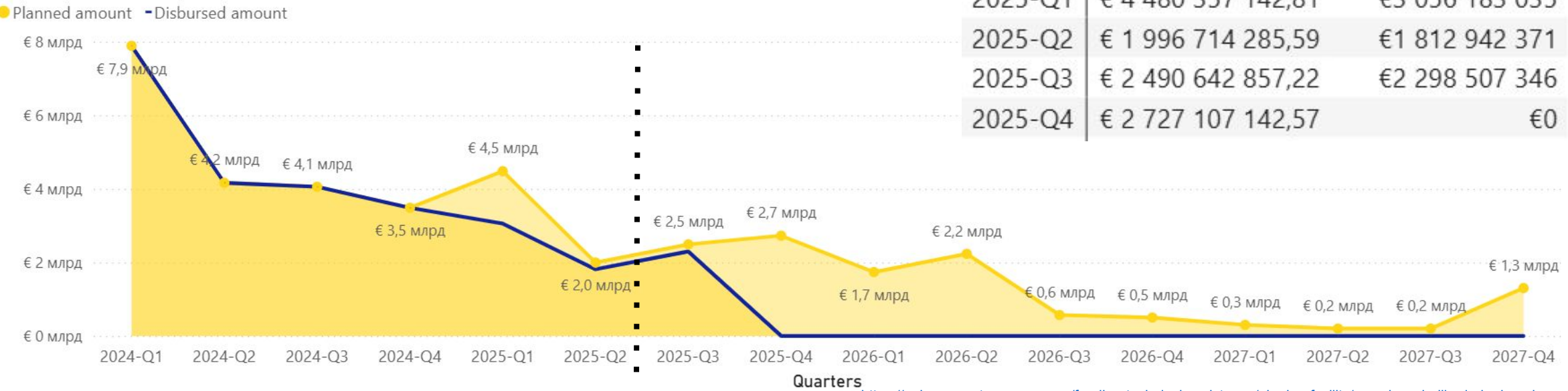
SPECIAL TOPIC**RRR4U*****Two years of the
Ukraine Facility:
results and challenges***



Pillar I: Decelerating Dynamics

- **€26.8 billion (~70%) disbursed** under Pillar I
 - Transitional and unconditional funding + successful implementation of Q2-Q4 2024 indicators
 - 2025 required concentration of efforts: 56 indicators (31 in 2024)
- Amendments to Ukraine Plan (August 2025) **did not lead** to accelerated implementation

Quarters	Planned amount	Disbursed amount
2024-Q1	€ 7 890 000 000,00	€7 890 000 000
2024-Q2	€ 4 165 092 856,92	€4 165 092 856,92
2024-Q3	€ 4 056 428 571,18	€4 056 428 571,18
2024-Q4	€ 3 485 499 999,55	€3 485 499 999,55
2025-Q1	€ 4 480 357 142,81	€3 056 183 035
2025-Q2	€ 1 996 714 285,59	€1 812 942 371
2025-Q3	€ 2 490 642 857,22	€2 298 507 346
2025-Q4	€ 2 727 107 142,57	€0



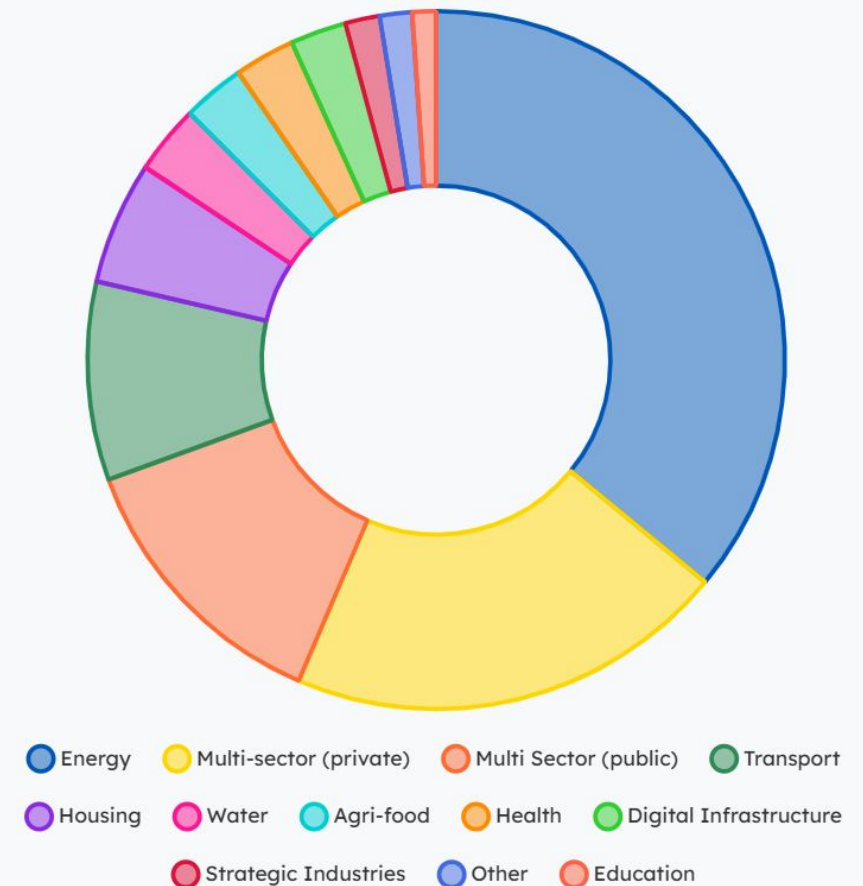
https://enlargement.ec.europa.eu/funding-technical-assistance/ukraine-facility/scoreboard-pillar-i-ukraine-plan_en



Pillar II: Active Deployment

- As part of attracting investments with the support of the Ukraine Investment Framework, **€6.9 billion (~73%) has been allocated**
 - 58% - public sector projects, 42% - private;
 - 25+ IFI programs are under implementation;
 - expected **mobilization of €21.6 billion** investments;
- Financing of 20+ IFI programs for ~€3 billion has been approved, to be launched in 2026
- The effectiveness of tools **could be higher** - currently the ratio is 1:3.1 vs 1:4.2 planned
 - €9.5 billion under the UIF is intended to raise up to €40 billion investments

Total: EUR 6.9 bn (guarantees + blending)



<https://uif.eu/>



Pillar III: Routine Operations

➤ Funding areas:

- technical assistance (Technical Cooperation Facility, TCF), including grants, direct procurement, and contractors (indirect management); beneficiaries - government entities, local authorities, CSOs, and media;
- EU contributions to the Extended Partial Agreement on the Register of Damage caused by the RF aggression against Ukraine;
- coverage of servicing costs, liquidity management, and administration of borrowings under Pillar I of the Ukraine Facility (borrowing costs subsidy);
- coverage legacy costs linked to the loans under the exceptional macro-financial assistance in 2022 and some costs under EIB guarantees (financial obligations under the External Lending Mandate 2014-2020);
- audit services for the entire Ukraine Facility

➤ 2024: €488 million, incl. €260.68 million TCF, €227.86 million borrowing costs

➤ 2025: €790 million, incl. €389 million TCF, €400 million borrowing costs

➤ 2026-2027: 2-year program for €2.288 billion [approved](#) in January, including €313.52 million TCF, €2.66 billion borrowing costs

RRR4U



rrr4u.org



All materials of the RRR4U consortium

ANNEX 1

Detailed status of implementation of IMF structural benchmarks





BENCHMARK No. 1 Any non-systemic bank that becomes state-owned will be transferred to the DGF in case of violation of prudential regulations and will not be subject to recapitalization at state expense.

(constantly)

Sector: financial sector

Status: in progress

Currently, there are two non-systemic banks are state-owned namely PINbank and Motor Bank. , They were transferred to the state by decisions of the High Anti-corruption Court of Ukraine.. They operated for more than a year in violation of prudential regulations and in February 2026, by decision of the NBU, were transferred to the DGF for resolution. As of March 2, the banks are under temporary administration. The benchmark will be implemented for the existing two banks after the DGR decides on the resolution of these banks without involving state resources. (through liquidation or transfer to the private investor). This decision will be made in the next few weeks. After that, the indicator will be formally open, but its status will change only in the event of the acquisition of other non-systemic banks by the state.



BENCHMARK No. 2 Strengthening the nomination process for members of the supervisory boards of state-owned banks

(end of February 2026)

Sector: fiscal sector, governance

Status: not completed

Benchmark requires Ukraine to Implement the recommendations outlined in MEFP ¶151 to strengthen the nomination process for members of the supervisory boards of state-owned bank). The recommendations include confidentiality of the work of the nomination committee, de-prioritizing the nationality criterion, strengthening evaluation procedures, including the introduction of an annual evaluation of the work of supervisory boards, and requiring the Ministry of Finance to maintain a list of qualified candidates from previous selections for supervisory boards. As of March 2, the relevant Government decision had not been made public.



BENCHMARK No. 3 Adopt a package of tax measures for 2026–27 (end of March 2026)

Sector: fiscal sector

Status: in progress



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According to the Memorandum, this structural benchmark provides for tax changes designed to broaden the tax base and create a more favorable environment for economic growth and de-shadowing.

In particular, it is expected that by the end of March 2026, the parliament should adopt a package of tax measures, which will contain the following provisions:

- taxation of income received through digital platforms;
- abolition of tax exemption for the import of goods in low-value postal items;
- abolition of VAT exemption under the simplified taxation system (STS) by introducing mandatory VAT registration from January 1, 2027 for STS payers with turnover exceeding the general VAT registration threshold. This threshold may be increased - from the current level of UAH 1 million, but not higher than UAH 4 million.

Initially, all of these measures were supposed to be prior actions for the new Program, but eventually the IMF moved them to the structural benchmark.

Passing such a package will be politically difficult in the Parliament.

It is unlikely that this structural benchmark will be implemented in March, as the corresponding draft law does not even exist yet.



BENCHMARK No. 4 Appoint a permanent head of the State Custom Service

(end of December 2025)

Sector: fiscal sector

Status: in progress

This structural benchmark is inherited from the previous program (previously it was numbered 43). Under the old program, the structural benchmark initially determined the appointment of the Head of the State Custom Service by the end of June 2025, but by that date the competition for the Head of the State Custom Service was not even announced. The impossibility of fulfilling the benchmark was clear back in May. Therefore, based on the results of the IMF Mission in May 2025, it was agreed on a priority measure for the 8th review of the Program: preparation of a customs reform plan. On June 17, the government announced the preparation of such a plan.

The deadline for the implementation of the lighthouse itself - the appointment of a permanent head of the SMS - 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 Custom Service. A commission of international and Ukrainian representatives was also created to select the head.

On November 10, a meeting of the Commission for the competition for the position of the Head of the State Custom Service of Ukraine was held, at which [the Procedure for conducting the competition](#), criteria and methodology for evaluating candidates for the position of Head of the State Custom Service of Ukraine were approved. According to the Commission's expectations, the competition will end only in April 2026. In the new Program, the deadlines for the implementation of the benchmark will probably be postponed again. In any case, the benchmark has not been implemented under the existing program.

16 candidates were admitted to the next stage of the competition. According to available information, the timely completion of the lighthouse (by the end of March) is likely.



BENCHMARK No. 5 Alignment of transfer pricing rules with international standards

(end of June 2026)

Sector: fiscal sector, governance

Status: in progress

It is necessary to register a draft law on amendments to the Tax Code in Verkhovna Rada to harmonize transfer pricing rules with OECD standards and implement Article 4 of the EU Anti-Tax Avoidance Directive (ATAD).

It is planned to strengthen the rules for taxation of corporate groups' profits: expanding and tightening the application of transfer pricing, introducing restrictions on taking into account debt financing costs when calculating income tax with the possibility of carrying forward unrecognized costs to future periods, as well as taxation of foreign companies with actual management in Ukraine.

The changes are aimed at reducing opportunities for underreporting income tax through intra-group transactions and debt schemes and are a structural benchmark of the IMF program with a submission deadline of the end of June 2026.



BENCHMARK No. 6 Approve an updated strategy for state-owned banks
(end of June 2026)

Sector: financial sector, governance

Status: in progress

The state-owned banks strategy adopted in 2020 was in effect until the end of 2025. The updated strategy should include steps that will actually extend the status of state-owned banks (100% state-owned) to banks in which the state share is less than 100%. At present, no progress on the adoption of the strategy was reported



BENCHMARK No. 7 Implement a framework for oversight of critical third party risks

(end of June 2026)

Sector: financial sector

Status: In progress

This benchmark replicated benchmark 51 from the previous Program.

The benchmark is aimed at strengthening the NBU's control over hybrid banking models, in particular those where non-bank companies provide services that are critical to the functioning of the bank. This includes, among other things, the model of a bank in a smartphone, where the work of a bank (like Monobank) is closely linked to non-bank companies that are currently not subject to regulation. It is proposed to extend the NBU's requirements for business reputation and professional suitability to them.

According to the February Memorandum on the Economic and Financial Policy, the NBU must publish for public comment amendments to regulatory rules that will strengthen the requirements for third parties of banks by March 2026, and it is expected to do the same for other financial institutions, by May 2026. By June these requirements must come into force. Also, if necessary, a draft law will be submitted to the Verkhovna Rada to expand the powers of the NBU. As of March 2, such drafts have not been published.



BENCHMARK No. 8 NACP to issue new regulations establishing a riskbased system for verification of asset declarations, prioritizing senior officials in identified high-risk areas

(end of June 2026)

Sector: government

Status: in progress

To enhance prevention, and consistent with IMF technical assistance on strengthening the asset declaration and lifestyle monitoring frameworks, the National Agency for Corruption Prevention (NACP) will issue regulations prioritizing and enhancing the verification of asset declarations of senior officials in high-risk sectors (tax, customs, public procurement and energy).

In addition, the Memorandum notes that, aligned with the IMF technical assistance , which will provide guidance on the principles and modalities of publication, the NACP will publish, on a biannual basis, key performance indicators on risk-based verification and lifestyle monitoring activities, starting end-March 2026 for the second half of 2025.



BENCHMARK No. 9 Publish a technical analysis of the costs of quasi-fiscal support for electricity, gas, and heating, including subsidy coverage and scenarios for financially sustainable reforms while protecting vulnerable consumers

(end of July 2026)

Sector: energy

Status: in progress

To ensure the fiscal sustainability of energy sector reforms, and with the support of IMF technical assistance, the Ukrainian authorities will conduct and publish a comprehensive technical analysis of the costs of quasi-fiscal operations arising from price caps and public service obligations (PSOs) in the electricity, gas, and district heating sectors.

The Memorandum states that the analysis will include a quantitative assessment of the financial burden on the sector, an evaluation of the distribution of existing subsidies, and the development of reform scenarios for the gradual recovery of costs, while ensuring adequate social protection for vulnerable consumers. The deadline for completing the analysis is the end of July 2026.



BENCHMARK No. 10 Develop a design for a centralized data repository for tax and customs administration
(end of December 2026)

Sector: fiscal sector, governance

Status: in progress

This benchmark is a continuation of benchmark 47 of the previous Program, according to which the Ministry of Finance, the State Tax Service, and the State Migration Service adopted an updated IT strategy in September 2025.

As stated in the text of the Memorandum, the key approach defined in the IT strategy is to consolidate at the level of the Ministry of Finance the IT systems of the State Tax Service and the State Customs Service (STS), as well as to ensure the management of these IT systems by an independent administrator (IPA) using cloud technologies. The strategy provides for a gradual transition to a new level of service-oriented systems, in particular in the State Tax Service and the State Customs Service, to make services available online.

For this, a necessary task is to develop a design for a centralized data repository for tax and customs administration, which is provided for by structural benchmark No. 10 of the new Program.



BENCHMARK No. 11 Reform of the NSSMC (end of December 2026)

Sector: financial sector, governance

Status: in progress

It is necessary to continue the reform of the National Securities and Stock Market Commission (NSSMC), strengthen its institutional capacity and introduce a new governance model. To do this, it is necessary to create a supervisory board with a majority of independent members and amend the law on the NSSMC, providing for the transfer of the Commission's subordination from the President to the Cabinet of Ministers.

Due to the change of leadership and the loss of experienced personnel, the regulator has lost some of its ability to effectively perform its functions. Without strengthening the management and personnel capacity of the NSSMC, it will be difficult to ensure approximation to EU standards, reform of the capital markets infrastructure and proper support for the financial system in the recovery process.

The key indicator is the adoption of amendments to the relevant law on the NSSMC, which introduce a new governance model and the creation of a supervisory board with a majority of independent members. The deadline is the end of December 2026.



BENCHMARK No. 12 **Appoint all Accounting Chamber members**
(end of December 2026)

Sector: fiscal sector, governance

Status: in progress

In December 2024, the law on the reform of the Accounting Chamber came into force. Among other things, it introduced a renewed procedure for the competitive selection of members of the Accounting Chamber, which provides for the creation of an Advisory Group of Experts (hereinafter - AGE) of 6 people (three international experts and three representatives from the Verkhovna Rada with the predominance of voting rights of international experts). However, in August 2025, the Verkhovna Rada [failed](#) to vote on the creation of an AGE to conduct a preliminary selection of candidates for the positions of members of the Accounting Chamber.

In the new Memorandum, the Ukrainian side undertook to establish the AGE by the end of April 2026, which would conduct a preliminary selection of candidates for the RP and appoint 6 new Accounting Chamber members from among the verified candidates by the end of 2026. Recall that under the updated law, the Accounting Chamber consists of eleven members.

ANNEX 2**RRR4U**

Detailed status of implementation of Ukraine Plan indicators





Status of implementation of Ukraine Plan indicators scheduled for Q2 2024

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

INDICATOR No. 2.2 Approval of the digitalization plan of the State Customs Service

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

INDICATOR No. 2.3 Approval of the Budget Declaration for 2025-2027

The budget declaration was finally approved on June 28, 2024, the last working day of the quarter. This is probably due to the expectation of a positive decision by the IMF Executive Board on the fourth review of the Program. Thus, the macro indicators on which the budget indicators of the Declaration for 2025-2027 are based differ from the IMF macro forecast. The budget declaration contains forecast revenues, one of the components of which is an additional package of tax measures. Since there is no certainty about the amounts of international support, it remains limited, which forced the government to foresee a reduction in spending on almost all functions, except for defense, in 2025, and on defense as well in the following two years.

INDICATOR No. 2.7 Approval of the Action Plan for the Implementation of the Roadmap for Reforming Public Investment Management

Improving the quality of public investment management (PIM) will allow for more economical and effective use of public funds in conditions of limited budget resources. One of the steps should be the unification of PIM approaches and competitive selection of projects for budget financing. The Action Plan for the Implementation of the Roadmap for Reforming the UIP was adopted [in June 2024](#).

INDICATOR No. 4.2 Appointment of a new head of the National Agency for the Prevention of Corruption

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

Following the results of the competitive selection, Viktor Volodymyrovych Pavlushchyk was appointed Head of the National Agency for the Prevention of Corruption by Order of the Cabinet of Ministers of Ukraine dated February 27, 2024 No. 162-r.



Status of implementation of Ukraine Plan indicators scheduled for Q2 2024

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

INDICATOR No. 6.2 Entry into force of the Law on Corporate Governance of State-Owned Companies

In February 2024, the parliament adopted a law improving corporate governance in Ukraine. In March, it was signed by the president and the law entered into force on the day of publication. According to the adopted law, state-owned companies must have supervisory boards, the powers and responsibilities of which have been clarified, the government must develop a state property policy. Compliance, risk management and internal audit mechanisms have also been introduced.

INDICATOR No. 8.3 Entry into force of legislation revising the legal basis for ESBU's activities

On June 20, the Verkhovna Rada adopted draft law No. 10439, the text of which was agreed with the requirements of international partners. On June 28, it was signed by the president and the law entered into force. The new legislation will pave the way for the renewal of the ESBU management and detectives through transparent competitions. This will provide a chance to transform the bureau into an effective body that will prevent economic crimes and schemes that cause budget losses.

INDICATOR No. 10.1 Development and approval of the Integrated National Energy and Climate Plan

On June 25, the NPEC was [approved](#) by order 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 NPEC [was published](#).

INDICATOR No. 10.15 Adoption of the Strategy for Thermal Modernization of Buildings for the Period Until 2050 and the Action Plan for its Implementation

In accordance with [the order](#) of the Cabinet of Ministers of December 29, 2023 No. 1228-r, the Strategy for the Thermal Modernization of Buildings of Ukraine until 2050, the concept of the State Targeted Economic Program to Support the Thermal Modernization of Buildings until 2030, and the Operational Plan of Implementation Measures in 2024-2026, which sets out a long-term plan for the gradual renewal of the building stock of Ukraine, taking into account energy-saving technologies, were approved.

INDICATOR No. 12.8 Adoption of a mine action strategy until 2033 and a system for prioritizing areas to be demined

The Mine Action Strategy until 2033 and its operational plan for 2024-2026 were approved by [the Resolution of the Cabinet of Ministers of Ukraine](#) on June 28, 2024.



Status of implementation of Ukraine Plan indicators scheduled for Q3 2024

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

INDICATOR No. 4.1 Increase in the staff of the Specialized Anti-Corruption Prosecutor's Office

Within the framework of the implementation of this indicator, the Specialized Anti-Corruption Prosecutor's Office was to be given the opportunity to increase the number of employees from 10% to no less than 15% of the number of employees of the National Anti-Corruption Bureau. To implement this indicator, the Verkhovna Rada of Ukraine adopted draft law No. 10060 dated 08.12.2023, which determined that the total number of employees of the Specialized Anti-Corruption Prosecutor's Office is 15% of the statutory maximum number of central and territorial departments of the National Anti-Corruption Bureau of Ukraine.

INDICATOR No. 4.4 Entry into force of amendments to the Criminal Code and the Criminal Procedure Code

The indicator was implemented untimely. On October 29, 2024, the Verkhovna Rada adopted the draft law No. 12039 as a basis and in its entirety, and on October 31, 2024, the law was signed by the President and comes into force on November 1, 2024.

INDICATOR No. 4.6 Approval of the action plan for the implementation of the Asset Recovery Strategy for 2023–2025

As part of the implementation of this indicator, the Cabinet of Ministers of Ukraine was to adopt and publish an Action Plan for the Implementation of the Asset Recovery Strategy for 2023–2025. As a result, on August 13, 2024, the previously prepared action plan for the implementation of the Asset Recovery Strategy for 2024–2025 was approved [by the Resolution of the Cabinet of Ministers of Ukraine No. 759-r](#).

INDICATOR No. 7.6 Approval of a comprehensive Demographic Development Strategy until 2040

On September 30 2024, the government adopted the Demographic Development Strategy until 2040. The next step towards its implementation is the adoption of a detailed Action Plan.

INDICATOR No. 8.1 Adoption of the Deregulation Action Plan

In early September, the Government approved an updated [plan of measures for Deregulation](#). It includes 99 measures, a significant part of which is planned to be implemented this year. The plan mainly involves the cancellation of a number of permits, which, according to the developers of the plan, are outdated or irrelevant. It also includes the support of a number of deregulation draft laws, including those on state control (5837) and in the field of foreign economic activity (5167). There are also a number of measures to improve current regulation.



Status of implementation of Ukraine Plan indicators scheduled for Q3 2024

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

INDICATOR No. 9.5 Entry into force of legislation amending the State Strategy for Regional Development for 2021-2027

The government adopted [an updated SDRD](#) on August 13, which identifies new challenges as well as strategic and operational goals. [the Action Plan for the Implementation of the Social Development Strategy](#) was not updated, although logically it should also have been amended.

INDICATOR No. 10.8 Entry into force of amendments to the Criminal Code and the Criminal Procedure Code

The following procedures and requirements were approved by the National Energy Regulatory Commission:

- [Procedure](#) for obtaining, suspending and terminating the status of data transfer administrator (resolution of 12/27/2023 No. 2613);
- [Procedure for](#) the functioning of insider information platforms (resolution No. 137 of January 16, 2024);
- [Requirements](#) for ensuring integrity and transparency in the wholesale energy market (resolution of March 27, 2024 No. 614) (on August 23, 2024, the NEURC [published](#) draft amendments to the Requirements, the collection of comments and proposals lasted until September 9, an open discussion will take place on October 31);
- [Procedure](#) for submitting information regarding the performance of economic and trade transactions with wholesale energy products (resolution No. 618 of March 27, 2024).

On October 2, the Cabinet of Ministers of Ukraine [approved](#) the terms of reference for the development of an information system to ensure the performance of the functions of the National Commission for the Regulation of Energy and Utilities of Ukraine, thereby completing the implementation of this indicator.

INDICATOR No. 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 Environment published [a draft](#) concept note for discussion. The collection of comments and suggestions [continued](#) until May 30. According to the position voiced by the Ministry of Environment during the public discussion held on May 14, 2024, [the purpose and objective](#) of the note is to summarize all existing derogations from EIA procedures in a single document, determine the body that makes decisions on such derogations, the period of application of the derogations, and provide arguments regarding the reasons for their application. On September 18, the Ministry of Environment [published](#) the final version of the Concept Note, which defines the scope of derogations from the EIA and SEA rules.

INDICATOR No. 13.1 Adoption of the Law of Ukraine "On Amendments to the National Program for the Development of the Mineral and Raw Materials Base of Ukraine for the Period Until 2030"

As part of the implementation 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 National Program for the Development of the Mineral and Raw Materials Base of Ukraine for the Period Until 2030".

On December 18, the Verkhovna Rada [adopted](#) in the second reading and in general the updated state program for the development of the mineral and raw materials base of Ukraine until 2030. Thus, the indicator is considered fulfilled.



Status of implementation of Ukraine Plan indicators scheduled for Q4 2024

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

INDICATOR No. 2.1. Approval of the strategic plan for the digitalization of the State Tax Service

As part of the implementation of this indicator, it was envisaged to adopt a Strategic Plan for the Digitalization of the State Tax Service, 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 international DAC7 information exchange system should also be ensured. Stakeholders should pay attention to ensuring that the State Tax Service monitors the implementation of the initiatives specified in the document, as currently the assessment of the effectiveness of the implementation of this [Plan](#) is the responsibility of the State Tax Service together with the Ministry of Finance and the Ministry of Digital Affairs.

INDICATOR No. 3.6. Legislation to improve the bankruptcy regime has come into force

The indicator is part of the insolvency resolution and enforcement reforms.

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

On September 19, 2024, the Verkhovna Rada adopted the relevant law (draft No. 10143 dated October 12, 2023). On September 22, the law was signed by the President. The law entered into force on January 23, 2025.

INDICATOR No. 6.1. Adoption of state ownership policy and ranking of state-owned companies

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

The policy provides for the basic principles of managing state-owned enterprises, the procedure for their division into those that will remain in state ownership to ensure state policy goals, and those that will be privatized, liquidated, or reorganized for partial privatization. It also defines the category of enterprises that will remain in state ownership during martial law.

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

INDICATOR No. 7.5. Approval of two strategies: Strategy for reforming psychoneurological and other residential institutions and deinstitutionalizing care for persons with disabilities and the elderly and 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 a 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 the Cabinet of Ministers' Order No. 1201-r dated November 26, 2024.

The Strategy for Reforming Residential and Psychoneurological Institutions for Adults was approved by the Cabinet of Ministers' Order No. 1315-r dated December 24, 2024.



Status of implementation of Ukraine Plan indicators scheduled for Q4 2024

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

INDICATOR No. 8.7. Entry into force of legislation on the resumption of market surveillance and control measures for non-food products, including product safety inspections

In order to restore market surveillance and control measures for non-food products, including product safety inspections, [Resolution](#) of the Cabinet of Ministers No. 261 of March 8, 2024 "On Amendments to the Resolutions of the Cabinet of Ministers of Ukraine of March 13, 2022 No. 303 and of May 3, 2022 No. 550" was adopted and entered into force.

INDICATOR No. 9.6. Entry into force of legislation for the development of urban planning at the local level

To implement this indicator, the Cabinet of Ministers of Ukraine developed [Resolution No. 254 dated March 5, 2024](#) "Some issues of implementing a pilot project on the creation of the Unified State Register of Administrative-Territorial Units and Territories of Territorial Communities, the Unified State Register of Addresses, the Register of Buildings and Structures as part of the Unified State Electronic System in the Field of Construction."

Another act of the Cabinet of Ministers, namely [Resolution No. 909 of August 9, 2024](#), regulated the issue of implementing a pilot project on the introduction of the Urban Planning Cadastre at the state level.

[Resolution of the Cabinet of Ministers of Ukraine No. 1111 of September 26, 2024](#) introduced the concept of the administrator of the Urban Planning Cadastre and the electronic system for the pilot project, and defined their powers.

The digitalization of urban planning services, in particular the project to implement a digital Urban Planning Cadastre at the state level, is important because it actually unites previously dispersed urban planning documentation that existed on paper in various local government bodies.

INDICATOR No. 10.2. Introduction of a market concept for renewable energy

On March 1, the Cabinet of Ministers approved [Resolution No. 232](#), which provides for improving the procedure for holding auctions for the allocation of support quotas for renewable energy facilities.

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

On November 29, the Cabinet of Ministers [approved](#) the schedule for auctions for the allocation of renewable energy support quotas for 2025, as well as forecast indicators for renewable energy support quotas until 2029.

INDICATOR No. 10.10. Ensuring the independence of the National Energy and Public Utilities Commission

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

On December 27, 2023, the National Commission for the Regulation of Energy and Utilities of Ukraine [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](#).

Law No. [3915-IX](#) of 21.08.2024 amended Law No. [3354-IX](#) "On Law-Making Activities", which exempted the NEURC from adjusting decisions. Thus, the conflict with the provision of Part 6 of Article 14 of the Law on the NEURC was removed. However, the Law "On Law-Making Activities" has only just entered into force, but most of the provisions, in particular regarding the functional independence of the NEURC, are put into effect a year after the end of martial law.



Status of implementation of Ukraine Plan indicators scheduled for Q4 2024

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INDICATOR No. 11.1. Adoption of the updated National Transport Strategy of Ukraine for the period until 2030

The strategy is aimed at achieving the following goals, which meet the requirements of Ukraine Plan:

- restoration and development of a competitive and efficient transport system integrated into the Trans-European Transport Network (TEN-T);
- high-quality passenger transportation and unhindered mobility;
- energy-efficient transport that is safe for humans and the environment and is geared towards decarbonization;
- institutional capacity, human capital and effective governance.

The National Transport Strategy of Ukraine for the period until 2030 and the operational plan of measures for its implementation in 2025-2027 were approved by the Cabinet of Ministers on December 27, 2024 ([Resolution No. 1550](#)).

INDICATOR No. 11.2. Adoption of the Strategy for the Development and Expansion of Border Infrastructure with the Member States of the European Union and Moldova until 2030

On December 24, 2024, the Cabinet of Ministers of Ukraine, [by Resolution No. 1337-r](#), approved the Strategy and the operational plan of measures for its implementation in 2024-2030.

The strategy aims to build 17 and modernize 29 border crossing points with the EU and Moldova. Ukraine also aims to conclude an agreement on joint control with each EU neighboring country. The eQueue project should be extended to all road border crossing points. In addition, the first scanners in Ukraine for inspecting railway rolling stock should be purchased and put into operation.

The possibility of implementation raises doubts about the measure to reconstruct Ukrainian railway tracks to European standards. For example, if about 3 km of tracks were reconstructed in 2024, then in two years this figure should be 100 km. Given the high cost and chronic lack of funding, the implementation of the measure may cause difficulties.

INDICATOR No. 12.1. Adoption of the Strategy for the Development of Agriculture and Rural Sectors for the Period Until 2030

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

The strategy is aimed at achieving food security, ensuring the sustainability of the agricultural sector, and efficient land use.

INDICATOR No. 12.5. The Law on the State Agrarian Register came into force

The indicator is part of a reform designed to improve the official public electronic register of farms.

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

INDICATOR No. 13.1. Adoption of the Law of Ukraine "On Amendments to the National Program for the Development of the Mineral and Raw Materials Base of Ukraine for the Period Until 2030"

As part of the implementation of the reform to increase the investment attractiveness of Ukraine, one of the steps is the adoption of the Law of Ukraine "On Amendments to the National Program for the Development of the Mineral and Raw Materials Base of Ukraine for the Period Until 2030".

On December 18, the Verkhovna Rada [adopted](#) in the second reading and in general the updated state program for the development of the mineral and raw material base of Ukraine until 2030.



Status of implementation of Ukraine Plan indicators scheduled for Q1 2025

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

INDICATOR No. 1.1. Entry into force of legislation on civil service remuneration reform

Indicator 1.1. provides for the entry into force of legislation that complies with the principles of public administration set out in the OECD SIGMA program. The reform provides for:

- introduction of remuneration based on job classification by function;
- division of salary into a guaranteed part and a variable part;
- reduction of the seniority bonus from 50% to 30%.

Partially, the relevant changes for 2024 have already been implemented [by the Resolution of the Cabinet of Ministers of Ukraine](#) “On the issue of remuneration of civil servants based on the classification of positions in 2024”. At the same time, these changes are systematically determined by the Law: the relevant draft law No. [8222](#) was adopted as a basis on July 28, 2023, and in general it was adopted on March 11, 2025, and sent for the President's signature on March 17. The President [signed](#) the draft law only on June 3. The entry into force of the law allowed the government to adopt two resolutions on June 6:

- [On approval](#) of the Procedure for forming the salary fund of civil servants in a state body
- [On amendments](#) to the Resolution of the Cabinet of Ministers of Ukraine dated December 29, 2023 No. 1409.

Therefore, the indicator is fulfilled, but with a delay.

INDICATOR No. 4.7. Entry into force of the law on reforming ARMA

To implement this indicator, it is proposed to adopt a Law on Reforming the National Agency for the Detection, Tracing and Management of Assets Obtained 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 head of the agency;
- an independent external performance evaluation system;
- transparent procedure for managing and selling seized assets.

Back in 2023, draft law No. [10069 was registered](#), which received criticism from [public representatives](#) due to the excessive potential powers granted and the risk of duplicating the functions of the State Property Fund of Ukraine.

On January 2, 2025, the Cabinet of Ministers of Ukraine submitted to the Verkhovna Rada draft law No. [12374](#), which proposes to reform the ARMA. Alternative draft laws were also submitted to this draft law — [12374-1](#) and [12374-2](#). Some of these draft laws are not synchronized with the vision of the reform outlined in Ukraine Plan, which was also pointed out by [the public](#).

[12374-d](#) was adopted in the first reading. After the draft law was considered 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 framework of Ukraine Plan.

The Verkhovna Rada of Ukraine adopted it as a whole on June 18, 2025. At the same time, the law adopted by the Rada had a delay in promulgation - the Chairman of the Verkhovna Rada of Ukraine signed the law on July 15, 2025, and the President of Ukraine on July 27, 2025.

On 07/30/2025, the Law of Ukraine No. [4503-IX](#) entered into force, which means that the corresponding **indicator was implemented with a delay**.



Status of implementation of Ukraine Plan indicators scheduled for Q1 2025

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

INDICATOR No. 6.6. To praise the roadmap for the separation of public service obligations (PSO) and other activities

The Government should adopt and publish a roadmap for mandatory structural separation of activities related to the performance of special duties (PSO) and activities not related to the performance of special duties for all state-owned companies entrusted with special duties.

[The Action Plan for the Separation of Activities of Public Sector Economic Entities, Which Are Assigned to Perform Special Duties, from the Performance of Such Duties and Activities Unrelated to Their Performance](#), was approved by the Cabinet of Ministers on April 4, 2025.

INDICATOR No. 7.2. Entry into force of the law on preschool education

Today, one of the obstacles to business is the shortage of labor. At the same time, studies show that the level of female participation in the labor force remains lower than in many developed countries. One reason is the lack of access to quality early childhood education.

That is why one of the indicators of Ukraine Plan is a reform designed to improve access to quality preschool education in order to attract women with preschool-age children to the labor market.

The relevant [law](#) was already adopted by the parliament in June 2024. It regulates the issues identified in Ukraine Plan, which can be considered the implementation of this indicator. The law entered into force on January 1, 2025.

INDICATOR No. 7.11. Adoption of the Strategy for the Development of Culture of Ukraine

Ukraine lacks a coherent policy for the development of Ukrainian culture, while the relevant issues can now be attributed to security issues. These issues were raised several times during public consultations on the preparation of Ukraine Plan.

Thus, in accordance with the Plan, the government undertook to adopt a Strategy for the Development of Culture of Ukraine.

The relevant Ministry invited experts and scholars in the summer to provide recommendations for the future draft Strategy. The first [discussions](#) on the draft Strategy took place in December.

In February 2025, the Ministry held several public discussions on the Strategy. In March, the text of the Strategy was finalized.

The Cabinet of Ministers of Ukraine approved [the Cultural Development Strategy on time](#) (March 28, 2025).

INDICATOR No. 9.4. Entry into force of legislation on public consultations on public policy issues

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 abolition of martial law in Ukraine. The law will launch a legal mechanism for conducting public consultations during the formation and implementation of state policy, resolving issues of local importance, which will create the prerequisites for coordinated, effective and efficient political decision-making.

The corresponding [bill](#) was passed in June 2024. In October, [the law](#) was finally signed by the President.

As provided for in Ukraine Plan, it is proposed that this draft law will enter into force 12 months from the date of termination or cancellation of martial law.



Status of implementation of Ukraine Plan indicators scheduled for Q1 2025

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INDICATOR No. 12.3. An automated system for public monitoring of land relations has been put into operation. A mass assessment of land has been carried out.

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

The necessary regulatory framework for both components of the indicator was adopted in 2023. Limited public [monitoring](#) The land deals system has been in operation since 2021 and should be fully operational by the end of March, but as of March 24, it has not been made public.

At the end of March 2025, [the portal of the automated system for public monitoring](#) of land relations was launched and as of April 28, 2025, it is operating in test mode with incomplete functionality.

INDICATOR No. 12.7. A long-term plan for the development of Ukraine's irrigation system has been approved

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

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

INDICATOR No. 13.5. Updating the subsoil user's electronic account

To implement the reform, the State Service for Geology and Subsoil Resources must update the subsoil user's electronic account, digitize secondary geological information, and ensure the issuance of digital special permits for subsoil use.

On March 28, 2023, the Ministry of Environment approved the Regulations on the subsoil user's electronic cabinet by a corresponding [order](#), which determine the general principles of its functioning. May 19, 2023 Cabinet of Ministers [approved](#) the Procedure for maintaining, functioning and accessing information of the unified state electronic geoinformation system for subsoil use, developed in accordance with the Law of December 1, 2022 No. 2805-IX.

In terms of digitalization, 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 books of geological reports have been scanned, which have been published on an interactive map.

The State Register of Special Permits for Subsoil Use ([SCR](#)) [began commercial operation](#) on April 1. Thus, the indicator is considered fulfilled — despite the fact that access to the resource is temporarily restricted during martial law, with the exception of law enforcement agencies, state authorities, and local governments.

INDICATOR No. 14.1. Approval of a new plan for the allocation and use of radio frequencies in Ukraine

The Cabinet of Ministers' resolution should enter into force and define radio technologies permitted for use in Ukraine, with a definition of the radio frequency bands and radio services to which they correspond, as well as the terms for terminating their development and use, as well as a list of promising radio technologies for implementation in Ukraine with a definition of 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 No. 1253 on November 1, 2024, so the indicator can be considered fulfilled.



Status of implementation of Ukraine Plan indicators scheduled for Q1 2025

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INDICATOR No. 14.2. Entry into force of legislation on strengthening cyber defense capabilities of state information resources and critical information infrastructure facilities

Regulatory acts to align with the NIS and NIS2 Directives should enter into force. The acts should focus on the following areas:

- regulation of the implementation of measures aimed at creating an appropriate legal framework for implementing measures to prevent, detect and stop acts of aggression in cyberspace in the context of the Russian Federation's war against Ukraine;
- strengthening the level of protection of state information resources and critical information infrastructure from cyberattacks;
- comprehensive improvement of 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 No. 4336-IX entered into force on April 20, 2025 - with a three-week delay.

INDICATOR No. 14.3. Approval of an action plan for the transition of public services to electronic form by 2026

To this end, it is necessary to develop and adopt a Cabinet of Ministers Order on approving an action plan for the transfer 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; healthcare; veterans' services; military services; customs; and social services.

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

INDICATOR No. 15.2. Entry into force of the Law "On the Basic Principles of State Climate Policy"

The adoption of the Framework Climate Law is important in view of the need to bring the legislation into line with the requirements of EU law, in particular Regulation (EU) 2021/1119, which establishes the framework for achieving climate neutrality, and Regulation (EU) 2018/1999 on the Governance of the Energy Union and Mitigation of Climate Change, as well as in order to implement the action plan to implement the recommendations of the European Commission presented in the Progress Report of Ukraine under the 2023 EU Enlargement Package, approved by the Cabinet of Ministers' Resolution No. 133-r of 09.02.2024.

On October 8, 2024, the Verkhovna Rada of Ukraine adopted in its entirety the Law "On the Basic Principles of State Climate Policy" (Registration No. [11310](#)), introduced by the Cabinet of Ministers at the end of May 2024, and on October 25, the Law was signed by the President. The Law [entered into force](#) on the day following its publication (October 30, 2024), except for Articles 14 and 21.

INDICATOR No. 15.5. Approval of the Action Plan for the creation of a national greenhouse gas emissions trading system

The development and submission to the Ministry of Environment of a draft order on the approval of an 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. Plan [was published](#) on the Ministry of Environment's website. On December 30, 2024, the Ministry of Environment announced the completion of the public discussion procedure.

On February 21, 2025, the Government [approved](#) the ETS implementation plan.



Status of implementation of Ukraine Plan indicators scheduled for Q2 2025

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INDICATOR No. 5.4. Improvements in the area of resolving the problem of non-performing loans (NPL)

A Non-Performing Loan Resolution Strategy, developed in accordance with current EU legislation, should be approved. The strategy should focus on the following key areas:

- strengthening prudential requirements;
- data exchange on problem loans;
- review of potential obstacles and development of measures to improve the framework for restructuring and resolution of problem loans.

The strategy for resolving non-performing loans was approved as a separate section of the Lending Development Strategy.

INDICATOR No. 7.1. Entry into force of the law on vocational education

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 also addresses 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.

On August 21, 2025, the bill was finally passed by the deputies and sent to the President for signature on the same day. The President signed the law on September 9, 2025.

INDICATOR No. 7.10. Adoption of the Cabinet of Ministers' resolution on the procurement of social services

The resolution should provide for:

- transition from institutional funding to a result-oriented model of social service procurement;
- 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 Cabinet of Ministers of Ukraine adopted the relevant Resolution on June 25, 2025.

INDICATOR No. 8.4. Adoption of the SME strategy and action plan for its implementation

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 to it on August 30. The Strategy provides for four strategic goals for the recovery and facilitation of business, promotion of innovation and green transition, development of education and culture of entrepreneurship, and strengthening competitiveness in the domestic and foreign markets.

The program implementation indicators, among other things, suggest an increase in exports of goods to 60 billion euros by 2027, of which 35 billion euros will go to the EU by increasing the number of SME exporters to 35 thousand. It is also expected to reduce unemployment to 11% and increase the share of sales through e-commerce to 20%. In the field of science and education, it is said that the knowledge intensity of GDP will increase to 0.7% due to an increase in spending on scientific activities to 470 million euros and 1.7 million entrepreneurs who have improved their qualifications fully or partially at state expense.



Status of implementation of Ukraine Plan indicators scheduled for Q2 2025

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

INDICATOR No. 9.2. Research on the necessary measures to grant territorial communities the status of a legal entity

This concerns the approval and publication on the web portal of the Ministry of Reconstruction of a study on the necessary measures to grant territorial communities the status of a legal entity.

On June 13, the Ministry of Communities and Territories Development of Ukraine held [a presentation of the study "Community as a Legal Entity of Public Law"](#). The study reveals the reasons and consequences of assigning this status to communities, as well as proposals for legislative changes to implement such a decision.

INDICATOR No. 10.4. Implementation of the Roadmap for the process of separating the renewable energy surcharge from the transmission tariff

In accordance with [Ukraine Plan](#), the development of a Roadmap for the process of separating the renewable energy surcharge from the transmission tariff with the definition of the necessary legislative acts and implementation deadlines is entrusted to the National Commission for the Regulation of Energy and Utilities of Ukraine (upon consent).

On February 18, the Government [approved](#) the Priority Action Plan for 2025, according to which, if approved, the National Commission for the Regulation of Energy and Utilities of Ukraine (NCERC) must submit a draft order on the approval of the roadmap in June 2025.

Based on the results of consideration at the meeting of the Government Committee on May 28, 2025, [the draft ordinance was finalized](#).

On June 25, the Cabinet of Ministers [approved](#) the Roadmap for the separation of the renewable energy surcharge from the tariff for electricity transmission services and the action plan for the implementation of the Roadmap for the separation of the renewable energy surcharge from the tariff for electricity transmission services for 2025 and 2026.

INDICATOR No. 13.3. Publication of a package of investment projects for the extraction of critical raw materials

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 areas offered through the mechanism of electronic auctions and production sharing agreements (PSAs) for solid minerals.

Resolution of the Cabinet of Ministers of Ukraine No. 132 of February 14, 2023 [approved](#) a 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.

On August 15, 2024, the State Service of Geology and Subsoil of Ukraine [published](#) a draft resolution of the Cabinet of Ministers for discussion. In addition, in 2024, the Portfolio of Critical Raw Materials of Ukraine was [published](#) with a list of investment opportunities in this sector, as well as [the presentation](#) "Ukraine: Mining Investment Opportunities".

On March 4, 2025, the State Service for Geoscience and Mineral Resources [published](#) a new draft resolution of the Cabinet of Ministers. The annexes include two lists of subsoil areas — those that will be provided for use through e-auctions and those that will be provided for use through a competition for the conclusion of a PSA. The second list almost completely duplicates the current resolution of the Cabinet of Ministers of Ukraine No. 132 of February 14, 2023, with the exception of one area (potassium salts), which is proposed to be replaced by another. On April 9, a revised regulatory impact analysis [was published](#).

On July 14, 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 PSA competitions. In addition, a portfolio of investment projects for the extraction of critical raw materials [was posted on the website of the State Service for Geoscience and Mineral Resources of Ukraine](#), which, according to [the dashboard](#) of the Ministry of Economy for monitoring the implementation of the indicators of Ukraine Plan, is considered to be the implementation of the indicator.



Status of implementation of Ukraine Plan indicators scheduled for Q2 2025

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

INDICATOR No. 13.4. Launching international tenders for the conclusion of production sharing agreements (PSAs) and ensuring their transparency

It is necessary to launch international tenders for the conclusion of production sharing agreements (PSAs) using standard terms of these agreements, approved and published by the Cabinet of Ministers. 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 No. 132 of February 14, 2023 [approved](#) the list of subsoil areas (fields).

On April 8, the Cabinet of Ministers approved the proposals of the Interdepartmental Commission for the Organization of the Conclusion and Implementation of PSAs regarding the holding of a competition for the conclusion of an agreement on the distribution of hydrocarbons to be extracted in [the Mezhyhirsk](#) and [Svichansk](#) oil and gas fields.

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 No. 15.6. Restoration of the mandatory MZV system

The indicator is aimed at implementing the reform to introduce market-based mechanisms for pricing emissions. To improve the MZV system, as well as taking into account the specifics of wartime, the Cabinet of Ministers at its meeting on November 14 In 2023, Resolution No. 1203 [was adopted](#), which improves the requirements for [monitoring, reporting, and verification of greenhouse gas emissions in Ukraine](#).

As [It is noted](#) that the changes improve the MZV processes and simplify the requirements for operators for the duration of martial law. In particular, the deadlines for submitting monitoring plans in case of changes are doubled; the "transition period" is extended, and laboratory requirements are adjusted.

On October 1, the Ministry of Environment, together with GIZ, [launched](#) training sessions on MZV for facility operators, consultants, verifiers and other interested parties. It is noted that the training sessions were initiated in connection with the changes in the legislation in the field of MZV 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 Environment decided to organize appropriate measures to ensure that all stakeholders understand the processes and fulfill their tasks.

On November 21, the Verkhovna Rada approved in the first reading draft law No. [12131](#), which provides for the restoration of the mandatory MZV system. On January 8, 2025, the Law [was adopted](#) in the second reading and in its entirety. The act [entered into force](#) on February 1, 2025



Status of implementation of Ukraine Plan indicators scheduled for Q3 2025

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

INDICATOR No. 3.2.1 Entry into force of the Law on New Courts for Administrative Cases, beginning of transparent selection of judges

On February 26, 2025, the Parliament approved in its entirety the draft law No. [12368-1](#). Thus, the Kyiv City District Administrative Court should be established in Ukraine as a court of first instance and the Kyiv City Administrative Court of Appeal, which will perform the role of a court of appeal.

After consultations with the High Council of Justice, which supported the draft law on April 29, 2025, on May 19, 2025, the President submitted to the Verkhovna Rada the draft Law No. [13302](#) on the establishment of courts. The law was adopted on September 16, 2025, and entered into force on October 2, 2025. On October 29, 2025, the High Qualification Commission of Judges of Ukraine announced a competition for 27 judicial positions: 17 in the district court, 10 in the appellate court. The indicator was implemented with a delay.

INDICATOR No. 8.8. Adoption of harmonized standards for three groups of industrial products

It is necessary to adopt the translation method for 3 groups of industrial goods (machinery, electromagnetic compatibility of equipment, low-voltage electrical equipment).

According to the UkrNDNC, a number of standards on [electromagnetic compatibility](#), [machines](#) and [low-voltage equipment have been adopted by translation and are in force](#).

Thus, we consider the indicator fulfilled.

INDICATOR No. 13.2. Publication of the report on the results of the verification of strategic mineral reserves in Ukraine

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.

On September 19, 2025, the State Service for Geonadra [published the "Report on Verification of Strategic and Critical Mineral Reserves"](#) taking into account the United Nations Resource Classification Framework (UNRC).

INDICATOR No. 15.9. Adoption of the National Waste Management Plan until 2033

The indicator provides for the adoption of the Cabinet of Ministers' resolution "On Approval of the National Waste Management Ukraine Plan until 2033".

Such a plan [was approved](#) by the order of the Cabinet of Ministers of Ukraine dated December 27, 2024 No. 1353-r. On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine Plan, which provide for the postponement of the indicator deadline to the 3rd quarter of 2025. Thus, the indicator is considered to have already been implemented.

INDICATOR No. 5.2. Entry into force of legislation on the sale of public sector banks

The indicator provides for the entry into force of changes to the rules for the sale of state-owned banks. In particular, it is proposed to update Law No. 4524-VI, which determines the features of the sale of blocks of shares of state-owned banks. The updated legislation should allow the sale of minority and majority blocks of shares of banks and banks in general in accordance with the priorities set by international partners. In order to implement the indicator, [Law 3983-IX](#) On the Features of the Sale of Blocks of Shares Owned by the State in the Authorized Capital of Banks came into force in October 2024. In the updated monitoring of the Ministry of Economy, this indicator is marked as fulfilled.

The amended Ukraine Plan postponed the implementation of this indicator to Q3 2025.



Status of implementation of Ukraine Plan indicators scheduled for Q3 2025

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

INDICATOR No. 8.8. Adoption of harmonized standards for three groups of industrial products

It is necessary to adopt the translation method for 3 groups of industrial goods (machinery, electromagnetic compatibility of equipment, low-voltage electrical equipment).

According to the UkrNDNC, a number of standards on [electromagnetic compatibility](#), [machines](#) and [low-voltage equipment have been adopted by translation and are in force](#). Thus, we consider the indicator fulfilled.

INDICATOR No. 13.2. Publication of the report on the results of the verification of strategic mineral reserves in Ukraine

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.

On September 19, 2025, the State Service for Geonadra [published the "Report on Verification of Reserves of Strategic and Critical Minerals"](#) taking into account the United Nations Resource Framework Classification (UNRF). The documents describe the resource base of unlicensed deposits and subsoil areas with deposits of strategic minerals.

INDICATOR No. 15.9. Adoption of the National Waste Management Plan until 2033

The indicator provides for the adoption of the Cabinet of Ministers' resolution "On Approval of the National Waste Management Ukraine Plan until 2033".

This plan [was approved](#) by the order of the Cabinet of Ministers of Ukraine dated December 27, 2024 No. 1353-r. On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine Plan, which provide for the postponement of the indicator deadline to the 3rd quarter of 2025. 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.

INDICATOR No. 5.2. Entry into force of legislation on the sale of public sector banks

The indicator provides for the entry into force of changes to the rules for the sale of state-owned banks. In particular, it is proposed to update Law No. 4524-VI, which determines the features of the sale of blocks of shares of state-owned banks. The updated legislation should allow the sale of minority and majority blocks of shares of banks and banks in general in accordance with the priorities set by international partners. In order to implement the indicator, [Law 3983-IX On the Features of the Sale of Blocks of Shares Owned by the State in the Authorized Capital of Banks](#) came into force in October 2024. In the updated monitoring of the Ministry of Economy, this indicator is marked as fulfilled.

The amended Ukraine Plan postponed the implementation of this indicator to the third quarter of 2025.



Indicator No. 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 to increase the number of judges of the High Anti-Corruption Court (HACC) by reviving the work of the Public Council of International Experts (PCIE). To implement this measure, it is necessary to increase the staffing of HACC judges by 60% and the HACC staff by 40%.

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

At the beginning of the court's formation, in 2018, the High Council of Justice (HCJ) approved the staffing of the HCJ at 39 judge positions, including 12 judge positions in the Appellate Chamber.

In 2023, the Supreme Court of Justice received an appeal from the President of the Supreme Court of Justice requesting to increase the number of Supreme Court judges. According to the procedure, the Supreme Court of Justice, having heard the positions of the State Judicial Service Commission and the Supreme Court of Justice, [decided to temporarily determine](#) (until the approval of the standards for court staffing and the implementation of new calculations based on them) the number of judges in the Supreme Court of Justice - 63 positions, of which 21 positions are for judges of the Appellate Chamber.

As for increasing the staff of the court apparatus, the Supreme Court of Justice planned to increase the number [to 414](#) staff units from 326 in 2024, which does not yet meet the target of 40%.

In November 2023, a competition for 24 positions in the HACC began, but it was delayed, in particular due to the expiration of the powers of the then composition of the State Audit Office. At the end of April 2024, [a new composition of the State Audit Office was formed](#). According to [the results of](#) the first stage of the qualification assessment "Exam" for the HACC, **only 7 participants in the competition successfully continued their participation in it** and were admitted to the next stage - "Dossier study and interview".

As a result of the assessment of dossiers and interviews [by the HQCJ and the State Anti-Corruption Commission on February 17, 2024, it was determined](#) that **2 out of 7 candidates** meet the criteria and continue to participate in the competition for the High Anti-Corruption Court. **On March 19, 2025, the HQCJ [approved 2 winners of the competition](#)** to fill vacant positions of judges in the High Anti-Corruption Court.



Indicator No. 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

To correct problems with previous waves of elections to the Supreme Judicial Council of Ukraine, in March 2025, draft Law No. [13114](#) was introduced by the People's Deputies of Ukraine.

Instead, on May 14, 2025, the Verkhovna Rada adopted Draft Law No. [12331-2](#), which included provisions from Draft Law No. [13114](#), which facilitate the procedure for submitting and passing a competition for the position of judge.

Thus, on June 3, 2025, the HQCJ announced a new [competition](#) to fill 23 vacant judicial positions. Of these, 10 are to be selected for the Appellate Chamber, and 13 for the court of first instance.

A special feature of this recruitment is that participants, when applying for the competition, can apply both for a vacant position in the Appellate Chamber and for a place among the judges of the first instance according to the rating principle. Participants with the highest scores will have the opportunity to become judges in the Appellate Chamber.

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

As of August 6, 2025 (the deadline for submitting documents), 205 candidates applied to participate in the competition. Among the applicants, 130 were men (63%) and 75 were women (37%).

On September 16, 2025, the HQCJ considered the issue of admitting 124 candidates to undergo a qualification assessment and participate in the competition. Based on the results of the meetings, the Commission **decided to admit 98 people to undergo a qualification assessment and participate in the competition.**



Indicator No. 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

On October 1, 2025, 158 participants were tested on their knowledge of the history of Ukrainian statehood as the first stage of the qualifying exam within the framework of the competition for vacant positions of judges of the High Anti-Corruption Court.

Coded test results were established for 146 individuals:

- 1) did not score the average acceptable and passing score – 4 people;
- 2) scored an average acceptable and passing score – 142 people.

On October 27, candidates for the position of judge of the High Anti-Corruption Court took [a test on cognitive abilities](#). Of the 131 applicants, a third (44 people) failed the task. 87 participants will advance to the next (fourth) stage to complete a practical task on court specialization.

142 candidates who successfully passed the test of knowledge on the history of Ukrainian statehood were admitted to the second stage of the qualification exam - testing general knowledge in the field of law and knowledge in the specialization of the High Anti-Corruption Court, in particular its Appellate Chamber (list at the link).

On October 13, 2025, 141 participants (1 did not appear) passed the test of general knowledge in the field of law and knowledge in the specialization of the High Anti-Corruption Court, in particular its Appellate Chamber.

Coded test results are set:

- 1) did not score a passing score – 10 people;
- 2) scored a passing score – 131 people:

87 candidates were admitted to the fourth stage of the qualification exam - completion of a practical task on the specialization of the High Anti-Corruption Court, in particular its Appellate Chamber.



Indicator No. 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

The fourth stage of the qualification exam (completion of a practical task on the specialization of the High Anti-Corruption Court, in particular its Appellate Chamber) was scheduled for October 9, 2025, and the schedule for its implementation was determined - November 12 and 14, 2025.

In December 2025, the HQCJ published the results of the candidates' practical exam. It was found that **73 out of 85 applicants successfully passed the exam and are moving on to the next stage.**

The next stage of the competition is currently underway - special joint meetings of the High Qualification Commission of Judges of Ukraine and the Public Council of International Experts are scheduled for the period from February 16 to March 17, 2026.

Members of the Supreme Judicial Council and the Supreme Judicial Council will evaluate candidates for compliance with a number of criteria, including integrity, legality of the sources of origin of property, compliance of the standard of living of the candidate or his family members with the declared income, and others specified [in the Law of Ukraine "On the Supreme Judicial Council"](#).

It is also worth mentioning separately **the progress in recruiting employees for vacant positions in the staff of the High Anti-Corruption Court**, as this is also a component of this indicator.

On July 29, 2025, a selection was announced for vacant positions of employees of the Supreme Anti-Corruption Court. As of August 17, 2025, the Supreme Anti-Corruption Court received 145 resumes.

Based on the results of the processing of resumes and interviews conducted in several stages, 10 people were recommended for appointment to various positions in the court staff.

In [October 2025](#), according to the results of the selection for positions in the legal department of the VAKS apparatus, 118 resumes were submitted, 2 candidates were selected. In [December 2025](#), a selection was announced for 4 positions in the apparatus, based on the results of reviewing 51 submitted resumes, 3 candidates were selected, one position remained without winners in the selection.

Unfulfilled as of the end of February 2026 .



Indicator No. 3.5. Entry into force of legislation on the review of judges' declarations of integrity and the procedure for their verification (Q2 2025)

Sector: judicial system

Status: not completed

To implement the indicator, the law and acts of the HQCJ must come into force, in accordance with which the declarations of integrity of judges and the procedure for their verification must be revised.

For this purpose, the Ministry of Justice prepared, and the Cabinet of Ministers submitted to the Verkhovna Rada the corresponding draft law No. [13165](#) dated April 9, 2025.

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

[13165-2](#) was submitted to the Verkhovna Rada on April 25, 2025. The challenges of this bill are consistent with No. [13165](#), and in some ways are even more contrasting.

As the European Commission notes in the 2024 Report, the updated system should provide for a temporary but meaningful vetting procedure for judges of higher courts 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 meaningful vetting procedure for judges of higher courts involving 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 a special inspection is conducted. In addition, the draft law carries the risk of restricting access due to publication on the official website of the HQCJ. Finally, the provision on the exclusion of liability for intentional failure to provide or declare information seems unfounded.

On June 3, 2025, the Verkhovna Rada supported the draft Law No. [13165-2](#) in the first reading. The draft law is currently being prepared for the second reading.

It is known that [the Supreme Court of Justice of Ukraine has asked](#) the Venice Commission to provide an opinion on the draft law. The Venice Commission provided its [opinion](#) on 14.10.2025. Based on its own position and the collected opinions of other stakeholders, the Supreme Court of Justice of Ukraine provided [an advisory opinion](#) on draft law No. 13165-2 on 04.12.2025, proposing a number of clarifications.

As of the end of February 2026, the indicator remains unfulfilled.



Indicator No. 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, draft law No. [9363](#) was recognized as rejected and withdrawn from consideration due to the termination of powers by the Cabinet of Ministers of Ukraine.

At the same time, the People's Deputies of Ukraine submitted for consideration by the Verkhovna Rada draft law No. [14005](#) dated September 4, 2025. An analysis of the draft law allows us to conclude that its provisions are identical to No. [9363](#).

On September 17, 2025, the People's Deputies of Ukraine failed to include draft law No. [14005](#) on their agenda. On October 8, 2025, the Committee on Anti-Corruption Policy adopted a decision to recognize it as meeting the requirements of anti-corruption legislation.

On November 4, 2025, the Verkhovna Rada adopted draft law No. [14005](#) in the first reading with the finalization of its provisions. Thus, **as of the end of February 2026, the indicator remains unfulfilled.**



Indicator No. 2.8. Implementation of the Roadmap for Reforming the Public Investment Management System

(Q3 2025)

Sector: public finance management

Status: done

Several IMF structural benchmarks are dedicated to the reform of the public investment management (PIM) system, which Ukraine is successfully and timely implementing. The roadmap was adopted in December 2023, while the implementation [plan](#) is in summer 2024.

Indicator 2.8. addresses 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, in fact, we are talking about the fact that such a tool will be DREAM (Digital Recovery Ecosystem for Accountable Management) - a platform originally created for transparency and coordination of efforts in reconstruction and recovery.

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

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

The main measures of the plan are being implemented on time. At the same time, changes have not yet been made to several regulatory acts of ministries, but it is likely that the indicator will be recognized as being implemented on time.



Indicator No. 3.1. At least 20% of judicial vacancies have been filled
(Q3 2025)

Sector: judiciary

Status: completed, but not on time

The indicator will be considered fulfilled if at least 20% of the judicial vacancies available as of October 16, 2023 (total number of vacant positions 2,205) are filled on the basis of amended legislation, which will include the following elements:

- simplified selection stages and shortened mandatory training periods for judges;
- consistent application of clear and properly published evaluation criteria and methodology for assessing the professional competence and integrity of candidates for the position of judge;
- involving the Public Integrity Council in assessing the integrity of candidates for judicial positions in cases where this is required by law.

According to the records of the High Qualification Commission of Judges of Ukraine as of December 23, 2025, the situation with filling vacancies is as follows:

- the number of vacant positions of judges in courts as of October 16, 2023 was 2,205 (20% - 441 vacancies);
- The number of positions that were filled in the period from October 16, 2023 to December 23, 2025 is 453.

Thus, **indicator 3.1. was implemented with a delay**.



Indicator No. 10.5. Adoption of legislation for the electricity integration package
(Q3 2025, postponed from Q4 2025)

Sector: energy

Status: not completed

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, 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 Ukraine Plan, which provide for the postponement of the indicator deadline to Q3 2025. With the new deadline, as of the end of December, the indicator is still unfulfilled.



Indicator No. 12.4. Entry into force of legislation on state support for agriculture in Ukraine
(Q3 2025)

Sector: agri-food sector

Status: completed, but not on time

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 November 4, [Law 4619-IX entered into force](#) on the basis of alternative [draft law 13202-1](#). According to the relevant 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.



Indicator No. 15.4. Approval of Ukraine's 2nd Nationally Determined Contribution to the Paris Agreement (Q3 2025)

Sector: green transition and environmental protection

Status: completed, but not on time

The implementation of the indicator requires the entry into force of the Cabinet of Ministers' order on approval of Ukraine's 2nd Nationally Determined Contribution to the Paris Agreement. In addition, according to the conditions of the indicator, Ukraine's second NDC to the Paris Agreement should be more ambitious compared to the current Updated NDC of Ukraine. This obligation is also [fixed](#) by the final and transitional provisions of the Law "On the Basic Principles of State Climate Policy".

The updated NDC of Ukraine to the Paris Agreement was approved by the Cabinet of Ministers Order [No. 868-r](#) on July 30, 2021, and the preparation process [has been ongoing](#) since 2018. The document is published [on the UNFCCC website](#). In addition, in July 2021, the Ministry of Environment published an analytical review of the updated NDC [in Ukrainian](#) and [English](#). In July 2023, a draft action plan for the implementation of the NDC [was published](#) with identified key measures that will contribute to the reduction of greenhouse gas emissions.

As [reported](#) in March 2025 by the Minister of Environmental Protection and Natural Resources Svitlana Hrynychuk, "NDC 3.0" should set a medium-term goal to reduce 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 May 27, the Ministry of Environmental Protection and Natural Resources [held](#) a discussion of the draft NDC by 2035, where model scenarios of the NDC were presented.

On June 11, the Ministry of Environmental Protection and Natural Resources [published](#) a draft order of the Cabinet of Ministers "On the approval of the Second Nationally Determined Contribution of Ukraine to the Paris Agreement". The declared goal is to reduce greenhouse gas emissions by 68-73% in 2035 from the 1990 level. On July 25, [a report](#) on the results of electronic consultations with the public on the draft order was published on the website of the Ministry of Environment. However, as [noted](#), the Ministry of Environment did not take into account a significant part 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 order of the CMU on the approval](#) of the Second Nationally Determined Contribution of Ukraine to the Paris Agreement in September 2025.

On October 29, the Cabinet of Ministers [approved](#) Ukraine's 2nd NDC, so the indicator was implemented with a delay.



Indicator No. 1.2. Entry into force of amendments to the legislation on improving the procedure for entering, passing and dismissing from the civil service
(Q4 2025 - postponed from Q3 2025)

Sector: public administration reform

Status: not completed

Ukraine has been undergoing a public administration reform for years, which is designed to promote the existence of 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. is designed to improve the procedures for selection, promotion and dismissal from the civil service.

At the same time, it is noted that the new legislation (including by-laws) should enter into force by the end of the third quarter of 2025. It should comply with the OECD principles of public administration (SIGMA) regarding selection procedures based on professional competencies.

[bill No. 13478](#) was registered in the parliament, but it was withdrawn due to the change of government. With this understanding, the deputies submitted an identical [bill No. 13478-1 on July 16](#): the responsible committee decided to consider it only on September 11.

Although, in accordance with the amendments to Ukraine Plan, this measure was postponed to the 4th quarter of 2025, it was not implemented in time. As of March 2, not even the first reading had taken place, and there is no unity in the parliament regarding approaches to the resumption of competitions .



Indicator No. 2.6. Approval of the medium-term public debt management strategy
(Q4 2025)

Sector: public finance management

Status: done

Several structural benchmarks of the IMF Program are dedicated to the public debt management strategy: No. 10 and No. 15 (completed in 2023).

Effective public debt management allowed Ukraine to reduce public and state-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 after Covid. As a result, Ukraine had a stable fiscal situation at the beginning of a full-scale war

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 Eurobonds. Also in December 2026, the government restructured warrants. Thus, important elements of the Public Debt Management [Strategy](#) for 2024-2026 have been implemented.

The change in the main challenges and the implementation of an important component of the Strategy prompted the adoption of a new Strategy.

The Cabinet of Ministers approved **Medium-term public debt management strategy for 2026–2028** December 24, 2025. Therefore, the Indicator was completed on time.

New [Strategy](#) defines three main goals of debt policy for 2026–2028:

- Increasing the share of grants and other non-debt financing to ensure financing of the state budget.
- Reducing debt risks by reducing the cost of debt, extending the maturity of debt obligations and optimizing their structure.
- Maintaining relations with investors and stimulating the development of the domestic government bond market as a tool for economic recovery.



Indicator No. 2.9. Adoption and entry into force of amendments to the resolutions of the Cabinet of Ministers on state financial control

SLIDE 1/5

(Q4 2025)

Sector: public finance management

Status: done

To implement the indicator, amendments to the resolutions of the Cabinet of Ministers or other legislative acts on state financial control must be adopted and come into force, which will relate, in particular, to 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, using international auditing standards;
- strengthening measures to monitor procurement procedures.

The reform is expected to increase the efficiency and quality of the State Audit Service's work in line with European Union practice and the SIGMA principles of financial inspection.

Based on an analysis of the regulatory framework governing the functions of the State Audit Service, and taking into account the SIGMA principles of public administration, legislative amendments will be made that will provide a clearer definition of the mandate of the State Audit Service.

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

In order to implement the specified indicator, the Resolution of the Cabinet of Ministers of Ukraine dated 06.09.2024 No. 1031 "On Amendments to the Resolutions of the Cabinet of Ministers of Ukraine dated February 3, 2016 No. 43 and dated October 25, 2017 No. 1110" was adopted, which provides for strengthening cooperation between the authorities of Ukraine with EU institutions in the field of protecting the financial interests of the European Union, which ensured the functioning of the Anti-Fraud Coordination Service (AFCOS) and the mechanism for interdepartmental interaction regarding reporting facts of violations for the protection of the financial interests of the EU (AFCOS Network) and the Order of the Ministry of Finance of Ukraine dated 27.09.2024 No. 476 "On Approval of the Methodology for Determining Automatic Risk Indicators, Their List and Procedure for Application".



Indicator No. 2.9. Adoption and entry into force of amendments to the resolutions of the Cabinet of Ministers on state financial control

SLIDE 2/5

(Q4 2025)

Sector: public finance management

Status: done

On March 27, 2025, the Head of the State Audit Service of Ukraine, Alla Basalayeva, and the Head of the Audit Council of the Ukraine Facility, Marek Belka, signed a Memorandum, which should ensure close cooperation between the two institutions.

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

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

[meeting](#) was held on June 5, 2025 to ensure control over Ukraine Facility funds. The meeting discussed the limits of responsibility of management bodies, monitoring and control over the implementation of Ukraine Plan to identify signs of double funding, fraud and other illegal activities with EU funds.

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

In 2024, UAH 39 billion (or EUR 861 million) has been allocated and already used under budget programs to implement the investment indicators of the Ukraine Facility. Almost 100% of these funds will be covered by state financial control measures through state financial audit, inspection, procurement verification and procurement monitoring.

Last year, auditors completed 310 DFC activities regarding budget funds that Ukraine receives under the European assistance instrument Ukraine Facility. Currently, 78 are ongoing, and about 148 more control activities of varying complexity will take place in the near future.



Indicator No. 2.9. Adoption and entry into force of amendments to the resolutions of the Cabinet of Ministers on state financial control

SLIDE 3/5

(Q4 2025)

Sector: public finance management

Status: done

Typical errors that led to violations include customers' ignorance that the procurement was carried out with Ukraine Facility funds, and non-compliance with the requirements of the Framework Agreement between Ukraine and the EU on special mechanisms for implementing Union financing for Ukraine under the Ukraine Facility. For example, double financing, which can be mistakenly interpreted as co-financing, as well as overestimation of the cost and volume of works and equipment, remains a problem.

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

The State Audit Service also developed a draft model for risk assessment in the planning process to ensure the selection of control objects to which funds are allocated for the implementation of the steps of Ukraine Plan. The State Audit Service also prepared and submitted to the Ministry of Finance of Ukraine proposals for the formation of the Ukraine Facility Fund Audit Strategy.

On July 14, 2025, the Ministry of Economy published letter No. [3323-04/48400-07](#) regarding procurement taking into account the provisions of the Framework Agreement under the Ukraine Facility. The letter covers the following issues:

1. Procurement under the Ukraine Facility and the VAT exemption mechanism.
2. Regarding the clarifications of the European Commission's Directorate-General for Enlargement and Eastern Neighbourhood (DG ENEST) on the rules on the eligibility of persons, entities and materials for supply.
3. Regarding procurement under the Ukraine Facility instrument related to the implementation of the public investment project to ensure high-quality, modern and accessible general secondary education "New Ukrainian School" in 2025.
4. Regarding purchases from various sources of funding, in particular those related to the implementation of a public investment project to modernize workshops and laboratories of vocational and specialized pre-higher education institutions, ensuring energy efficiency, safety and inclusiveness of the educational space.
5. Regarding the draft amendments to Resolution No. 1178.



Indicator No. 2.9. Adoption and entry into force of amendments to the resolutions of the Cabinet of Ministers on state financial control

SLIDE 4/5

(Q4 2025)

Sector: public finance management

Status: done

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 a total amount of over 124 million UAH and revealed financial violations in the amount of over 185 thousand UAH, which were reimbursed in full.

On September 29, 2025, it became known that [the Government updated the regulations on procurement within the framework of the Ukraine Facility](#), bringing them into line with the requirements of international obligations.

According to information provided by the Ministry of Finance of Ukraine, regarding assistance to the State Audit Service to provide the institution with the means to protect the financial interests of the EU, in particular regarding funds used within Component I of Ukraine Plan, in accordance with the principles of international auditing standards, the following has been developed:

- the draft resolution of the Cabinet of Ministers of Ukraine "On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine on the Activities of State Financial Control Bodies", which, in particular, proposes to make changes in the context of the specifics of conducting audits of recipients identified within the framework of the Ukraine Facility instrument in order to protect the financial interests of the EU;
- draft resolution of the Cabinet of Ministers of Ukraine "On approval of the Procedure for conducting state financial audit by the State Audit Service and its interregional territorial bodies within the framework of international treaties of Ukraine", which determines the procedures and mechanisms for conducting the relevant state financial audit by the bodies of the State Audit Service.

The above-mentioned draft resolutions were agreed upon in accordance with the procedure established by law with the interested bodies and on October 20, 2025, were sent by the State Audit Service to the Ministry of Finance for submission by the Minister of Finance of Ukraine for consideration by the Cabinet of Ministers of Ukraine.

Also, in order to strengthen measures to monitor procurement procedures, the State Audit Service has developed a draft order of the Cabinet of Ministers of Ukraine "On approval of the Roadmap for strengthening control over public procurement and approval of the action plan for its implementation for 2025-2027", the adoption of which will contribute to the effective and transparent implementation of public procurement and strengthen state financial control over compliance with procurement legislation.

The specified draft order has been agreed with the interested bodies and is being prepared for submission to the Cabinet of Ministers of Ukraine for consideration in accordance with the established procedure.



Indicator No. 2.9. Adoption and entry into force of amendments to the resolutions of the Cabinet of Ministers on state financial control

SLIDE 5/5

(Q4 2025)

Sector: public finance management

Status: done

On November 13, 2025, the CMU, by Resolution No. [1473](#) "On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine on the Activities of State Financial Control Bodies", changed the procedures regarding:

- conducting audits and inspections, in particular regarding:
- making purchases;
- preparation of administrative acts;
- deadlines for the implementation of audit materials;
- consideration of requests for audits;
- actions of officials in the event of obstruction of their work.

The changes regulate the specifics of conducting audits of recipients identified within the framework of the Ukraine Facility and are aimed at preventing fraud, corruption and other violations that may harm national financial interests, as well as the European Union. At the same time, the adopted changes expand the reactive functions of state financial control.

On November 19, 2025, the Cabinet of Ministers of Ukraine approved the Procedure for conducting a state financial audit within the framework of international treaties of Ukraine to protect national financial interests and the European Union.

The New Procedure defines clear mechanisms and procedures for state financial audit of funds provided to Ukraine under the Ukraine Facility and other international agreements, regarding:

- legality of use;
- efficiency (effectiveness) of use and conservation;
- accounting and reliability of financial reporting;
- functioning of the internal control system.

The procedure provides for conducting an audit taking into account international auditing standards in accordance with the state financial control action plan, which is posted on the official website of the State Audit Service.

Thus, the indicator is considered fulfilled.



Indicator No. 3.3. 20% of old disciplinary proceedings (cases) not considered as of the end of 2023 have been resolved (Q4 2025)

Sector: judiciary

Status: done

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 September 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 79 complaints as priority (from those received by December 31, 2023) and of these, **23 complaints (29%) have already been considered**, which corresponds to the established target indicator.



Indicator No. 3.4. The qualification assessment (verification) was conducted to ensure predictability, consistency and openness of disciplinary practice regarding judges.
(Q4 2025)

Sector: judiciary

Status: done

50% of judges who were supposed to pass it as of September 30, 2016, in accordance with the established procedure and with the involvement of the Public Integrity Council, must undergo a qualification assessment (verification).

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 September 22, 2025:

- 3,169 judges (46%) 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%) are not fit for their positions;
- Regarding 975 judges (14%), the qualification assessment was terminated during its implementation for reasons beyond the control of the HQCJ;
- 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 4,313 judges (62%), the qualification assessment has been completed to meet indicator 3.4.**



Indicator No. 3.9. A system for collecting data on the execution of court decisions is in place.

(Q4 2025)

Sector: judiciary

Status: done

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

The implementation of a data collection system on the execution of court decisions will allow tracking progress towards execution, analyzing 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.

It became known from the Government's Priority Action Plan that [the implementation of the data system on the execution of court decisions is planned for December 2025.](#)

On December 4, 2025, the Ministry of Justice announced the launch of [the Data Collection System on the Execution of Court Decisions.](#)

The section provides current and archival information (starting from 2022) on the enforcement of court decisions.

The system contains:

- data on bodies and persons carrying out compulsory execution of court decisions and decisions of other bodies;
- information on the status of digitalization of enforcement proceedings;
- indicators of the activities of state enforcement agencies and private enforcement agents.

In the first half of 2025, state enforcement officers received 2,314,403 enforcement documents on collection to the budget for certain socially important categories - this is 54.5% of the total number of documents received for execution.

Thus, **the indicator should be considered completed on time.**



Indicator No. 4.8. Conducting the next National Risk Assessment
(Q4 2025)

SLIDE 1/2

Sector: fight against corruption and money laundering

Status: not completed

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 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.

[a meeting](#) of the Council on Prevention and Counteraction to the Legalization (Laundering) of Proceeds of Crime, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction was held .

The main focus was on the National Risk Assessment in the field of money laundering and terrorist financing. Participants discussed the stages and approaches to conducting the assessment, including updating the methodology in accordance with modern challenges caused by the armed aggression of the Russian Federation, the transformation of the economy, and the development of digital financial technologies.

The purpose of the assessment is to identify, analyze and understand current threats that can be used to legalize proceeds from crime or finance terrorism. The results of the National Risk Assessment will become the basis for updating state policy in the field of counteraction and for the effective application of a risk-based approach.



Indicator No. 4.8. Conducting the next National Risk Assessment
(Q4 2025)

SLIDE 2/2

Sector: fight against corruption and money laundering

Status: not completed

According to information provided by the State Financial Monitoring Service of Ukraine, in accordance with the indicative plan for conducting a national risk assessment (NRA) (period of information collection and analysis from 2022 to 2024), approved by the Working Group on National Risk Assessment on February 28, 2025, the first stage of its implementation has been completed - the STAGE OF COLLECTION AND ANALYSIS OF INFORMATION NECESSARY FOR CONDUCTING THE NRA.

On September 24, 2025, the draft Report on the implementation of the NRA was sent to the EC for preliminary assessment.

As part of the II stage - PREPARATION, APPROVAL AND PUBLICATION OF THE NRA RESULTS, a survey is conducted on the compliance of the NAR results with the professional judgments of the NAR participants (taking into account the competence of the NRA participants).

As of the end of February, the National Risk Assessment had not been prepared, and therefore the indicator is not fulfilled. According to the information provided in response to a request for access to public information from the State Financial Monitoring Service of Ukraine, as of 10.12.2025, the draft Report on the National Risk Assessment was sent for approval to the Ministry of Finance of Ukraine. Based on its review, the Ministry of Finance of Ukraine provided comments and recommendations, the elimination of which is currently underway.



Indicator No. 5.6. Entry into force of the Law on Improving State Regulation of Capital Markets and Organized Commodity Markets (Q4 2025)

Sector: 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 enter into force 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 No. 6.7. Assessment and, if necessary, amendments and entry into force of legislation on the separation of PSO and non-PSO activities in SOEs

(Q4 2025 — postponed from III quarter 2025)

Sector: state asset management

Status: not completed

This indicator is a logical continuation of indicator 6.6, which provides for the adoption of a Roadmap on the demarcation of activities related to the performance of special duties (PSO, public service obligations) and activities not related to the performance of special duties by state-owned enterprises.

Yes, it is planned to separate accounts between PSO and non-PSO activities in SOEs in order to avoid cross-subsidization. Yes, at the first stage (indicator 6.6 should be implemented in the Q1 2025), it is envisaged to adopt a relevant Roadmap, which defines steps for the mandatory structural separation of activities related to the performance of special duties and activities not related to the performance of special duties for all state-owned companies engaged in PSO.

Indicator 6.7 will assess the legislation identified in the Roadmap and, if necessary, amend it. This will be done to ensure that the appropriate separation of accounts between PSOs and non-PSOs is working effectively in all state-owned companies. By Q3 2027, the government should ensure that an independent audit is conducted in SOEs involved in PSOs on the effectiveness of the implementation of the legislation.

As of January 30, 2026, the government has not submitted a corresponding bill to parliament. At the same time, People's Deputy Oleksiy Movchan submitted bill [No. 13620](#), which, among other things, also provides for the peculiarities of maintaining separate accounting of transactions of public sector economic entities entrusted with the performance of special duties, from the performance of such duties and activities not related to their performance. But the bill was submitted back in August 2025, and to date has not been adopted even in the first reading.



Indicator No. 6.9. Lifting the suspension of the State Aid Law and restoring State Aid Control and harmonizing the State Aid Law with the EU acquis
(Q4 2025, postponed from Q3 2025)

Sector: state asset management

Status: not completed

RRR4U



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

In March 2025, the Antimonopoly Committee published for public discussion [a draft law on the restoration of the provisions of the Law on State Aid](#). The draft law proposed to restore the effect of the Law until the end of martial law in territories where hostilities are not underway, and to make a number of changes to the substantive provisions of the Law. The draft law was prepared in constant dialogue with the European Commission regarding the compliance of the draft law with the norms of EU law. In September, the AMC submitted a revised version of the draft law to the Cabinet of Ministers.

Bill [No. 14345](#) to implement this indicator was registered with the Verkhovna Rada only on December 30, 2025. It is envisaged to restore the full effect of the Law of Ukraine "On State Aid to Economic Entities", except for territories where hostilities are ongoing or which are temporarily occupied. New thresholds for "minor" aid have also been defined. As of March 2, 2026, no Opinion of the relevant committee has been submitted to this draft law.

At the same time, [the conclusion](#) of the experts of the UA2EU program notes that although the draft law does not contradict EU law, it is not fully compliant with the norms of EU law, and therefore must be supplemented.



Indicator No. 7.8. Entry into force of the Law of Ukraine "On the Basic Principles of Housing Policy"
(Q4 2025)

Sector: human capital

Status: completed, but not on time

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.

[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. Then, for months, the draft law was finalized for consideration in the second reading (1916 amendments were received). On October 3, 2025, the Verkhovna Rada completed consideration of the amendments submitted to the draft law "On the Basic Principles of Housing Policy". On January 13, the draft law was finally voted on by deputies. On February 13, the President of Ukraine signed the Law, and it [entered into force on February 15](#); therefore the indicator was fulfilled with a delay.

**Indicator No. 8.2. Deregulation in certain sectors**

(Q4 2025 - postponed from Q3 2025)

Sector: business environment

Status: not completed



Legislation needs to be passed (legislation needs to come into force) to deregulate and simplify the conditions for doing business.

Some of the areas have already been implemented:

- digitalization of permitting and licensing procedures through the implementation of a pilot project to introduce a Unified State Electronic System of Permit Documents - the “ePermit” system;
- regulating the issue of succession of permits and licenses in the event of a change in the organizational and legal form of a business entity - [current Law No. 4196-IX](#), which was adopted on 09.01.2025.

Another direction is in progress:

- reducing business inspections by introducing voluntary insurance and auditing - [Law No. 14030 dated September 11, 2025](#) “On the Basic Principles of State Supervision (Control)” is currently being prepared for the second reading.

The deadline for implementing this indicator was moved from the third to the fourth quarter of 2025. However, even as of February 2026, the bill had not yet been considered in the second reading.

**Indicator No. 10.3. Improving permitting procedures for investments in renewable energy sources**

(Q4 2025, postponed from Q3 2025)

Sector: energy

Status: not completed

To achieve this indicator, it is necessary to adopt and enter into force legislation to reduce permitting procedures for investments in renewable energy in accordance with European Union rules.

On August 11, 2025, the Ministry of Energy [published](#) the draft Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding the Implementation of European Union Legislation in the Sector of Renewable Energy Sources”, which, in particular, provides for the introduction of the main principles of permitting procedures for investments in renewable energy sources that comply with EU rules.

On December 3, [draft law No. 14271](#) on the implementation of EU legislation in the field of RES was registered in the Verkhovna Rada. However, on December 16, its consideration was postponed, making it impossible to meet the indicator on time.



Indicator No. 10.7. Appointment of a nominated electricity market operator
(Q4 2025)

Sector: energy

Status: not completed

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.



Indicator No. 10.11. Determination of the special status of the NEURC (Q4 2025)

Sector: energy

Status: not completed

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 benchmark 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 No. 10.11. Determination of the special status of the NEURC (2) (Q4 2025)

Sector: energy

Status: not completed

On November 1, the Energy Community Secretariat [published](#) its annual report for 2025, in which it noted systemic limitations on the independence of the NEURC, in particular its functioning as a central executive authority, the lack of adopted legislation to strengthen its autonomy, its financial and personnel dependence on other authorities, and the need to coordinate certain regulatory decisions with the CMU, ministries and the Antimonopoly Committee of Ukraine. Additional risks arise in a state of martial law, when NEURC decisions can be overturned by other authorities, as confirmed by the restriction of access to key electricity market data in December 2024.

In turn, in [a letter](#) to the Chairman of the NEURC dated November 26, the Energy Community Secretariat once again emphasised its fundamental position that the independence of the national energy regulator is a basic condition for the functioning of integrated energy markets and the implementation of the EU acquis. The Secretariat supports the swift adoption of legislative changes to strengthen the institutional autonomy of the NEURC, in particular with regard to the transparency and independence of the procedures for selecting Commission members, expanding decision-making powers and eliminating conflicts of interest. The Secretariat emphasised the need to ensure adequate resources for the NEURC even in wartime and confirmed its readiness to continue supporting Ukraine in these reforms.

On December 8, the [draft law](#) No. 14282 on strengthening guarantees for the exercise of the NEURC's powers was registered in the Verkhovna Rada. As of the end of December, the draft law is being reviewed by the Verkhovna Rada committees. In turn, on December 18, the NEURC [published](#) a statement emphasising that the mechanism for rotating the entire composition of the commission proposed by the draft law contradicts EU legislation and violates European principles of regulatory bodies, and called for consultations with the Energy Community Secretariat. The NEURC also [sent](#) proposals to the draft law to the Verkhovna Rada Committee on Energy, Housing and Utilities. As of the end of January 2026, the draft law is being processed by the Verkhovna Rada committees.

On January 5, 2026, the EU Delegation to Ukraine [confirmed](#) that the institutional and operational independence of the NEURC, in particular through transparent appointment procedures and protection from conflict of interest, is a key condition for investor confidence, energy market stability and Ukraine's progress towards EU membership.

On January 31, 2026, representatives of the NEURC, during a meeting with the Director of the Energy Community Secretariat, Artur Lorkovsky, [discussed](#) urgent challenges in the energy sector of Ukraine, the passage of the heating season under attacks, the issue of price caps, the need to adopt draft law No. 12087-d, strengthening the independence of the Regulator, and further steps to integrate the markets of Ukraine and the EU.



Indicator No. 10.13. Adoption of the State Target Economic Program for Energy Modernization of Heat Generating Enterprises for the Period Until 2030
(Q4 2025)

Sector: energy

Status: completed on time

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. "

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.

On October 1, the Cabinet of Ministers [approved](#) 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



Indicator No. 10.14. Supporting the development of efficient and more sustainable district heating
(Q4 2025 , postponed from Q3 2025)

Sector: energy

Status: not completed

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.

On May 5, the Ministry of Development [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 the 4th quarter of 2025.

On September 22, the Verkhovna Rada [registered](#) government draft law No. 14067 "On Amendments to Certain Laws of Ukraine on Supporting the Development of Efficient and Sustainable District Heating." On November 6, the Verkhovna Rada Committee on Energy, Housing and Utilities issued [an opinion](#) recommending the adoption of the draft law in the first reading, and a draft [resolution](#) on adopting the draft law as a basis was also published.

On February 10, 2026, the draft Law was [adopted](#) as a basis.



Indicator No. 13.6. Publication of a report on current legislation in the field of ESG reporting implementation (Q4 2025)

Sector: management of critical raw materials

Status: completed on time

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.

On August 4, the Verkhovna Rada [registered](#) a government draft Law on amendments to the Law of Ukraine "On Accounting and Financial Reporting in Ukraine" to introduce sustainable development reporting. Also, on September 5, the Parliament submitted a draft Law "On Amendments to the Law of Ukraine "On Audit of Financial Statements and Auditing Activities" and Certain Laws of Ukraine on Improving Legislation in the Field of Auditing Activities" (reg. No. 14016), which provides for the establishment of requirements for auditors to prepare a report on mandatory assurance on sustainable development reporting.

On December 22, a study prepared by BRDO on ESG reporting for the extractive sector [was published on the Ministry of Economy's website](#). Thus, the indicator is fulfilled.



Indicator No. 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: completed, but not on time

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

On October 8, 2024, the Verkhovna Rada [adopted](#) the Law of Ukraine 3991-IX "On the Basic Principles of State Climate Policy", which provides for the establishment of the Scientific and Expert Council on Climate Change and Ozone Layer Preservation as an independent advisory scientific and expert body with the aim of scientifically supporting 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 a year from the entry into force of the law.

On February 18, the Cabinet of Ministers [approved](#) the Government's Priority Action Plan for 2025, where, among other things, the Ministry of Environment must develop and submit to the Cabinet of Ministers a draft resolution on approving the Regulation 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 Work Plan of the Ministry of Environment Protection and Natural Resources with a deadline of Q4 2025.

According to our information, as of May 2025, the Ministry of Environment Protection and Natural Resources had already developed a draft decision and submitted it for approval to the central executive authorities in September.

On November 12, during [the COP30 climate conference in Brazil](#), Deputy Minister of Economy Pavlo Kartashov [noted](#) that by the end of the year it is planned to approve the regulations and composition of the Scientific and Expert Council on Climate Change and Ozone Layer Preservation and authorize the Green Transition Office to perform the functions of the secretariat, ensuring operational functionality.

On January 14, 2026, the Cabinet of Ministers [approved](#) a resolution on the establishment of the Scientific and Expert Council on Climate Change and Ozone Layer Preservation. Thus, the indicator is considered to be fulfilled with a delay.



Indicator No. 11.3 Adoption of the Law of Ukraine "On Railway Transport of Ukraine", entry into force of the final provisions of the Law
(divided into two - with completion dates in Q4 2025 and Q4 2026, initially Q4 2025)

Field: transport

Status: not completed

In the fall of 2024, two draft laws No. [12142](#) "On the system and features of the functioning of the railway transport market of Ukraine" from the CMU and an alternative to it No. [12142-1](#) from the deputies of the transport committee of the Verkhovna Rada were registered: the first of them was withdrawn due to the change of government, and the second was removed from consideration due to the government's decision to divide the indicator into two with the postponement of the implementation deadlines. .

Both bills provided for the creation of a National Commission for state regulation in the transport sector, the separation of Ukrzaliznytsia and the admission of private traction operators to the track. In addition, it is envisaged to create a Railway Transport Service and a National Bureau for Investigation of Transport Accidents , which will be responsible for transport safety and railway interoperability (the ability of rail transport to maintain safe traffic) .

Both draft laws only partially implemented European directives and regulations into Ukrainian legislation, such as Directive 2012/34/EU on the creation 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 Ukraine Plan, the government divided this indicator into two:

11.3. 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 - 4th quarter of 2025: On August 20, the Ministry of Development and Trade launched an online consultation on the draft law “ [On Safety and Interoperability of Railway Transport of Ukraine](#) ”. The corresponding draft law [No. 14174](#) was registered in the Verkhovna Rada only on October 31. As of November 27, only the Committee's opinion was provided. On December 17, the draft law was adopted in the first reading, but it is impossible to adopt it in full and enter into force in 2025.

11.8 Entry into force of the law on the railway transport market with phased application of its provisions. - 4th quarter of 2026



Indicator No. 11.3 Entry into force of the Law "On Traffic Safety and Interoperability of Railway Transport of Ukraine"

(Q4 2025)

Field: transport

Status: not completed

The indicator provides for the 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. To implement this indicator, on August 20, the Ministry of Development and Trade launched an online consultation on the draft law “ [On Safety and Interoperability of Railway Transport of Ukraine](#) ”.

The corresponding draft law [No. 14174](#) was registered in the Verkhovna Rada only on October 31. The draft law embodies Ukraine's obligations under the Association Agreement and implements the requirements of the EU's "fourth railway package" (directives 2016/798, 2016/797, etc.). After its adoption, Ukraine will switch to the European model of safety management. Instead of formal control, a risk management system, operator liability, and an independent safety authority will appear. And the Ukrainian railway system will be able to technically and organizationally work in a single space with EU networks (ETCS/ERTMS, TSI, subsystem admission, conformity assessment modules).

In practice, this means:

- clear rules for admitting infrastructure and rolling stock to operation according to European technical specifications (TSI), with transparent conformity assessment procedures
- transition to a European approach to technical maintenance, clear definition of responsibility for the safe condition of rolling stock (ECM approach), requirements for accounting and risk management
- preparation for full integration into the European TEN-T corridors, reduction of technical barriers to transit, simplification of access for foreign operators, opening the market for manufacturers already working under TSI

In general, the draft law complies with EU law. However, some provisions, in particular those on risk assessment and the cost of certificates, require further elaboration.

On December 17, the bill was passed only in the first reading. As of March 2, January, not even a table for the second reading had been prepared.



Indicator No. 1.5. Full launch and use of the human resources management information system (HRMIS)

(Q1 2026)

Sector: public administration reform

Status: in progress

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

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

In general, individual elements of HRMIS are already operational, and therefore, most likely, this indicator will be met on time.



Indicator No. 3.7 Entry into force of legislation on simplified insolvency procedures for MSMEs (Q1 2026)

Sector: judiciary

Status: in progress



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

The relevant bill No. 15024 introduces a simplified bankruptcy procedure for micro and small businesses. It is a fast-track procedure with a maximum period of up to 180 days, lower costs and minimal bureaucracy: fewer documents, faster processing, lower fees. Access criteria will be clearly defined so that the procedure applies only to bona fide small businesses, and complex or conflicting cases will be considered according to general rules. Clear rules will also be established for the interaction of bankruptcy procedures and privatization of state-owned enterprises so that assets do not remain in limbo for years.

Bill No. 15024 was registered with the Verkhovna Rada on February 10, 2026. As of the end of February, it is under consideration in the committee. There is only one month left to pass the bill.



Indicator No. 3.12. Entry into force of legislation ensuring transparent and merit-based selection of prosecutors for management positions in prosecutorial bodies

(Q1 2026)

Sector: judicial system

Status: in progress



According to Ukraine Plan, “enhancing the accountability and integrity of the prosecutor’s office is key to combating the abuse of power and pressure on businesses and investors by law enforcement agencies, which is a widespread phenomenon in Ukraine.”

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

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

On June 24, the newly appointed Prosecutor General of Ukraine, Ruslan Kravchenko, [supported](#) a publicly transparent, merit-based selection of prosecutors for leadership positions, as envisaged by the EU initiative "Ukraine Facility" and planned changes to the legislation, which provide for the adoption of a special law taking into account the best European standards.

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

As of the end of February 2026, the Prosecutor General's Office, in response to a request for access to public information, informed that it had developed a draft Law of Ukraine "On Amendments to the Law of Ukraine "On the Prosecutor's Office", which was sent to the Cabinet of Ministers of Ukraine by letter dated December 30, 2025 for further submission to the Verkhovna Rada of Ukraine for consideration.

At the same time, the Cabinet of Ministers of Ukraine has not yet submitted a corresponding draft Law to the Verkhovna Rada of Ukraine, and there is little time left for its consideration in the Parliament, adoption and entry into force. Therefore, the indicator is at risk of failure.



Dictator No. 5.1. Publication of the banking system stability assessment
(Q1 2026)

Sector: financial markets

Status: in progress

The indicator requires the publication of a sustainability assessment of the 20 largest banks by assets. If necessary, the assessment should include a stress test that assesses the bank's condition under an adverse economic scenario and an independent asset quality assessment (AQR).

In December 2024, the NBU approved [the terms of reference for the assessment](#) of banks in 2025 and determined the features of its implementation. In May 2025, the NBU [approved the methodology for stress testing banks](#). The procedure for conducting the assessment corresponds to the indicator. In September, the NBU announced the completion of the assessment of the stability of banks and published [a short assessment report](#), which confirms the fulfillment of the conditions of the indicator during the assessment. On December 28, [the full assessment results were published](#). Accordingly, the indicator was completed ahead of schedule.



Indicator No. 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.

As of March 2, the relevant bill has not yet been submitted to parliament. It is likely that the government will adopt a corresponding decision by means of a Resolution on the experiment. The possibility of such an approach to implementing indicators was recently announced by Yulia Svyrydenko.



Indicator No. 9.3. Better division of powers between local governments and executive authorities

(Q1 2026)

Sector: decentralization and regional policy

Status: in progress



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

Legislation on the separation of powers between local governments and executive authorities shall enter into force within 12 months after the termination or lifting of martial law, but not before the start of the new budget period.

These legislative changes will lead to a better distribution of powers between local governments and executive authorities based on the principles of subsidiarity and decentralization, will contribute to the elimination of conflicts of competence between different levels of central, regional, district and local government, as well as within local governments, and to the proper quality of public services at the local level, as well as the effective use of budget funds.

The relevant draft law No. 1 4412 “On the principles of the separation and distribution of powers between levels of public governance” has already been considered by the relevant committee of the Verkhovna Rada. Only a month remains to adopt the draft law in the first and second readings.



Indicator No. 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 SAR.

On July 24, 2025, the State Agrarian Register information and communication system 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 were accepted from July 24, 2025 to August 22, 2025.

Also, in September-November 2025, farmers could apply for funding through SAR for a number of payments: budget subsidies for frontline territories, compensation for the construction and reconstruction of livestock farms, land reclamation systems, stocking, and grants for winemakers in the Odesa region.

It is expected that at the end of the period, the Government will produce a report confirming that by the end of 2025, 80% of support has been received through the SAR, therefore the implementation of the indicator is ongoing.



Indicator No. 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

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The indicator provides for the approval by the Cabinet of Ministers of a strategy for the implementation of the principles of the circular economy and an action plan for its implementation. The strategy is expected to identify potential opportunities and consequences of the transition to a closed-loop 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 body responsible for implementation 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.

The strategy [is being developed](#) with the financial support of the EU and in cooperation with leading international organizations within the framework of the project “Circular Economy - Promoting Sustainable Production and Consumption Models in Ukraine”. According to [information](#) from the project publication, as of March 2025, the Strategy for the Development of the Circular Economy of Ukraine until 2035, the Operational Plan for the Implementation of the Strategy for 2025-2027, and recommendations for changes in legislation to implement the principles of the circular economy were developed. In turn, on September 10, 2025, a Consultation Meeting [was held in Poltava](#) as part of the strategic environmental assessment of the draft Strategy, with the assistance of the Ministry of Economy, Environment and Agriculture of Ukraine. However, as of the end of October, the draft documents had not been published in general.

On November 10, the Ministry of Economy [published](#) a statement on determining the scope of the SEA of the Circular Economy Development Strategy. The collection of comments and suggestions continued until November 20.

On January 6, 2026, the Ministry of Economy [published](#) for public discussion the draft Strategy for the Development of the Circular Economy of Ukraine until 2035 and the operational plan of measures for its implementation in 2026-2028, and the Report on the Strategic Environmental Assessment. On February 6, the public discussion of the draft document ended; according to [the Ministry](#) of Economy, more than 4,500 comments were received.



Indicator No. 1.4. Resumption of work and modernization of the Single Civil Service Vacancy Portal (career.gov.ua)

(Q2 2026, postponed from Q1 2026)

Sector: public administration reform

Status: in progress

The indicator assumes the restoration of the Single Civil Service Vacancy Portal (career.gov.ua). The portal should be fully operational and generate statistics on all vacancies and appointments.

Such a portal will contribute to the transparency of civil service employment and increase efficiency. The National Agency for Civil Service is responsible for implementing the indicators.

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

The wording has also been slightly clarified: Modernization of the Unified State Web Portal of Electronic Services in terms of the functionality of civil service vacancies. It is likely that a new web portal will be developed, rather than modernizing the previous one.



Indicator No. 5.3. Reduction of the state share in the banking sector
(Q2 2026)

Sector: financial markets

Status: in progress

The indicator overlaps with the IMF's benchmark 6 on adopting an updated strategy for managing state-owned banks. There are currently seven state-owned banks, accounting for over 50% of Ukraine's banking net assets. However, two smaller banks are currently referred to the DGF for resolution and they are likely to be liquidated or transferred to private investors.

The indicator foresees the Government's approval of the Strategy for Reforming State-Owned Banks, which will provide for a gradual reduction of the state's share in the banking sector. It will also address fiscal risks, the resolution of problem loans, improving governance and operational efficiency, and ensuring the long-term sustainability of banks with state participation. Although the potential reduction of the state's share could come at the expense of the market share of existing banks, the Government on 1 October decided to prepare for the sale of stakes in two state-owned banks

Until recently, the strategic principles for reforming the state banking sector until 2025 were in effect, adopted in 2020. According to the (outdated) monitoring of the Ministry of Economy, as of January 8, the implementation of the indicator has not begun.



Indicator No. 5.5. Entry into force of legislative changes to improve the resolution of problem loans
(Q2 2026, postponed from Q1 2026)

Sector: financial markets

Status: in progress

The indicator foresees the entry into force of legislative acts that will implement the recommendations of the NPL resolution strategy (Indicator 5.4). The strategy has now 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, changes are foreseen to the Bankruptcy Procedures Code as of 2 March were not submitted to the Verkhovna Rada.



Indicator No. 3.10. An updated IT system for the execution of court decisions is in operation
(Q2 2026)

Sector: judiciary

Status: in progress

In accordance with the requirements of this indicator, the IT system for the execution of court decisions must begin its work.

The implementation of indicator 3.10 depends on the implementation of others, in particular 3.8 and 3.9 regarding amendments to the legislation on the digitalization of the execution of court decisions and the implementation and filling of the data collection system on the execution of court decisions.



Indicator No. 4.5. Adoption of a new Anti-Corruption Strategy and State Anti-Corruption Program for the period after 2025 (Q2 2026)

Sector: fight against corruption and money laundering

Status: in progress

The Anti-Corruption Strategy and the State Anti-Corruption Program for its implementation for the period after 2025 must be adopted by the Verkhovna Rada and the Cabinet of Ministers, respectively, and published.

At this stage, the National Agency on Corruption Prevention (NACP), together with expert author teams, is forming a wide list of problems in various areas, the existence of which hinders integration with the European and global markets, reducing the level of public trust in the authorities and restraining the potential for reforms, and ultimately, generating (may generate) corrupt practices in the specified area.

On December 31, [the CMU extended the deadline for implementing the measures](#) of the State Anti-Corruption Program for 2023-2025 until the date of entry into force of the State Anti-Corruption Program for the next period.

As of the end of February 2026, the NACP sent [the developed draft law](#) "On the Principles of State Anti-Corruption Policy for 2026-2030" to other state authorities for approval.



Indicator No. 6.3. Creation of supervisory boards with a majority of independent members
(Q2 2026)

Sector: state asset management

Status: in progress

According to the terms of this indicator, supervisory boards with a majority of independent members should be appointed for at least 15 state-owned companies, from the list of key state-owned companies approved by the Cabinet of Ministers in a protocol decision.

Nominations for members of supervisory boards should be made after a competitive selection based on procedures agreed upon and in force at the time the selection begins.

On January 9, 2026, the Government adopted [a decision to update the procedure for selecting candidates](#) for the supervisory boards of strategic business entities. The updated mechanism provides for an accelerated process of selecting and appointing independent members and state representatives, applying the OECD principles of corporate governance, in particular professionalism, transparency, and independence.

It is expected that the introduction of the new procedure will strengthen supervision over the activities of state-owned enterprises and contribute to increasing the efficiency of management of critical infrastructure facilities under martial law.

On January 28, 2026, [the Government appointed](#) new members of the Supervisory Board for NNEGC Energoatom based on the submission of the nomination committee.



Indicator No. 7.7. Approval of the Employment Strategy (Q2 2026)

Sector: human capital

Status: in progress

The situation on the labor market is difficult: most employers complain about the lack of labor force as the biggest obstacle to their activities. At the same time, the unemployment rate remains high due to the mismatch between demand and supply of labor. Therefore, a change in labor market policy is important. Changes are also needed within the framework of the European integration process.

The indicator provides for the adoption by the Cabinet of Ministers of the Employment Strategy, which will provide for measures in the following areas:

- creating favorable conditions for employment of the population, including through the development of entrepreneurship and with a special emphasis on women;
- simplifying access to the labor market;
- retraining and requalification;
- reforming the state employment service;
- reforming the labor market forecasting system;
- Stimulating the attraction of foreign talents to the Ukrainian labor market - foreign entrepreneurs, highly qualified and working personnel, and students.

In May and June 2025, the Ministry of Economy, with the assistance of BRDO, held several working groups to develop the Strategy. On November 5, [the draft Strategy was published](#) for public discussion.

According to available information, on January 7, 2026, the government approved the Employment Strategy of Ukraine for the period until 2030, as well as the operational plan of measures for the implementation of the Strategy in 2026-2028. The text of the Strategy and the plan are not yet available.



Indicator No. 7.12. Investment in education
(Q2 2026)

Sector: human capital

Status: in progress

Investment in education is one of the investment indicators provided for by the Ukraine Facility.

This involves directing funds to improve access to safe and quality education, including preschool education in accordance with the new legislation on preschool education, in particular:

- shelter and safe conditions in educational institutions;
- school buses;
- materials and equipment for educational institutions, modern teaching methods, including through digitalization;
- quality food;
- creation of workshops and laboratories in educational institutions, increasing the energy efficiency of educational institution buildings.

Initially, it was planned that 650 million euros in equivalent should be spent for these purposes in 2024 and 2025, but after changes to the Plan for Ukraine, this amount was reduced to 300 million euros.

At least 5% of these investments under the "Decentralization" section should be directed to the subnational level.



Indicator No. 7.14. Investment in healthcare
(Q2 2026)

Sector: human capital

Status: in progress

Investment in healthcare is another investment indicator provided for by the Ukraine Facility.

This involves directing funds to strengthen the healthcare sector, in particular:

- laboratory equipment for microbiological, chemical and physical analysis;
- shelter and security for healthcare facilities;
- hospital equipment for medical analysis, surgery and patient care;
- infrastructure and premises for healthcare facilities;
- IT systems to improve the efficiency and effectiveness of medical services.

Initially, it was planned that 200 million euros in equivalent should be spent for these purposes in 2024 and 2025, but after changes to Ukraine Plan, this amount was increased to 400 million euros.

At least 20% of these investments under the "Decentralization" section should be directed to the subnational level.



Indicator No. 7.18. Providing housing for vulnerable groups of the population
(Q2 2026)

Sector: human capital

Status: in progress

Providing housing for vulnerable groups is identified as one of the government's priorities. It is also an investment indicator provided for by the Ukraine Facility.

This is about allocating funds to provide housing:

- persons with disabilities of groups I–II who defended the independence, sovereignty and territorial integrity of Ukraine;
- family members of deceased defenders;
- internally displaced persons who defended the independence, sovereignty and territorial integrity of Ukraine, as well as their family members.

It is expected that the equivalent of 200 million euros will be spent for these purposes in 2024 and 2025.



Indicator No. 8.10. Investments in financial support for microenterprises and SMEs

(canceled in Q2 2026 - merged with indicator 8.11 in Q4 2027)

Sector: business environment

Status: in progress

In fact, it was about ensuring the development of a business support grant program, including e-Work, as well as the "Affordable Loans 5-7-9%" program in the amount of 800 million euros (in equivalent) for 2024 and 2025.

However, when the amendments were made, this indicator was canceled. Instead, only indicator 8.11 remained, which now provides for financing in the amount of 450 million euros equivalent instead of the previously planned 1.75 billion euros.

This concerns funds for financial support to micro-enterprises, SMEs, including small and medium-sized farmers, and especially small and medium-sized processing enterprises, also in accordance with the new SME Strategy and Action Plan, when adopted, and where appropriate, which may include both corporate lending and grants, which will be distributed on the basis of transparent criteria. Corporate lending will be implemented through financial intermediaries.

Grants will be provided through specialized organizations with appropriate resources and capabilities, as well as through financial intermediaries.



Indicator No. 9.7 Investments in the restoration, reconstruction and modernization of regional authorities, in particular local self-government (Q2 2026)

Sector: decentralization and regional policy

Status: in progress

According to this indicator, at least 5% of the non-repayable financial support under Component I of the Ukraine Facility should be directed to the needs of the restoration, reconstruction and modernization of subnational authorities of Ukraine.

Most likely, the funds will be sent in the form of a subvention.



Indicator No. 10.6. Adoption of legislation on changing the conditions of taxation of electricity market participants

(Q2 2026)

Sector: energy

Status: in progress

The indicator assumes the adoption of legislation to change the indirect taxation regime for electricity market participants, necessary for the integration of day-ahead and intraday markets with similar markets in neighboring countries, as well as for electricity import and export operations.

The list of amendments to the Tax and Customs Codes will be clarified after the adoption of the basic law on the transposition of the electricity integration package - draft Law No. 12087-d (indicator 10.5).



Indicator No. 10.9. Adoption of the Roadmap for the gradual liberalization of the gas and electricity market, which should be implemented after the end of martial law

(Q1 2026)

Sector: energy

Status: in progress

To implement the indicator, the Cabinet of Ministers must approve the Roadmap for the gradual liberalization of the gas and electricity market with the steps that need to be taken and the corresponding deadlines that must be implemented after the end of martial law. The roadmap should be based on a technical analysis of the financial situation of the sector and should focus on:

- steps to reform the PSO and gradually liberalize prices after the end of martial law;
- measures to protect vulnerable consumers, including a new subsidy structure that will increase targeting and the level of support;
- preparatory actions for the end of martial law, including identifying vulnerable groups and creating appropriate digital solutions.

The government mentioned the same task as part of the implementation of the cooperation program with the IMF, in particular, the Memorandum on Economic and Financial Policy following the 8th review indicated that such a “roadmap” should be developed within six months after the end of martial law.

According to the [dashboard](#) of the Ministry of Economy, as of the end of February 2026, the implementation of the indicator was “in progress”.



Indicator No. 12.9. Investments in demining
(Q2 2026)

Sector: agri-food sector

Status: in progress

The indicator assumes the need for an investment of at least 30 million euros in the demining of agricultural land.

To implement the indicator, it is necessary to allocate at least 30 million euros (in the equivalent in hryvnias) in the state budgets for 2024 and 2025 for payments to owners or users of agricultural land for demining costs.

The draft state budget for 2024 included 2 billion hryvnias to compensate farmers for humanitarian demining services, and the draft state budget for 2025 included 3 billion hryvnias, which together amounts to more than 30 million euros in equivalent. In 2026, 2 billion hryvnias of state expenditures are foreseen for this area.



Indicator No. 14.4. Entry into force of legislation supporting electronic identification schemes aligned with the eIDAS Regulation (Q2 2026)

Sector: digital transformation

Status: in progress

To be considered for successful implementation of this indicator, a regulatory legal act on the functioning of the Integrated Electronic Identification System in Ukraine as a key component of the national electronic identification infrastructure must come into force in accordance with the principles of Regulation (EU) 2024/1183.

The regulatory act should focus on:

- creating a modern electronic identification system in Ukraine and ensuring its sustainable development;
- ensuring interoperability (technological compatibility) of electronic identification tools, electronic identification intermediate nodes (hubs) and electronic identification schemes;
- protection of information resources processed within the system.



Indicator No. 15.7. Adoption of the Law of Ukraine to Reduce Deforestation and Forest Degradation

(Q1 2026)

Sector: green transition and environmental protection

Status: in progress

To achieve this indicator, a law regulating the issue of confirming the sustainability of the origin of timber and other goods associated with the risk of deforestation and forest degradation must come into force. The document should provide for the creation of a transparent system for tracking and controlling the movement of timber through the expansion of electronic accounting, the introduction of certification for all timber products, and the establishment of requirements for confirming its origin during trade.

In June 2025, the State Forestry Agency [reported](#) that it had already implemented a number of tools that ensure the readiness of the Ukrainian forest sector for the EU Regulation on Combating Deforestation and Forest Degradation (EUDR), in particular:

- electronic logging ticket – a transparent permit system for felling wood with geolocation coordinates of felling sites;
- e-TTN with photo fixation – a tool for tracking timber transportation and preventing illegal operations;
- e-certificate – confirms the origin of wood for export operations;
- Transparent electronic auctions – all raw timber is sold through open auctions, which promotes fair competition and eliminates shady schemes.

In addition, the State Forestry Agency plans to:

- implementation of EUDR requirements into national legislation;
- deepening the functionality of Electronic timber accounting system, automating the entry of geolocation data into logging tickets and other documents;
- regular verification of the Electronic timber accounting system and continued cooperation with international partners;
- information campaigns and trainings for forestry enterprises and business representatives.

On March 17, 2025, the Ministry of Environment [held](#) a meeting with FAO representatives on forest sector reform and Ukraine's preparation for the implementation of the EU Regulation on preventing deforestation (EUDR). It was agreed to create a working group to develop a new Forest Code, which should ensure transparent forest management, strengthen control, and harmonize legislation with EU norms.



Indicator No. 15.7. Adoption of the Law of Ukraine to Reduce Deforestation and Forest Degradation (2)

(Q1 2026)

Sector: green transition and environmental protection

Status: in progress

On November 27, 2025, the Head of the State Forestry Agency, Viktor Smal, [announced](#) that the European Parliament supported the postponement of the implementation of the EUDR for one year, which gives Ukrainian exporters additional time to prepare traceability systems and documentary evidence of the origin of wood.

On November 28, the Cabinet of Ministers of Ukraine approved a [resolution](#) defining the procedure for implementing a pilot project to introduce EU legislation on preventing deforestation and forest degradation in relation to exported wood products. It is reported that the pilot project will be implemented over two years, and based on the results, the Ministry of Economy will prepare a report and proposals for improving legislation for the full implementation of EU requirements.

On January 6, 2026, the State Forestry Agency [identified](#) 2026 as a key preparatory stage before the launch of EUDR requirements in 2027, with an emphasis on digitalization of timber accounting, launch of the exporter's office, preparation of a draft law, and completion of reforms to comply with EU standards.



Indicator No. 1.3. Resumption of recruitment to the civil service taking into account professional competencies
(Q3 2026)

Sector: public administration reform

Status: in progress

This indicator is a logical continuation of other measures within the framework of the implementation of public administration reform, in particular those provided for in indicators 1.1 and 1.2.

This indicator assumes that the resumption of selection for vacant positions based on professional competencies for all civil servants will be carried out gradually in three stages:

- 1) for civil service positions of category "A";
- 2) for civil service positions of category "B" (in the territory controlled by Ukraine, where there are no hostilities);
- 3) for civil service positions of category "B" (in the territory controlled by Ukraine, where there are no hostilities).

Thus, at the beginning of the full-scale war, competitions for relevant positions were canceled. It is planned to resume them in order to promote higher professionalism in the civil service.



Indicator No. 3.13. Entry into force of legislation improving the disciplinary system of prosecutors and increasing the capacity of the Qualification and Disciplinary Commission of Prosecutors
(Q3 2026)

Sector: judiciary

Status: in progress

Legislation on improving the disciplinary system of prosecutors and strengthening the institutional capacity of the Qualification and Disciplinary Commission of Prosecutors comes into force.

An improved legal and institutional framework aimed at implementing GRECO recommendations will contain the following elements:

- clarifying disciplinary offenses related to the conduct of prosecutors and their adherence to ethical norms, and expanding the list of available disciplinary sanctions in order to increase their proportionality and effectiveness;
- amending the provisions on the composition of the Qualification and Disciplinary Commission of Prosecutors to ensure that the majority of seats are held by prosecutors elected by their colleagues, and conducting an independent and objective pre-selection procedure for all candidates for members of the Qualification and Disciplinary Commission, including a verification of their integrity;
- increasing the efficiency of disciplinary proceedings by increasing the statute of limitations.



Indicator No. 6.4. Corporatization of key state-owned enterprises
(Q3 2026)

Sector: state asset management

Status: in progress

This indicator is part of efforts to improve the governance and management of state-owned enterprises.

At least 15 state-owned enterprises from the list of the most important state-owned enterprises, approved by a protocol decision of the Cabinet of Ministers, will need to be transformed into joint-stock companies or limited liability companies.

At the end of August 2025, the Commercial Code was abolished in Ukraine ([Law No. 4196-IX of 09.01.2025](#)). After August 28, 2025, corporatization of state-owned enterprises must be carried out within three years. State-owned enterprises (including commercial and state-owned) must be transformed into joint-stock companies (JSC) or limited liability companies (LLC), 100% of the shares or stakes of which belong to the state.

Minister of Economy, Environment and Agriculture Oleksiy Sobolev stated during the World Economic Forum in Davos in January 2026 that Ukraine is ready to begin the privatization of large state-owned companies, in particular, to put up for sale 25% of the shares of NNEGC Energoatom. In addition, the Cabinet of Ministers of Ukraine adopted a resolution introducing a separate Procedure for the sale of assets for which a court has imposed a sanction in the form of collection to the state's income, which will allow the corporate rights of 26 objects to be put up for auction.



Indicator No. 7.4. Entry into force of legislation on the system of changes to implement the system of transition from military service to civilian life
(Q3 2026 - postponed from Q3 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.

The deadline for implementing this indicator was moved from the fourth quarter of 2025 to the third quarter of 2026. As of January 2026, the greatest progress was the presentation in November 2025 of the White Paper and the model of the draft law "On the system of transition from service in the security and defense sector to civilian life."



Indicator No. 10.16. Establishing minimum energy performance requirements for buildings and products covered by EU ecodesign legislation

(Q3 2026)

Field: energy

Status: in progress

To implement the indicator, the Cabinet of Ministers must adopt acts on minimum requirements for energy efficiency of buildings, as well as products in accordance with EU legislation on ecodesign, and the Ministry of Development and Trade must adopt acts on requirements for energy efficiency of products in accordance with EU legislation on energy labeling.

On October 27, 2020, the Ministry of Development and Trade [approved](#) the Minimum Requirements for Energy Efficiency of Buildings, which are still in effect, and on February 6, 2025, requirements for buildings with close to zero energy consumption were [approved](#).

As of the end of September 2025, the State Agency for Energy Efficiency and Energy Efficiency developed and the government adopted technical regulations establishing [ecodesign requirements](#) for 30 types of equipment and technology, as well as 13 technical regulations on energy [labeling](#).

From October 18, 2025, 10 technical regulations on ecodesign and labeling, aimed at increasing the energy efficiency of household appliances and harmonizing Ukrainian legislation with the requirements of the European Union, [entered into](#) force. Technical regulations on ecodesign requirements for: household washing machines and household washer-dryers; light sources and separate control gears; refrigeration appliances; household dishwashers; electronic displays entered into force.

On February 5, 2026, the Cabinet of Ministers approved the resolution "On Approval of the Technical Regulation on Ecodesign Requirements for Servers and Data Storage Products." The document will enter into force in six months.

Task 17 of the Operational [plan](#) measures to implement in 2024–2026 the Long-term Strategy for Thermal Modernization of Buildings for the period until 2050 provides for the updating of technical regulations and regulatory framework for energy efficiency of buildings with approximation to EU standards in Q4 2025. The main result will be the approval of updated minimum requirements for energy efficiency of residential and public buildings to reduce the marginal level of energy consumption.



Indicator No. 3.15. The Specialized District Administrative Court and the Specialized Appeal Administrative Court are functioning
(Q4 2026)

Sector: judiciary

Status: in progress

The indicator will be considered fulfilled if the new district administrative court and the administrative court of appeal are operational to consider disputes with the participation of central authorities, by:

- determining the number of judges of these courts;
- announcement and holding of competitions for filling vacant positions of judges of these courts, appointment of judges of these courts;
- providing courts with premises and logistical facilities;
- notification of the start of the work of the courts by publishing relevant information on the web portal of the judiciary and in the newspaper "Holos Ukrainy"

[received 356 applications](#) for participation in competitions for vacant positions of judges in the Specialized District Administrative Court and the Specialized Appeal Administrative Court . The number of unique candidates is 268 people, 88 candidates apply for positions of judges in the SOAC and the SAAC simultaneously.

On February 20, [the Supreme Administrative Court of Ukraine considered materials](#) on the admission of candidates to undergo qualification assessment and participation in competitions for vacant positions of judges in the Specialized District Administrative Court and the Specialized Administrative Court of Appeal.

The issue of admission of 41 candidates to the Specialized District Administrative Court was considered in the competition: 33 people were admitted to participate in the competition, 8 were refused.

In the competition to the Specialized Administrative Court of Appeal, the issue of admission of 22 candidates was considered: 19 people were admitted to participate in the competition, 3 were refused.



Indicator No. 3.14. An electronic document management system has been introduced in the criminal justice system (Q4 2026)

Sector: judiciary

Status: in progress

The indicator will be considered fulfilled if the system-forming module, the electronic criminal proceedings module, and the case analytics module of the electronic document management system in the criminal justice system are functional, which ensures the digital processing of criminal proceedings and the gradual replacement or significant modernization of the outdated Unified Register of Pre-Trial Investigations.



Indicator No. 2.4. State budget expenditure reviews
(Q4 2026)

Sector: public finance management

Status: in progress

The indicator assumes that reviews of state budget expenditures are conducted annually based on a decision of the Government and according to a methodology that complies with the best practices of the Organization for Economic Cooperation and Development (OECD), in particular in such priority areas as social protection, education, healthcare, energy, and business support.

The Ministry of Finance is currently working on changes to the Methodology for Conducting Expenditure Reviews. The CMU is expected to traditionally adopt a list of budget programs or areas for spending reviews in 2026.



Indicator No. 2.5. The Law on Amendments to the Budget Code on Determining the Procedure for Managing Fiscal Risks of Local Budgets has come into force (Q4 2026)

Sector: public finance management

Status: in progress

The indicator assumes that the law will provide for

- identification of entities managing fiscal risks of local budgets;
- establishing a procedure for interaction between various entities responsible for managing fiscal risks of local budgets;
- determining methodological principles for managing fiscal risks of local budgets.

Today, the Ministry of Finance is already preparing a report on fiscal risks as an element of the documents for the preparation of the law on the State Budget. It contains an assessment of risks and impacts on the state budget. These include macroeconomic shocks, financial risks of state-owned enterprises, debt risks, etc.

At the same time, no unified approaches to managing fiscal risks of local budgets have yet been identified, although this is an important element of the sustainability of the general public administration system.



Indicator No. 11.5. Entry into force of legislation on merchant shipping and inland waterways
(Q4 2026)

Field: transport

Status: in progress

The Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine on Merchant Shipping and Navigation on Inland Waterways" is to enter into force.

The Ukrainian law will focus on the following key areas:

- definition and regulation of the principles of ensuring the safety of navigation in the territorial sea, internal sea waters, seaports and inland waterways;
- improving the mechanism for implementing the international regime for the protection of ships and seaports;
- definition of a detailed mechanism for controlling vessels in the seaport;
- review of the functions of the central executive body that implements state policy in the areas of maritime and inland waterway transport and shipping in the Merchant Shipping Code, the Laws of Ukraine "On Transport", "On Inland Water Transport" and "On Seaports of Ukraine" in order to eliminate duplication of legislative norms and clarify the distribution of competence, in particular, with the central executive body that ensures the formation and implementation of state policy in the areas of maritime and inland waterway transport;
- simplification of administrative procedures, a clear list of powers of state bodies, elimination of administrative barriers.

At the end of December 2025, the Cabinet of Ministers approved [the draft law](#) "On Amendments to Certain Legislative Acts of Ukraine Relating to Merchant Shipping and Inland Waterway Navigation", which will allow for the launch of a large-scale reform of the public administration system in the field of maritime and inland water transport.



Indicator No. 7.9. Amendments to the Law “On Social Housing” have come into force
(Q4 2026)

Sector: human capital

Status: in progress

The indicator assumes that amendments to the Law "On Social Housing" should enter into force or a new version of this law should enter into force.

The need for amendments to this law or a new version is due to the adoption in January 2026 of the law on the basic principles of housing policy, which changes the framework regulation of social housing.

So, amendments to this law or its new version should provide for the following:

- creating an institutional framework to ensure a sufficient supply of social housing projects;
- creating a transparent system for monitoring citizens' needs to ensure prompt response at the local level;
- creating a transparent framework for monitoring by the public, civil society and the international community;
- improving the capacity of the institutional base to ensure a sufficient supply of social housing projects;
- improving the rules for the creation and operation of social housing, including ensuring compliance with energy efficiency, safety and other standards



Indicator No. 7.3. Rehabilitation of Persons with Disabilities in Ukraine
(Q4 2026)

Sector: human capital

Status: in progress

The indicator assumes that amendments to the Law of Ukraine "On the Rehabilitation of Persons with Disabilities in Ukraine" should enter into force.

The law focuses on the following main areas:

- using the International Classification of Functioning, Disability and Health to measure functioning.
- "implementation of an electronic system that contains information about a person's needs and automatically offers services in accordance with the identified needs (social, medical and others)"

Such changes are important given the large number of people with disabilities who remain without access to opportunities to meet these needs. At the same time, rehabilitation will also help integrate such people, particularly veterans, into social life and the labor market.



Indicator No. 11.8 **Entry into force of the law on the railway transport market with the phased application of its provisions**
(Q4 2026)

Field: transport

Status: in progress

Initially, the law was supposed to be adopted in the 4th quarter of 2025, but the implementation deadline was postponed.

The adoption of the law on the railway transport market is a key requirement of the Association Agreement and the negotiating chapter "Transport Policy", without it there is no full-fledged entry into the single European railway area. The law should implement Directive 2012/34/EU (single European railway area) and Regulation 1370/2007 (PSO), that is, move from the "ministerial-monopoly" model to a market with competition and public service contracts. The law will allow for the functional separation of infrastructure and carriers, create an independent regulator and licensing authority, introduce non-discriminatory access to infrastructure and transparent infrastructure rates, as well as a normal system of PSO contracts for passenger transportation.

The creation of an independent regulatory body and licensing authority can theoretically be done in 1–2 years, but critical are real independence, powers of access to information, and the ability to appeal discriminatory decisions of UZ or the ministry. Licensing of operators can be launched relatively quickly, because this is a more technical and legal task. The most difficult element here is the creation of a truly competitive market, because it affects the interests of UZ, large shippers, and local authorities.

The entry into force of the Law of Ukraine "On the Railway Transport Market" by the end of 2026 is quite possible, if there is political will from the deputies. It is not advisable to delay the adoption of this law any longer. The term of 3–5 years for the full launch of the market according to EU standards looks very tight, but also achievable. And again, provided there is political will, a strong team in the government and the Ukrainian Railways, and synchronization with the requirements of the EU and the IMF.



Indicator No. 10.12. Lifting the moratorium on increasing tariffs for heat and hot water
(Q4 2026, postponed from Q4 2025)

Field: energy

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 Ukraine Plan, which provide for the postponement of the indicator deadline to Q4 2026.



Indicator No. 10.12. Lifting the moratorium on increasing tariffs for heat and hot water (2)

(Q4 2026, postponed from Q4 2025)

Field: energy

Status: in progress

On December 2, 2025, the National Commission for the Regulation of Energy and Utilities of Ukraine approved for discussion [a change](#) in tariffs for the distribution of gas and water for non-household consumers. And despite the fact that the Regulator emphasized that tariffs for centralized water supply and centralized wastewater disposal for the population would be applied at the same tariff level as of February 24, 2022, on December 23, the Cabinet of Ministers “[requested](#)” the National Commission for the Regulation of Energy and Utilities of Ukraine to leave tariffs for water supply for household consumers unchanged.

In turn, on December 24, the Cabinet of Ministers [adopted](#) a decision that strengthens state control in the electricity and heat supply sectors under martial law. From now on, the State Energy Supervision Agency will be able to monitor compliance with legislative requirements by all business entities in the electricity and heat supply sectors - electricity producers, transmission system operators, distribution system operators, and heat supply enterprises.

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