

No. 29
July 2026

RRR4U

Monitoring of the implementation of the IMF programme and EU assistance

SPECIAL TOPIC

*“How ineffective law enforcement agencies
are damaging the investment climate”*





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Summary

Ukraine has received \$3.39 bn from the World Bank under the Development Policy Operation (DPO-1 2026) support facility. Twelve other commitments have also been set out for Ukraine: fulfilling these will enable the country to receive a further \$1 billion from the World Bank under DPO-2.

On 20 July 2026, **the IMF Executive Board approved the first review** of the Extended Fund Facility programme. Ukraine received **a second disbursement of approximately \$690 million** from the Fund. [The IMF press release](#) states that, overall, programme implementation has been satisfactory, although the Fund's experts noted that **reform implementation has slowed**. The updated Memorandum with the IMF contains eight new structural benchmarks, seven of which are fiscal.

On July 30, **the Council of the EU [approved](#) amendments to the Ukraine Plan**, paving the way for the mobilisation of additional funding of over €8 billion in 2026. Following the update to the Ukraine Plan, the main challenge is not only to launch new reforms but also to fulfil existing commitments in a timely manner, upon which further EU funding depends.

Requirements for Receiving Assistance from the World Bank





World Bank's Development Policy Support Operation – new tasks

- In July, Ukraine received \$3.39 billion from the World Bank under the first component of the Development Policy Operation (DPO-1 2026), amounting to \$3.39 billion.
- The second component of the DPO loan, amounting to \$1 billion, requires the fulfilment of commitments by the end of 2026 or, at the latest, by the end of Q1 2027: 12 comprehensive tasks have been identified, some of which involve continuing the implementation of reforms that were adopted in order to secure the first loan.
- The three main areas of reform are:
 - Private sector financing and investment
 - Skilled workforce and employment
 - Cross-border market integration
- The commitments include the adoption of legislation and regulations that must comply with EU law.



Private sector financing and investment

Public-Private Partnership (PPP)

1. Adopt the regulatory and legal acts necessary for the implementation of the law on public-private partnerships: effectively implement the adopted PPP law ([No. 4510-IX](#))

Access to finance and cross-border payments

2. Adopt regulatory acts for the practical implementation of the laws on factoring and the National Development Agency: these laws were adopted for DPO-1 ([No. 4466-IX](#) and [No.4622-IX](#) respectively)
3. Adopt the law on investment funds, draft law [No. 13246](#) (registered on 1 May 2026; no opinion has yet been issued by the relevant committee)
4. Adopt the law on property valuation – draft law [No. 13435](#) (adopted in principle on 30 June)
5. Adopt a law on joining the Single Euro Payments Area (SEPA): the bill has been carried over from DPO-1. The government's draft bill has been withdrawn due to a change of government, although a parliamentary draft bill exists (corresponding to Indicator 4.9 of Ukraine's Plan)

Privatisation and corporate governance of state-owned enterprises

2. Announce a privatisation tender for at least one state-owned bank
3. Adopt a law on small-scale privatisation
4. Adopt regulatory acts and legislative amendments to strengthen corporate governance and the functioning of supervisory boards of state-owned enterprises



Skilled workforce and employment

Housing policy

9. Pass a law on securitisation and covered bonds – Draft Law [No. 15172](#) was passed in the first reading on 30 June

Vocational education

9. Adopt regulatory acts introducing a new funding model [for](#) vocational education institutions ([the Vocational Education Law](#) was passed in August 2025)

Cross-border market integration

Agriculture

9. Adopt the regulatory acts necessary for the full launch of a payment agency in the field of state support for agriculture

Energy

9. Adopt regulatory and legal acts to further integrate the Ukrainian electricity market with the EU market



Monitoring of the Implementation of Structural Benchmarks Under the IMF Programme



Completed
on time



Completed,
but not on
time



In progress



Not completed





IMF programme: The Fund has approved the first review of the programme

- **The IMF Executive Board has approved the first review of the Extended Fund Facility programme;**
- Ukraine has received the **second disbursement (approximately \$690 million)** under the programme.

From [the IMF press release](#):

*“Ukraine has **maintained macroeconomic and financial stability** despite Russia’s continuing war, a more challenging external environment, and risks remaining exceptionally high.*

*Program performance **has been broadly satisfactory. Reform implementation has slowed**, with several structural benchmarks completed with a delay or missed.”*



IMF programme: The Fund has approved the first review of the programme

What was completed on time:

- ✓ The strategy for state-owned banks has been updated;
- ✓ A system for monitoring risks posed by critical third parties in the financial sector has been introduced.

What was completed, but not on time or not completed:

- ✓ The process for appointing members of the supervisory boards of state-owned banks has been improved;
- ✓ A new permanent head of customs was appointed;
- ✗ Adopt a package of tax measures for 2026–27;
- ✗ Submission to Parliament of amendments to the Tax Code of Ukraine regarding transfer pricing.

What was postponed:

- ⌚ The National Agency for Corruption Prevention (NACP) has issued new rules establishing a risk-based system for verifying of asset declarations;
- ⌚ Publication of an analysis of the financial implications of regulated tariffs and subsidies in the energy sector (quasi-fiscal operations).



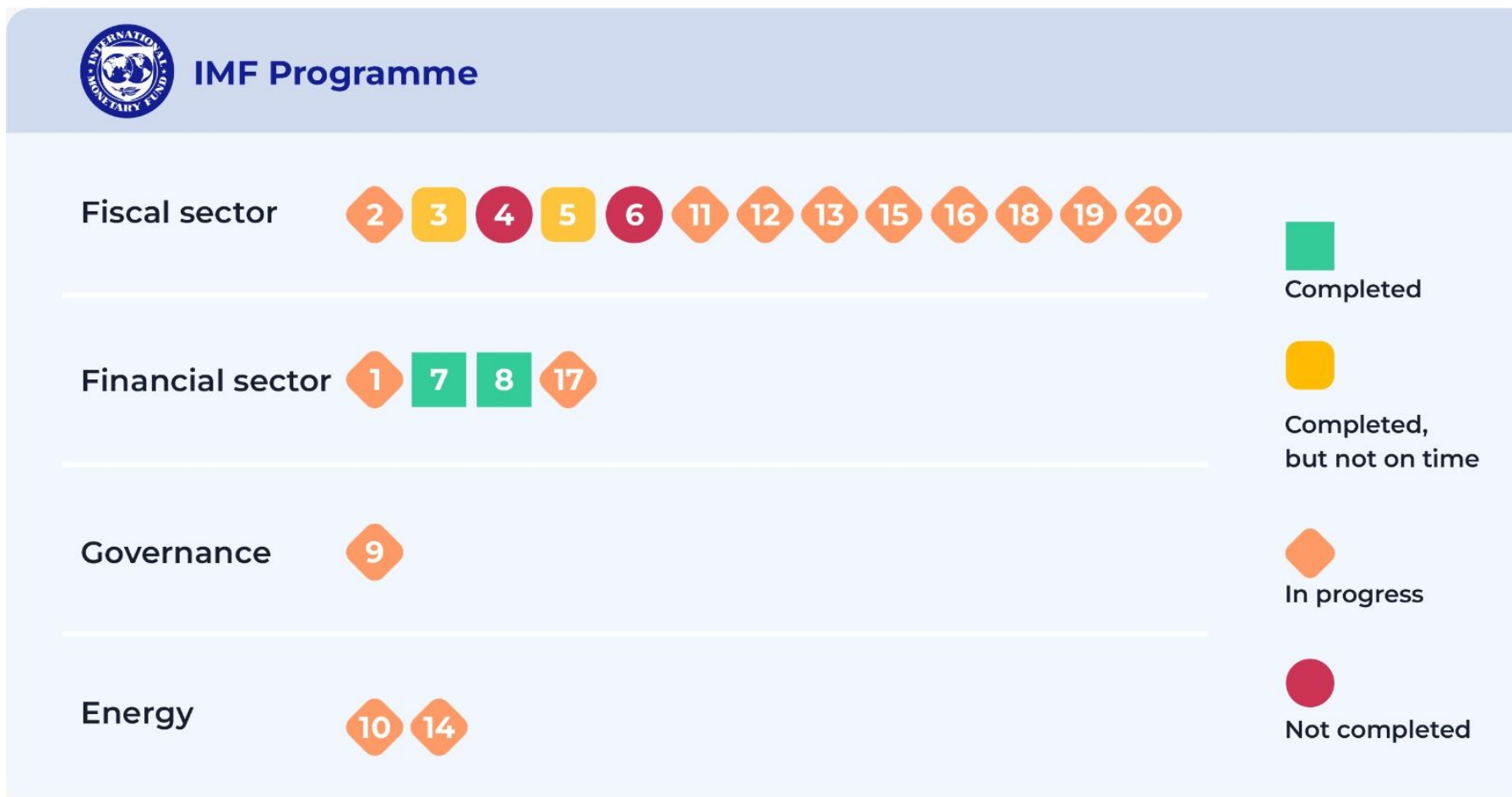
IMF programme: The Fund has approved the first review of the programme

The updated [Memorandum](#) includes **eight new structural benchmarks**:

1. Refrain from assigning any new ad-hoc spending obligations to the Pension Fund of Ukraine (continuous);
2. Enact legislation to introduce a tax on income earned from digital platforms and to remove the tax exemption on low-value imports through postal shipments (end of July 2026);
3. Submit to Parliament of amendments to the Tax Code, including to reform transfer pricing and interest limitation rules (end of August 2026);
4. Submit amendments to the Tax Code to raise the threshold for unscheduled audits upon VAT refund requests and negative VAT liabilities from UAH 100,000 to UAH 1,000,000 (end of August 2026);
5. Enact legislation to ensure National Energy and Utilities Regulatory Commission (NEURC) independence and improve nomination procedures (end of October 2026);
6. Adoption of new organizational KPIs for the State Tax Service (end of December 2026);
7. Submit anti-avoidance rules to prevent abuse of the Simplified Tax regime (end of December 2026);
8. Enact the removal of the VAT exemption for ST and raise the VAT registration threshold, effective Jan 1, 2028 (end of April 2027).



Roadmap for Implementing the IMF's Structural Benchmarks



Monitoring the implementation of indicators of Ukraine Plan



completed
on time



completed,
but not on
time



in
progress



not
completed



→ Ukraine's Plan: more money → more reforms

- On July 30, **the Council of the EU approved amendments to the Ukraine Plan**, paving the way for the mobilisation of over €8 billion in additional funding in 2026 under the Ukraine Support Loan
- the updated Ukraine Plan **includes 27 new reform milestones** (of which 10 indicators will require the adoption of laws);
 - the total number **of indicators rises from 146 to 173**;
 - **34 existing indicators are being amended** (for 12 indicators, deadlines are being extended; for 6 indicators, the description is being changed; and for 5 investment steps, the content or funding is being revised);
 - all final **reforms must be completed by the Q3 2027**.

**The backlog in indicator implementation continues to grow, potentially putting
approximately €7.35 billion at risk.**

✖ 2025: 8 unfulfilled commitments

- **4.3.** Increase the staffing levels of the High Anti-Corruption Court
- **1.2.** Amendments to the legislation on the civil service (No. [13478-1](#))
- **4.8.** Conduct the next National Risk Assessment
- **6.7.** Assessment and, where necessary, amendments to distinguish between PSOs and non-PSOs in state-owned enterprises (No. [13620](#))
- **6.9.** Lifting the suspension of the State Aid Act (No. [14345](#) – withdrawn)
- **10.3.** Improving permitting procedures for investments in renewable energy sources (No. [14271](#))
- **10.7.** Appointment of a nominated electricity market operator
- **10.11.** Defining the special status of the NEURC (No. [14282](#))

**~€1.93
billion**

**~ €280
million** at risk of
irretrievable loss due to the
non-fulfilment of

Indicator 4.3

✖ Q1 2026: 4 unfulfilled indicators

- **1.5.** Launch and implementation of a human resources management information system
- **3.7.** Legislation on simplified insolvency procedures for micro, small and medium-sized enterprises (No. [15024](#))
- **3.12.** Introduction of a transparent selection process for prosecutors in senior positions (No. [15343](#))
- **15.8.** Strategy for implementing the principles of the circular economy and an action plan for its implementation

~€**2.30**
billion

9.3. Distribution of powers between levels of public administration –
postponed to the Q1 2027

✖ Q2 2026: 7 unfulfilled indicators

- **3.17.** Human Rights Protection Strategy
- **4.20.** State Programme to Combat Trafficking in Human Beings until 2030
- **6.3.** Supervisory boards of state-owned enterprises with a majority of independent members
- **8.12.** Amendments regarding the designation of a single national metrology institute
- **10.9.** Roadmap for the gradual liberalisation of the gas and electricity markets
- **10.19.** Terms of reference for an external audit of the NEURC
- **5.5.** Entry into force of legislation on the resolution of non-performing loans

~€3.12
billion

Investment indicators:

- **7.12.** Investment in education totalling at least €300 million
- **7.14.** Investment in healthcare totalling at least €200 million
- **7.18.** Investment in housing for veterans with disabilities, families of deceased veterans and internally displaced persons (IDPs) totalling at least €200 million
- **9.7.** Allocation of at least 5% of grant support to community reconstruction needs



	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 2.10 6.10 6.11 6.12	Completed
Fight Against Corruption and money laundering / Judicial System	3.3 3.4 3.9 4.8	3.12	3.10 3.17 4.20	3.13 4.5 4.9 4.16 4.18	3.14 3.15 3.16 4.11 4.12 4.19 4.13 4.14 4.15	Completed, but not on time
Business Environment / Human Capital	7.8 8.2	3.7 8.5	7.7 7.20 7.12 7.14 7.18 8.12		7.21 8.11	In progress
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	10.9 10.19 15.11	10.16 10.21	10.6 10.18 10.20 15.7	Not completed
Agri-food Sector / Transport	11.3	12.6	12.9	11.9	11.8	
Decentralisation and Regional Policy			9.7			
Digital Transformation			14.4		14.5	
Financial Markets	5.6	5.1	5.3 5.5			

Monitoring of macro-financial assistance: Ukraine Support Loan



completed



completed,
but not on
time



in
progress



not
completed





Ukraine Support Loan: Macro-financial assistance component

- Three out of the 12 conditions required to receive the second tranche of assistance have been met: the UPI IT concept, the Budget Declaration and expenditure reviews. However, work on some of the more complex conditions has not yet begun.
- Unfortunately, the President has still not signed the law introducing taxation of income earned via digital platforms — this is one of the 12 conditions required to receive the second tranche of assistance. We had previously marked this indicator as ‘fulfilled’, but have now reverted it to ‘in progress’.
- On 30 July, Ukraine received the second defence tranche from the EU under the Ukraine Support Loan, amounting to €3.47 billion. The funds were transferred to a special defence account. This tranche is not part of the macro-financial assistance, so no conditions had to be met to receive it.



Map of Ukraine Support Loan Conditions

Pillar	Policy actions for the I instalment	Policy actions for the II instalment	Policy actions for the III instalment	
Pillar 1: Domestic revenue mobilisation	1.1 1.2 1.3	2.1 2.2 2.3 2.4 2.5 2.6	3.1 3.2 3.3 3.4	 Completed
Pillar 2: Sustainability and quality of public expenditure	1.4	2.7 2.8 2.9 2.10	3.5 3.6 3.7 3.8	 Completed, but not on time
Pillar 3: Public finance management systems	1.5 1.6 1.7	2.11 2.12	3.9 3.10 3.11 3.12 3.13	 In progress
				 Not completed

SPECIAL TOPIC**RRR4U**

***How ineffective law
enforcement agencies
damage the investment
climate***





Cooperation with law enforcement is a problem

2.7 / 5

**EBA Investment
Attractiveness
Index**

Main obstacles:
corruption and a
weak judiciary

18%

**of Business
Ombudsman Council
complaints concern
law enforcement**

The BOC focuses
mainly on tax issues
— 18% is a
significant share

Searches

**by SBI and SSU at
miltech companies
in July**

Reignited debate
on further reform



Which law enforcement bodies does business deal with?

BES

Handles most economic crimes (Chapter VII of the Criminal Code)

SBI • SSU • National Police

Other cases: asset misappropriation, obstructing the Armed Forces, select Criminal Code articles...

NABU

May investigate businesses in corruption cases



Yet another business inspection moratorium (July 2025):

covered the Prosecutor General's Office, SBI, BES, SSU and the National Police

Business needs every part of the law enforcement system to work well — the problem isn't just SBI or BES.



Years of reform at SBI and BES

State Bureau of Investigation (SBI)



2026

**Overloaded and
lacking clear
priorities**

Bureau of Economic Security (BES)



**Underfunded
and
under-resourced**



International attention turns to BES and SBI

BES

- Ukraine Facility: indicator 8.13 (BES law) Completed — Law No. 3840-IX in force since 29 June 2024
- Ukraine Facility: indicator 8.11 requires acts strengthening BES by Q4 2026
- IMF: the 2027 budget must provide sufficient funding to hire and retain staff

Strengthening BES capacity

SBI

- Ukraine Facility: indicator 4.13 requires an SBI reform law by Q4 2026 (status: 'in progress')
- Ukraine Facility: bill No. 13602 only registered on 6 August 2025 — not yet passed
- 'Ducks-Kos' plan: SBI reform delivered only 1 point out of 10 (Membership Check assessment)

Complete SBI reform

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consortium

Annex 1

Detailed Status of Implementation of IMF Structural Benchmarks





BENCHMARK No. 1 Any non-systemically important bank that is nationalised will be transferred to the Deposit Guarantee Fund in the event of a breach of prudential standards and will not be subject to recapitalisation using public funds (ongoing)

Sector: financial sector

Status: in progress (effectively completed)

As at 28 April, all state-owned banks are systemic. Previously, the state owned two non-systemically important banks, but in March they were declared insolvent and transferred to the Deposit Guarantee Fund (DGF) for resolution. In April, the DGF [liquidated one of the banks](#), [having](#) previously [transferred part of its assets and liabilities](#) to another bank. The other bank was [sold to a foreign investor](#). Thus, the state's involvement in non-systemically important banks has come to an end, and the benchmark has effectively been met, although it remains in force should the state gain control of another non-systemically important bank (for example, as a result of sanctions or confiscation).



BENCHMARK No. 2 Refrain from assigning any new ad-hoc spending obligations to the Pension Fund of Ukraine
(ongoing)

Sector: fiscal sector

Status: in progress

The introduction of new expenditure commitments for the Pension Fund of Ukraine in excess of the overall expenditure ceiling of its budget — in particular through unscheduled indexation outside the scope of the pension reform — should be avoided without prior consultation with the IMF and an analysis of the impact on the long-term sustainability of the pension system (continuous structural benchmark).

In practice, this refers to additional payments not provided for under pension legislation. The most recent example is the one-off supplementary payment of 1,500 UAH in April 2026 (Cabinet of Ministers Resolution No. 341 of 18 March 2026): this was financed, in particular, from the Pension Fund of Ukraine's resources. It is precisely such decisions that will now require prior consultation with the IMF. The restriction will remain in force until the end of the Extended Fund Facility (EFF) programme, i.e. until February 2030.

This obligation does not apply to the annual indexation of pensions in accordance with the statutory formula, nor to payments to categories of people affected by the war.



BENCHMARK No. 3 Strengthening the process for appointing members of the supervisory boards of state-owned banks

(end of February 2026)

Sector: fiscal sector, governance

Status: completed, but not on time

Implement the recommendations set out in MEFP ¶151 to strengthen the process for appointing members of the supervisory boards of state-owned banks (MEFP ¶151) The recommendations include ensuring the confidentiality of the nomination committee's work; reducing the priority given to the nationality criterion; strengthening assessment procedures, in particular by introducing an annual assessment of the work of supervisory boards; and requiring the Ministry of Finance to maintain a list of qualified candidates from previous selection rounds for supervisory boards.

Although the deadline for implementing this benchmark was the end of February 2026, on 2 March the government adopted [a resolution](#) implementing four out of five recommendations. On July 2 the Government fulfilled its commitment to conduct an annual assessment of the performance of banks' supervisory boards.

Thus, the IMF considers this indicator to be “not completed on time”.



BENCHMARK No . 4 To adopt a package of tax measures for 2026–27

(end of March 2026)

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Sector: fiscal sector

Status: not completed

In accordance with the Memorandum, this structural benchmark envisages tax reforms designed to broaden the tax base and create an environment more conducive to economic growth and the reduction of the informal economy.

In particular, it was envisaged that by the end of March 2026, parliament would adopt a package of tax measures containing the following provisions:

- taxation of income received via digital platforms; — **not completed**; [draft law No. 15111-d](#) is awaiting the **President of Ukraine's signature and will be implemented once Zelenskyy signs it**
- abolition of the tax exemption on imports of goods in low-value postal consignments; — **not completed**; [Bill No. 15112-1](#) **has not passed a single reading**
- abolition of the VAT exemption under the simplified taxation system (STS) by introducing mandatory VAT registration from 1 January 2027 for STS taxpayers with a turnover exceeding the general VAT registration threshold. This threshold may be raised from the current level of 1 million UAH, but not above 4 million UAH. — **Not implemented**; **the draft law was not even submitted to the Verkhovna Rada**
- Permanent application of the 5 per cent military levy. — **Implemented**, [Law No. 4835-IX of 7 April 2026](#).

According to the updated Memorandum of Cooperation with the IMF, Structural Benchmark No. 4 remains unfulfilled. Instead, the IMF has approved a series of new benchmarks that are conceptually consistent with Benchmark No. 4.



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

(end of March 2026)

Sector: Fiscal sector

Status: Completed, but not on time

This structural benchmark was carried over from the previous program (it was previously numbered 43). Under the old program, the benchmark originally called for appointing the Head of the State Customs Service by the end of June 2025, but as of that date, a competition for the position had not even been announced. It was already clear in May that this benchmark would not be met. Therefore, following the IMF Mission's visit in May 2025, a priority action for the 8th review of the Program was agreed upon: the preparation of a customs reform plan. On June 17, the government announced the preparation of such a plan.

The deadline for the benchmark "appointment of a permanent head of the State Customs Service" was postponed from the end of June to the end of December 2025 during the eighth review of the program. On August 4, [the government announced an open competition](#) for the position of head of the State Customs Service. A commission comprising international and Ukrainian representatives was also established to select the head. On November 10, a meeting of the Commission for the Competition to Fill the Position of Head of the State Customs Service was held, during which [the procedures for conducting the competition](#), as well as the criteria and methodology for evaluating candidates for the position of head of the State Customs Service of Ukraine, were approved.

On March 27, the Commission for Selecting the Head of the State Customs Service announced the results of the selection process, naming Ruslan Damentsov and Orest Mandziy as the finalists. According to the procedure, the Ministry of Finance was to select one of the candidates and submit the nominee to the Cabinet of Ministers for approval. As of noon on March 31, the head of the State Customs Service had not been appointed. On April 10, the government finally appointed Orest Mandziy as head of the State Customs Service.



BENCHMARK No. 6 Alignment of transfer pricing rules with international standards

(end of June 2026)

Sector fiscal sector, governance

Status: not completed

A draft law amending the Tax Code to align transfer pricing rules with OECD standards and implement Article 4 of the EU Anti-Tax Avoidance Directive (ATAD) must be tabled in the Verkhovna Rada.

The plan provides for tighter rules on the taxation of corporate group profits: the extension and stricter application of transfer pricing rules, the introduction of restrictions on the deduction of debt financing costs when calculating corporation tax, with the possibility of carrying forward undeducted costs to future periods, and the taxation of foreign companies with effective management in Ukraine.

The changes are aimed at reducing opportunities to understate corporation tax through intra-group transactions and debt schemes and constitute a structural benchmark of the IMF programme, with a submission deadline of the end of June 2026.

The Ministry of Finance published [the](#) relevant [draft legislation](#) on its website on 27 February, but it has not yet been registered with the Verkhovna Rada. The benchmark has not been met, and the IMF has reformulated it as a new benchmark, No. 12.



BENCHMARK No. 7: Approve the updated strategy for state-owned banks
(end of June 2026)

Sector: financial sector, governance

Status: Completed

Until recently, the strategy for state-owned banks adopted in 2020 was in force, and the main guidelines for state-owned banks during the period of martial law were adopted in 2022. In July, [updated guidelines for the operation of state-owned banks](#) were published. Although the decree purportedly approving this document is dated 30 June, the electronic signature on the document itself is dated 6 July. The guiding principles set out steps defined by the indicator, in particular the adoption of amendments to the Banking Act, which effectively extend the status of state-owned banks (100 per cent state ownership) to banks in which the state's share is less than 100 per cent but greater than 50 per cent. Despite the *de facto* delay in adopting the document, IMF staff assessed the indicator as fulfilled on time.

**BENCHMARK No. 8: Introduce a risk oversight framework for critical third parties**

(end of June 2026)

Sector: financial sector

Status: in progress

This benchmark is effectively carried over from the previous Programme, where it was numbered 51.

The benchmark aims to strengthen the NBU's oversight of hybrid banking service models, particularly those where non-banking companies provide services that are critical to the bank's operations. Among other things, this refers to the 'bank-in-a-smartphone' model, where the bank's operations (such as those of Monobank) are closely linked to non-banking companies that are currently not subject to regulation. It is proposed to require banks to verify that these companies comply with the NBU's requirements regarding business reputation and professional competence.

Following the February M9, on 9 March the NBU published [a draft resolution on third parties to banks](#) for public consultation. According to the NBU, the draft was developed on the basis of [a](#) relevant [document](#) from the Basel Committee on Banking Supervision. It stipulates that banks must carry out a thorough due diligence check on critical service providers and subsequently monitor their compliance with the requirements set by the NBU. In May, draft resolutions concerning payment service providers and insurers were published. On 30 June, the NBU officially published the [final regulations](#).



BENCHMARK No. 9 NACP to issue new regulations establishing a riskbased system for verification of asset declarations, prioritizing senior officials in identified high-risk areas

(end of September 2026)

Sector: governance

Status: in progress (*not completed* — as of June 2026; during the first review of the programme, ~~the deadline was postponed to end of September 2026~~)

This benchmark was not completed under the previous Memorandum, so the deadline for its completion was postponed to the end of September 2026.

The structural benchmark stipulates that, building on 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 these high-risk sectors, and publish, on a bi-annual basis, key performance indicators on risk-based verification and lifestyle monitoring activities starting end-September 2026.

Furthermore, in the updated Memorandum, the Ukrainian side has undertaken to commission launch an independent external audit of the NACP, to assess, in particular, the agency's effectiveness in verifying the accuracy of high-level officials' asset declarations and in managing its whistleblower function in 2024–2025, and will propose options to remedy any identified shortcomings. To strengthen the audit process in the future, by end-July 2026, the Cabinet of Ministers will issue a Resolution approving updated criteria and a methodology for evaluating the performance of the NACP (non-structural benchmarks).



BENCHMARK No. 10 Publish a technical analysis of the costs of quasi-fiscal support for electricity, gas and heating, subsidy coverage, and scenarios for financially sustainable reforms that protect vulnerable consumers
(end of October 2026, postponed from the 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 are to conduct and publish a comprehensive technical analysis of the costs of quasi-fiscal operations (QFOs) arising from price caps and public service obligations (PSOs) in the electricity, natural gas and heat supply sectors.

In accordance with the Memorandum, the analysis should include a quantitative assessment of the financial costs associated with price caps and PSOs, an evaluation of the current housing subsidy system, and should identify fiscally sustainable scenarios for a gradual transition to economically justified tariffs whilst ensuring adequate social protection for vulnerable consumers. The results of the analysis are to form the basis for the preparation of a roadmap for the gradual liberalisation of the natural gas and electricity markets, which the Ministry of Energy is developing in coordination with the European Commission. The roadmap will set out the stages for reforming public service obligation (PSO) mechanisms, the gradual transition to market-based pricing following the lifting of martial law, and the preparatory measures required prior to its completion.

Once the technical analysis has been prepared and the roadmap approved, the Government plans to assess the fiscal and social implications of a possible tariff review for existing and potential recipients of housing subsidies, ensuring the protection of vulnerable households, the maintenance of payment discipline and medium-term fiscal sustainability. Further reform involves gradually bringing tariffs for electricity, natural gas, heating and hot water to economically justified levels, a review of the public service obligation (PSO) system, amendments to Law of Ukraine No. 2479-IX to lift the moratorium on tariff increases, and the reform of tariff policy in the centralised heat supply sector through the introduction of a new tariff-setting methodology and the settlement of accumulated debts of heat supply companies.

According to our information, work on the technical analysis is being carried out by the Ministry of Energy with the participation of IMF experts and forms part of the preparation of a roadmap for the gradual liberalisation of the natural gas and electricity markets (indicator No. 10.9 of Ukraine's Plan).



BENCHMARK No. 11 Taxation of parcels and income from digital platforms

(end of July 2026)

Sector: fiscal sector

Status: in progress

Legislation needs to be adopted on tax on income received via digital platforms and the abolition of the tax exemption for low-value goods imported by post.

The initial tax package, planned for early 2026, proved politically unfeasible (Benchmark No. 4, end of March 2026, not met).

Instead, an updated approach has been proposed: the adoption of a package of tax measures, including:

- taxation of income generated via digital platforms; — **in progress**; [draft law No. 15111-d](#) has been awaiting the President of Ukraine's signature since 12 June. According to [EP](#), EU representatives requested that the law not be signed in its current form due to an unrelated amendment relaxing financial monitoring of politically exposed persons (PEPs).
- the abolition of tax exemptions on imports of goods in low-value postal consignments; — **in progress**; following the change of government, the previous draft bills were withdrawn from the Verkhovna Rada. On 30 July, the government only approved [the](#) accompanying [draft law](#) on amendments to the Customs Code. It is impossible to meet this requirement in time.


BENCHMARK No. 12 **Changes to transfer pricing rules**

(end of August 2026)

Sector: fiscal sector
Status: in progress

Amendments to the Tax Code regarding the reform [of transfer pricing rules](#) and the implementation [of the interest deduction limitation](#) rule in accordance with Article 4 of the EU ATAD Directive must be submitted to Parliament (MEFP ¶125).

The original structural benchmark (benchmark No. 6) was due to be completed by the end of June 2026; however, the preparation of complex legislation required additional time, and the deadline was therefore not met. The IMF agreed to grant the government a further two months, whilst narrowing the scope of the measure: the issue of abolishing the tax relief for controlled foreign companies (CFCs) has been separated into a separate draft law on combating tax avoidance, which will be submitted later this year.

The aim of the reform is to limit the erosion of the tax base and the transfer of profits to offshore jurisdictions by harmonising Ukraine's legislation with OECD standards and EU directives.

The Ministry of Finance published the relevant draft legislation on its website on 24 February, but it has not yet been registered with the Verkhovna Rada.



BENCHMARK No. 13 Raising the threshold for unscheduled tax audits
(end of August 2026)

Sector: fiscal sector

Status: in progress

Amendments to the Tax Code must be submitted to raise the threshold for unscheduled audits relating to VAT refund claims and negative tax liabilities from 100,000 to 1 million UAH (MEFP ¶130)

As of the end of July 2026, no draft legislation has yet been introduced, which poses risks to the timely fulfilment of this benchmark.



BENCHMARK No. 14 Enact legislation to ensure the independence of the NEURC and improve the procedures for nominating candidates

(end of October 2026)

Sector: energy

Status: in progress

To strengthen the independence of the National Commission for State Regulation of Energy and Public Utilities (NEURC), Ukraine must adopt legislative amendments aimed at reinforcing the Regulator's institutional independence, enhancing the transparency of procedures for selecting its members, and introducing regular assessments of the NEURC's corporate governance and independence.

In accordance with the Memorandum, amendments to the Law of Ukraine 'On the NEURC' should provide for an update to the procedure for forming the Selection Committee. In particular, the committee should consist of six members with casting votes, three of whom will be nominated by international partners. Furthermore, the legislative amendments are intended to ensure greater transparency in the procedures for decision-making and the appointment of the Regulator's members.

The Memorandum also stipulates that, within 6 months of the amended law coming into force, the first independent external assessment of the NEURC's corporate governance and independence must be carried out and published in accordance with the new legislation.



BENCHMARK No. 15 Adoption of operational KPI for the State Tax Service (end of December 2026)

Sector: fiscal sector

Status: in progress

By the end of December 2026, the government is to approve strategic and operational key performance indicators (KPIs) for the State Tax Service in line with international practice.

The new system for evaluating the State Tax Service's performance will place greater emphasis on reducing the costs of tax compliance. Instead of tax collection targets, the KPIs will ensure a balance between actual increases in revenue resulting from measures to improve tax compliance and improvements in administrative efficiency, which will help reduce the associated costs for both the state and taxpayers.

The results of KPE implementation will be published quarterly, broken down by region and taxpayer segment where applicable.



BENCHMARK No. 16 Develop a design for a centralised 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 Programme, under which the Ministry of Finance, the State Tax Service and the State Customs Service adopted an updated IT strategy in September 2025.

As stated in the text of the Memorandum, the key approach set out in the IT strategy is to consolidate the IT systems of the State Tax Service and the State Customs Service at the level of the Ministry of Finance, and to ensure that these IT systems are managed by an independent administrator using cloud technologies. The strategy envisages a gradual transition to a new level of service-oriented systems, particularly within the State Tax Service and the State Customs Service, in order to make services available online.

To this end, a key task is to develop the design of a centralised data repository for tax and customs administration, as set out in Benchmark No. 10 of the new Programme.

Work on the design is already underway.



BENCHMARK No . 17 Reform of the National Securities and Stock Market Commission

(end of December 2026)

Sector: financial sector, governance

Status: in progress

It is necessary to continue reforming the NSSMC, strengthen its institutional capacity and introduce a new governance model. To this end, a supervisory board comprising a majority of independent members must be established, and amendments must be made to the law on the NSSMC to transfer the Commission's reporting line from the President to the Cabinet of Ministers.

Due to changes in leadership and the loss of experienced staff, the regulator has lost some of its capacity to perform its functions effectively. Without strengthening the NSSMC's governance and human resources capacity, it will be difficult to ensure alignment with EU standards, reform the capital markets infrastructure and provide adequate support to the financial system during the recovery process.

Key indicator – the adoption of amendments to the relevant law on the NSSMC, introducing a new governance model and establishing a supervisory board with a majority of independent members. Deadline – end of December 2026.



BENCHMARK No. 18 **Appoint all ACU board members from the pool of vetted candidates in accordance with the 2024 amendments**
(end of December 2026)

Sector: fiscal sector, governance

Status: in progress

In December 2024, the law on the reform of the Accounting Chamber of Ukraine (hereinafter referred to as the ACU) came into force. Among other things, it introduced an updated competitive selection procedure for members of the ACU, which provides for the establishment of an Advisory Group of Experts (hereinafter 'AGE') comprising six members (three international experts and three representatives from the Verkhovna Rada, with the international experts having a casting vote). However, in August 2025, the Verkhovna Rada [failed to pass](#) a vote on the establishment of the AGE to carry out the preliminary selection of candidates for the posts of members of the Accounting Chamber.

In the updated Memorandum, the Ukrainian side undertakes to appoint six members of the AGE, which is to carry out the preliminary selection of candidates for the ACU and, by the end of 2026, to appoint six new members of the ACU from among the vetted candidates (it should be noted that, under the updated law, the ACU consists of eleven members).

It should be noted that as far back as September 2025, the Budget Committee [resubmitted](#) to Parliament the nominations for the Advisory Group of Experts to carry out the preliminary selection of candidates for the positions of members of the Accounting Chamber. However, this matter has still not been considered.

**BENCHMARK No. 19** New rules to prevent abuse of the simplified tax regime

(end of December 2026)

Sector: fiscal sector**Status:** in progress

Draft legislation must be submitted to Parliament to curb abuse of the simplified taxation system (MEFP ¶124), providing for: (i) restrictions on the practice of artificially splitting businesses to retain eligibility for the simplified taxation system's preferential regimes; (ii) restrictions on the possibility of returning to the simplified taxation system after switching to the general taxation system; (iii) restrictions on the use of the simplified taxation system to provide services to a current or former employer.

As at the end of July 2026, the draft legislation is still being drafted.

**BENCHMARK No. 20 Abolition of the VAT exemption for the simplified tax regime**

(end of April 2027)

Sector: fiscal sector

Status: in progress

The VAT exemption for taxpayers under the simplified taxation system (STS) must be abolished and the threshold for mandatory VAT registration raised, with effect from 1 January 2028 (MEFP ¶21) — one year later than previously planned. The threshold will be raised, but not above the limit set by EU Directive 2006/112.

The initial tax package, planned for early 2026, proved politically unfeasible (Benchmark No. 4, end of March 2026, not completed).

As of the end of July 2026, the draft bill had not yet been submitted to the Verkhovna Rada

Annex 2

Detailed status of implementation of the indicators of Ukraine's Plan





Status of Implementation of Ukraine's Plan Indicators for the Q2 2024

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

INDICATOR No. 2.2 Approval of the State Customs Service's Digitalization Plan

In accordance with the provisions of the National [Strategic Plan](#), the Ministry of Finance 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, on the last working day of the quarter. This was likely due to the fact that officials were awaiting a positive decision from the IMF Executive Board regarding the fourth review of the Program. Indeed, the macroeconomic indicators on which the budget figures in the Declaration for 2025–2027 are based differ from the IMF's macroeconomic forecast. The Budget Declaration contains revenue projections, one component of which is an additional package of tax measures. Since there is no certainty regarding the amounts of international support, it remains limited, which forced the government to project a reduction in expenditures for nearly all functions—except defense—in 2025, and for defense as well in the following two years.

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

Improving the quality of public investment management (PIM) will allow for a more economical and efficient use of public funds amid limited budgetary resources. One of the steps should be the standardization of PIM approaches and the competitive selection of projects for budget funding. The Action Plan for Implementing the Roadmap for PIM Reform was adopted [in June 2024](#).

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

On November 13, 2023, [an announcement regarding the conditions and deadlines for the competition](#) for the position of Chair 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 process, Viktor Volodymyrovych Pavlushyk was appointed Chair of the National Agency for Corruption Prevention by Order No. 162-r of the Cabinet of Ministers of Ukraine dated February 27, 2024.



Status of Implementation of Ukraine's Plan Indicators for the Q2 2024

Full implementation 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, parliament passed a law to improve corporate governance in Ukraine. In March, the president signed it into law, and it took effect on the date of publication. Under the adopted law, state-owned companies must have supervisory boards, whose powers and responsibilities have been clarified, and the government must develop a state property policy. Mechanisms for compliance, risk management, and internal audit have also been introduced.

INDICATOR No. 8.3 Entry into force of legislation revising the legal framework for the activities of the BEB

On June 20, the Verkhovna Rada adopted law No. 10439, the text of which was aligned with the requirements of international partners. On June 28, the president signed it, and the law entered into force. The new legislation will pave the way for the renewal of the BEB's leadership and investigators through transparent competitive selection processes. This will provide an opportunity to transform the bureau into an effective body that prevents economic crimes and schemes that cause losses to the budget.

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

On June 25, the National Energy and Climate Plan (NECP) was [approved](#) by a resolution of the Cabinet of Ministers of Ukraine, and the text [was published](#) on the Ministry of Economy's website. An English version of the NECP [was released](#) in October.

INDICATOR No. 10.15 Adoption of the Building Thermal Modernization Strategy for the period up to 2050 and the Action Plan for its implementation

Pursuant to Cabinet of Ministers [Order](#) No. 1228-r of December 29, 2023, the Strategy for the Thermal Modernization of Buildings in Ukraine through 2050 was approved, the concept of the State Targeted Economic Program to Support the Thermal Modernization of Buildings through 2030, and the Operational Action Plan for implementation in 2024–2026, which sets out a long-term plan for the gradual renovation of Ukraine's building stock using energy-efficient technologies.

INDICATOR No. 12.8 Adoption of a strategy for mine action through 2033 and a system for prioritizing areas subject to demining

The Mine Action Strategy through 2033 and its accompanying Operational Plan for 2024–2026 were adopted [by a Resolution of the Cabinet of Ministers of Ukraine](#) on June 28, 2024.



Status of Implementation of the Ukraine Plan Indicators for the Q3 2024

Full reports on implementation are available here: rrr4u.org/analytics

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

As part of the implementation of this indicator, the Specialized Anti-Corruption Prosecutor's Office was to be given the opportunity to increase its staff from 10% to at least 15% of the National Anti-Corruption Bureau's staff. To implement this indicator, the Verkhovna Rada of Ukraine adopted law No. 10060 dated December 8, 2023, which stipulated that the total number of employees of the Specialized Anti-Corruption Prosecutor's Office shall be 15% of the maximum number of employees of the central and regional offices of the National Anti-Corruption Bureau of Ukraine, as established by law.

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

The indicator was not met on time. On October 29, 2024, the Verkhovna Rada adopted draft law No. 12039 in principle and in its entirety, and on October 31, 2024, the law was signed by the President and will enter into force on November 1, 2024.

INDICATOR No. 4.6 Approval of the Action Plan for Implementing the Asset Recovery Strategy for 2023–2025

As part of fulfilling this indicator, the Cabinet of Ministers of Ukraine was to adopt and publish the Action Plan for Implementing the Asset Recovery Strategy for 2023–2025. Consequently, on August 13, 2024, [Order No. 759-r of the Cabinet of Ministers of Ukraine](#) approved the previously prepared Action Plan for the Implementation of the Asset Recovery Strategy for 2024–2025.

INDICATOR No. 7.6 Approval of a Comprehensive Demographic Development Strategy through 2040

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

INDICATOR No. 8.1 Adoption of the Action Plan on Deregulation

In early September, the government approved [an updated Action Plan on Deregulation](#). It includes 99 measures, a significant portion of which are scheduled to be implemented this year. The plan primarily involves the elimination of a number of permits that the plan's developers consider outdated or irrelevant. It also includes support for a number of deregulation bills, including those related to state control (5837) and foreign economic activity (5167). There are also a number of measures aimed at improving existing regulations.



Status of Implementation of the National Plan Indicators for the 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 [the updated State Strategy for Regional Development](#) on August 13, which identifies new challenges as well as strategic and operational objectives.

At the same time, [the Action Plan](#) for implementing the State Strategy for Regional Development 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 Code of Criminal Procedure

The NEURC approved the following procedures and requirements:

- [Procedure](#) for Acquiring, Suspending, and Terminating the Status of a Data Transmission Administrator (Resolution No. 2613 of December 27, 2023);
- [Procedure](#) for the Operation of Insider Information Platforms (Resolution No. 137 of January 16, 2024);
- [Requirements](#) for Ensuring Integrity and Transparency in the Wholesale Energy Market (Resolution No. 614 dated March 27, 2024) (On August 23, 2024, the NEURC [published](#) a draft amendment to the Requirements; the period for submitting comments and proposals lasted until September 9, and a public hearing will be held on October 31);
- [Procedure](#) for Submitting Information on Commercial Transactions Involving Wholesale Energy Products (Resolution No. 618 of March 27, 2024).

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

INDICATOR No. 15.10 Adoption and Entry into Force of the Law of Ukraine on the Prevention, Reduction, and Control of Industrial Pollution

In late April 2024, the Ministry of Environmental Protection published [a draft](#) concept note for public discussion. The collection of comments and proposals [lasted](#) until May 30. According to the position articulated by the Ministry of Ecology during the public discussion held on May 14, 2024, [the purpose and objective](#) of the memorandum are to consolidate all existing exemptions from EIA procedures into a single document, to identify the authority responsible for deciding on such exemptions, to specify the period of application for the exemptions, and to provide justification for the reasons behind their application.

On September 18, the Ministry of Environmental Protection [published](#) the final version of the Concept Note, which defines the scope of exemptions from EIA and SEA regulations.

INDICATOR No. 13.1. Adoption of the Law of Ukraine “On Amendments to the National Program for the Development of Ukraine’s Mineral Resource Base for the Period until 2030”

As part of the reform to improve planning and ensure optimal conditions for attracting strategic investors, one of the steps is the adoption of the Law of Ukraine “On Amendments to the National Program for the Development of Ukraine’s Mineral Resource Base for the Period until 2030.”

On December 18, the Verkhovna Rada [adopted](#), in the second reading and as a whole, the updated State Program for the Development of Ukraine’s Mineral Resource Base through 2030. Thus, the indicator is considered fulfilled.



Status of Implementation of Ukraine's Plan Indicators for the Fourth Quarter of 2024

Full reports on implementation 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, the adoption of the Strategic Plan for the Digitalization of the State Tax Service was envisaged, taking into account the recommendations set forth in the National Revenue Strategy through 2030.

At the end of 2024, the Ministry of Finance published [the Plan](#), which includes measures previously mentioned in the National Revenue Strategy. Integration with the DAC7 international information exchange system must also be ensured.

Stakeholders should focus on ensuring that the State Tax Service's implementation of the initiatives outlined in the document is monitored, as the assessment of [the Plan's](#) effectiveness currently falls under the responsibility of the State Tax Service, together with the Ministry of Finance and the Ministry of Digital Transformation.

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

This indicator is part of reforms to insolvency regulation and the enforcement of court decisions.

The new legislation should focus on preventing bankruptcy and restoring debtors' solvency, the timely identification of signs of crisis at a company, the identification of additional opportunities for restoring companies' solvency, and the availability of information for companies on mechanisms for preventing insolvency and early warning.

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

INDICATOR No. 6.1. Adoption of a State Property Policy and Ranking of State-Owned Companies

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

The policy sets out the basic principles for managing state-owned enterprises and the procedure for classifying them into those that will remain in state ownership to ensure the achievement of public policy objectives, 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 a state of martial law.

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

INDICATOR No. 7.5. Approval of two strategies: the Strategy for Reforming Psychoneurological and Other Residential Institutions and Deinstitutionalizing Care for Persons with Disabilities and the Elderly, and the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024–2028

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

The Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment was approved by Cabinet of Ministers Order No. 1201-r of November 26, 2024.

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



Status of Implementation of Ukraine's Plan Indicators for the Fourth Quarter of 2024

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

INDICATOR No. 8.7. Enactment of legislation to resume market surveillance and control measures for non-food products, including product safety inspections

To resume market surveillance and control measures for non-food products, including product safety inspections, Cabinet of Ministers [Resolution No. 261](#) of March 8, 2024, "On Amending Cabinet of Ministers of Ukraine Resolutions No. 303 of March 13, 2022, No. 303 and No. 550 of May 3, 2022."

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

To fulfill this indicator, the Cabinet of Ministers of Ukraine adopted [Resolution No. 254 dated March 5, 2024](#), "Certain Issues Regarding the Implementation of a Pilot Project to Create 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 of Ukraine, namely [Resolution No. 909 dated August 9, 2024](#), regulated the implementation of a pilot project to introduce an Urban Planning Cadastre at the national level.

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

The digitization of urban planning services—in particular, the project to implement a digital Urban Planning Cadastre at the national level—is significant because it effectively consolidates previously scattered urban planning documentation that existed in paper form across various local government bodies.

INDICATOR No. 10.2. Introduction of a market-based approach to renewable energy

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

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

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

INDICATOR No. 10.10. Ensuring the Independence of the NEURC

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

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

Law [No. 3915-IX](#) of August 21, 2024, amended Law [No. 3354-IX](#) "On Lawmaking Activities," thereby exempting the NEURC from the requirement to obtain judicial approval of its decisions. This resolves the conflict with the provisions of Part 6 of Article 14 of the Law on the NEURC. However, while the Law "On Lawmaking Activities" has just entered into force, most of its provisions—in particular those concerning the NEURC's functional independence—will take effect one year after the termination of martial law.



Status of Implementation of Ukraine's Plan Indicators for the Fourth Quarter of 2024

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

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

The strategy aims to achieve the following objectives, which are consistent with the requirements of the Plan of Ukraine:

- restoring and developing a competitive and efficient transportation system integrated into the Trans-European Transport Network (TEN-T);
- high-quality passenger transportation and unimpeded mobility;
- energy-efficient transportation that is safe for people and the environment, with a focus on decarbonization;
- institutional capacity, human capital, and effective governance.

Ukraine's National Transport Strategy for the period up to 2030 and the operational action plan for its implementation in 2025–2027 were adopted 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 European Union Member States and Moldova through 2030

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

The Strategy aims to build 17 and modernize 29 border crossing points with EU countries and Moldova. Ukraine also aims to conclude a joint control agreement with each of the EU's neighboring countries. The "E-Queue" project is to be expanded to all road border crossing points. In addition, Ukraine's first scanners for inspecting rolling stock are to be purchased and put into operation.

Doubts about the feasibility of the project arise regarding the reconstruction of Ukrainian rail tracks to meet European standards. For instance, while approximately 3 km of track was reconstructed in 2024, this figure is expected to reach 100 km just two years later. Given the high cost and chronic lack of funding, implementing this measure may prove challenging.

INDICATOR No. 12.1. Adoption of the Strategy for the Development of Agriculture and Rural Areas for the Period up to 2030

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

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

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

This indicator is part of a reform designed to improve the official public electronic registry of farms.

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

INDICATOR No. 13.1. Adoption of the Law of Ukraine "On Amendments to the National Program for the Development of Ukraine's Mineral Resource Base for the Period until 2030"

As part of the reform to enhance Ukraine's investment attractiveness, one of the steps is the adoption of the Law of Ukraine "On Amendments to the National Program for the Development of Ukraine's Mineral Resource Base for the Period until 2030."

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



Status of Implementation of Ukraine's Plan Indicators for the Q1 2025

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

INDICATOR No. 1.1. Enactment of legislation on civil service pay reform

Indicator 1.1 calls for the entry into force of legislation consistent with the principles of public administration set forth in the OECD SIGMA program. The reform provides for:

- the introduction of a pay system based on the functional classification of positions;
- the division of wages into a guaranteed component and a variable component;
- a reduction in the seniority allowance from 50% to 30%.

Some of these changes for 2024 have already been implemented [by the Cabinet of Ministers of Ukraine Resolution](#) "Issues of Civil Servant Compensation Based on Job Classification in 2024." At the same time, these changes are systematically defined by the Law itself: the corresponding draft law No. [8222](#) was adopted in principle as early as July 28, 2023, and was passed in its entirety on March 11, 2025, before being sent to the President for signature on March 17. The President [signed](#) the draft law only on June 3. The law's entry into force enabled the government to adopt two resolutions on June 6:

- [On the Approval of](#) the Procedure for Forming the Civil Servants' Pay Fund in a Government Agency
- [On Amending](#) Resolution No. 1409 of the Cabinet of Ministers of Ukraine dated December 29, 2023.

Therefore, the indicator has been met, 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 reforming the National Agency for the Identification, Tracing, and Management of Assets Derived from Corruption and Other Crimes (ARMA), with subsequent entry into force. The law should focus on:

- a transparent and merit-based selection process for the agency's director;
- an independent external performance evaluation system;
- a transparent procedure for managing and selling seized assets.

The Verkhovna Rada adopted it in its entirety on June 18, 2025. However, the law adopted by the Rada was delayed in its promulgation—the Chairman of the Verkhovna Rada of Ukraine signed the law on July 15, 2025, and the President of Ukraine signed it on July 27, 2025.

On July 30, 2025, Law of Ukraine No. [4503-IX](#) entered into force, meaning that **the indicator was fulfilled with a delay.**

INDICATOR No. 9.1. Entry into force of legislation on reforming the territorial organization of the executive branch

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

On October 8, 2025, law No. [14048](#) was adopted by the Verkhovna Rada in the first reading. On November 5, 2025, the Verkhovna Rada adopted law No. [14048](#) in its entirety. On November 10, the law was signed by the President of Ukraine, and on November 12, it entered into force as Law of Ukraine [No. 4677-IX](#). The provisions of the Law will take effect 12 months after the termination or repeal of martial law. Thus, **the indicator is considered fulfilled with a delay.**



Status of Implementation of Ukraine's Plan Indicators for the Q1 2025

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

INDICATOR No. 6.6. Adopt a roadmap for the separation of public service obligations (PSO) from other activities

The Government must adopt and publish a roadmap for the mandatory structural separation of activities related to the fulfillment of public service obligations (PSO) from activities not related to the fulfillment of such obligations for all state-owned companies entrusted with public service obligations.

[The action plan for separating the activities of public-sector entities entrusted with public service obligations from the performance of such obligations and from activities not related to their performance](#) was adopted 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 activity is a shortage of labor. At the same time, studies show that the rate of women's participation in the labor force remains lower than in many developed countries. One of the reasons is the lack of access to quality preschool education.

That is why one of the indicators of the Ukraine Plan is a reform aimed at improving access to quality preschool education in order to attract women with preschool-aged children to the labor market.

[The](#) relevant [law](#) was already adopted by parliament in June 2024. It addresses the issues outlined in the Ukraine Plan, which can be considered fulfillment of this indicator. The law took effect on January 1, 2025.

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

Ukraine lacks a comprehensive policy for the development of Ukrainian culture, even though these issues can now be classified as security concerns. These issues were raised several times during public consultations on the preparation of the Plan for Ukraine.

Thus, in accordance with the Plan, the government committed to adopting a Strategy for the Development of Ukrainian Culture.

In the summer, the relevant ministry invited experts and scholars 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 Strategy for the Development of Culture](#) on time (March 28, 2025).

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

This indicator provides for the entry into force of the Law of Ukraine "On Public Consultations," with its implementation to begin within 12 months of the date of termination or repeal of martial law in Ukraine. The law will establish a legal framework for conducting public consultations during the formulation and implementation of public policy and the resolution of issues of local significance, thereby creating the conditions for coordinated, effective, and results-oriented policy-making.

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

As provided for in the Plan for Ukraine, it is proposed that this law take effect 12 months after the termination or lifting of martial law.



Status of Implementation of Ukraine's Plan Indicators for the Q1 2025

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

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

This indicator calls for the implementation of an automated system for monitoring land relations and the conduct of a mass land valuation.

The necessary regulatory framework for both components of the indicator was adopted in 2023. Public [monitoring](#) of land transactions has been operating on a limited basis since 2021 and is scheduled to be fully operational by the end of March; however, as of March 24, it has not been made public.

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

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

The plan for the development of the irrigation system sets an ambitious goal: it will use the method of total economic benefits, aligned with water resources management based on a basin approach, grounded in an environmental impact assessment and strategic environmental reform.

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

INDICATOR No. 13.5. Updating the Subsurface User's Electronic Account

As part of the reform, the State Service of Geology and Subsurface Resources must update the subsurface user's electronic account, digitize secondary geological information, and ensure the issuance of digital special permits for subsurface use.

On March 28, 2023, the Ministry of Ecology and Natural Resources approved, [by a](#) corresponding [order](#), the Regulations on the Subsurface User's Electronic Portal, which define the general principles of its operation. On May 19, 2023, the Cabinet of Ministers [approved](#) the Procedure for the Maintenance, Operation, and Access to Information of the Unified State Electronic Geoinformation System for Subsurface Use, developed in accordance with Law No. 2805-IX of December 1, 2022.

Regarding digitization, 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 volumes of geological reports have been scanned and published on an interactive map.

On April 1, the State Register of Special Permits for Subsurface Use ([order of the State Geological Service](#)) [began](#) full-scale operation. Thus, the indicator is considered fulfilled—despite the fact that, during the period of martial law, access to the resource is temporarily restricted, with the exception of law enforcement agencies, state authorities, and local self-government bodies.

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

A resolution of the Cabinet of Ministers is to enter into force and specify the radio technologies permitted for use in Ukraine, specifying the radio frequency bands and the radio services to which they correspond, as well as the deadlines for ceasing their development and use, and a list of promising radio technologies for implementation in Ukraine, specifying the radio frequency bands and the 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; therefore, the indicator can be considered fulfilled.



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INDICATOR No. 14.2. Entry into force of legislation to strengthen the cybersecurity capabilities of state information resources and critical information infrastructure assets

Regulatory acts are to enter into force to ensure alignment with the NIS and NIS2 Directives.

These acts should focus on the following areas:

- regulating the implementation of measures aimed at establishing an adequate legal framework for carrying out actions to prevent, detect, and stop acts of aggression in cyberspace in the context of Russia's war against Ukraine;
- strengthening the protection of state information resources and critical information infrastructure against cyberattacks;
- comprehensive improvement of the regulatory and legal framework in the field of cybersecurity and information protection to strengthen the capabilities of the national cybersecurity system to counter cyber threats.

The corresponding Law No. 4336-IX entered into force on April 20, 2025—three weeks later than scheduled.

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

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

The action plan should focus on the following key areas: recovery; education; healthcare; services for veterans; services for military personnel; customs; and social services.

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

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

The adoption of a framework climate law is important given the need to bring 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 on mitigating the effects of climate change, as well as to implement the action plan for carrying out the European Commission's recommendations set forth in the Report on Ukraine's Progress within the Framework of the 2023 EU Enlargement Package, approved by Order of the Cabinet of Ministers No. 133-r dated February 9, 2024.

On October 8, 2024, the Verkhovna Rada of Ukraine adopted in its entirety the Law “On the Basic Principles of State Climate Policy” (Reg. [No. 11310](#)), submitted by the Cabinet of Ministers in late 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), with the exception of Articles 14 and 21.

INDICATOR No. 15.5. Approval of the Action Plan for the Establishment of a National Greenhouse Gas Emission Allowance Trading System

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

In November, a draft action plan for establishing the ETS [was published](#) on the Ministry of Environmental Protection's website. On December 30, 2024, the Ministry of Environmental Protection announced the completion of the public consultation process.

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



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INDICATOR No. 5.4. Improvements in Addressing Non-Performing Loans (NPLs)

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

- strengthening prudential requirements;
- exchanging data on non-performing loans;
- reviewing potential obstacles and developing measures to improve the framework for restructuring and resolving non-performing loans.

The Strategy for Resolving Non-Performing Loans was approved as a separate section of the Credit Development Strategy.

INDICATOR No. 7.1. Enactment of the Law on Vocational Education

The Law on Vocational Education should establish fair rules governing the operations of educational institutions in the vocational education services market. It should also expand the institutional capacity of educational institutions to provide formal and non-formal vocational education. It is also important to regulate the relationships between vocational education institutions and national, local, and international stakeholders to ensure the sustainable development of human capital in Ukraine.

[The draft law](#) on vocational education presented in April 2024 by the Ministry of Education and Science did not meet all of these requirements. Therefore, an updated version of the draft law was prepared. On April 16, 2025, the Verkhovna Rada adopted the draft Law of Ukraine "On Vocational Education" ([No. 13107-d](#)) as a basis.

On August 21, 2025, the law was finally adopted by 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 a CMU resolution on the procurement of social services

The resolution should provide for:

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

The Cabinet of Ministers adopted the relevant resolution on June 25, 2025.

INDICATOR No. 8.4. Adoption of an SME Strategy and an Action Plan for Its Implementation

On August 30, the government approved [the Strategy for the Recovery, Sustainable Development, and Digital Transformation of Small and Medium-Sized Enterprises for the period up to 2027](#) and its accompanying Operational Plan. The Strategy sets out four strategic objectives: business recovery and facilitation, promoting innovation and the green transition, developing entrepreneurship education and culture, and strengthening competitiveness in domestic and foreign markets.

The program's performance indicators, among other things, call for an increase in goods exports to 60 bn euros by 2027, of which 35 bn euros will go to the EU through an increase in the number of SME exporters to 35,000. The plan also calls for a reduction in unemployment to 11% and an increase in the share of sales via e-commerce to 20%. In the field of science and education, the plan aims to increase the R&D intensity of GDP to 0.7% by raising spending on scientific activities to 470 m euros and ensuring that 1.7 m entrepreneurs have upgraded their qualifications, either fully or partially, at public expense.



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INDICATOR No. 9.2. Study on the measures necessary to grant local communities legal entity status

This involves the approval and publication on the Ministry of Recovery's web portal of a study on the necessary measures to grant territorial communities the status of a legal entity.

On June 13, the Ministry of Community and Territorial Development of Ukraine hosted [a presentation of the study "The Community as a Legal Entity Under Public Law."](#) The study outlines the grounds for and consequences of granting 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's Plan](#), the development of a Roadmap for the process of separating the renewable energy surcharge from the transmission tariff—including the identification of necessary legislative acts and implementation deadlines—has been entrusted to the NEURC (subject to approval).

On February 18, the Government [approved](#) the Priority Action Plan for 2025, under which the NEURC, subject to approval, is to submit a draft order approving the roadmap in June 2025.

Following a review at a meeting of the Government Committee on May 28, 2025, [the draft order](#) was finalized.

On June 25, the Cabinet of Ministers [approved](#) the Roadmap for Separating the Renewable Energy Surcharge from the Electricity Transmission Tariff and the Action Plan for Implementing the Roadmap for Separating the Renewable Energy Surcharge from the Electricity Transmission Tariff for 2025 and 2026.

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

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

Cabinet of Ministers Resolution No. 132 of February 14, 2023, [approved](#) a list of subsoil plots (deposits) that are of strategic importance for the sustainable development of the economy and the country's defense capabilities, which will be granted for use through competitive bidding for the conclusion of production-sharing agreements.

On August 15, 2024, the State Service of Geology and Subsurface Resources of Ukraine [published](#) a draft resolution of the Cabinet of Ministers for public comment. Additionally, in 2024, Ukraine's Critical Raw Materials Portfolio was [published](#), featuring a list of investment opportunities in this sector, along with [a presentation](#) titled "Ukraine: Mining Investment Opportunities."

On March 4, 2025, the State Service of Geology and Subsoil [published](#) a new draft resolution of the Cabinet of Ministers. The annexes include two lists of subsoil plots—those to be granted for use through e-auctions and those to be granted for use through tenders for the conclusion of PSA agreements. The second list almost entirely duplicates the current CMU Resolution No. 132 of February 14, 2023, with the exception of one plot (potash salts), which is proposed to be replaced by another. A revised regulatory impact analysis [was published](#) on April 9.

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 production-sharing agreement (PSA) tenders. In addition, the State Geology and Subsoil Agency's website [features](#) a portfolio of investment projects for the extraction of critical raw materials, which, according to the Ministry of Economy's [dashboard](#) for monitoring the implementation of Ukraine's Plan indicators, is considered fulfillment of the indicator.



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

International tenders for the conclusion of production-sharing agreements (PSAs) must be launched using the model terms and conditions for such agreements, as approved and published by the Cabinet of Ministers of Ukraine. The transparency of the tenders and the PSAs themselves is ensured through open access to the terms and content of the agreements.

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

On April 8, the Cabinet of Ministers approved the proposals of the Interagency Commission on the Organization of the Conclusion and Implementation of PSA regarding the conduct of a tender for the conclusion of an agreement on the production sharing of hydrocarbons to be extracted from the [Mezhygorsk](#) and [Svichansk](#) oil and gas-bearing subsoil blocks.

On August 18, the Cabinet of Ministers presented a draft Government Action Program. The document [calls](#) for the drafting and submission to the Cabinet of Ministers of Ukraine by December 2025 of a law establishing a legislative mechanism for granting the right to use subsoil areas (deposits) of mineral resources under PSA terms (excluding hydrocarbons) (Amendments to the Law "On Production Sharing Agreements").

On August 13, the Cabinet of Ministers [announced](#) a new tender for the conclusion of a hydrocarbon production-sharing agreement within the Mezhygorsk block, and on August 27, the Government [announced](#) the launch of a tender for the conclusion of a production-sharing agreement for the "Dobra" block in the Kirovohrad region. According to the decision, a tender announcement will be published within two months, and the application period will last three months, after which the winner will be selected. In light of this, we consider the indicator to have been met with a delay.

INDICATOR No. 15.6. Restoration of the mandatory emissions trading system

This indicator aims to implement reforms to introduce market-based mechanisms for emissions pricing. To improve the MRV system, and taking into account the specific circumstances of wartime, the Cabinet of Ministers, at its meeting on November 14, 2023, [adopted](#) Resolution No. 1203, which refines the requirements for monitoring, reporting, and verifying greenhouse gas emissions in Ukraine.

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

On October 1, the Ministry of Ecology and Natural Resources, in collaboration with GIZ, [launched](#) training sessions on MRV. On November 21, the Verkhovna Rada approved draft law [No. 12131](#) in its first reading, which provides for the reinstatement of the mandatory MRV system. On January 8, 2025, the law [was adopted](#) in its second reading and as a whole. The law [entered into force](#) on February 1, 2025.

INDICATOR No. 3.8. Improving the enforcement of court decisions. The law on the digitization of enforcement proceedings has entered into force

The indicator is considered fulfilled upon the entry into force of the law on the enforcement of court decisions regarding property and non-property obligations and the subsequent digitization of enforcement proceedings.

On November 4, 2025, the Verkhovna Rada adopted law No. [14005](#) in the first reading, with revisions to its provisions. Thus, as of the end of March 2026, the indicator remains unmet.

On April 7, 2026, the Verkhovna Rada approved law No. [14005](#), and on April 21, it was signed by the President of Ukraine. However, its provisions [partially entered into force](#) on April 23, 2026, and will fully enter into force on October 23, 2026. Thus, the indicator has been implemented with a delay.



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INDICATOR No. 3.2.1 Entry into force of the Law on New Courts for the Adjudication of Administrative Cases; commencement of a transparent selection process for judges

On February 26, 2025, Parliament approved law No. [12368-1](#) in its entirety. Consequently, Ukraine is set to establish the Kyiv City District Administrative Court as a court of first instance and the Kyiv City Administrative Court of Appeals, which will serve as the court of appeals.

Following consultations with the High Council of Justice, which endorsed the law on April 29, 2025, the President submitted Draft Law No. [13302](#) on the establishment of the courts to the Verkhovna Rada on May 19, 2025. 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 and 10 in the appellate court. The indicator was achieved with a delay.

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

It is necessary to adopt standards for three groups of industrial products (machinery, electromagnetic compatibility of equipment, and low-voltage electrical equipment) through the translation method.

According to data from the Ukrainian National Scientific and Technical Center, a number of standards regarding [electromagnetic compatibility](#), [machinery](#), and [low-voltage equipment](#) have been adopted by translation and are currently in force. Thus, we consider this indicator to have been met.

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

This indicator aims to improve planning and ensure optimal conditions for attracting strategic investors. To fulfill this indicator, the State Service of Geology and Subsoil must publish a report on the verification/reassessment of reserves of critical minerals in Ukraine, taking into account international classification systems, and the results must be made publicly available to investors.

On September 19, 2025, the State Service of Geology and Subsoil [published the "Report"](#) on the Verification of Reserves of Strategic and Critical Minerals," taking into account the United Nations Framework Classification of Resources (UNFC).

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

This indicator calls for the adoption of a Cabinet of Ministers resolution "On the Approval of the National Waste Management Plan of Ukraine through 2033."

This plan [was approved](#) by Resolution No. 1353-r of the Cabinet of Ministers of Ukraine dated December 27, 2024. On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine's Plan, which provide for postponing the indicator's deadline to the Q3 2025. Thus, the indicator is considered to have already been achieved.

INDICATOR No. 5.2. Entry into force of legislation on the sale of state-owned banks

This indicator calls for the entry into force of amendments to the rules governing the sale of state-owned banks. Specifically, it is proposed to update Law No. 4524-VI, which sets forth the specific provisions for the sale of stakes in state-owned banks. The updated legislation should allow for the sale of both minority and majority stakes in banks, as well as the sale of entire banks, in accordance with the priorities set by international partners. To fulfill this indicator, [Law No. 3983-IX](#) "On the Specifics of Selling State-Owned Shareholdings in the Authorized Capital of Banks" entered into force in October 2024. In the Ministry of Economy's updated monitoring report, this indicator is marked as fulfilled.

In the revised Plan for Ukraine, the target date for fulfilling this indicator has been moved to the Q3 2025.



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

[A section on public investment projects](#) has already been created on the DREAM portal.

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

The plan's key measures are being implemented on schedule.

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

It is necessary to adopt standards for three groups of industrial products (machinery, electromagnetic compatibility of equipment, and low-voltage electrical equipment) through the transposition method.

According to data from the Ukrainian National Scientific and Technical Center, a number of standards regarding [electromagnetic compatibility](#), [machinery](#), and [low-voltage equipment](#) have been adopted by transposition and are currently in force. Thus, we consider this indicator to have been met.

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

This indicator aims to improve planning and ensure optimal conditions for attracting strategic investors. To fulfill this indicator, the State Service of Geology and Subsoil must publish a report on the verification/reassessment of reserves of critical minerals in Ukraine, taking into account international classification systems, and the results must be made publicly available to investors.

On September 19, 2025, the State Service of Geology and Subsoil [published the "Report on the Verification of Reserves of Strategic and Critical Minerals."](#)

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

This indicator calls for the adoption of a Cabinet of Ministers resolution "On the Approval of Ukraine's National Waste Management Plan through 2033."

This plan [was approved](#) by Cabinet of Ministers of Ukraine Decree No. 1353-r dated December 27, 2024. On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine's Plan, which provide for postponing the indicator's deadline to the Q3 2025. Thus, the indicator is considered to have already been met. The National Waste Management Plan is subject to review every 4 years from the date it enters into force.

INDICATOR No. 5.2. Entry into force of legislation on the sale of state-owned banks

This indicator calls for the entry into force of amendments to the rules governing the sale of state-owned banks. Specifically, it is proposed to update Law No. 4524-VI, which sets forth the specific provisions for the sale of stakes in state-owned banks. The updated legislation should allow for the sale of both minority and majority stakes in banks, as well as the sale of entire banks, in accordance with the priorities set by international partners. To fulfill this indicator, [Law No. 3983-IX](#) "On the Specifics of Selling State-Owned Shareholdings in the Authorized Capital of Banks" entered into force in October 2024. In the Ministry of Economy's updated monitoring report, this indicator is marked as fulfilled.

In the revised Plan for Ukraine, the target date for fulfilling this indicator has been moved to the Q3 2025.



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INDICATOR No. 3.1. At least 20% of judicial vacancies have been filled

The indicator will be considered achieved if at least 20% of the judicial vacancies existing as of October 16, 2023 (total number of vacant positions: 2,205) are filled in accordance with the amended legislation.

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

- the number of vacant judicial positions in the courts as of October 16, 2023, was 2,205 (20% — 441 vacancies);
- the number of positions filled between October 16, 2023, and December 23, 2025, was 453.

Thus, **Indicator 3.1 has been met with a delay.**

INDICATOR No. 10.5. Adoption of legislation for the Electricity Integration Package

To fulfill this indicator, legislation must be adopted to transpose the provisions of the Electricity Integration Package. The legislation, which is to enter into force, must align Ukraine's national legislation with the Electricity Integration Package, which was incorporated into the Energy Community's acquis in December 2022.

On July 22, Draft Law No. 12087-d [was adopted](#) in the first reading. On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine's Plan, which provide for postponing the indicator's deadline to the Q3 2025. On April 7, 2026, the law [was adopted](#) in the second reading and signed by the President on April 20. The law entered into force on April 23. However, according to the established deadlines, the indicator was not met on time.

INDICATOR No. 12.4. Entry into force of legislation on state support for agriculture in Ukraine

This indicator calls for the adoption of amendments to the Law on State Support for Agriculture. According to the indicator, the law will define:

- New measures to support agriculture and its sectors based on a SWOT analysis
- New approaches to supporting investments in small farms
- Financial support instruments involving international financial institutions
- Use of the State Agrarian Register to provide support

On April 21, the government submitted a draft law to the Verkhovna Rada that provides for the implementation of a number of provisions of EU regulations on the Common Agricultural Policy (CAP), the creation of an independent payment agency, the establishment of a Farm Sustainability Data Network (FSDN), and an Integrated Administration and Control System (IASK) for agricultural support. On November 4, [Law No. 4619-IX](#), based on alternative [draft law No. 13202-1](#), entered into force. The indicator was implemented with a delay.

INDICATOR No. 15.4. Approval of Ukraine's Second Nationally Determined Contribution to the Paris Agreement

To fulfill this indicator, a Cabinet of Ministers resolution approving Ukraine's second nationally determined contribution (NDC) to the Paris Agreement must enter into force. Additionally, according to the indicator's terms, Ukraine's second NDC to the Paris Agreement must be more ambitious than its current Updated NDC.

[On](#) October 29, the Cabinet of Ministers approved Ukraine's second Nationally Determined Contribution to the Paris Agreement, so the indicator was fulfilled with a delay.



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INDICATOR No. 2.6. Adoption of a medium-term public debt management strategy

As a result of Russia's full-scale war against Ukraine, public and government-guaranteed debt is rapidly approaching 100% of GDP. In 2024, Ukraine restructured its Eurobonds. In December 2026, the government also restructured its warrants. Thus, key elements of [the](#) Public Debt Management [Strategy](#) for 2024–2026 were implemented.

Changes in key challenges and the implementation of a major component of the Strategy prompted the adoption of a new Strategy.

The Cabinet of Ministers approved [the Medium-Term Public Debt Management Strategy for 2026–2028](#) on December 24, 2025. Therefore, the indicator was met on time.

INDICATOR No. 2.9. Adoption and entry into force of amendments to Cabinet of Ministers resolutions on public financial control

To fulfill this indicator, amendments to legislative acts on public financial control must be adopted and enter into force regarding:

- enabling the State Audit Service to ensure that the agency has the means to protect the financial interests of the EU by applying international auditing standards;
- strengthening measures to monitor procurement procedures.

To fulfill this indicator, the Cabinet of Ministers of Ukraine adopted Resolution No. 1031 of September 6, 2024, "On Amending Cabinet of Ministers of Ukraine Resolutions No. 43 of February 3, 2016, and No. No. 1110," which provides for enhanced cooperation between Ukrainian authorities and EU institutions in the area of protecting financial interests.

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

On November 13, 2025, the Cabinet of Ministers of Ukraine, by Resolution No. [1473](#) "On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine Regarding the Activities of State Financial Control Bodies," amended the procedures for conducting audits and inspections.

On November 19, 2025, the Cabinet of Ministers of Ukraine approved the Procedure for Conducting State Financial Audits under Ukraine's International Agreements to Protect National Financial Interests and Those of the European Union. Thus, the indicator was met on time.

INDICATOR No. 3.3. 20% of pending disciplinary proceedings (cases) that had not been reviewed as of the end of 2023 have been resolved

Achieving this indicator is necessary to address the backlog of complaints for which the statute of limitations is about to expire. This will ensure that judges are held accountable for committed and proven disciplinary offenses.

According to data from the High Council of Justice's automated case management system, **as of the end of September 2025**, disciplinary inspectors of the High Council of Justice, in accordance with paragraph 13.7 of the Regulations of the High Council of Justice, disciplinary inspectors of the High Council of Justice had identified 79 complaints as priority cases (among those received by December 31, 2023), and **23** of these **complaints (29%) have already been reviewed**, which meets the established target.



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INDICATOR No. 3.4. Qualification assessments (reviews) have been conducted in a manner that ensures predictability, consistency, and transparency in disciplinary practices regarding judges

50% of the judges who were required to undergo a qualification assessment (review) as of September 30, 2016, must complete it in accordance with established procedures and with the involvement of the Public Integrity Council.

Achieving this indicator will make it possible to verify that judges' qualifications meet the requirements of their positions.

According to the High Council of Justice, the number of individuals appointed (elected) to judicial positions as of September 30, 2016, was 6,958; of these, as of September 22, 2025, the qualification assessment had been completed for 4,313 judges (62%) to fulfill indicator 3.4. Thus, the indicator was met on time.

INDICATOR No. 3.9. A system for collecting data on the enforcement of court decisions is operational

The implementation of a system for collecting data on the enforcement of court decisions will make it possible to track the progress toward enforcement, analyze the reasons for non-enforcement of court decisions, identify systemic problems, and ensure greater transparency and oversight of the activities of the State Enforcement Service and other entities responsible for enforcing court decisions.

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

This section provides current and archived information (dating back to 2022) on the enforcement of court decisions.

Thus, the indicator should be considered achieved on time.

INDICATOR No. 5.6. Entry into force of the Law on Improving State Regulation of Capital Markets and Organized Commodity Markets

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

[The law](#), aimed at improving the regulation of the state capital market, entered into force on April 27, 2024, although some provisions took effect on January 1, 2026, and others will take effect on January 1, 2028.

According to the Verkhovna Rada's Committee on European Integration, the provisions of the law generally comply with IOSCO principles, despite comments on certain provisions.

INDICATOR No. 7.8. Entry into force of the Law of Ukraine "On the Basic Principles of Housing Policy"

To fulfill this indicator, it is necessary to adopt the Law of Ukraine "On the Basic Principles of Housing Policy," which is intended to introduce modern principles of housing policy, increase housing affordability, regulate mechanisms for state support and rental housing, and ensure a transparent system for recording housing needs and monitoring. To this end, on January 6, 2025, law No. 12377 was submitted to the Verkhovna Rada, which provides for the implementation of European approaches to housing policy, the development of financial mechanisms for housing provision, public-private partnerships, and the creation of a Unified Housing Information and Analytical System.

On January 13, the law was finally passed by the deputies. On February 13, the President of Ukraine signed the law, and it [entered into force on February 15](#); therefore, the indicator was achieved with a delay.



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INDICATOR No. 8.2. Deregulation in Selected Sectors

To meet this indicator, permitting and licensing procedures were digitized through the “ePermit” system, the succession of permitting documents and licenses was regulated (Law No. 4196-IX), and mechanisms were introduced to reduce business inspections through voluntary insurance and auditing (Law No. 4840-IX). Despite the deadline being postponed from the third to the fourth quarter of 2025, the indicator was fully achieved only in the Q2 2026.

INDICATOR No. 10.13. Adoption of the State Targeted Economic Program for the Energy Modernization of Heat-Generating Enterprises for the Period through 2030

The indicator calls for the Cabinet of Ministers to adopt the State Targeted Economic Program for the Energy Modernization of Heat-Generating Enterprises through 2030.

On July 19, 2024, the Ministry of Infrastructure [published](#) a draft of the State Targeted Economic Program for the Energy Modernization of State- and Municipally-Owned Heat-Generating Enterprises for the period up to 2030. The collection of comments and proposals lasted until mid-August 2024.

On October 1, the Cabinet of Ministers [approved](#) the State Targeted Economic Program for the Energy Modernization of State- and Municipally-Owned Heat-Generating Enterprises for the Period through 2030.

INDICATOR No. 13.6. Publication of a report on current legislation regarding the implementation of ESG reporting

This indicator aims to approve and publish a study assessing current legislation on the implementation of ESG reporting for the extractive sector and providing recommendations to address gaps in the legislation.

In late 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 adopt ESG practices.

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, this indicator has been met.

INDICATOR No. 15.3. Approval of the Regulations on the Scientific and Expert Council on Climate Change and Ozone Layer Preservation

This indicator requires the adoption of a Cabinet of Ministers resolution “On the Approval of the Regulations on the Scientific and Expert Council on Climate Change and Ozone Layer Preservation.”

On October 8, 2024, the Verkhovna Rada [adopted](#) Law of Ukraine No. 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 to provide scientific support for the formulation of state climate policy. The law also defines the tasks of the Scientific and Expert Council, which, along with its membership, must be approved by the Cabinet of Ministers within one year of the law's entry into force.

On January 14, 2026, the Cabinet of Ministers [approved](#) a resolution establishing the Scientific and Expert Council on Climate Change and Ozone Layer Preservation. On April 22, the Cabinet of Ministers [approved](#) a resolution to optimize the work of the Scientific and Expert Council. Thus, the indicator is considered to have been met with a delay.



Status of Implementation of Ukraine's Plan Indicators for the Q1 2026

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

INDICATOR No. 5.1. Publication of a stability assessment of the banking system

This indicator requires the publication of a stability assessment of the 20 largest banks by assets. The assessment must include a stress test evaluating the bank's condition under an adverse economic scenario and an independent asset quality review (AQR).

In December 2024, the NBU approved [the terms of reference](#) for the 2025 bank [assessment](#) and defined the specifics of its implementation. In May 2025, the NBU [approved the methodology for stress testing banks](#). The procedure for conducting the assessment complies with the indicator. In September, the NBU announced the completion of the bank resilience assessment and published [a summary report on the assessment](#), which confirms that the indicator's conditions were met during the assessment. On December 28, [the full results of the assessment](#) were published. Accordingly, the indicator was fulfilled ahead of schedule.

INDICATOR No. 12.6. Implementation of support through the State Agrarian Register (DAR)

Previously, in the fourth quarter of 2024, Ukraine fulfilled indicator 12.3, which required the entry into force of the law on the State Agrarian Register. Specifically, the Law of Ukraine "On the Information and Communication System 'State Agrarian Register'" was adopted, which establishes the legal, organizational, and financial foundations for the creation and operation of the "State Agrarian Register" information and communication system.

The next step in improving the official public electronic registry of agricultural enterprises is the implementation of indicator 12.6, which stipulates that a report will be submitted indicating that, by the end of 2025, **80%** of state support was provided through the State Agrarian Registry.

According to information from the Ministry of Economy, based on the results for 2025, 37,785 entities in the agro-industrial complex received state support totaling 5.9 bn UAH; of these, 37,523 entities are registered in the State Agrarian Register, representing **99.9%** of the target for Step 12.6 of Ukraine's Plan. Therefore, **the indicator was met on time.**



Indicator No. 4.3. Increase the staffing levels of the High Anti-Corruption

Court

(Q1 2025)

Sector combating corruption and money laundering

Status: not met

Ukraine's plan proposed increasing the number of judges at the High Anti-Corruption Court (HACC) by reinstating the Public Council of International Experts (PCIE). To implement this measure, it is necessary to increase the authorised strength of HACC judges by 60 per cent and that of the HACC secretariat by 40 per cent.

This indicator should be considered in close conjunction with others relating to strengthening the capacity of anti-corruption institutions, so as to ensure that they are able to cope with their workload within a reasonable timeframe without becoming overburdened.

To view a detailed overview of the progress made on this indicator, we recommend that you refer to the [May 2026](#) edition (slides 63–66). The latest updates on the implementation of this indicator are provided below.

On 20 March 2026, the High Qualification Commission of Judges (HQCJ) and the High Council of Justice (HCJ) announced [the results of special joint meetings](#) concerning the compliance of candidates for the posts of judges of the High Anti-Corruption Court with the criteria set out in law. Sixty-nine candidates took part in these meetings; seven withdrew from the competition of their own accord. Following the results of the joint vote, 22 candidates remained in the competition for positions as judges of the High Anti-Corruption Court.

On 24 April 2026, the High Qualification Commission of Judges (HQCJ) began [conducting interviews](#) and determining the results of the qualification assessment of the 22 candidates. Following the interviews, on 22 June, [recommendations were made](#) for the appointment of seven candidates to the Appeals Chamber of the High Anti-Corruption Court and 12 candidates to other judicial posts at the High Anti-Corruption Court. In addition, the Commission terminated the qualification assessment of four judges regarding their suitability for their current posts, who, within the framework of this competition, had confirmed their ability to administer justice at the High Anti-Corruption Court.

For its part, the High Council of Justice completed its consideration of the recommendations provided by the High Qualification Commission of Judges during July and, following the interviews, submitted a proposal to the President of Ukraine to appoint 16 out of 19 candidates by presidential decree. Regarding the remaining three candidates, the High Council of Justice announced an indefinite suspension of the interviews.

It is also worth mentioning **the progress made in recruiting staff for vacant posts within the secretariat of the High Anti-Corruption Court**, as this is also a component of this indicator.

On 29 July 2025, a recruitment process was announced for vacant posts within the Secretariat of the High Anti-Corruption Court. As of 17 August 2025, the High Anti-Corruption Court had received 145 CVs.

Following the review of the CVs and the interviews, which took place in several stages, 10 candidates were recommended for appointment to various posts within the court's secretariat.

In [October 2025](#), following the selection process for posts in the Legal Department of the High Anti-Corruption Court's administrative staff, 118 CVs were submitted and two candidates were shortlisted. In [December 2025](#), a selection process was announced for four posts within the administration; following the review of 51 CVs submitted, three candidates were shortlisted, whilst one post remained unfilled.

However, as of the end of July 2026, the indicator remains **unmet**.



Indicator No. 1.2. Entry into force of amendments to the legislation regarding the improvement of the procedures for entry into, service in, and departure from the civil service

(Q4 2025 – postponed from Q3 2025)

Sector public administration reform

Status: not completed

For years, Ukraine has been undergoing public administration reform, which is designed to foster a professional and effective civil service in the country. Indicator 1.1. provides for improvements to the approach to remuneration in the civil service, whilst indicator 1.2. is intended to improve the procedures for recruitment, service and dismissal from the civil service.

It is specified that the new legislation (including subordinate legislation) is to come into force by the end of the Q3 2025. It must comply with the OECD's SIGMA principles of public administration concerning selection procedures based on professional competencies.

On 15 July, [the](#) relevant [draft law No. 13478](#) was registered in parliament, but it was withdrawn due to a change of government. Recognising this, MPs submitted [an](#) identical [draft law No. 13478-IX](#) on 16 July: the responsible committee did not decide to consider it until 11 September.

Although, in accordance with amendments to Ukraine's Plan, this measure had been postponed to the Q4 2025, it was not completed in time.

On 29 April, the bill was finally passed at first reading.

As of the end of July, the text for the second reading is not yet available.



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

Sector: fight against corruption and money laundering

Status: Not completed

To fulfill this indicator, the next National Risk Assessment must be prepared and conducted in accordance with the updated Methodology for Conducting the National Risk Assessment of the Legalization (Laundering) of Proceeds from Crime and the Financing of Terrorism in Ukraine.

On July 1, 2025, [a meeting](#) of the Council on Preventing and Combating the Legalization (Laundering) of Proceeds of Crime, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction took place.

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

The purpose of the assessment is to identify, analyze, and understand current threats that could be exploited to launder proceeds of crime or finance terrorism. The results of the National Risk Assessment will serve as the basis for updating state policy in the field of countermeasures and for the effective application of a risk-based approach.

According to information provided by the State Financial Monitoring Service of Ukraine, in accordance with [Resolution No. 690 of the Cabinet of Ministers of Ukraine dated August 5, 2020](#), following the analysis and synthesis of materials submitted as part of the National Risk Assessment (hereinafter "NRA"), the State Financial Monitoring Service, in a letter dated November 18, 2025, sent the draft NRA Report to the participants for approval. By the time the draft NRA Report was submitted to the Ministry of Finance of Ukraine for approval, 22 participants had provided positive responses.

In addition, in November 2025, discussions on the draft NRA Report took place with representatives of the Council of Europe and the European Commission (DG ENEST), resulting in generally positive feedback (Review of Ukraine's Draft National Risk Assessment 2025 against the revised FATF NRA Guidance and Toolkit).

The draft National Risk Assessment Report was sent to the Ministry of Finance of Ukraine for approval via a letter dated December 10, 2025. Joint work is currently underway with the Ministry of Finance of Ukraine to refine the draft National Risk Assessment Report.

As of the end of June 2026, the National Risk Assessment had not been prepared; therefore, this indicator remains unmet.



Indicator No. 6.7. Review and, where necessary, amendment and enactment of legislation regarding the distinction between activities relating to the fulfilment of public service obligations (PSOs) and those not relating to PSOs within state-owned enterprises

(Q4 2025 — postponed from Q3 2025)

Sector management of state assets

Status: not completed

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

It is therefore planned to separate the accounts for PSO and non-PSO activities within state-owned enterprises in order to avoid cross-subsidisation. Thus, in the first stage (indicator 6.6 is to be implemented in the Q1 2025), the adoption of a corresponding Roadmap is envisaged, setting out the steps for the mandatory structural separation of activities relating to the fulfilment of public service obligations and activities not related to the fulfilment of public service obligations for all state-owned companies engaged in PSOs.

In accordance with indicator 6.7, the legislation set out in the Roadmap will be assessed and, if necessary, amended. This will be done to ensure that the appropriate separation of accounts between PSO and non-PSO activities is functioning effectively in all state-owned companies. By the Q3 2027, the government must ensure that an independent audit is carried out in state-owned enterprises involved in PSO to assess the effectiveness of compliance with the legislation.

As of 30 January 2026, the government had not submitted the relevant draft legislation to parliament. Meanwhile, MP Oleksiy Movchan has tabled Bill [No. 13620](#), which, amongst other things, also sets out the specific requirements for maintaining separate accounts for transactions carried out by public sector entities entrusted with special duties, distinguishing between the performance of such duties and activities not related to their fulfilment. However, the draft law was submitted back in August 2025, and to date has not even been adopted at first reading.

Meanwhile, on 25 March 2026, the Cabinet of Ministers of Ukraine adopted [a resolution](#) which partially regulates this issue, but does not constitute fulfilment of the indicator.



Indicator No. 6.9. Lifting the suspension of the State Aid Act, resuming state aid control, and harmonising the State Aid Act with the EU acquis
(Q4 2025, postponed from Q3 2025)

Sector management of state assets

Status: not completed

In May 2024, the Verkhovna Rada reinstated the State Aid Act in respect of aid provided through the Entrepreneurship Development Fund. However, the main provisions of the State Aid Act remain suspended for the duration of martial law.

In March 2025, the Antimonopoly Committee published [a draft law on the reinstatement of the provisions of the Law on State Aid](#) for public consultation. The draft law proposed reinstating the Law until the end of martial law in territories where no hostilities are taking place, and introducing a number of amendments to the substantive provisions of the Law. The draft law was prepared in constant dialogue with the European Commission regarding the compliance of its provisions with EU law. In September, the Antimonopoly Committee submitted a revised version of the draft law to the Cabinet of Ministers.

Draft Law [No. 14345](#), implementing this indicator, was registered with the Verkhovna Rada only on 30 December 2025. It provides for the full reinstatement of the Law of Ukraine 'On State Aid to Business Entities', with the exception of territories where hostilities are ongoing or which are temporarily occupied. New thresholds for 'de minimis' aid have also been defined.

On 9 June, the draft law was referred back for a second first reading, and on 30 June, a draft resolution on adopting the draft law in principle was registered. It was not until 13 July that the draft law received the opinion of the relevant Verkhovna Rada committee, and by 16 July it had been withdrawn from the Rada due to a change of government. As yet, no new draft has been registered with the Rada.



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 fulfil this indicator, legislation must be adopted and brought into force to streamline authorisation procedures for investment in renewable energy in accordance with European Union rules.

On August 11, 2025, the Ministry of Energy [published](#) a draft Law of Ukraine 'On Amendments to Certain Laws of Ukraine Regarding the Implementation of European Union Legislation in the Field of Renewable Energy Sources', which, in particular, provides for the introduction of the key principles of authorisation procedures for investments in renewable energy sources that comply with EU rules. On November 28, the draft law was [approved](#) by the Government.

On December 3, [draft law No. 14271](#) on the implementation of European Union legislation in the field of renewable energy sources was registered with the Verkhovna Rada. However, on December 16, its consideration was postponed, which made it impossible to meet the indicator on time.

In early April 2026, the draft law was referred back for a second first reading, and on April 29, the draft law was adopted at first reading. As of the end of July, the draft law had not been considered at second reading.



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

Sector: energy

Status: not completed

This indicator provides for the NEURC to appoint a nominated electricity market operator 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.

As early as 2023, the NEURC began actively [discussing](#) the appointment of a nominated market operator at its meetings, where it was noted that the NEURC currently lacks the legal basis to independently determine who will be the sole nominated participant for the European spot energy market, and that legislative provisions must be introduced to enable the NEURC to make the relevant amendments to the specified Licence Conditions.

JSC “Market Operator” [believes](#) that it should be recognised by the NEURC as the nominated market operator, as it already holds observer status on the NEMO Committee. In particular, the Letter of Expectations from the owner of JSC “Market Operator” for 2025 [states](#) that the Company’s objective within the framework of market coupling is to obtain the status of a nominated market operator (NEMO) and to organise trading on the integrated SDAC/SIDC markets.

On April 21, 2026, the NEURC [announced](#) the start of the practical implementation of the law on energy market integration; in particular, it is envisaged that procedures will be drawn up for the appointment, suspension of activities and termination of the functions of the NEMO. The regulator is required to ensure the appointment of the NEMO within four months of the entry into force of Law No. 4834-IX (i.e. by August 23, 2026).

On July 7, 2026, the NEURC [approved](#) the Procedure for the Appointment of the Nominated Electricity Market Operator. The document sets out the rules for the appointment and supervision of NEMO – the company responsible for organising trading on the day-ahead and intraday markets in accordance with European rules. The document sets out requirements regarding financial capacity, IT systems, market oversight, transparency, non-discriminatory access for market participants and the separation of activities to avoid conflicts of interest. The Procedure also sets out mechanisms for monitoring, suspending or terminating the operator’s activities in the event of non-compliance with the criteria, and regulates the NEURC’s interaction with ACER and the bodies of the Energy Community.

The next step will be the procedure for appointing the NEMO in accordance with the approved Procedure.



Indicator No. 10.11. Establishment of the NEURC's special status

(Q4 2025)

Sector: energy

Status: not completed

This indicator provides for the adoption and entry into force of legislative amendments that will establish a special status to ensure the independence of the Regulator, as required by 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 Regarding the Strengthening of the Regulator's Independence in the Energy and Utilities Sectors'. With this decision, the Regulator began implementing [the Action Plan](#) to ensure the independence of the NEURC, which was developed to fulfil Ukraine's international obligations in the context of European integration, in particular the recommendations of the Energy Community. Among other things, the draft law provides for a clarification of the NEURC's special status as a central executive body.

The Energy Community Secretariat [has](#) repeatedly [pointed](#) out that the independence of the national energy regulator is one of the key requirements of the EU acquis. At the same time, the Secretariat notes that fully ensuring the NEURC's independence may require amendments to the Constitution of Ukraine, which are currently impossible under martial law. In this regard, ways of strengthening the Regulator's institutional independence within the framework of the current constitutional model are being explored.

In accordance with [the Memorandum](#) on Economic and Financial Policies under the IMF programme, Ukraine has committed to adopting legislative changes aimed at strengthening the NEURC's independence, improving the procedures for selecting the Regulator's members, and introducing regular external assessments of its governance and independence. The draft legislation is to be drawn up taking into account the recommendations of the Energy Community Secretariat.

In November 2025, the Energy Community Secretariat, in its annual report, once again [drew attention](#) to systemic issues regarding the NEURC's independence, in particular its financial and institutional dependence, as well as the need to strengthen the Regulator's autonomy through legislation. The EU Delegation to Ukraine and the Energy Community Secretariat [confirmed](#) that the adoption of the relevant legislative amendments is an important prerequisite for the integration of Ukraine's energy markets into the EU market and for Ukraine's fulfilment of its European commitments.

To this end, on December 8, 2025, draft law No. 14282 was [registered](#) with the Verkhovna Rada to strengthen the guarantees for the exercise of the NEURC's powers; as of the end of July 2026, it is still being considered by parliamentary committees.



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

Sector: energy

Status: completed, but not on time

This indicator aims to improve the efficiency of the district heating sector. To fulfil this indicator, the Law of Ukraine 'On Amendments to Certain Laws of Ukraine Regarding Support for the Development of Efficient and Sustainable District Heating' must be adopted and come into force.

It is worth noting that, in November 2023, the Concept of the State Targeted Economic Programme for the Energy Modernisation of State- or Municipally-Owned Heat-Generating Enterprises for the period up to 2030 [was approved](#), which provides for improving the efficiency of district heating systems. Furthermore, on 9 February 2025, the Law "On Amendments to Certain Laws of Ukraine in the Fields of Energy and Heat Supply Regarding the Improvement of Specific Provisions Related to the Conduct of Economic Activities and the Operation of Martial Law in Ukraine", [adopted](#) on January 14, came into force. This law aims to settle arrears, improve payment discipline, develop the renewable energy market and bring Ukrainian legislation into line with EU standards.

On May 5, the Ministry of Development [published](#) a draft Law "On Amendments to Certain Laws of Ukraine Regarding Support for the Development of Efficient and Sustainable Centralised Heat Supply". On 18 August, the Cabinet of Ministers presented a draft Government Action Programme. The document [sets out plans](#) to draft and submit to the Cabinet of Ministers of Ukraine, by December 2025, a bill amending certain laws of Ukraine to support the development of efficient and sustainable district heating. On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine's Plan, which provide for the deadline for this indicator to be postponed to the Q4 2025.

On September 22, Government draft law No. 14067 "On Amendments to Certain Laws of Ukraine Regarding Support for the Development of Efficient and Sustainable District Heating" [was registered](#) with the Verkhovna Rada. On November 6, the Verkhovna Rada Committee on Energy and Housing and Communal Services issued [an opinion](#) recommending that the draft law be adopted at first reading, and a draft [resolution](#) on adopting it as a basis was published.

On February 10, 2026, the draft law was [adopted](#) in principle. The draft law was reviewed by the relevant Verkhovna Rada committee ahead of the second reading; in particular, a comparative table was provided on 18 May. Experts from the DiXi Group joined the process, providing a number of proposals aimed at ensuring competition in the installation of individual heating units. On 17 July, the Act was adopted and signed by the President on July 24.



Indicator No. 11.3: Entry into force of the law on rail safety and interoperability in Ukraine, to be implemented within three years of its adoption (2/2)

(Q4 2025)

Sector: transport

Status: completed, but not on time

Draft Law [No. 14174](#) was only registered with the Verkhovna Rada on 31 October 2025. The draft law fulfils Ukraine's obligations under the Association Agreement and implements the requirements of the EU's 'Fourth Railway Package' (Directives 2016/798, 2016/797, etc.). Once adopted, Ukraine will transition to the European safety management model. Formal controls will be replaced by a risk management system, operator accountability and an independent safety authority. The Ukrainian railway system will then be technically and organisationally capable of operating within a single area alongside EU networks (ETCS/ERTMS, TSIs, subsystem authorisation, conformity assessment modules).

In practice, this means:

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

Overall, the draft law complies with EU law. The amendments introduced at the second reading have significantly improved its compliance through the introduction of independent (accredited) external risk assessments and additional safeguards to ensure the impartiality and transparency of procedures. At the same time, certain provisions require further clarification, in particular regarding the cost and methodology for setting the price of certificates and services, as well as a more comprehensive enshrinement of the application of Technical Specifications for Interoperability (TSIs) and procedural criteria for decision-making.

On 17 December, the draft law was adopted at first reading. On 25 May 2026, a table was prepared for the second reading.

Draft Law [No. 14174](#) was signed by the President of Ukraine and registered as [Law No. 4904-IX of 9 June 2026](#). The Law shall enter into force on the day following its publication and shall come into effect three years after the date of its publication.



Indicator No. 1.5. Full-scale launch and use of the Human Resources Management Information System (HRMIS)

(Q1 2026)

Sector public administration reform

Status: not completed

This indicator envisages the introduction and use of a Human Resources Management Information System (HRMIS) in all ministries and all other central executive bodies and their territorial bodies.

The idea of introducing such a system is not new. Work on its implementation began as far back as 2018–2019. It is designed to reduce human resources management costs within executive bodies and to make management processes more transparent, comprehensible and efficient.

Overall, certain elements of the HRMIS are already operational, but the system had not been fully launched as of the end of July 2026.



Indicator No. 3.7: Entry into force of legislation on simplified insolvency procedures for micro, small and medium-sized enterprises

(Q1 2026)

Sector business environment

Status: not completed

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

The relevant draft law No. 15024 introduces a simplified insolvency procedure for micro and small businesses. This involves a 'fast-track' process with a time limit of up to 180 days, lower costs and minimal red tape: fewer documents, faster processing and lower fees. Eligibility criteria will be clearly defined so that the procedure applies only to small businesses acting in good faith, whilst complex or contentious cases will be dealt with under the general rules. Clear rules will also be established governing the interaction between bankruptcy procedures and the privatisation of state-owned enterprises, to ensure that assets do not remain in limbo for years.

[Draft Law No. 15024](#) was registered with the Verkhovna Rada on 10 February 2026. As of the end of July, it had not even been considered at first reading. The indicator has not been met.



Indicator No. 3.12. Entry into force of legislation ensuring a transparent and merit-based selection process for prosecutors to leadership positions within the prosecutor's office (Q1 2026)

Sector: Judicial System and Human Rights

Status: not completed

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

The indicator calls for the enactment of legislation that will ensure a transparent and merit-based selection process for prosecutors in leadership positions. This legislation will include:

- clear evaluation criteria, including professional competence and integrity/ethics;
- a transparent, competitive, and merit-based selection process that includes vetting for professional competence and integrity;
- strengthening the institutional capacity and authority of the Office of the Prosecutor General and prosecutorial self-governance bodies, in particular the Council of Prosecutors, with regard to the selection of prosecutors for leadership positions.

On June 24, Ukraine's newly appointed Prosecutor General Ruslan Kravchenko publicly [endorsed](#) a transparent, merit-based selection process for prosecutors in leadership positions, as provided for in the EU's "Ukraine Facility" initiative.

In August 2025, members of the Verkhovna Rada of Ukraine introduced two draft laws—No. [13601](#) and [13601-1](#)—which are partially aimed at fulfilling the indicator. However, neither draft law even reached the first reading stage.

As of the end of March 2026, the Office of the Prosecutor General reported that it had drafted a law "On Amendments to the Law of Ukraine 'On the Prosecutor's Office,'" which was sent by letter dated December 30, 2025, to the Cabinet of Ministers of Ukraine for subsequent submission to the Verkhovna Rada of Ukraine for consideration. However, the Cabinet of Ministers of Ukraine has not yet submitted the relevant draft law to the Verkhovna Rada of Ukraine.

On June 22, 2026, members of the Verkhovna Rada of Ukraine registered Law No. [15343](#), which provides for an open competition for the position of Prosecutor General. Candidates are submitted to the President of Ukraine solely based on the results of a competition conducted by a six-member selection committee: three members appointed by the High Council of Justice and three appointed by the High Council of Justice based on recommendations from international organizations of European Union member states. Currently, the draft law has been provided to members of parliament for review.

Therefore, the indicator remains unfulfilled.



Indicator No. 8.5. Ensuring that issues relating to connection to utility networks are resolved
(Q1 2026)

Sector business environment

Status: completed, but not on time

This indicator envisages the entry into force of the Law on Amendments to Legislative Acts regarding the simplification of connecting immovable property to external utility networks and the improvement of legal regulation in the field of pipeline transport. The law will cover:

- a unified procedure for connecting to utility networks
- the disclosure of information on utility networks in electronic registers
- the inclusion of data on utility networks and their protection zones in state property registers.

However, it was subsequently decided that, to fulfil this indicator, a Resolution of the Cabinet of Ministers of Ukraine would be adopted instead of a law.

Thus, [by Resolution No. 950 of 15 July 2026](#), the Cabinet of Ministers of Ukraine simplified and standardised the procedure for connecting properties to centralised water supply and sewerage networks through amendments to Government Resolutions Nos. 681 and 1066. The updated mechanism provides for the digitisation of key stages of the procedure, establishes a single list of required documents, clear deadlines for processing applications, and uniform rules for interaction between service customers and service providers.

We therefore consider this indicator to have been achieved, albeit with a delay.



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: not completed

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

At the end of May 2024, a meeting of the inter-ministerial working group on the development of the circular economy [was held](#) at the Ministry of Economy, where the results achieved and the further work plan for developing the strategy were presented. The strategy [is being](#) developed with financial support from the EU and in collaboration with leading international organisations as part of the project 'Circular Economy – Promoting Sustainable Production and Consumption Models in Ukraine'. [According](#) to the project's publication, as of March 2025, the Strategy for the Development of Ukraine's Circular Economy up to 2035, the Operational Plan for the Implementation of the Strategy for 2025–2027, and recommendations on legislative changes to implement the principles of the circular economy had been drawn up. In turn, on 10 September 2025, a consultation meeting [was held](#) in Poltava as part of the strategic environmental assessment of the draft Strategy, with the support of the Ministry of Economy, Environment and Agriculture of Ukraine. However, as of the end of October, the draft documents had not been published at all.

On 10 November, the Ministry of Economy [published](#) a statement defining the scope of the strategic environmental assessment of the Circular Economy Development Strategy. The collection of comments and proposals continued until 20 November. At the end of November in [Vinnytsia](#) and in early December in [Odesa](#), consultation meetings were held to discuss the SEA of the draft Strategy.

On 6 January 2026, the Ministry of Economy [published](#), for public consultation, the draft Strategy for the Development of Ukraine's Circular Economy up to 2035, the operational plan for its implementation in 2026–2028, and the Strategic Environmental Assessment Report. On 6 February, the public consultation on the draft document concluded; according [to](#) the Ministry of Economy, over 4,500 comments were received.

On 24 April, the Ministry of Economy [published](#) a draft order 'On the Approval of the Strategy for the Development of Ukraine's Circular Economy for the Period up to 2035 and the Adoption of the Operational Plan for its Implementation in 2026–2028'. The draft order underwent a public consultation process and, as of May, consultations with the European Commission [were ongoing](#).



Indicator No. 3.10. An updated IT system for the enforcement of court decisions is operational (Q2 2026)

Sector: Judicial System and Human Rights

Status: Completed

In accordance with the requirements of this indicator, the IT system for the enforcement of court decisions must begin operating.

The implementation of Indicator 3.10 depends on the implementation of other indicators, specifically 3.8 and 3.9, regarding amendments to legislation on the digitization of court decision enforcement and the implementation and populating of the data collection system for court decision enforcement. Since both indicators have been completed, this fully clears the way for the implementation of Indicator 3.10.

Nevertheless, as of May 2026, there is no publicly available information regarding the development and/or readiness of the IT system for the enforcement of court decisions.

On June 1, 2026, the Ministry of Justice of Ukraine, in collaboration with the State Enterprise “National Information Systems” (NAIS) and the State Judicial Administration, carried out the next phase [of modernization of](#) the Automated System for Enforcement Proceedings (ASEP). The software update is aimed at improving the efficiency of court decision enforcement, reducing paper-based document flow, and further digitizing interactions between government agencies, enforcement officers, and other participants in enforcement proceedings.

The main outcome of the modernization was the introduction of new functionality for electronic interaction with the Unified Judicial Information and Telecommunications System (UJITS). Specialists have completely overhauled the process of information exchange between agencies.

From now on, orders to garnish wages, pensions, scholarships, and other income of debtors will be sent directly to the electronic accounts of institutions, enterprises, and organizations registered in the Unified Judicial Information and Telecommunications System (UJITS). Thus, the indicator can be considered achieved.



Indicator No. 3.17. Adoption of a Presidential Decree approving the Human Rights Protection Strategy (Q2 2026)

Sector the judicial system and human rights

Status: not completed

The implementation of this indicator is aimed at developing and introducing human rights protection measures that would address current threats.

[The previous Strategy](#) was adopted in 2021, and its implementation period expired in 2025.

In March 2026, the Ministry of Justice [announced](#) the launch of public consultations on the draft Presidential Decree 'On the Approval of the National Human Rights Strategy for the Period up to 2035', which will set out the strategic objectives, priorities and principles for ensuring and protecting human rights and freedoms in Ukraine for the period up to 2035, taking into account the conditions of martial law, the consequences of the Russian Federation's armed aggression and the needs of post-war recovery. The consultations ran until 2 April 2026.

However, as of the end of July, the National Human Rights Strategy for the period up to 2035 had not been approved by a presidential decree; therefore, the indicator remains unfulfilled.



Indicator No. 4.20. Adoption of the national programme to combat human trafficking by 2030
(Q2 2026)

Sector combating corruption and money laundering

Status: not completed

Human trafficking remains a pressing threat, driven by domestic socio-economic factors and external challenges, in particular the Russian Federation's armed aggression against Ukraine.

On 25 February 2026, the Cabinet of Ministers of Ukraine, [by Order No. 184-r](#), approved the Concept of the State Targeted Social Programme to Combat Human Trafficking for the period up to 2030, instructing the Ministry of Social Policy, Family and Unity, together with the relevant central executive authorities, regional state administrations and the Kyiv City State Administration (military administrations) to develop and submit to the Cabinet of Ministers of Ukraine, within three months, a draft State Targeted Social Programme to Combat Trafficking in Human Beings for the period up to 2030.

In accordance with the directive, the Ministry of Social Policy prepared and published [the relevant draft State Targeted Social Programme](#) to Combat Trafficking in Human Beings. However, as of the end of July 2026, the State Programme had still not been approved by the Cabinet of Ministers of Ukraine. Consequently, the indicator remains unmet.



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

Sector: financial markets

Status: Achieved

This indicator overlaps with IMF Benchmark 6 on the adoption of an updated strategy for the management of state-owned banks. There are currently seven state-owned banks, which account for over 50 per cent of Ukraine's banks' net assets. However, two small banks have now been transferred to the Deposit Guarantee Fund for resolution and are likely to be wound up or transferred to private investors.

The indicator provides for the Government's approval of a Strategy for Reforming State-Owned Banks, which will envisage a gradual reduction in the state's share of the banking sector. It will also address the reduction of fiscal risks, the resolution of non-performing loans, the improvement of governance and operational efficiency, and the ensuring of long-term sustainability of state-owned banks. On 30 June, the Government adopted a decision approving [the guidelines for operations of for state-owned banks](#). This document sets out the relevant measures. Before that, on 1 October 2025, the Government decided to prepare for the sale of shareholdings in two state-owned banks. In April 2026, the selection process for advisers on the privatisation of a further state-owned bank began. The document provides for the sale of Ukrgasbank or Sens Bank if favourable terms can be secured in 2027–2028, and, in the longer term, the sale of PrivatBank and a stake in Oschadbank. There are no plans to sell Ukreximbank.



Indicator No. 5.5. Entry into force of legislative amendments to improve the regulation of non-performing loans
(Q2 2026, postponed from Q1 2026)

Sector financial markets

Status: not completed

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

To date, the relevant recommendations have been partially implemented. In particular, the NBU has amended the definition of non-performing loans. However, as of 26 July, the proposed amendments to the Bankruptcy Code had not been submitted to the Verkhovna Rada and, consequently, the indicator remains unfulfilled.



Indicator No. 6.3. Establishment of supervisory boards with a majority of independent members (1/3) (Q2 2026)

Sector: management of public assets

Status: not completed

In accordance with the terms of this indicator, supervisory boards comprising a majority of independent members are to 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.

Candidates for membership of supervisory boards must be nominated following a competitive selection process based on procedures agreed and in force at the time the selection process begins.

In September 2024, the Cabinet of Ministers of Ukraine approved the new composition of the supervisory board of JSC “Energy Company of Ukraine”

[By Order No. 46-r of 21 January 2025](#), the Cabinet of Ministers of Ukraine approved the candidates for the positions of members of the supervisory board of the state-owned company ‘Forests of Ukraine’. The supervisory board comprises three independent members and one state representative.

The members of the Supervisory Board of JSC “HARTON” [were elected](#) by the remote Annual General Meeting of Shareholders of JSC “HARTON”, held on 15 April 2025, Minutes No. 30 of 21 April 2025, for a term until the next Annual General Meeting of Shareholders of JSC ‘HARTON’.

[By Order No. 442-r of 6 May 2025, the](#) composition of the Supervisory Board of JSC ‘Motor Sich’ was updated.

In July 2025, the Cabinet of Ministers of Ukraine, [by Order No. 721-r of 15 July 2025](#), updated the composition of the Supervisory Board of the private joint-stock company ‘Ukrainian Danube Shipping Company’ (UDS). This body consists of five members, including three independent members and two state representatives.



Indicator No. 6.3. Establishment of supervisory boards with a majority of independent members (2/3) (Q2 2026)

Sector: management of public assets

Status: not completed

By Decree No. [1090-r](#) dated October 1, 2025, the Government completed the competitive selection of members for the supervisory board of the joint-stock company “Ukrainian Railways.”

By Resolution No. [1633](#) dated December 10, 2025, the Cabinet of Ministers approved the establishment of the joint-stock company “Guaranteed Buyer” based on the relevant state-owned enterprise.

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

The introduction of the new procedure is expected to strengthen oversight of state-owned enterprises’ activities and contribute to more effective management of critical infrastructure facilities under martial law.

On January 28, 2026, [the Government appointed](#) new members to the Supervisory Board of NAEK “Energoatom” based on a recommendation from the nomination committee.

On March 2, 2026, the Cabinet of Ministers of Ukraine approved the candidates for independent members and state representatives to the new composition of the Supervisory Board of NJSC “Naftogaz of Ukraine.”

The composition of the Supervisory Board of the State Enterprise “Polygraphic Combine ‘Ukraine’ for the Production of Securities” was [updated on March 5, 2026](#). It now includes three independent members and two state representatives.



Indicator No. 6.3. Establishment of supervisory boards with a majority of independent members (3/3) (Q2 2026)

Sector: management of public assets

Status: not completed

On May 13, the Cabinet of Ministers, upon the recommendation of the Nomination Committee, approved the candidacies of the following state representatives:

- to the supervisory board of NEC “Ukrenergo”—Yuriy Boyko, Mykola Brusenko, and Yegor Perelygin;
- to the supervisory board of LLC “Gas Transmission System Operator of Ukraine”—Anton Bendyk.

The supervisory board of the joint-stock company “National Public Broadcasting Company of Ukraine” was [renewed by Decision No. 1404](#) of 28 May 2026.

On 17 June 2026, the Cabinet of Ministers of Ukraine [terminated the powers of](#) four independent members of the supervisory board of PJSC “Ukrhydroenergo” and one state representative with effect from 7 July 2026; consequently, [the government is launching a competition](#) for positions on the supervisory board.

On 1 July, the Cabinet of Ministers of Ukraine adopted [a resolution](#) entitled ‘Matters concerning the supervisory board of the joint-stock company “National Nuclear Energy Generating Company “Energoatom”’, whereby Dominique Minier and Matthew Murray were appointed as independent members of the supervisory board.

Also on 1 July, the Cabinet of Ministers of Ukraine [approved](#) the appointment of Yuriy Butsa as the state representative on the supervisory board of JSC ‘Gas Transmission System Operator of Ukraine’, which was the final appointment to complete the full composition of the supervisory board.

On 15 July, the Government adopted [a decision](#) approving the dissolution of the state-owned enterprise ‘Pavlograd Chemical Plant Scientific and Production Association’ through its conversion into a limited liability company.

Thus, according to public sources as of July 2026, supervisory boards with a majority of independent members had been established in 13 out of the 15 companies required to meet this indicator; therefore, the indicator remains unmet for the time being.



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

Sector human capital

Status: completed

The situation in the labour market is challenging: most employers cite labour shortages as the greatest obstacle to their operations. At the same time, the unemployment rate remains high due to a mismatch between labour demand and supply. Therefore, a change in labour market policy is essential. Changes are also required within the framework of the European integration process.

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

- creating favourable conditions for employment, including through the development of entrepreneurship, with a particular focus on women;
- simplifying access to the labour market;
- retraining and reskilling;
- reforming the public employment service;
- reforming the labour market forecasting system;
- encouraging the recruitment of foreign talent to the Ukrainian labour market – foreign entrepreneurs, highly skilled workers, manual workers and students.

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

According to available information, on 7 January 2026, the government approved the Employment Strategy for the Population of Ukraine for the period up to 2030, as well as an operational plan of measures for implementing the Strategy in 2026–2028.



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

Sector human capital

Status: in progress

Investment in education is one of the investment indicators set out in the Ukraine Facility.

This involves channelling funds to improve access to safe, high-quality education, including pre-school education in accordance with the new legislation on pre-school education, in particular:

- shelter and safe conditions in educational establishments;
- school buses;
- materials and equipment for educational establishments, modern teaching methods, including through digitalisation;
- high-quality meals;
- the establishment of workshops and laboratories in educational institutions, and improving the energy efficiency of educational buildings.

It was originally envisaged that the equivalent of 650 million euros would be spent on these objectives in 2024 and 2025, but following changes to the Ukraine Plan, this amount was reduced to 300 million euros.

The government does not report on the implementation of these investments, but our own preliminary estimates indicate that the relevant funds have not been spent.

At least 5 per cent of these investments, in accordance with the 'Decentralisation' section, are to be channelled to the sub-national level.

As the government has not published a report on the relevant expenditure and it is not entirely clear which specific expenditure will be counted towards these investments, we are maintaining the status of this indicator as 'in progress'. However, there is a risk that it has not been met.



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

Sector: human capital

Status: in progress

Investment in healthcare is another of the investment indicators set out in the Ukraine Facility.

This involves channelling funds to strengthen the healthcare sector, specifically:

- laboratory equipment for microbiological, chemical and physical analysis;
- shelter and security measures 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 healthcare services.

It was originally envisaged that the equivalent of 200 million euros would be spent on these purposes in 2024 and 2025, but following changes to the Ukraine Plan, this amount was increased to 400 million euros.

The government does not report on the implementation of these investments, but our own preliminary assessments indicate that the relevant funds have not been spent.

At least 20 per cent of these investments, in accordance with the 'Decentralisation' section, are to be channelled to the sub-national level.

As the government has not published a report on the relevant expenditure and it is not entirely clear which specific expenditure will be counted towards these investments, we are maintaining the status of this indicator as 'in progress'. However, there is a risk that it has not been met.



Indicator No. 7.18. Provision of housing for vulnerable groups
(Q2 2026)

Sector human capital

Status: in progress

Providing housing for vulnerable groups has been identified as one of the government's priorities. It is also an investment indicator set out in the Ukraine Facility.

This involves channelling funds to provide housing for:

- persons with Group I-II disabilities who defended Ukraine's independence, sovereignty and territorial integrity;
- family members of fallen (deceased) defenders;
- internally displaced persons who defended Ukraine's independence, sovereignty and territorial integrity, as well as their family members.

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

As the government has not published a report on the relevant expenditure and it is not entirely clear which specific expenditure will be counted towards the relevant investments, we are leaving the status of this indicator as 'in progress'. However, there is a risk that it has not been met.

**Indicator No. 7.20. Implementation of the National Strategy to Close the Gender****Pay Gap**

(Q2 2026)

Sector human capital**Status:** Completed

The Cabinet of Ministers must approve the Operational Action Plan for the implementation, in 2026–2028, of the National Strategy for Closing the Gender Pay Gap for the period up to 2030.

This is necessary to improve the functioning of the labour market.

The Cabinet of Ministers approved the relevant Action Plan by its [Order No. 504-r of 27 May 2026.](#)



Indicator No. 8.12. Adoption of amendments to the resolution of the Cabinet of Ministers of Ukraine on the designation of a single national metrology institute (Q2 2026)

Sector business environment

Status: not completed

This indicator provides for amendments to Resolution No. 330 of the Cabinet of Ministers of Ukraine dated 27 May 2015, which designates the single national metrology institute of Ukraine – the State Enterprise ‘All-Ukrainian State Scientific and Production Centre for Standardisation, Metrology, Certification and Consumer Protection’ (SE ‘Ukrmetrteststandard’, Kyiv).

The amendments are aimed at bringing the national metrology system into line with the requirements of European Union legislation and international standards, as well as at improving the institutional model for the operation of the national metrology institute. This is an important component of harmonising Ukrainian legislation in the field of technical regulation and ensuring the uniformity of measurements in accordance with European practices.

The essence of the indicator lies in updating the regulatory framework defining the status and powers of the single national metrology institute, with the aim of ensuring the effective functioning of the national metrology system, the international recognition of measurement results, and Ukraine’s integration into the European quality infrastructure.

On 25 May, the Ministry of Economy [published](#) a draft resolution of the Cabinet of Ministers of Ukraine ‘On Amendments to Paragraph 1 of Resolution No. 330 of the Cabinet of Ministers of Ukraine dated 27 May 2015’, which provides for the updating of the list of scientific metrology centres and the official designation of the State Enterprise ‘Ukrmetrteststandard’ as the sole national metrology institute responsible for the creation, improvement, preservation and application of national standards and for ensuring metrological traceability to the International System of Units (SI), which will contribute to the harmonisation of the national metrology system with EU standards.



Indicator No. 9.7. Investment in the restoration, reconstruction and modernisation of regional authorities, in particular local government (Q2 2026)

Sector decentralisation and regional policy

Status: in progress

According to this indicator, at least 5 per cent of the non-repayable financial support under Component I of the Ukraine Facility must be allocated to the needs of the restoration, reconstruction and modernisation of Ukraine's sub-national authorities.

It is most likely that the indicator takes into account funds allocated in the form of grants.

As there is no clear answer as to exactly which expenditure is included in this amount, we are awaiting official data.



Indicator No. 10.9. Adoption of a roadmap for the gradual liberalisation of the gas and electricity markets, to be implemented following the end of martial law

(Q2 2026)

Sector: energy

Status: not completed

To fulfil this indicator, the Cabinet of Ministers must approve a Roadmap for the gradual liberalisation of the gas and electricity markets, setting out the steps to be taken and the corresponding deadlines, to be implemented following the end of martial law. The Roadmap should be based on a technical analysis of the sector's financial condition and should focus on:

- measures to reform public service obligations and gradually liberalise prices following the end of martial law;
- measures to protect vulnerable consumers, including a new subsidy structure that will improve targeting and the level of support;
- preparatory actions ahead of the end of martial law, in particular the identification of vulnerable groups and the development of appropriate digital solutions.

As of the end of May, according to unofficial information, work on this has begun on the part of the Ministry of Energy and through individual international technical assistance projects. A key element of this work is conducting a technical analysis of the costs of quasi-fiscal support and developing scenarios for financially sustainable reforms that protect vulnerable consumers (Structural Benchmark No. 10 of the IMF programme).



Indicator No. 10.19. Preparation of the Terms of Reference (ToR) for an independent external audit of the NEURC

(Q2 2026)

Sector: energy

Status: not completed

This indicator involves the development and approval of the Terms of Reference for an independent audit of the NEURC's activities. The audit is to assess the effectiveness of internal governance mechanisms, the transparency of decision-making processes, compliance with ethical standards and anti-corruption measures, as well as the adequacy of the regulator's financial management.

The terms of reference should provide for an assessment of:

- regulatory decision-making processes, in particular internal procedures for approval, documentation, traceability and mechanisms to ensure transparency and integrity;
- ethical standards and practices, including the prevention of conflicts of interest, declaration of interests, recusal procedures and accountability mechanisms for Commission members, management and staff;
- the anti-corruption programme and internal compliance mechanisms, identifying institutional vulnerabilities and corruption risks;
- processes for financial decision-making, the allocation and management of financial resources, as well as internal control systems that ensure transparency, accountability and protection against undue influence;
- the NEURC's communication policy, including interaction with EU and Energy Community regulators, market participants and other public authorities;
- financial management, in particular budgeting, procurement, internal control and reporting.

As of the end of July, no information regarding the preparation of the terms of reference is publicly available.



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

Sector: agri-food sector

Status: completed

This indicator requires an investment of at least €30 million to be made in the demining of agricultural land.

To meet this indicator, a total of at least €30 million (in UAH equivalent) must be allocated in the state budgets for 2024 and 2025 to compensate owners or users of agricultural land for the costs of demining.

The relevant budget expenditure item under the programme classification is '1201420 Compensation for the costs of humanitarian demining of agricultural land'.

In 2024, 434 million UAH, or 10 million euros, were allocated for such demining. In 2025, the figure was 1.3 trillion UAH, or 47 million euros.

Total investment in required demining during this period amounted to 57 million euros, exceeding the 30 million euros set as the target. The target has been met.



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

Sector digital transformation

Status: completed

For this indicator to be considered successfully achieved, legislation governing the operation 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 legislative act should focus on:

- establishing a modern electronic identification system in Ukraine and ensuring its sustainable development;
- ensuring interoperability (technological compatibility) between electronic identification means, electronic identification hubs and electronic identification schemes;
- protecting the information resources processed within the system.

To fulfil this indicator, the Cabinet of Ministers of Ukraine approved [the Regulations on the Integrated Electronic Identification System](#) (as amended), which set out the procedure for appointing, defining the structure and functioning of the integrated electronic identification system, as well as its establishment and use.

Furthermore, [the Procedure for Maintaining the Register of Electronic Identification Schemes and Digital Identification Wallets](#) sets out the procedure for maintaining the register of electronic identification schemes and digital identification wallets, and for making amendments to that register.

In addition, the Cabinet of Ministers adopted [Resolution No. 764 of 28 June 2024](#), which sets out the organisational, methodological, technical and technological requirements for providers of e-identification and e-trust services, as well as the procedure for their verification.

[CMU Resolution No. 226 of 28 February 2025](#) approved the Procedure for assessing the risks and consequences of the unauthorised use or substitution of identification data of users of e-identification services and for notifying the supervisory authority of the provision of electronic trust services using e-identification means.

Furthermore, to establish requirements for electronic identification means within the context of the electronic identification scheme, depending on the levels of trust in such means and the trust assessment procedure, the CMU developed the relevant Technical Regulations, approved [by Resolution No. 577 of 16 May 2025](#). Thus, **the indicator has been fulfilled.**



Indicator No. 15.11. Adoption of amendments to the Procedure for the implementation of state water monitoring

(Q2 2026)

Sector green transition and environmental protection

Status: completed

This indicator involves amending Resolution No. 758 of the Cabinet of Ministers of Ukraine of 19 September 2018 'On the Approval of the Procedure for State Water Monitoring' with a view to further aligning the national water monitoring system with the requirements of European Union legislation, in particular the provisions of:

- Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (Water Framework Directive);
- Directive 2008/105/EC of the European Parliament and of the Council of 16 December 2008 on environmental quality standards in the field of water policy.

The amendments are intended to improve the state water monitoring system by implementing European approaches to assessing the ecological and chemical status of water bodies, expanding the list of monitored pollutants, improving methods for data collection and analysis, and introducing mechanisms for the regular monitoring of the status of surface and groundwater in accordance with EU requirements.

On 10 June, the Cabinet of Ministers [approved](#) Resolution No. 754 "On Amendments to the Procedure for State Water Monitoring". The resolution introduces monitoring of substances on the EU watch list, sets out requirements for monitoring points, methods and frequency, and establishes a list of substances for continuous monitoring. This will help bring the water monitoring system into line with EU standards, enable the timely detection of pollutants and facilitate the fulfilment of Ukraine's European integration commitments.

We therefore consider this indicator to have been met on time.



Indicator No. 1.4. Resumption of operations and modernisation of the Unified Civil Service Vacancies Portal (career.gov.ua)
(Q3 2026, postponed from Q2 2026)

Sector public administration reform

Status: in progress

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

Such a portal will promote transparency in civil service recruitment and improve efficiency. The National Agency for Civil Service (NACS) is responsible for the implementation of this indicator.

In accordance with the amendments to the Plan for Ukraine adopted by the government, it has been proposed to postpone the modernisation of the portal until the Q2 2026.

The wording has also been clarified slightly: 'Modernisation of the Unified State Web Portal for Electronic Services with regard to its civil service vacancy functionality.' It is likely that a new web portal will be developed rather than the existing one being modernised.



Indicator No. 3.13. Entry into force of legislation that improves the disciplinary system for prosecutors and enhances the capacity of the Qualification and Disciplinary Commission for Prosecutors
(Q3 2026)

Sector: Judicial System and Human Rights

Status: in progress

Under the terms of this step, legislation aimed at improving the disciplinary system for prosecutors and strengthening the institutional capacity of the Qualification and Disciplinary Commission for Prosecutors is to enter into force.

The improved legal and institutional framework aimed at implementing GRECO's recommendations will include the following elements:

- clarification of disciplinary offenses related to prosecutors' conduct and their compliance with ethical standards, and expansion of the list of available disciplinary sanctions to enhance their proportionality and effectiveness;
- amending the provisions governing the composition of the Qualification and Disciplinary Commission for Prosecutors to ensure that the majority of seats are held by prosecutors elected by their peers, and conducting an independent and objective pre-selection procedure for all candidates for membership in the Qualification and Disciplinary Commission for Prosecutors, including a vetting of their integrity;
- improving the effectiveness of disciplinary proceedings by extending the statute of limitations.

As of July 2026, there is no information available in the public domain regarding progress in meeting this indicator.



Indicator No. 4.5. Adoption of a new Anti-Corruption Strategy for the period after 2025 (Q3 2026)

Sector: fight against corruption and money laundering

Status: in progress

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

On 31 December, [the Cabinet of Ministers extended the deadline for implementing the measures](#) of the State Anti-Corruption Programme for 2023–2025 until the date on which the State Anti-Corruption Programme for the subsequent period comes into force.

On 2 April 2026, the draft Anti-Corruption Strategy for 2026–2030 was submitted by the National Agency for Corruption Prevention (NACP) to the Cabinet of Ministers of Ukraine for consideration.

The draft Anti-Corruption Strategy for 2026–2030, as submitted by the National Agency to the Government, can be viewed via the following links:

- [in Ukrainian](#);
- [in English](#).

Three draft laws relating to the Anti-Corruption Strategy for 2026–2030 have now been submitted to the Verkhovna Rada of Ukraine:

- No. [15230](#) of 13 May 2026, submitted by O.V. Radina, Chair of the Verkhovna Rada Committee on Anti-Corruption Policy. The draft bill reproduces the version of the strategy prepared by the NACP;
- No. [15230-1](#) of 18 May 2026, submitted by the Cabinet of Ministers of Ukraine, was developed on the basis of a draft prepared by the NACP. On 16 July 2026, the draft was withdrawn following the government's resignation;
- No. [15230-2](#) of 25 May 2026, initiated by Members of the Ukrainian Parliament from the 'European Solidarity' political party.

Following consideration of the draft laws by the Verkhovna Rada Committee on Anti-Corruption Policy, it was decided to reject draft laws No. [15230](#) and No. [15230-2](#), and to revise and submit a new draft law that would incorporate the provisions of the three previous drafts. This was registered on 27 July 2026 under No. [15230-d](#), and it has already received [a favourable opinion](#) from the Main Committee for approval at first reading.

In the updated Ukraine Plan, the indicator was split into two and their implementation was postponed — 4.5 concerning the adoption of the Anti-Corruption Strategy to the Q3 2026, and 4.11 concerning the adoption of the State Anti-Corruption Programme to the Q4 2026. As of the end of July 2026, draft Anti-Corruption Strategy No. [15230-d](#) is being prepared for a vote in the Parliament's chamber for consideration at first reading.



Indicator No. 4.9 Strengthening the anti-money laundering system to enable accession to SEPA
(Q3 2026)

Sector: combating corruption and money laundering

Status: in progress

Under Indicator No. 4.9, legislation aimed at further strengthening the anti-money laundering framework must come into force, in particular with a view to Ukraine submitting an application to join the geographical scope of the Single Euro Payments Area (SEPA) schemes.

The Single Euro Payments Area (SEPA), which covers the EU and certain other European countries, allows cashless transfers in euros between participating countries to be carried out just as easily, quickly and cheaply as within a single country (a sort of 'financial visa-free regime').

Two draft laws on this matter were registered with the Verkhovna Rada: [No. 14327](#) (government) and [No. 14327-D](#) (committee's draft). The government's draft law was withdrawn following a change of government. The alternative draft remains pending but so far Rad\а hasn't considered it.

It is not yet clear whether the government will table a new bill.



Indicator No. 4.16 Transparency of fund transfers and certain crypto-assets
(Q3 2026)

Sector: combating corruption and money laundering

Status: in progress

Legislation must be introduced (the law must come into force) on information accompanying transfers of funds and certain crypto-assets, in accordance with the principles of Regulation (EU) 2023/1113, and corresponding amendments must be made to anti-money laundering legislation.

As of the end of July, this indicator is in the process of being implemented.



Indicator No. 4.18 Combating the unauthorised use of payment cards
(Q3 2026)

Sector: combating corruption and money laundering

Status: in progress

Legislation must be introduced (the law must come into force) establishing criminal liability for unlawful acts involving payment cards and other payment instruments carried out for the benefit of third parties, in accordance with the principles of Directive (EU) 2019/713.

As of the end of July, this indicator is in the process of being implemented.



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

Sector: management of state assets

Status: in progress

This indicator forms 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 public limited companies or limited liability companies.

At the end of August 2025, the Commercial Code was repealed in Ukraine ([Law No. 4196-IX of 9 January 2025](#)). Within three years of 28 August 2025, the corporatisation of state-owned enterprises must be completed. State-owned enterprises (including commercial and state-owned enterprises) must be transformed into public limited companies (PLCs) or limited liability companies (LLCs), 100 per cent of the shares or equity interests in which are owned by the state.



Indicator No. 10.16. Establishment of minimum energy efficiency requirements for buildings and for products covered by EU ecodesign legislation

(Q3 2026)

Sector: energy

Status: in progress

To fulfil this indicator, the Cabinet of Ministers must adopt regulations on minimum energy efficiency requirements for buildings and products in accordance with EU ecodesign legislation, whilst the Ministry of Development must adopt regulations on energy efficiency requirements for products in accordance with EU energy labelling legislation.

On October 27, 2020, the Ministry of Development [approved](#) the Minimum Energy Performance Requirements for Buildings, which remain in force to this day, and on 6 February 2025, requirements for nearly zero-energy buildings were [approved](#).

As of the end of September 2025, the State Agency for Energy Efficiency had drawn up, and the government had adopted, technical regulations setting out [eco-design](#) requirements for 30 types of equipment and appliances, as well as 13 technical regulations on energy [labelling](#). On 18 October 2025, 10 technical regulations on eco-design and labelling [came into force](#), aimed at improving the energy efficiency of household appliances and harmonising Ukrainian legislation with European Union requirements. Technical regulations on eco-design requirements have come into force for: domestic washing machines and domestic washer-dryers; light sources and separate ballasts; refrigeration appliances; domestic dishwashers; and electronic displays.

On February 5, 2026, the Cabinet of Ministers [approved](#) a resolution “On the Approval of the Technical Regulation on Ecodesign Requirements for Servers and Data Storage Products”. The document will come into force in six months’ time. In turn, on 18 June, the Ministry of Development [published](#) an order approving the Technical Regulation on the energy labelling of energy-using products.

Task 17 of [the](#) Operational Action [Plan](#) for the implementation, in 2024–2026, of the Long-Term Strategy for the Thermal Modernisation of Buildings up to 2050 provides for the updating of technical regulations and the regulatory framework on the energy efficiency of buildings to bring them into line with EU standards in the Q4 2025. The main outcome will be the approval of updated minimum energy efficiency requirements for residential and public buildings to reduce the maximum level of energy consumption.



Indicator No. 10.21. Submission by the State Nuclear Regulatory Inspectorate of request to the IAEA for an Integrated Regulatory Review Service (IRRS) mission

aRRR4U

(Q3 2026)

Sector: energy

Status: in progress

This indicator involves the State Nuclear Regulatory Inspectorate of Ukraine (SNRIU) making a formal request to the International Atomic Energy Agency (IAEA) for an Integrated Regulatory Review Service (IRRS) mission, scheduled to commence in the first half of 2027.

The IRRS mission is an international expert assessment mechanism carried out by the IAEA to conduct a comprehensive analysis of the national nuclear and radiation regulatory system to determine its compliance with the IAEA's international safety standards and global best practices.

The essence of this initiative lies in launching a process of independent international assessment of the SNRA's activities, which will cover the regulator's institutional capacity, the effectiveness of its regulatory functions, the regulatory framework, licensing mechanisms, inspection activities, the assurance of nuclear and radiation safety, as well as the level of independence of the regulatory body.

On July 2, the Chairman of the State Nuclear Regulatory Inspectorate – Chief State Inspector for Nuclear and Radiation Safety of Ukraine, Oleg Korikov, [announced](#) that the Ukrainian side intends to submit a request to the IAEA in the near future regarding the conduct of an IAEA Integrated Regulatory Review Service (IRRS) mission. In turn, on 23 July, Oleg Korikov [approached](#) the IAEA with a proposal to conduct an IAEA Integrated Regulatory Review Service (IRRS) mission in Ukraine.



Indicator No. 11.9. Adoption by the Cabinet of Ministers of Ukraine of a resolution approving the Action Plan for the phased introduction of competition in the freight and passenger transport sectors of the rail transport market

(Q3 2026)

Sector: transport

Status: in progress

Achievement of this indicator is necessary for Ukraine's progress in creating a competitive rail transport market in line with EU requirements.

The Cabinet of Ministers of Ukraine must approve an action plan setting out the phased introduction of competition in the freight and passenger rail transport sector, establish a timetable for ensuring non-discriminatory access to rail infrastructure (in particular the 1,435 mm gauge) and define the mandatory stages for reforming the 1,520 mm gauge network.

The action plan must be aligned with the revised National Programme for the Adaptation of Ukrainian Legislation to European Union Legislation (NPAA).

As of July 2026, according [to](#) Oleksii Balesta, Deputy Minister of Community and Territorial Development of Ukraine, the draft Railway Sector Reform Plan is being developed in close cooperation with the European Commission.



Indicator No. 1.3. Resumption of recruitment to the civil service, taking professional competencies into account (Q4 2026)

Sector public administration reform

Status: in progress

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

This indicator provides for the resumption of the selection process for vacant posts, taking into account professional competencies for all civil servants, to be implemented gradually in three stages:

- 1) for Category 'A' civil service posts;
- 2) for Category 'B' civil service posts (in territory controlled by Ukraine where no hostilities are taking place);
- 3) for Category 'C' civil service posts (in territory controlled by Ukraine where no hostilities are taking place).

At the start of the full-scale war, competitive selection processes for these posts were suspended. There are plans to resume them in order to promote a higher level of professionalism within the civil service.



Indicator No. 2.4. Conduct of the spending review of the state budget
(Q4 2026)

Sector public finance management

Status: in progress

The indicator stipulates that state budget spending reviews are to be conducted annually on the basis of a Government decision and in accordance with a methodology consistent with the best practices of the Organisation for Economic Co-operation and Development (OECD), particularly in priority areas such as social protection, education, healthcare, energy and business support.

On 20 May, the Cabinet of Ministers of Ukraine adopted a resolution on conducting expenditure reviews in 2026 ([No. 463-r](#)): 14 key spending units at the national level will conduct spending reviews across 26 areas.



Indicator No. 2.10. Strengthening internal control and internal audit in Ukraine, as well as safeguarding the EU's financial interests within the framework of the 'Ukraine Facility' mechanism

(Q4 2026)

Sector public finance management

Status: in progress

On the basis of the legislation adopted under Indicator 2.9, Ukraine's internal control and internal audit systems, as well as the mechanisms for protecting the financial interests of Ukraine and the European Union under the Ukraine Facility, are to be strengthened through the adoption by the Cabinet of Ministers of Ukraine of a national Action Plan on 'strengthening internal control and internal audit systems in Ukraine to ensure accountable and effective governance'. The Action Plan should cover the following aspects:

- improving the State Audit Service of Ukraine's effective access to the information and data necessary to carry out state financial control measures under the 'Ukraine Facility' mechanism, including the relevant registers, databases and information systems;
- amending the Audit Strategy for the implementation of the 'Plan for Ukraine' to clarify the respective roles and mechanisms for cooperation between the Ministry of Finance, the State Audit Service and the internal audit units of state bodies with the bodies responsible for expenditure;
- improving the methodological framework for conducting risk-based systemic audits of expenditure under the 'Ukraine Facility' and ensuring their effective implementation by the Q2 2027, including the assessment of risks of fraud, corruption, conflicts of interest and double funding;
- strengthening risk management and the role of internal control and internal audit in the preparation of management representations, in particular by providing practical guidance and support to government bodies responsible for implementing the 'Plan for Ukraine'.



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

Sector: judicial system and human rights

Status: in progress

The indicator will be considered achieved if the system module of the electronic criminal case management system (eCase), the electronic criminal proceedings module, and the case analysis module are operational to ensure the digital processing of criminal cases and gradually replace or significantly modernize the outdated Unified Register of Pretrial Investigations.



Indicator No. 3.15. The Specialised District Administrative Court and the Specialised Administrative Court of Appeal are operational (Q4 2026)

Sector: Judicial System and Human Rights

Status: in progress

The indicator will be considered achieved once a new district administrative court and an administrative court of appeal have commenced operations to hear disputes involving central government bodies, by:

- determining the number of judges for these courts;
- announcing and conducting a competition to fill vacant judicial posts in these courts, and appointing judges to these courts;
- providing the courts with premises and logistical resources;
- announcing the commencement of the courts' operations by publishing the relevant information on the judiciary's web portal and in the newspaper 'Holos Ukrainy'.

The High Qualification Commission of Judges of Ukraine [received 356 applications](#) to take part in the competitions for vacant judicial posts at the Specialised District Administrative Court and the Specialised Administrative Court of Appeal. There were 268 unique candidates; 88 candidates are applying for judicial posts at both the Specialised District Administrative Court and the Specialised Administrative Court of Appeal simultaneously.

On 15 June 2026, the Commission approved the coded and decoded results of the fourth stage of the qualification examination (completion of a practical task in the specialisation of the Specialised District Administrative Court) as part of the competition.

67 candidates successfully completed the practical task in the specialisation of the Specialised District Administrative Court and remain in the competition.

On 22 June 2026, the Commission approved the coded and decoded results of the fourth stage of the qualifying examination (completion of a practical task specialising in the Specialised Administrative Court of Appeal) as part of the competition.

23 candidates successfully completed the practical task in the specialisation of the Specialised Administrative Court of Appeal and remain in the competition.

10 candidates are applying for judicial posts in both competitions simultaneously.

The next stage involves the Expert Council, comprising three representatives from Ukraine and three representatives delegated by international organisations. Together with them, the Commission will conduct interviews with the candidates.

On 5 June 2026, a meeting took place between members of the Expert Council and the High Council of Justice to establish a common understanding of the working process and to foster working relations between the Expert Council, members of the High Council of Justice, and the secretariats of the Council and the Commission within the framework of the competition for judicial posts at the Specialised Administrative Court of Appeal and the Specialised Administrative Court.



Indicator No. 3.16. Entry into force of legislation expanding the participation of independent experts appointed by international partners in the selection process for members of the High Qualification Commission of Judges of Ukraine (Q4 2026)

Sector the judicial system and human rights

Status: in progress

Under this indicator, a law is to come into force which, in close cooperation with the European Commission regarding specific conditions, expands the participation of independent experts appointed by international partners in the selection committee attached to the High Qualification Commission of Judges (HQCJ).

The first composition of the selection committee for members of the High Qualification Commission of Judges completed its term of office on 1 June 2025. Under the regulations in force at the time, the casting vote was held by representatives appointed by international organisations. In future, the selection process should take place without the involvement of representatives of the international community on the committee.

In 2027, the four-year term of office for 15 of the 16 members of the HQJC will come to an end, necessitating a new large-scale competition.

However, the High Qualification Commission of Judges is a vital body responsible for assessing the suitability of candidates for their posts and for selecting hundreds of judges across Ukraine.

With a view to extending the term of the Selection Commission, draft law No. [13382](#) of 18 June 2025 was registered in the Verkhovna Rada of Ukraine. It proposes extending the term of the previously established Selection Commission by five years from the date of appointment of the first fully-fledged composition of the High Council of Justice. The Commission, which includes international experts, is thus set to remain in post until June 2028, enabling it to participate in the renewal of the High Council of Justice.

The draft bill was submitted to the People's Deputies of Ukraine for consideration a year ago, and no significant changes have been made to it since then.



Indicator No. 4.11. Adoption of the new State Anti-Corruption Programme for 2026–2030
(Q4 2026)

Sector combating corruption and money laundering

Status: in progress

Under this indicator, the Government is to adopt and publish the State Anti-Corruption Programme for the implementation of the Anti-Corruption Strategy for the period 2026–2030. This is the logical next indicator, which can be achieved immediately following step 4.5 on the adoption of the Anti-Corruption Strategy for the period 2026–2030.

The State Anti-Corruption Programme serves as a roadmap for implementing the State Anti-Corruption Strategy and must contain a set of mandatory measures for ministries and other public authorities, with specific timeframes for implementation, which will minimise or eliminate the identified corruption risks.



Indicator No. 4.12. Entry into force of amendments to the Code of Criminal Procedure aimed at ensuring swift and high-quality justice (Q4 2026)

Sector combating corruption and money laundering

Status: in progress

Under this indicator, amendments to the Code of Criminal Procedure are to come into force with a view to ensuring swift and high-quality justice. These amendments are aimed at:

- abolishing the automatic closure of criminal cases due to the expiry of pre-trial investigation time limits and revising the current time limits;
- removing procedural obstacles in criminal proceedings, particularly in high-level corruption cases;
- ensuring that limitation periods are extended and that the grounds for their interruption or suspension are brought into line with European standards;
- extending the jurisdiction of the National Anti-Corruption Bureau of Ukraine (NABU) to cover high-risk positions, based on an existing independent assessment.

These changes are aimed at improving the effectiveness of investigations into corruption offences and ensuring that punishment is inevitable.



Indicator No. 4.13. Entry into force of the law on the reform of the State Bureau of Investigations of Ukraine
(Q4 2026)

Sector combating corruption and money laundering

Status: in progress

Entry into force of the law on the reform of the State Bureau of Investigations, taking into account the results of an independent comprehensive analysis of the SBI's activities, as and when available, which includes the following elements:

- substantial involvement of international experts, in particular to ensure the transparency and objectivity of the selection procedure for the Bureau's head on the basis of professional merit;
- a mechanism for the appraisal of senior management;
- an independent external evaluation of performance, carried out by independent experts appointed by international partners.

On 29 May, Prime Minister Yulia Svrydenko stated that the draft law on reforming the State Bureau of Investigation (SBI) should be finalised by the end of the year and submitted to the Verkhovna Rada in December.

As of July 2026, the government had not submitted the relevant draft law to parliament.



Indicator No. 4.14. Entry into force of legislation permitting civil and administrative cases to be heard by the High Anti-Corruption Court with a single judge
(Q4 2026)

Sector combating corruption and money laundering

Status: in progress

According to the terms of this indicator, amendments to the Civil Procedure Code and the Administrative Procedure Code of Ukraine, which provide for the hearing of civil and administrative cases in the High Anti-Corruption Court (HACC) by a single judge, are to come into force.

At the legislative level, there are still no amendments to the procedural codes (the Civil Procedure Code and the Code of Administrative Procedure) that would provide for the hearing of civil and administrative cases in the HACC by a single judge. The relevant amendments were discussed in Government Bill No. [14033](#), which was withdrawn following the government's resignation on 16 July 2026; however, at present, these cases are heard exclusively by a panel (comprising three first-instance judges).

The complexity of collegial hearings in such cases lies in organisational and procedural factors (difficulties in coordinating judges' schedules, the impact of human factors such as illness or leave, as well as higher financial costs for the state). Furthermore, the hearing of civil and administrative cases in the High Administrative Court of Ukraine is subject to strict procedural time limits that must be adhered to, which complicates the organisation of panel hearings for the resolution of property-related disputes.



Indicator No. 4.15. Entry into force of legislation ensuring that anti-corruption bodies have effective, impartial and timely access to high-quality forensic medical examinations

(Q4 2026)

Sector combating corruption and money laundering

Status: in progress

The purpose of this indicator is the entry into force of legislation which:

- ensures the institutional and operational independence of the Research Centre for Independent Forensic Medical Examination (RCIFME) by taking the measures necessary for the proper functioning of a supervisory body comprising members appointed in accordance with the procedure laid down by law, which, amongst other things, be responsible for appointing the head of the RCE, submitting proposals for his or her dismissal, and assessing his or her performance, as well as having the power to participate in inspections of the RCE and in disciplinary proceedings concerning RCE staff;
- ensures timely access for the National Anti-Corruption Bureau of Ukraine (NABU) to forensic medical services provided by the National Forensic Science Centre, as a rule within two months, as well as an increase in the Centre's overall operational capacity;
- expands the scope for utilising private expert services in the field of forensic science by restricting the exclusive competence of state expert institutions to a narrower list of expert examinations defined by law.

This is necessary to overcome the monopoly on expert assessments in criminal proceedings and to eliminate 'bottlenecks' in anti-corruption investigations, which directly affects the speed with which high-level corrupt officials are brought to justice.



Indicator No. 4.19. Strengthening the financial investigations system
(Q4 2026)

Sector: combating corruption and money laundering

Status: in progress

Legislation (a strategy and action plan) on financial investigations needs to be introduced, taking into account EU recommendations and international technical assistance, as well as methodological guidelines on conducting financial investigations in subordinate legislation, particularly in money laundering cases.

The action plan should provide for an audit of ongoing cases to enable the retrospective opening of financial investigations. The methodological guidelines should set out the criteria for opening financial investigations, the methods and resources for conducting them, mechanisms for data exchange (in particular with foreign jurisdictions), the use of joint investigation teams, approaches to building a case, as well as mechanisms for monitoring and evaluating effectiveness.

The aim is to increase the number of stand-alone cases and convictions for money laundering.



Indicator No. 6.10. Adoption of a roadmap for lifting the moratoria on the accrual of debts by state-owned enterprises and the gradual lifting of these moratoria (Q4 2026)

Sector management of state assets

Status: in progress

This indicator was added during the update of the Ukraine Plan to secure funding under the Ukraine Support Loan.

The aim of the indicator is to prepare and approve a roadmap for the gradual lifting of moratoriums on debt recovery from state-owned enterprises, in order to strengthen financial discipline within state-owned enterprises, reduce distortions of market competition and bring the sector closer to standards of good corporate governance.

The indicator involves the adoption of a roadmap for the gradual lifting of moratoriums on debt recovery from state-owned enterprises. This entails reducing the special protection afforded to state-owned enterprises against the enforcement of debt obligations, which should strengthen financial discipline, enhance management accountability and bring the governance of state-owned enterprises closer to market rules. Implementation is scheduled for the Q4 2026; the indicator is currently being implemented.



Indicator No. 6.11. Entry into force of amendments to the legislation on state-owned enterprises, bringing the operational autonomy and internal control systems of state-owned enterprises into line with OECD standards (Q4 2026)

Sector management of state assets

Status: in progress

This indicator was added as part of the update to Ukraine's Plan in order to secure funding under the Ukraine Support Loan mechanism.

It provides for the entry into force of amendments to legislation on state-owned enterprises, which are intended to strengthen their operational autonomy and internal controls in line with OECD standards. This should reduce direct state intervention in the management of state-owned enterprises, enhance the accountability of management bodies and bring the corporate governance of state-owned enterprises into line with international practices.



Indicator No. 6.12. Independent assessment of key corporate governance systems in selected state-owned enterprises outside the defence sector, in accordance with Cabinet of Ministers Resolution No. 1223, involving external auditors and/or consultancy firms.
(Q4 2026)

Sector management of state assets

Status: in progress

This indicator was added as part of the update to the Ukraine Plan in order to secure funding under the Ukraine Support Loan mechanism.

It provides for the conduct and publication of an independent comprehensive assessment of corporate governance systems in selected non-defence state-owned enterprises. The assessment is to cover internal control, risk management, public procurement, corporate integrity and anti-corruption mechanisms, involving external auditors or consultants in accordance with internationally recognised standards.



Indicator No. 7.21. Entry into force of legislation on occupational health and safety

(Q4 2026)

Sector management of state assets

Status: in progress

This indicator was added as part of the update to Ukraine's Plan in order to secure funding under the Ukraine Support Loan mechanism.

This indicator provides for the entry into force of legislation on occupational health and safety in accordance with the principles of the EU Framework Directive on Occupational Health and Safety. The expected changes are intended to improve the protection of workers' lives and health, strengthen employers' responsibility for safe working conditions and, at the same time, simplify regulation in this area.



Indicator No. 8.11. Strengthening the institutional capacity of the Bureau of Economic Security
(Q4 2026)

Sector: business environment

Status: in progress

Legislation needs to be introduced (the law has come into force) to further strengthen the institutional capacity of the Bureau of Economic Security of Ukraine (BES) to effectively combat economic crime, in particular by:

- establishing regional offices of the BES;
- ensuring the BES has access to key information systems, registers and databases through electronic data exchange;
- strengthening the institutional capacity, in particular the staffing capacity, of the BES, applying a gender-sensitive approach and ensuring that BES staff participate in specialised training on best practices for detecting, preventing and investigating criminal offences.



Indicator No. 10.6. Adoption of legislation to amend the tax regime for participants in the electricity market

(Q4 2026)

Sector: energy

Status: in progress

This indicator provides for the adoption of legislation to amend the indirect taxation regime for electricity market participants, which is necessary for the integration of the 'day-ahead' and intraday markets with similar markets in neighbouring countries, as well as for electricity import and export operations.

The list of amendments to the Tax and Customs Codes will be finalised following the adoption of the framework law on the transposition of the electricity integration package (see indicator 10.5). In accordance with the final and transitional provisions of Law No. 4834-IX, the Cabinet of Ministers of Ukraine must, within 12 months of the law coming into force, ensure the adoption and alignment of the necessary regulatory acts.

In turn, on June 9, the NEURC [adopted](#) amendments to the Electricity Market Rules aimed at strengthening financial discipline, increasing the transparency of market operations and improving the mechanisms for interaction between market participants and the transmission system operator. The amendments also strengthen the protection of balancing market participants and improve the mechanisms for settlements and monitoring of the fulfilment of contractual obligations.



Indicator No. 10.18. Entry into force of secondary legislation on electricity market integration in accordance with the Energy Community acquis

(Q4 2026)

Sector: energy

Status: in progress

This indicator provides for the drafting, adoption and entry into force of subordinate legislation necessary for the implementation of Law of Ukraine No. 4834-IX and the further integration of the Ukrainian electricity market into the European energy area. These acts are intended to ensure the alignment of national legislation with the five network codes and the European Union's guiding principles in the field of electricity, namely:

- rules for the allocation of long-term cross-border transmission capacity (Commission Regulation (EU) 2016/1719);
- the rules on capacity allocation and congestion management at cross-border interconnectors (Commission Regulation (EU) 2015/1222);
- rules on system balancing (Commission Regulation (EU) 2017/2195);
- Rules on the operation of the electricity transmission system (Commission Regulation (EU) 2017/1485);
- the network code on the restoration of the electricity system following emergencies and blackouts (Commission Regulation (EU) 2017/2196).

In accordance with Law of Ukraine No. 4834-IX, the NEURC [has commenced](#) the development of a package of subordinate legislation necessary for the implementation of the European network codes and the integration of the Ukrainian electricity market into the EU internal market, in particular, [it approved](#) an Action Plan for the timely drafting and adoption of secondary legislation required to implement the provisions of the Act. At the same time, the market operator amended the rules governing the operation of organised market segments, as required for the further implementation of the market coupling mechanism in accordance with the requirements of the legislation.

On July 10, the NEURC [held](#) the first meeting of the Advisory Body for the practical and timely implementation of Law No. 4834-IX. Working groups within the Advisory Body will prepare proposals for draft regulatory acts necessary for the implementation of the Act, as well as recommendations on the transposition of European Union and Energy Community legislation in the field of electricity.



Indicator No. 10.20. Completion of the NEURC's independent external audit of the integrity and reliability of its financial processes and decision-making

(Q4 2026)

Sector: energy

Status: in progress

This indicator provides for the conduct and completion of an independent external audit of the activities of the National Commission for State Regulation of Energy and Public Utilities (NEURC), with the aim of comprehensively assessing its institutional capacity, governance mechanisms, transparency and integrity of operations.

The audit is to cover an assessment of:

- regulatory decision-making processes, in particular internal procedures for approval, documentation, traceability and mechanisms to ensure the transparency and integrity of the Commission's decisions;
- ethical practices, including mechanisms for preventing conflicts of interest, the declaration of interests, recusal procedures and accountability of Commission members, management and staff;
- the anti-corruption programme and internal compliance mechanisms, identifying institutional vulnerabilities and risks to the integrity of the regulator's activities;
- the NEURC's communication policy, in particular its interaction with regulators of the European Union and the Energy Community, market participants and other public authorities, as well as mechanisms to ensure transparency, consistency and equal treatment of all stakeholders;
- the financial aspects of the Commission's activities, including budgeting, procurement, internal control and reporting processes.

Fulfilment of this indicator follows the preparation of the Terms of Reference (ToR) for an independent external audit of the NEURC (indicator No. 10.20), which is scheduled for completion by the end of June 2026.



Indicator No. 11.8 **Entry into force of the law on the rail transport market, with its provisions to be implemented in stages**
(Q4 2026)

Sector: transport

Status: in progress

The law was originally due to be adopted in the Q4 2025, but the deadline has been postponed.

The adoption of the law on the rail transport market is a key requirement of the Association Agreement and the 'Transport Policy' chapter of the negotiations; without it, full access to the Single European Railway Area cannot be achieved. The law is intended to implement Directive 2012/34/EU (Single European Railway Area) and Regulation 1370/2007 (PSO), i.e. to transition from a 'ministerial-monopoly' model to a competitive market with public service contracts. The law will enable the functional separation of infrastructure and operators, establish an independent regulator and licensing authority, introduce non-discriminatory access to infrastructure and transparent infrastructure charges, as well as a proper system of PSO contracts for passenger transport.

The establishment of an independent regulatory body and licensing authority could, in theory, be achieved within 1–2 years, but what is critical is genuine independence, powers regarding access to information, and the ability to challenge discriminatory decisions by Ukrainian Railways or the ministry. The licensing of operators can be launched relatively quickly, as this is more of a technical and legal task. The most difficult element here is the creation of a genuinely competitive market, as this affects the interests of Ukrainian Railways, major shippers and local authorities.

It is entirely possible for the Law of Ukraine 'On the Rail Transport Market' to come into force by the end of 2026, provided there is the political will among MPs. Further delays in passing this law would be unwise. A timeframe of 3–5 years for the full launch of the market in line with EU standards seems very tight, but it is also achievable. And, once again, this is provided there is political will, a strong team within the government and Ukrainian Railways, and alignment with the requirements of the EU and the IMF.



Indicator No. 14.5 Introduction of electronic certificates in the EU format on the 'Diya' platform
(Q4 2026)

Sector digital transformation

Status: in progress

The indicator will be considered achieved if the technical specifications of the 'Diya' portal's mobile app enable the use of electronic certification of Ukrainian citizens' attributes in the data format specified for the EU Digital Identity Wallet.

The EU Digital Identity Wallet (EUDI) is a government mobile app that enables EU citizens, residents and businesses to store and exchange digital documents, verify their identity to access public and private services, and create legally binding electronic signatures across all Member States of the European Union.

Each EU Member State must provide at least one digital solution for such a wallet by the end of 2026.

In [February 2025](#), the Diia team, in collaboration with the Ministry of Digital Transformation, successfully tested their compatibility with European digital wallets in accordance with the eIDAS 2.0 Regulation — the single digital standard for EU countries.

Digital wallets will provide a secure, reliable and confidential means of digital identification.



Indicator No. 15.7. Adoption of a Law of Ukraine to reduce deforestation and forest degradation (1/2)

(Q4 2026)

Sector green transition and environmental protection

Status: completed (conditionally)

To fulfil this indicator, a law must come into force to regulate the verification of the sustainable origin of timber and other goods associated with the risk of deforestation and forest degradation. The legislation must provide for the establishment of a transparent system for tracking and monitoring the movement of timber through the expansion of electronic record-keeping, the introduction of certification for all timber products, and the establishment of requirements for verifying their origin during trade.

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

- an electronic felling permit – a transparent authorisation system for timber felling, including the geolocation coordinates of felling sites;
- e-waybill with photographic evidence – a tool for tracking timber transport and preventing illegal operations;
- an e-certificate – confirming the origin of timber for export operations;
- transparent electronic auctions – all unprocessed timber is sold through open auctions, which promotes fair competition and eliminates shadow schemes.

In addition, the State Forestry Agency plans to:

- to implement the EUDR requirements into national legislation;
- expanding the functionality of the EOD system, and automating the entry of geolocation data into felling permits and other documents;
- regularly verifying the EOD system and continuing cooperation with international partners;
- running information campaigns and training sessions for forestry enterprises and business representatives.

On March 17, 2025, the Ministry of Environment [held](#) a meeting with representatives of the FAO regarding forestry sector reform and Ukraine's preparations for the implementation of the EU's EUDR Regulation on preventing deforestation. It was agreed to set up a working group to draft a new Forest Code, which is intended to ensure transparent forest management, strengthen oversight and harmonise legislation with EU standards.

On November 27, 2025, Viktor Smal, head of the State Forestry Agency, [announced](#) that the European Parliament had supported a one-year postponement of the EUDR's implementation, giving Ukrainian exporters additional time to prepare traceability systems and documentary evidence of timber origin.



Indicator No. 15.7. Adoption of a law of Ukraine to reduce deforestation and forest degradation (2/2)

(Q4 2026)

Sector green transition and environmental protection

Status: completed (conditionally)

On November 28, the Cabinet of Ministers of Ukraine approved a [resolution](#) setting out the procedure for implementing a pilot project to transpose European Union legislation on the prevention of deforestation and forest degradation in relation to exported timber products. It is reported that the pilot project will run for two years, after which the Ministry of Economy will prepare a report and proposals to improve legislation for the full implementation of EU requirements.

On January 6, 2026, the State Forestry Agency [identified](#) 2026 as a key preparatory stage ahead of the launch of the EUDR requirements in 2027, with a focus on the digitalisation of timber accounting, the launch of the exporter's portal, the preparation of a draft law and the completion of reforms to ensure compliance with EU standards.

On March 6, in a public report, the head of the State Forestry Agency, Viktor Smal, [noted](#) that, for the first time, Ukraine had been granted 'low-risk country' status by the EU under the EUDR Regulation, and that the State Forestry Agency had been recognised as one of the best-prepared organisations for implementing the EUDR Regulation. On April 24, the State Forestry Agency [announced](#) the establishment of the 'Forest Friends for Ukraine' working group to support forests and the forestry sector in responding to a range of challenges: full-scale war, rapid climate change and the implementation of reforms for EU membership.

On May 20, 2026, the Cabinet of Ministers of Ukraine [adopted](#) Resolution No. 646 on the launch of a pilot project to implement the requirements of the EU acquis in the field of preventing deforestation and forest degradation for agricultural products exported to the EU. The document provides for the creation of an electronic system for verifying the origin of agricultural produce via the 'State Agricultural Register' and its geoinformation subsystem to confirm that the produce was grown on land that has not been subject to deforestation since 31 December 2020. We therefore consider the indicator to be provisionally met following the approval of the relevant pilot resolution, which will remain in force until a full-fledged law is adopted.

Furthermore, on June 25, a draft law "On the circulation of goods linked to deforestation and/or forest degradation" [was registered](#) with the Verkhovna Rada; its aim is to combat deforestation and forest degradation by expanding the use of electronic timber accounting.



Indicator No. 9.3. Improved distribution of powers between local government bodies and executive authorities
(Q1 2027, revised from the Q1 2026)

Sector: decentralisation and regional policy

Status: in progress

Legislation is to come into force to ensure a better distribution of powers between local self-government bodies and executive authorities.

Legislation on the division of powers between local authorities and executive bodies will come into force within 12 months of 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 authorities and executive bodies based on the principles of subsidiarity and decentralisation, will help to resolve conflicts of competence between the various levels of central, regional, district and local government, as well as within local self-government bodies, and will contribute to the provision of high-quality public services at local level and the effective use of budgetary funds.

In Ukraine's updated plan, the deadline for achieving this indicator has been postponed by one year — it is now to be achieved by the Q1 2027. The indicator is therefore currently in the process of being implemented.

[The relevant draft law No. 14412](#) “On the Principles of Delimitation and Distribution of Powers between Levels of Public Administration” was approved in principle on 7 April 2026.



Indicator No. 11.5. Entry into force of legislation on merchant shipping and inland waterway navigation (Q1 2027, revised from Q4 2026)

Sector: Transport

Status: in progress

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

The Law of Ukraine will focus on the following key areas:

- defining and regulating the principles for ensuring the safety of navigation in territorial waters, inland waters, seaports, and inland waterways;
- improving the mechanism for implementing the international regime for the security of ships and seaports;
- defining a detailed mechanism for inspecting ships in seaports;
- revising the functions of the central executive authority responsible for implementing state policy in the areas of maritime and inland waterway transport and navigation in the Merchant Shipping Code, the Laws of Ukraine “On Transport,” “On Inland Waterway Transport,” and “On Seaports of Ukraine” to eliminate duplication of legislative provisions and clarify the division of authority, particularly with the central executive body responsible for formulating and implementing state policy in the fields of maritime and inland waterway transport;
- simplifying administrative procedures, establishing a clear list of powers for state bodies, and removing administrative barriers.

In late December 2025, the Cabinet of Ministers approved [Draft Law](#) No. 14344 “On Amendments to Certain Legislative Acts of Ukraine Concerning Merchant Shipping and Navigation on Inland Waterways,” which will enable the launch of a large-scale reform of the public administration system in the field of maritime and inland waterway transport.

[The conclusion](#) of the Verkhovna Rada Committee on EU Integration states that the draft law does not contradict the Association Agreement or Ukraine’s international legal obligations; however, it requires terminological refinement to more fully reflect Directive 2009/21/EU of the European Parliament and of the Council.

Following the resignation of the government on 16 July 2026, draft law No. 14344 was withdrawn from consideration.



Indicator No. 12.2 Establishment of the Farm Sustainability Data Network (FSDN)
(Q1 2027)

Sector: agri-food sector

Status: in progress

It is envisaged that a Farm Sustainability Data Network (FSDN) system, harmonised with the EU, will be established.

The system will enable the monitoring of the situation in the agricultural sector and the making of informed decisions regarding the allocation of state support to agricultural producers.

This step is necessary for Ukraine to gradually transition to a more evidence-based agricultural policy, compatible with EU approaches. The FSDN is intended to provide the state with systematic data on the state of farms and their economic, social and environmental sustainability. This will enable a better assessment of the agricultural sector's needs, the targeted allocation of state support, monitoring of its effectiveness, and preparation of Ukraine for future integration into the EU's Common Agricultural Policy. Work has been underway since 2024 to implement it at the pilot stage. In 2026, FADN/FSDN surveys are being conducted in three regions of Ukraine: Lviv, Zhytomyr and Poltava.



Indicator No. 4.10 Launch of the bank account register
(Q2 2027)

Sector: combating corruption and money laundering

Status: in progress

The aim of this reform is to further align Ukraine's legal framework with the EU acquis and FATF standards, as well as to establish an effective anti-money laundering system in Ukraine to combat economic crime more effectively and improve the overall business climate in Ukraine.

The necessary software and hardware must be put into operation to enable the functioning of the register of bank accounts held by natural persons and individual bank safety deposit boxes, as well as the register of bank accounts held by legal entities. In April, [draft law No. 14327-1](#), which, amongst other provisions, provides for the launch of the register, was recommended for approval at first reading. However, the Verkhovna Rada has not yet considered the draft law.



Indicator No. 4.17 Launch of the register of ultimate beneficial owners of trusts

(Q2 2027)

Sector: combating corruption and money laundering

Status: in progress

The aim of this reform is to further align Ukraine's legal framework with the EU acquis and FATF standards, as well as to establish an effective anti-money laundering system in Ukraine to combat economic crime more effectively and improve the overall business climate in Ukraine.

It is necessary to ensure the operation of the software and hardware system for the register of ultimate beneficial owners of trusts and other similar legal entities, and to ensure that authorised bodies have access to it. In April, [draft law No. 14327-1](#), which, amongst other provisions, provides for the launch of the register, was recommended for approval at first reading. However, the Verkhovna Rada has not yet considered the draft law.



Indicator No. 7.3. Legislative amendments have been adopted to improve the rehabilitation system for people with disabilities
(Q2 2027)

Sector human capital

Status: in progress

This indicator stipulates that amendments to the Law of Ukraine 'On the Rehabilitation of Persons with Disabilities in Ukraine' are to come into force.

The Act focuses on the following key areas:

- the application of the International Classification of Functioning, Disability and Health to measure functioning.
- the introduction of an electronic system containing information on a person's needs and automatically offering services in line with those identified needs (social, medical and others)

These changes are important given the large number of people with disabilities who currently lack access to the means of meeting these needs. Furthermore, rehabilitation will also help to integrate such individuals, particularly veterans, into social life and the labour market.



Indicator No. 7.4 Entry into force of legislation on the transition system for implementing the transition from military service to civilian life

(Q2 2027 — postponed from Q3 2026 — postponed from Q3 2025)

Sector: human capital

Status: in progress

The Law of Ukraine on amendments to certain legislative acts of Ukraine regarding the implementation of a system for the transition from military service to civilian life is to come into force, and resolutions of the Cabinet of Ministers approving the procedures and conditions for participants in the transition system to receive services are to be adopted. These acts should focus on ensuring the provision of:

- rehabilitation and medical care, in particular psychological support;
- training, retraining and further training programmes;
- the necessary conditions for the employment of veterans as a distinct category;
- measures to support veteran-run businesses.

The deadline for achieving this indicator has been postponed to the Q3 2026. As of January 2026, the most significant progress was the presentation in November 2025 of the White Paper and the draft bill 'On the system of transition from service in the security and defence sector to civilian life'.

At the same time, it is possible that a resolution of the Cabinet of Ministers will be adopted instead of a law.



Indicator No. 7.9. Amendments to the Law ‘On the Social Housing Stock’ have come into force
(Q2 2027)

Sector: human capital

Status: in progress

This indicator stipulates that amendments to the Law “On the Social Housing Fund” must come into force, or that a new version of this law must come into force.

The need for amendments to this Act or for a new version stems from the adoption in January 2026 of the Act on the Basic Principles of Housing Policy, which alters the regulatory framework for social housing.

Thus, amendments to this Act or its new version should provide for the following:

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



Indicator No. 10.12. Lifting the moratorium on increasing tariffs for heat and hot water
(Q2 2027, postponed from Q4 2026)

Sector: energy

Status: in progress

This indicator provides for the lifting of the moratorium introduced by Law of Ukraine [No. 2479-IX](#) of 27 July 2023 'On the Specifics of Regulating Relations in the Natural Gas Market and in the Heating Sector during Martial Law and the Subsequent Restoration of Their Functioning', with the aim of achieving economically justified tariffs for heating and hot water. Under the Act, the moratorium on tariff increases remains in force until the end of martial law and for a further six months thereafter.

On June 4, 2024, the Verkhovna Rada lifted the moratorium on increases to gas distribution tariffs for non-domestic consumers (enterprises, state-funded organisations, heat supply organisations, and public utility facilities). Consequently, following the adoption of the law, the moratorium remained in place only for domestic consumers.

In turn, [according to](#) the NBU's Inflation Report of April 2025, tariffs for gas, heating and hot water are unlikely to change this year. At the same time, from 2026, they are expected to gradually converge towards economically justified levels. Uncertainty regarding the timing and scale of tariff increases poses risks to the inflation forecast: postponing decisions will reduce inflation but worsen the financial position of energy companies. Conversely, a rapid rise in tariffs could exacerbate inflation and increase the need for subsidies.

On August 18, the Cabinet of Ministers presented a draft Government Action Programme. The document [provides for](#) the resolution of issues concerning the setting and application of tariffs for centralised water supply and centralised wastewater disposal services through amendments to CMU Resolution No. 502 of April 29, 2022 (October 2025) and the Procedure for Setting Tariffs (November 2025), the settlement of accounts payable by heat, water supply and wastewater disposal companies through the preparation of a draft law and amendments to CMU Resolution No. 812 of 19 July 2022 (October 2025), defining a mechanism for restructuring natural gas debt that is independent of the amount of debt arising from tariff differentials (by December 31, 2025).

On August 8, the Cabinet of Ministers [approved](#) amendments to Ukraine's Plan, which provide for the deadline for this indicator to be postponed to Q4 2026.



Indicator No. 11.6 Ensuring full compliance with the provisions of the Port

Services Regulation

(Q2 2027, carried over from the Q1 2027)

Sector: transport

Status: in progress

In accordance with this indicator, Ukraine must review and amend its national legislation (secondary legislation) to bring it fully into line with the requirements of Regulation (EU) 2017/352 of the European Parliament and of the Council of 15 February 2017, establishing requirements for market access to port services and common rules on financial transparency of ports.

These changes require amendments to subordinate legislation. It is envisaged that the Ministry of Community and Territorial Development will approve the procedure for the provision of towage services in seaports and on navigable waterways in Ukraine, the rules for maritime pilotage, and will also amend the rules governing the provision of services in seaports.

Currently, tariffs for pilotage services and port charges are set administratively, without any established methodology. However, as revenue from port charges is used to replenish the state budget through deductions from the profits of the Ukrainian Sea Ports Authority in the form of dividends, the drafting of the relevant regulations will require consultation with the Ministry of Finance.



Indicator No. 3.11 New IT solutions have been implemented in the judicial system
(Q3 2027)

Sector: Judicial system and human rights

Status: in progress

To meet this indicator, it is necessary to implement the electronic document management subsystems of the Unified Judicial Information and Communication System in 15 pilot courts of general, commercial, and administrative jurisdiction at the first-instance and appellate levels.

The electronic transfer of case materials between courts of first and appellate instance takes only a few minutes. This completely eliminates the months-long delays associated with the physical delivery and mailing of paper case files.

In turn, parties to the proceedings have round-the-clock access to their case materials via the “Electronic Office” from anywhere in the world. This prevents the accidental loss or tampering of documents from paper files.



Indicator No. 6.5 Improving the governance and management of state-owned enterprises
(Q3 2027)

Sector: management of state assets

Status: in progress

It is necessary to ensure the preparation and submission to the European Commission of the first annual report on the financial and operational performance of state-owned enterprises, confirming due compliance with corporate governance principles. The report must also include an assessment of the independence of decision-making by supervisory boards, in particular for at least the 15 largest state-owned enterprises, including an assessment of whether decisions on strategic issues and the appointment of senior management require de facto approval by the Government.

Prior to the assessment, it is necessary to ensure the implementation of and compliance with the following corporate governance principles:

- clearly define the powers of the Cabinet of Ministers of Ukraine, the Ministry of Finance and the Ministry of Economy, and strengthen parliamentary oversight;
- clearly define the mandate and scope of responsibility of the consolidated bodies managing state-owned enterprises in accordance with the State Property Policy;
- integrate the principles of public finance management into the articles of association of the largest state-owned enterprises (and, where necessary, the consolidated management bodies);
- bring the articles of association of the largest state-owned enterprises into line with the principles of corporate governance reform, in particular to ensure the independence of supervisory boards when taking decisions.



Indicator No. 6.8. Report on the results of an independent audit confirming the separation of activities relating to the performance of special duties from activities not relating to the performance of special duties
(Q3 2027)

Sector management of state assets

Status: in progress

By the end of the Q2 2027, Ukraine must ensure the preparation and submission of an independent audit report on the separation of accounts in key state-owned companies entrusted with special obligations (PSO). The audit must be carried out by an internationally recognised audit firm and confirm the separation of activities related to the fulfilment of PSOs from commercial activities. The report must cover an assessment of the implementation of the separation of accounts, compliance with market rules and the avoidance of cross-subsidisation, the definition of the scope and nature of special obligations, as well as an analysis of costs, financial flows and liabilities arising from the fulfilment of special obligations.

Fulfilment of this indicator is critical for enhancing the transparency of state asset management and for a gradual transition to a market-based model of operation for state-owned companies in line with EU standards.



Indicator No. 7.13. Investment in education
(Q3 2027)

Sector: human capital

Status: in progress

Investment in education is one of the investment indicators set out in the Ukraine Facility.

This involves channelling funds to improve access to safe and high-quality education, including pre-school education in accordance with the new legislation on pre-school education, in particular:

- shelter and safe conditions in educational establishments;
- school buses;
- materials and equipment for educational establishments, modern teaching methods, including through digitalisation;
- high-quality meals;
- the establishment of workshops and laboratories in educational institutions, and improving the energy efficiency of educational buildings.

It was originally envisaged that the equivalent of 650 million euros would be spent on these objectives in 2026 and 2027.

At least 5 per cent of these investments, in accordance with the 'Decentralisation' section, must be channelled to the sub-national level.



Indicator No. 7.15. Investment in healthcare
(Q3 2027)

Sector: human capital

Status: in progress

Investment in healthcare is another of the investment indicators set out in the Ukraine Facility.

This involves channelling funds towards strengthening the healthcare sector, specifically:

- laboratory equipment for microbiological, chemical and physical analysis;
- shelter and security measures 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 healthcare services.

It was originally envisaged that the equivalent of 400 million euros would be spent on these objectives in 2026 and 2027.

At least 20 per cent of these investments, in accordance with the 'Decentralisation' section, are to be channelled to the sub-national level.



Indicator No. 7.16 Investment in social infrastructure
(Q3 2027)

Sector: human capital

Status: in progress

Under this indicator, budgetary funding of at least €350 million (in hryvnia equivalent) must be secured for the rehabilitation, construction (new construction, reconstruction, major repairs, restoration) of damaged or destroyed social infrastructure in 2026 and 2027.

The Government's report (or the Treasury's report) must demonstrate that, in the state budgets for 2026 and 2027, the Government has allocated at least €350 million (in hryvnia equivalent) for the restoration, construction (new construction, reconstruction, major repairs, restoration) of damaged or destroyed social infrastructure, with the aim of addressing the social, economic and environmental consequences caused by the Russian Federation's armed aggression against Ukraine, particularly at regional level.

The state budget for 2026 includes €127 million (equivalent) in relevant expenditure. The indicator is in the process of being implemented.



Indicator No. 7.17 Investments in compensation for damaged or destroyed housing
(Q3 2027)

Sector: Human Capital

Status: in progress

Under this indicator, compensation is to be provided to individuals whose housing was damaged or destroyed as a result of military operations, terrorist acts, or acts of sabotage caused by the military aggression of the Russian Federation, based on verified data from the State Register of Property Damaged and Destroyed as a Result of Military Actions, Terrorist Acts, and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine.

The Government's report (or the Treasury's report) must demonstrate that, in the state budgets for 2026 and 2027, the Government has allocated at least 600 m euros (in hryvnia equivalent) to compensate individuals whose homes have been damaged or destroyed.



Indicator No. 7.19 Investment in housing provision for vulnerable groups
(Q3 2027)

Sector: human capital

Status: in progress

Under this indicator, budgetary funding of at least 450 million euros (in hryvnia equivalent) must be secured to provide housing for veterans with Group I–II disabilities, family members of fallen defenders and internally displaced persons in 2024, 2025, 2026 and 2027.

The Government's report (or the Treasury's report) must demonstrate that, in the state budgets for 2024, 2025, 2026 and 2027, the Government has allocated at least €450 million (in hryvnia equivalent) to provide housing for:

- persons with disabilities in categories I–II who defended Ukraine's independence, sovereignty and territorial integrity;
- family members of fallen defenders;
- internally displaced persons who defended Ukraine's independence, sovereignty and territorial integrity, and their family members.

In 2024, €96 million (equivalent) was spent on the relevant expenditure programme, and in 2025, €138 million.



Indicator No. 8.6 Entry into force of new public procurement legislation
(Q3 2027)

Sector: business

Status: in progress

The Ukraine Plan provides for the need to amend the law on public procurement to improve the regulatory framework, procurement procedures and practices, enhance competition, combat corruption in the procurement sector, strengthen the competencies and professional qualifications of procurement organisations, integrating sustainable development criteria, and, perhaps most importantly, bringing Ukraine's procurement system, procedures and practices more closely into line with those of the EU.

Following almost two years of preparation, on 27 May 2026, parliament passed Bill [No. 11520](#) at its second reading. It has not yet been signed by the President.

According to TI Ukraine's assessment, the draft law does not fully comply with all EU procedures and practices. At the same time, there is a possibility that the European Commission will consider this bill, once signed, as a fulfilled indicator, which would mean that Ukraine could receive a tranche for it as early as 2026.



Indicator No. 8.9 Resolving the issue of overdue payments
(Q3 2027)

Sector business environment

Status: in progress

The aim of this reform is to ensure that late payments do not hinder the conduct of business activities.

The reform consists of a single phase. It involves the entry into force of legislative amendments in line with the principles of Directive 2011/7/EU of the European Parliament and of the Council of 16 February 2011 on combating late payment in commercial transactions (recast).

The reform is expected to be fully implemented by the Q4 2027.



Indicator No. 8.10 Investment in financial support for micro, small and medium-sized enterprises
(Q3 2027)

Sector: business environment

Status: in progress

Under this indicator, budgetary funding of at least €450 million (in hryvnia equivalent at current prices) must be secured to improve access to financial support for micro-enterprises, SMEs, small and medium-sized farms, and, in particular, small and medium-sized processing enterprises in 2024, 2025, 2026 and 2027. Support may include both corporate lending and grants, which must be provided on the basis of transparent criteria.

The Government's report (or the Treasury's report) must demonstrate that the Government has allocated at least €450 million (in hryvnia equivalent at current prices) in the state budgets for 2024, 2025, 2026 and 2027 to implement the aforementioned support measures. It is expected that the investment will be completed by the Q4 2027.



Indicator No. 9.8 Investment in the restoration, reconstruction and modernisation of local authorities in Ukraine
(Q3 2027)

Sector decentralisation and regional policy

Status: in progress

As part of the implementation of this indicator, non-repayable financial support is to be allocated under Component I of the Ukraine Facility to cover the needs for the restoration, reconstruction and modernisation of Ukraine's regional authorities, in particular local self-government bodies.

To this end, a report must be prepared demonstrating that at least 20 per cent of the non-repayable financial support has been received under Component I of the Ukraine Facility.



Indicator No. 10.17. Investment of at least €550 million in strengthening Ukraine's energy infrastructure (Q3 2027)

Sector: energy

Status: in progress

By the end of Q4 2027, Ukraine must ensure that at least €550 million is allocated in the state budgets for 2026–2027 to strengthen energy infrastructure. A relevant government or treasury report must confirm that the funding is directed towards key areas: the modernisation of district heating systems, support for the Energy Efficiency Fund, the thermal modernisation of public sector buildings, the physical protection of energy infrastructure, and the development of renewable energy and highly flexible generation capacity. Part of the funding should also be channelled to the regional level as part of the decentralisation policy.

Implementing this measure is critically important for enhancing the resilience of Ukraine's power system during the war and during post-war recovery. Investment in energy efficiency and infrastructure modernisation will help reduce energy losses, improve the reliability of heat supply and ease the burden on the state budget in the long term. At the same time, supporting the development of renewable energy sources, flexible generation capacity and the physical protection of energy facilities is a key prerequisite for strengthening Ukraine's energy security, integrating into the EU energy market and fulfilling climate and European integration commitments.



Indicator No. 11.4 Adoption of subordinate legislation to implement Ukraine's railway transport legislation (Q3 2027)

Sector: transport

Status: in progress

The Ministry of Community and Territorial Development of Ukraine is to draft, and the Government is to adopt, a series of subordinate regulatory acts to implement the Law of Ukraine 'On Railway Transport in Ukraine' in order to introduce mechanisms for the functioning of the rail transport market, in particular regarding:

- equal access to infrastructure;
- licensing of carriers;
- safety management systems;
- the procedure for organising public service obligations (PSO) for passenger transport.

The issues of carrier licensing and the safety management system are enshrined in Law No. 4904 "On the Safety and Interoperability of Rail Transport in Ukraine", which was adopted on 9 June 2026.

The National Adaptation Programme stipulates that the law on the railway transport market must be adopted by December 2026. By the end of 2027, the Rules on Equal Access to Railway Transport Infrastructure and the Licensing Conditions for the Conduct of Business Activities by Railway Carriers must be drawn up. The implementation of functional separation between the infrastructure manager and railway operators, the independence of the infrastructure manager, and the licensing of railway operators are scheduled to be completed by the end of 2029. The procedures for setting tariffs for access to railway infrastructure, for approving and implementing the consolidated train timetable, for drafting and publishing the Network Statement, and for bringing into force the provisions of the Law of Ukraine 'On the Railway Transport Market' that liberalise the railway transport market are scheduled to be completed by the end of 2031.



Indicator No. 11.7: Invest at least 350 m euros in transportation infrastructure
(Q3 2027)

Sector: transport

Status: in progress

To meet this indicator, the Government must allocate at least 350 m euros (in hryvnia equivalent) during 2026–2027 for the construction, reconstruction, restoration, modernization, and refurbishment of damaged and destroyed transport infrastructure facilities in accordance with Ukraine's National Transport Strategy for the period up to 2030, a portion of which will be directed to the regional level (as part of the "Decentralization" section's step to allocate 20% to the subnational level), specifically in the following sectors:

- rail transport (in accordance with Ukraine's new legislation on rail transport);
- maritime and inland waterway navigation (in accordance with the new legislation on merchant shipping and navigation on inland waterways);
- road infrastructure;
- aviation;
- border crossing points (in accordance with the Strategy for the Development and Expansion of Border Infrastructure with European Union Member States and the Republic of Moldova through 2030).

The relevant investments should be reflected in a report by the Government or the Treasury.



Indicator No. 12.10 Investment of at least €150 million in the demining of agricultural land (Q3 2027)

Sector: agri-food sector

Status: in progress

The aim of this investment is to support owners or users of agricultural land who are carrying out demining activities.

The investment comprises two phases. The first phase involves budgetary funding of at least €30 million (in hryvnia equivalent at current prices) to compensate owners or users of agricultural land for the costs of demining in 2024–2025. The second phase involves budgetary funding of at least €100 million (in hryvnia equivalent at current prices) to compensate owners or users of agricultural land for the costs of demining in 2024–2027.

The Government's report (or the Treasury's report) must demonstrate that, in the state budgets for 2024–2025, the Government has allocated at least €30 million (in hryvnia equivalent at current prices) to compensate for demining costs, and in the state budgets for 2024–2027 — at least €100 million (in hryvnia equivalent at current prices) to implement the specified support measures. The investment is expected to be completed by the Q4 2027.

Annex 3

***Detailed status of
compliance with the
conditions for receiving
macro-financial
assistance under the
Ukraine Support Loan***





Condition No. 1.1: **Submit a law to Parliament to repeal tax exemptions for imported parcels** (condition for the first tranche)

Component: Domestic revenue mobilisation

Status: completed

The Cabinet of Ministers of Ukraine was to submit a draft law to the Verkhovna Rada of Ukraine that would include provisions to consider abolishing the tax-free limit of 150 euros on international parcels. This condition is closely linked to a structural benchmark for receiving funding from the IMF and to commitments to the EU regarding customs policy and revenue mobilization.

To fulfill this condition, amendments were introduced to law No. 12360—which established key performance indicators for customs authorities—providing for the imposition of VAT on low-value international postal shipments.

An attempt to repeal the exemption took place on May 26, when the Verkhovna Rada rejected law [No. 12360](#) on amendments to the Customs Code regarding key performance indicators for the State Customs Service.

Following the rejection of this bill, the Cabinet of Ministers of Ukraine is expected to submit a new law to abolish the value-added tax (VAT) exemption on parcels valued at up to EUR150.

At the same time, fulfillment of this condition was assessed positively for [receiving the first tranche](#) of macro-financial assistance under the Ukraine Support Loan.



Condition No. 1.2: To submit to Parliament a bill introducing taxation of income received via digital platforms (a condition for the first tranche)

Component: mobilisation of domestic revenue

Status: completed

All that was required was to submit a draft law to the Verkhovna Rada on the introduction of taxation of income received via digital platforms.

Such [a bill](#) was submitted back in April to fulfil IMF Structural Benchmark No. 3, so Condition No. 1.2 for the USL has also been fulfilled.



Condition No. 1.3: To pass a law extending the military levy at a rate of 5 per cent for a further three years (a condition for the first tranche)

Component: mobilisation of domestic revenue

Status: completed

It was necessary to pass a law extending the military levy (military tax) at a rate of 5 per cent for a further three years, which would generate at least 140 billion UAH in additional revenue per year.

This law ([No. 4835-IX of 7 April 2026](#)) was passed back in April to fulfil IMF Structural Benchmark No. 3, so condition No. 1.3 for the USL has also been met.



Condition No. 1.4: The Government's adoption of a resolution approving the Procedure for the development, monitoring, and evaluation of the results of strategy implementation, which serves as the basis for formulating proposals for public investment, together with a corresponding action plan
(condition for the first tranche)

Component: Sustainability and Quality of Public Expenditures

Status: completed

On March 25, 2026, the Government approved the Procedure for the Development, Monitoring, and Evaluation of the Results of Strategy Implementation, which serves as the basis for formulating proposals for public investments (hereinafter referred to as the "Procedure"). This decision marked an important benchmark in the reform of public investment management and is aimed at improving the quality of strategic planning, aligning government priorities with resources, and enhancing the effectiveness of investment decisions. The new Procedure establishes uniform requirements for the content of strategies. Specifically, they must clearly define strategic goals, objectives, measurable outcome indicators, an operational implementation plan, approaches to monitoring and evaluation, as well as a projected assessment of the financial needs for implementing the strategy.

Separately, the document standardizes reporting formats and monitoring approaches. This is necessary to ensure that strategies are not merely declarations of intent, but working documents that can be used to track progress, adjust actions, and evaluate results.



Condition No. 1.5: Adopt and publish the public financial management Strategy and the Action Plan for its implementation (condition for the first tranche)

Component: public finance management systems

Status: completed

Work on the document began in accordance with the Roadmap for Public Administration Reform. It was approved by a government decree back in May 2025 to support the negotiation process for Ukraine's accession to the EU (within Cluster 1, "Foundations").

Foreign experts were involved in preparing the draft. The Ministry of Finance received expert support from analysts of the EU4PFM program (EU Program for public financial management in Ukraine).

In early December 2025, the Ministry of Finance released the draft Strategy for public discussion. The document was reviewed by expert circles, representatives of local self-government bodies, and business associations.

After reviewing the comments and conducting consultations, the final version was agreed upon with the relevant ministries and agencies. The draft was submitted to the Cabinet of Ministers for consideration, culminating in its official adoption in late February 2026.

The full text of the decree, including a detailed Operational Action Plan, is available on the Verkhovna Rada's official website in [CMU Decree No. 217-r dated February 25, 2026](#).



Condition No. 1.6: **Submit to the Government a new Customs Code of Ukraine that will facilitate the harmonization of customs legislation with the EU Customs Code**
(condition for the first tranche)

Component: public finance management systems

Status: completed

The process of drafting and submitting the new Customs Code of Ukraine (CCU), fully harmonized with European standards, took place in two stages of Government approval, with extensive international and public consultations in between. Final approval by the Cabinet of Ministers took place on May 28, 2026, and on June 3, 2026, the government's draft law was officially registered with the Verkhovna Rada under No. [15295](#).

On August 26, 2025, the Government adopted its first protocol decision, endorsing the initial draft of the new code developed by the Ministry of Finance and the State Customs Service with technical support from EU experts. Immediately thereafter, the Government Office for Coordination of European and Euro-Atlantic Integration forwarded the draft text to the European Commission for an official assessment of its compliance with European legislation.

Between October 2025 and March 2026, 14 working meetings were held directly with European experts to incorporate the European Commission's amendments.

At the same time, a special government working group was active, comprising 15 representatives of the largest Ukrainian business associations and organizations selected by the Ministry of Finance, who together held more than 60 rounds of consultations.

On May 28, 2026, the Cabinet of Ministers of Ukraine officially approved the final draft of the new Customs Code.



Condition No. 1.7: Appoint a new permanent head of the State Customs Service
(condition for the first tranche)

Component: public finance management systems

Status: completed

The selection and appointment of a new Head of the State Customs Service of Ukraine (SCS) through an open competition concluded on April 10, 2026, when the Cabinet of Ministers of Ukraine officially appointed Orest Mandziy to this position. This competition was historic, as for the first time in many years, the agency received a full-fledged head without “acting” status through a completely new and transparent procedure.

The competition was announced by the Cabinet of Ministers on August 4, 2025, in accordance with the law on the restructuring of the customs service. A special competition commission was established, comprising an equal number of Ukrainian and international experts, with the latter holding the deciding vote.

From the fall of 2025 through March 2026, all candidates underwent a multi-stage selection process consisting of:

- a test of knowledge of legislation and general aptitude
- an assessment of integrity and professional competence
- final interviews. In the final stage, the committee conducted in-depth interviews with the 15 leading candidates.

On March 27, 2026, after seven rounds of voting, the commission selected two finalists. They were two current NABU employees—Orest Mandziy (head of NABU’s investigative unit since 2021) and Ruslan Damentsov. On March 30, 2026, the Selection Commission officially submitted the nominations of these two finalists to Ukraine’s Minister of Finance, Serhiy Marchenko, for consideration. The Minister of Finance reviewed the nominations and recommended Orest Mandziy to the Government. On April 10, 2026, the Cabinet of Ministers approved this appointment.



Condition No. 2.1 To submit to Parliament a draft bill amending the rules on corporate taxation to bring them into line with Article 4 of the EU Anti-Tax Avoidance Directive (ATAD)
(condition for the second tranche)

Component: mobilisation of domestic revenue

Status: in progress

Submit proposals to the Verkhovna Rada to amend legislation aimed at bringing Ukraine's corporate tax system into line with [Article 4](#) of the EU Anti-Tax Avoidance Directive (Council Directive (EU) 2016/1164).

Provisions are made to tighten the rules on the taxation of corporate group profits: expanding and applying transfer pricing rules more strictly; introducing restrictions on the deduction of debt financing costs when calculating corporation tax, with the possibility of carrying forward undeducted costs to future periods; and taxing foreign companies with effective management in Ukraine.

The changes are aimed at reducing opportunities to understate corporation tax through intra-group transactions and debt schemes and constitute a structural benchmark of the IMF programme, with a deadline for submission by the end of June 2026.

The Ministry of Finance published [the](#) relevant [draft legislation](#) on its website on 27 February, but as of 28 July it had not yet been registered with the Verkhovna Rada; therefore, condition No. 2.1 has not yet been met.



Condition No. 2.2 To pass a law introducing taxation on income generated via digital platforms
(condition for the second tranche)

Component: mobilisation of domestic revenue

Status: in progress

The Verkhovna Rada was due to pass a draft law introducing taxation of income generated through digital platforms.

This [draft law](#) was submitted back in April to fulfil IMF Structural Benchmark No. 3, and the Rada supported it in June.

As of 28 July, the law is awaiting the President's signature. We had previously marked condition No. 2.2 as fulfilled, but the prolonged delay in signing poses risks to the second tranche of the USL. The condition is still in the process of being fulfilled.



Condition No. 2.3 : Parliament's adoption of a law repealing tax exemptions for imported parcels, with the exception of those related to food security and defense

(condition for the second tranche)

Component: domestic revenue mobilisation

Status: in progress

The issue of abolishing tax exemptions for imported parcels valued at up to 150 euros is currently at the stage of reformulation and preparation of a new government draft bill. A previous attempt to amend the tax rules ended in failure in the parliamentary chamber.

On May 26, 2026, the Verkhovna Rada of Ukraine completely rejected and dismissed law No. 12360. Ahead of the second reading, radical amendments were introduced to this document (which initially concerned only the assessment of customs efficiency) to introduce a 20% VAT on small parcels. Parliament initially did not support these amendments, and subsequently rejected the bill in its entirety (with only 127 votes in favour). An attempt to return it for a second reading also failed, securing 222 votes out of the 226 required.

As the original bill has been rejected, the Cabinet of Ministers of Ukraine is obliged to draft and submit to the Rada a completely new bill to abolish the €150 limit.

Following the government's resignation, the bill to abolish the tax exemption on international consignments was resubmitted to the Verkhovna Rada of Ukraine on 29 July 2026. It is currently awaiting consideration by the committee.

**Condition No. 2.4 Adoption by Parliament of the law on the framework for property****valuation**

(condition for the second tranche)

Component: mobilisation of domestic revenue

Status: in progress

Ukrainian valuation standards are outdated and need to be aligned with European (TEGOVA) and international (IVS) standards. This will strengthen confidence in property valuations and bank collateral among both the business sector and public authorities, and will facilitate cross-border transactions.

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

Draft [Law](#) No. 13435 of 27 June 2025 passed its first reading on 28 July 2026. A final vote and the President's signature are still to come.



Condition No. 2.5 Adoption by the State Tax Service of a roadmap for improving VAT compliance management and an implementation plan (a condition for the second tranche)

Component: mobilisation of domestic revenue

Status: in progress

The State Tax Service is to adopt a roadmap for improving VAT compliance management, setting out key compliance risks, reform priorities and implementation timelines.

As at the end of July, fulfilment of this condition is in progress. In July, the State Tax Service began emphasising in its press releases that the National Revenue Strategy (NRS), adopted back in 2023, serves as the ‘roadmap’ for all necessary tax and customs requirements. It is possible that certain adjustments to the NRS will be regarded as fulfilment of condition No. 2.5.



Condition No. 2.6 Adoption by the State Tax Service of a plan to improve compliance with tax legislation (a condition for the second tranche)

Component: mobilisation of domestic revenue

Status: in progress

The State Tax Service is to adopt a plan to improve compliance with tax legislation, which identifies key gaps in tax compliance and sets out measures to address them over the coming year.

As at the end of July, fulfilment of this condition is in progress. In July, the State Tax Service began emphasising in its press releases that the National Revenue Strategy (NRS), adopted back in 2023, serves as a 'roadmap' for all necessary tax and customs requirements. It is possible that certain adjustments to the NRS will be regarded as fulfilment of condition No. 2.6.



Condition No. 2.7 : Adopt secondary legislation or methodological guidelines that clarify the definition of investments falling under the PIM framework and distinguish them from other capital expenditures in preparation for the EPP-2027 (condition for the second tranche)

Component: Sustainability and Quality of Public Expenditures

Status: in progress

The Memorandum of Understanding between Ukraine and the EU provides for the development and adoption of secondary legislation or methodological guidelines that will clarify the definition of investments falling under the Public Investment Management (PIM) framework and distinguish them from other capital expenditure.

The Ministry of Finance, with technical support from the IMF, is already drafting the relevant guidelines. Their aim is, in particular, to clearly distinguish between public investments and capital expenditure when compiling the Unified Portfolio of Public Investment Projects for 2027.



Condition No. 2.8: Adoption by the Government of the Concept for a Unified Information Ecosystem for Public Investment Management (condition for the second tranche)

Component: Sustainability and Quality of Public Expenditures

Status: completed

The Memorandum of Understanding between Ukraine and the EU stipulates that the Cabinet of Ministers of Ukraine will adopt the Concept of a Unified Information Ecosystem for Public Investment Management to ensure, among other things, the integration of systems and data related to PIM with the IT systems of the Ministry of Finance, the Ministry of Economy, the Ministry of Environment and Agriculture of Ukraine, the Ministry of Development, and relevant sectoral ministries, including DREAM, the State Budget, LOGICA, Prozorro, and the Treasury system, among others. The Concept must include an action plan defining the stages and timeframe for implementation.

On June 4, the Cabinet of Ministers of Ukraine adopted a resolution [“On the Approval of the Concept for the Development of a Unified Digital Ecosystem for Public Investment Management and the Approval of an Action Plan for 2026–2028 for Its Implementation”](#) (hereinafter referred to as the Concept).

The main goal of the Concept is to integrate disparate government information systems into a single network that will support the investment cycle at every stage—from planning and selecting community projects to their financing, technical oversight, and evaluation of results. Importantly, the future IT architecture will be based on the integration of existing digital tools. These include the DREAM system, which falls under the responsibility of the Ministry of Development, as well as the AIS “GRK-WEB” and LOGICA systems, the resources of the State Treasury Service, and the electronic procurement system.

The Ministry of Finance of Ukraine will coordinate the implementation of the Concept, monitor the execution of the action plan, and oversee the achievement of the defined results.



Condition No. 2.9 : Adoption of the Budget Declaration for 2027–2029, which has been agreed with the IMF and meets EU requirements (a condition for the second tranche)

Component: sustainability and efficiency of public expenditure

Status: fulfilled

The adoption of the Budget Declaration for 2027–2029, as required by the condition, was to include:

- (i) a baseline policy scenario for 2027–2029, reflecting the trajectory of key revenue and expenditure indicators under unchanged policies, as provided for by current legislation. This scenario would also quantify the gap – or fiscal space – between the deficit under current policies and the deficit consistent with the Government’s fiscal targets, as agreed with IMF staff;
- (ii) an active policy scenario for 2027–2029, including the impact of all planned expenditure and revenue measures, as well as measures to achieve the Government’s fiscal targets for the general government deficit and debt;
- (iii) a section explaining changes in macroeconomic assumptions compared with the previous Budget Statement and the discrepancies between previous forecasts and the latest outturn data;
- (iv) a special annex containing a summary of public investment projects reflected in the medium-term fiscal projections, in accordance with the PIM cycle.

All these requirements were met in the Budget Statement [adopted by](#) the Cabinet of Ministers on 17 June (later than the deadline stipulated in the Budget Code).



Condition No. 2.10 : The Government's decision on the areas, objectives and timetable for conducting expenditure reviews in 2026 (a condition for the second tranche)

Component: sustainability and efficiency of public expenditure

Status: fulfilled

To adopt and publish a decision of the Cabinet of Ministers defining the areas, objectives and timelines for conducting public expenditure reviews in 2026, covering areas related to overcoming the consequences of hostilities and ensuring post-war recovery, such as housing, regional and veterans' policies. The decision will also set out the requirements for expenditure review reports, which will include, in particular: at least two options for achieving the expenditure review objective; proposals for optimising state budget expenditure; and a proposal for the optimal option for achieving the review objective based on a comparison of the options included in the report.



Condition No. 2.11: Adoption by the Ministry of Finance of the State Customs Service's Digital Development Plan through 2030 (condition for the second tranche)

Component: public finance management system

Status: in progress

In February 2024, the Ministry of Finance approved the first Long-Term Strategic Plan for the Digitalisation of the State Customs Service, which covered the period only up to 2026. It focused on basic paperless procedures and the implementation of the ASMO 'Centre'.

In May 2025, the Cabinet of Ministers adopted Order No. [464-r](#), which officially extended the General Strategy for the Digitalisation of Public Finance until 2030. This required the Ministry of Finance to fundamentally update the customs service's departmental IT development plan in line with long-term European integration objectives.

The draft of the updated Plan was finalised in the first half of 2026 under the direct coordination of the Ministry of Finance of Ukraine and the new leadership of the State Customs Service. It was expected to be approved in July 2026; however, as of the end of the month, no relevant information is available in public sources.



Condition No. 2.12: The Verkhovna Rada must appoint the remaining experts to the commission responsible for selecting members of the Accounting Chamber of Ukraine (condition for the second tranche)

Component: public finance management systems

Status: in progress

In December 2024, the law on reforming the Accounting Chamber (hereinafter “ACU”) entered into force. Among other things, it introduced an updated competitive selection procedure for ACU members, which provides for the creation of an Advisory Group of Experts (hereinafter “AGE”) consisting of six members (three international experts and three representatives from the Verkhovna Rada, with international experts having the casting vote).

In August 2025, the Verkhovna Rada [failed to pass](#) a vote on the formation of the AGE to conduct the preliminary selection of candidates for positions as members of the Accounting Chamber.

In September 2025, the Budget Committee [resubmitted](#) to Parliament the nominations for the members of the AGE to conduct the preliminary screening of candidates for positions on the Accounting Chamber. However, this matter has not yet been considered.

In the updated Memorandum (June 2026), the Ukrainian undertakes to appoint six members of the AGE, which is to carry out the preliminary selection of candidates for the ACU and, by the end of 2026, to appoint six new members of the ACU from among the vetted candidates (it should be noted that, under the updated law, the ACU consists of eleven members).

Although the candidates for three international experts were identified and approved by Cabinet of Ministers Order No. 498-r of May 23, 2025, the Verkhovna Rada has not yet appointed the members of the AGE, whose candidates are to be nominated by parliamentary factions (groups). As a result, the AGE has not been formed and cannot begin the preliminary selection of candidates for positions on the Accounting Chamber.



Condition No. 3.1: To submit a draft bill to Parliament on reforming the preferential tax regime (a condition for the third tranche)

Component: mobilisation of domestic revenue

Status: in progress

Submit to the Rada a proposal for a law introducing measures to reform the preferential tax regime, which will generate additional revenue of at least 70 billion UAH per year, in particular:

- (i) measures to combat tax evasion to prevent the artificial fragmentation of businesses for the purpose of meeting the criteria for remaining under preferential tax regimes;
- (ii) restrictions on businesses re-switching to the simplified tax system after they have switched to the general tax system;
- (iii) the introduction of differentiated tax rates for third-group taxpayers depending on the type of economic activity; and
- (iv) measures to bring the legislation into line with Council Directive [2006/112/EC](#)



Condition No. 3.2: Adoption by Parliament of a law to simplify VAT administration for sole traders (a condition for the third tranche)

Component: mobilisation of domestic revenue

Status: in progress

Adoption by the Verkhovna Rada of a law simplifying VAT administration for sole traders (quarterly reporting instead of monthly; monthly tax invoices instead of daily; preparation of a preliminary tax return for sole traders; simplification of the process for unblocking tax invoices).

As at the end of June 2026, the relevant draft law had not been tabled in parliament.



Condition No. 3.3 The adoption by Parliament of a law bringing Ukraine's corporate tax system into line with Article 4 of the EU Anti-Tax Avoidance Directive (ATAD).
(condition for the third tranche)

Component: mobilisation of domestic revenue

Status: in progress

The Verkhovna Rada is to adopt amendments to legislation aimed at aligning Ukraine's corporate tax system with Article 4 of the EU Anti-Tax Avoidance Directive (Council Directive (EU) [2016/1164](#)).

The amendments provide for stricter rules on the taxation of corporate group profits: the extension and stricter application of transfer pricing rules, the introduction of restrictions on the deduction of debt financing costs when calculating corporation tax, with the possibility of carrying forward undeducted costs to future periods, and the taxation of foreign companies with effective management in Ukraine.

The changes are aimed at reducing opportunities to understate profit tax through intra-group transactions and debt schemes and constitute a structural benchmark of the IMF programme, with a deadline for submission by the end of June 2026.

The Ministry of Finance published [the](#) relevant [draft legislation](#) on its website on 27 February, but as of 28 July it had not yet been registered with the Verkhovna Rada.



Condition No. 3.4 To submit a draft bill to Parliament to bring corporate taxation into line with other provisions of the ATAD (a condition for the third tranche)

Component: mobilisation of domestic revenue

Status: in progress

Proposals must be submitted to the Verkhovna Rada to amend legislation aimed at aligning Ukraine's corporate tax system with the EU Anti-Tax Avoidance Directive (Council Directive (EU) [2016/1164](#)), in particular [Article 5](#) (capital gains tax on the withdrawal of assets), [Article 6](#) (General anti-abuse rule), [Articles 7](#) and [8](#) (Rules on controlled foreign companies), and [Articles 9](#), 9a and [9b](#) (Hybrid mismatches).

As at the end of July, compliance with this requirement is ongoing.



Condition No. 3.5 A report has been prepared setting out long-term projections of pension expenditure based on the current system and the planned parameters of the pension reform
(condition for Tranche III)

Component: sustainability and efficiency of public expenditure

Status: in progress

The indicator stipulates that the government, in cooperation with the World Bank, the IMF and the Commission's services, must provide a report containing long-term projections of pension expenditure based on the current system and the parameters of the planned pension reform.

As of the end of June 2026, the Ministry of Social Policy is developing a pension reform, for which a report on projected pension expenditure is to be prepared.



Condition No. 3.6 **Submit to Parliament the draft State Budget for 2027, explaining how the results of the expenditure reviews have been taken into account in the expenditure allocations** (a condition for the third tranche)

Component: sustainability and efficiency of public expenditure

Status: in progress

Submit to the Verkhovna Rada the draft State Budget of Ukraine for 2027, which must include an explanation of how the results of the expenditure review have been taken into account in the budget and reflected in the allocation of expenditure.

The Government has already begun work on the draft Law on the State Budget for 2027.



Condition No. 3.7 To develop a new Public Procurement Strategy for 2027–2030
(condition for Tranche III)

Component: sustainability and efficiency of public expenditure

Status: in progress

This indicator requires the development of a new Public Procurement Strategy for 2027–2030 and its submission to the European Commission as a condition for the third tranche of the Ukraine Support Loan. The strategy is to set out the further development of the procurement system following the expiry of the current strategy for 2024–2026, including the implementation of new legislation, further harmonisation with the EU acquis, the updating of the regulatory framework and the technical development of Prozorro.

For the time being, the Strategy for Reforming the Public Procurement System for 2024–2026, approved by the Cabinet of Ministers of Ukraine on 2 February 2024, remains in force, together with the operational plan for 2024–2025.



Condition No. 3.8 To prepare a draft defence procurement law, to be drawn up in 2027 in accordance with the EU acquis (a condition for the third tranche)

Component: sustainability and efficiency of public expenditure

Status: in progress

This indicator involves preparing a draft of the future defence procurement law, which is to be drawn up in 2027 and aligned with the EU acquis, in particular with EU rules on defence and security procurement. The rationale is to define in advance the approach to updating the special regime for defence procurement: striking a balance between transparency, competition, security constraints, the speed of procurement and the protection of sensitive information.

This is important both for the effective use of defence expenditure and for Ukraine's gradual alignment with the rules of the EU internal market in the defence industry.



Condition No. 3.9 The State Audit Service of Ukraine (SASU) is to prepare a proposal for a clear organisational and managerial separation of inspection and audit functions (a condition for Tranche III)

Component: public finance management system

Status: in progress

Preparation by the State Audit Service of a proposal for a clear organisational and managerial separation between inspection and audit functions within the structure of the State Audit Service.

The indicator stipulates that the State Audit Service must prepare a proposal for a clear organisational and managerial separation of inspection and audit functions. This is necessary to strengthen the system of public financial control: the inspection function must be separated from auditing so that auditing better aligns with a risk-based approach, assesses systemic issues and does not duplicate checks. In a broader context, this condition should also clarify the roles and interaction of the Ministry of Finance, the State Audit Service and internal audit units within the framework of implementing Ukraine's Plan.



Condition No. 3.10 Establish 10 new audit committees in accordance with current legislation within key budget-spending authorities (a condition for Tranche III)

Component: public finance management system

Status: in progress

Establish 10 new audit committees in accordance with the requirements of the legislation in the following key budget-spending agencies: the Ministry of the Interior, the Ministry of Energy, the Ministry of Digital Transformation, the Kyiv, Lviv and Chernivtsi Regional State Administrations; the State Agency for the Restoration and Development of Ukraine's Infrastructure; the State Property Fund of Ukraine, the National Securities and Stock Market Commission, and the National Commission for State Regulation in the Sectors of Energy and Public Utilities.



Condition No. 3.11 The Ministry of Finance will update the National Internal Audit Standards, aligned with the Global Internal Audit Standards (a condition for Tranche III)

Component: public finance management system

Status: in progress

Adoption by the Ministry of Finance of a revised national internal audit standard aligned with the Global Internal Audit Standards.

The indicator provides for the Ministry of Finance to update the National Internal Audit Standards and align them with the Global Internal Audit Standards. This is intended to enhance the quality of internal audit in the public sector, making it more independent, risk-based and useful for the management of budgetary funds. In a broader context, the indicator aims to strengthen internal control and internal audit systems as part of the reform of public financial control.



Condition No. 3.12 Adoption by Parliament of a new Customs Code of Ukraine in accordance with the EU Customs Code (condition for the third tranche)

Component: public finance management systems

Status: in progress

As at the end of June 2026, the government's draft bill for a new version of the Customs Code of Ukraine (reg. No. 15295), submitted by the Cabinet of Ministers of Ukraine, is currently at the initial stage of parliamentary consideration following its official registration with the Verkhovna Rada on June 3, 2026. The document, designed to be fully aligned with the EU Customs Code (Regulation No. 952/2013), is undergoing the statutory procedures in the relevant committees.

An expanded working group has now been formed under the Verkhovna Rada Committee on Finance, Tax and Customs Policy, involving representatives from the Ministry of Finance, the State Customs Service, the business community and experts from the EU4PFM programme. It will review and prepare the draft law for the first reading vote. Work will begin on July 7, 2026 and is expected to continue until the end of September 2026, after which the draft law is due to be submitted to the plenary chamber of parliament for consideration.

Following the resignation of the Government, a new draft Customs Code of Ukraine (No. 15450) was registered in the Verkhovna Rada; this effectively replaced draft No. 15295, which had been withdrawn following the Government's resignation, and is identical in text. Accordingly, the working group established under the relevant committee continued its work on the text of the draft. During July 2026, the content of 2 out of 17 sections was discussed.



Condition No. 3.13 Approve the technical requirements for national customs IT systems for processing customs declarations and managing risks (condition for the third tranche)

Component: public finance management systems

Status: in progress

The development of these systems is a mandatory technical requirement for Ukraine's accession to the EU Customs Union, as they enable Ukrainian databases to "communicate" in a single digital language with Brussels. The new platforms will fully automate the verification of declarations and the analysis of security risks even before goods cross the border, minimizing human error and corruption. For businesses, this means eliminating paper-based document flow, speeding up customs clearance, and reducing lines at the borders.

More details on the systems for which technical requirements are to be developed:

- Automated Export System (AES). Technical specifications are being developed based on the European Data Harmonisation standard for component interoperability. The Ministry of Finance is approving requirements that ensure the automatic exchange of messages between Ukrainian customs offices of departure and European customs offices of destination.
- Centralized Customs Clearance (CCI) and the New Import System (NIS). Functional and technical requirements are approved in accordance with the EU Customs Data Model (EU CDM). They provide for a separation of processes: declarations will be submitted to a central hub (CCI), while physical inspection of goods will take place at border or inland customs posts (NIS).
- Security Standards. A new national risk management system is being developed in accordance with the ICS2 Release technical regulations. The requirements approved by the Ministry of Finance mandate that the system accept and instantly process the Entry Summary Declaration (ENS) even before the goods actually cross the border. The technical specifications include the deployment of artificial intelligence algorithms to automatically compare ENS data with international security databases in real time.

As of June 2026, there is limited publicly available information regarding progress in the development and approval of technical requirements for such systems.

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