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Dear readers!

Here is the new issue of the Information Bulletin "Trade Facilitation in Ukraine Monitoring," a product of the Institute for Economic Research and Policy Consulting.

We strive to provide you with the latest and most up-to-date information on the state of customs reform implementation and the implementation of measures to facilitate international trade in Ukraine. Therefore, send your opinion, feedback, and wishes regarding communication links and methods of providing information to: customs@ier.kyiv.ua

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REGULATORY LEGAL ACTS THAT ENTERED INTO FORCE



The approval of this procedure represents an important stage in the systematic reform of the customs service, aimed at improving professionalism and integrity among personnel and strengthening the institutional capacity of customs authorities. The recertification of customs officers was foreseen by the so-called “Customs Reset Law” as one of the measures to renew customs authorities.

Source: <https://salo.li/4F9A1BE>

The Government Approved the Procedure for Certification in Customs Authorities

Resolution of the Cabinet of Ministers of Ukraine No. 1100 of September 8, 2025 “On Approval of the Procedure for the Organization and Conduct of Certification, Assessment of Integrity, and Professional Competence of Officials of Customs Authorities During Certification”.

The Government has approved the procedure for organizing and conducting certification, assessing the integrity and professional competence of customs officials. The document defines the rules and mechanisms for conducting certification of customs officials.

The procedure aims to ensure an objective assessment of the professional competence and integrity of customs officials; determine their compliance with the position held and future professional potential; and ensure that employees’ qualifications meet the modern requirements and tasks of the customs service.

According to the procedure, certification will be carried out based on specific criteria, taking into account:

- the level of legal knowledge and professional skills;
- the ability to perform official duties at an appropriate level;
- compliance with integrity and ethics standards of public service.



The Ministry of Finance Proposes It Is Proposed to Update the Procedure for Amendments to Orders Regarding the Maintaining Registers by Customs Implementation of Laws on the Ratification Authorities of Decisions of the Joint Committee of the Pan-Euro-Med Regional Convention

Draft Order of the Ministry of Finance of Ukraine “On Amendments to Certain Regulatory Legal Acts of the Ministry of Finance of Ukraine”. Publication date: September 4, 2025. Initiator: Ministry of Finance of Ukraine.

The draft order aims to implement the laws of Ukraine ratifying the decisions of the Joint Committee of the Pan-Euro-Med Regional Convention, which update the rules for determining the preferential origin of goods.

The main goal is to align the mentioned order with the provisions of the updated Convention, particularly by amending the procedure for confirming the origin of goods and expanding the list of documents required for issuing the EUR.1 certificate.

The list includes documents confirming processing or transformation of materials in the Convention’s member countries without acquiring originating status; delivery of Ukrainian goods to countries with which free trade agreements are in force; the possibility of issuing a EUR.1 certificate after export if the final destination or consignment split is clarified; the weight characteristics of non-preferential origin materials used in the production of the final product.

Source: <https://salo.li/AB71F7a>



Draft Resolution of the Cabinet of Ministers of Ukraine “On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine Concerning the Creation and Maintenance of Registers, Customs Control, and Official Control Measures”. Publication date: September 18, 2025. Initiator: Ministry of Finance of Ukraine.

The draft resolution was developed to bring Resolution No. 857 of July 15, 2025 “On Approval of the Procedures for Creating and Maintaining Certain Registers by Customs Authorities” in line with the Law of Ukraine No. 4323-IX of March 25, 2025 “On Amendments to the Customs Code of Ukraine and Other Laws of Ukraine Regarding Certain Issues of Administrative Liability for Customs Offenses, Clarification of the Implementation of Certain Customs Procedures, and Elimination of Terminological Inconsistencies.”

It is proposed to update the dataset specified in the list of datasets to be published as open data.

In addition, amendments are proposed to:

- the procedure for photo and video recording of customs control measures and other formalities carried out by controlling authorities;
- the list of goods subject to official control measures upon importation into (including transit through) the customs territory of Ukraine.

Amendments are also proposed to the Procedure for the Provision and Publication of Anonymized Summary Information for Statistical Purposes, Anonymized Analytical Information, Anonymized Information on Specific Export-Import Operations, and Other Customs-Related Information, approved by Resolution No. 462 of May 12, 2021.

Source: <https://salo.li/F1a7352>



The First Authorization for the Operation of a Customs Warehouse Has Been Issued

The State Customs Service announced that, for the first time in Ukraine, a mechanism for authorizing the operation of a customs warehouse has been implemented. The first company to receive such authorization is located in the Kyiv region, within the area of operation of the “Pivdennyi” customs post.

The authorization procedure for customs and temporary storage warehouses started on April 19, 2025, in accordance with the Customs Code of Ukraine and Resolution No. 1092 of September 27, 2022 (as amended on April 15, 2025).

Authorization is granted to enterprises that meet clearly defined criteria and conditions, including compliance with tax and customs legislation, proper warehouse infrastructure, all necessary documentation, and no outstanding tax liabilities.

The application for authorization is submitted by the business entity to the customs office in whose area the warehouse is located. Following verification of compliance with established requirements, a decision on authorization is made.

The implementation of this mechanism ensures transparency, objectivity, and predictability of procedures, creating a favorable business environment and bringing Ukraine’s customs system closer to EU standards.

Source: <https://salو.li/235860F>

The State Customs Service Introduced a Self-Assessment Tool for Enterprises’ Financial Standing

To facilitate enterprises’ self-assessment of their financial standing, the State Customs Service has developed a special table that automatically calculates integrated indicators according to updated criteria.

The new tool will help businesses prepare for the evaluation of the “Stable Financial Standing” criterion, which is mandatory for obtaining the status of Authorized Economic Operator (AEO) and for receiving authorizations for simplifications—such as using a general guarantee with a reduced reference amount or exemption from the guarantee.

The financial assessment algorithm was updated by Resolution No. 454 of April 15, 2025. The evaluation is based on integrated indicators calculated using liquidity, capitalization, and profitability ratios, considering industry specifics and company category.

Re-assessment of enterprises already holding authorizations for simplifications (such as reduced or exempt guarantees) will take place in Q2–Q4 of 2026, based on financial statements for 2025.

Meanwhile, enterprises that obtained AEO authorization under the transitional provisions of the Customs Code (Section XXI, Paragraph 6.4) will undergo reassessment according to the updated indicators after the seventeenth month following the termination or cancellation of martial law.

The table for calculating integrated indicators is available in “Section 4.3.1 of the Enterprise Self-Assessment Questionnaire and Control Question” at the link: <https://salو.li/5D538a7>

Source: <https://salو.li/3672802>



A Working Group Has Started Consultations on the Draft New Customs Code of Ukraine

The Ministry of Finance has issued an order establishing a working group to conduct consultations on the draft text of the new Customs Code of Ukraine. The group includes 15 representatives of the business community, civil society organizations, and customs experts.

At its inaugural meeting, Tetiana Ostrikova was elected Chair of the working group. Three deputy chairs were also elected, and the participants discussed the future work format and other organizational matters.

At the first meeting of the working group on October 3, 2025, the draft of the new Customs Code of Ukraine—developed based on the EU Customs Code—was presented. The event was jointly organized by the Ministry of Finance, the State Customs Service, and the working group. Over 250 entrepreneurs and experts, including representatives of civil society and business associations, participated both offline and online.

The draft text is available on the State Customs Service website:

<https://customs.gov.ua/en/proiekt-novogo-mitnogo-kodeksu-ukrayini#scrollTop=0>

Currently, the working group continues to work on the text of the draft Customs Code.

Source: <https://salo.li/CF0E677>



"Trade Facilitation Monitoring in Ukraine" is a continuation of the issues of the Monthly Monitoring of Trade Facilitation in Ukraine, which has been prepared by the Institute for Economic Research and Policy Consulting since 2015 within the framework of the Trade Facilitation Dialogue project, with the financial support of the European Union and co-financing of the International Renaissance Foundation, as well as the project "Support to the Civil Society Initiative "For Fair and Transparent Customs", which was implemented with the support of the European Union, the International Renaissance Foundation and the ATLAS Network.

The proposed newsletter is a continuation of the previous ones and is published within the framework of the activities of the Institute for Economic Research and Policy Consulting. The publication consists of three parts (if relevant materials are available):

- Regulations that have entered into force
- Draft regulations
- news.

We understand that small and medium-sized businesses do not have enough time to analyze new legislation or possible regulatory innovations. Also, a significant number of such acts are difficult for an average person to understand. "Monitoring of Trade Facilitation in Ukraine" is designed to draw attention to interesting events, innovations of Ukrainian legislation or planned changes related to the field of trade facilitation, in particular international trade, customs and customs issues, and can directly affect foreign economic entities. Also, in these publications, we will try to analyze draft regulations on this topic.

The Institute for Economic Research and Policy Consulting (IER) is an internationally recognized independent Ukrainian think tank founded in 1999.

The IER is engaged in the analysis of problems of economic development, international trade and business climate (in particular in the SME sector), participates in the development of policy documents at the national and regional levels.

The IER regularly issues its own macroeconomic forecast for Ukraine and participates in the development of the consensus forecast of the Ministry of Economic Development and Trade of Ukraine.

The IER team of sociologists conducts regular surveys of enterprises and experts in order to assess the business climate and expectations of Ukrainian business. IER successfully combines its analytical activities with advocacy for change and participation in the public life of Ukraine. The IER cooperates with central and local authorities, domestic and foreign think tanks, and civil society organizations. The work of the IER is financed by grants, charitable contributions and technical assistance funds.

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