



**REPORT**  
**ON IMPLEMENTATION**  
**OF THE ASSOCIATION**  
**AGREEMENT BETWEEN**  
**UKRAINE AND THE**  
**EUROPEAN UNION**  
**FOR 2025**

**EUUJA**

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# CONTENT

<b>FOREWORD OF DEPUTY PRIME MINISTER FOR EUROPEAN AND EURO-ATLANTIC INTEGRATION OF UKRAINE TARAS KACHKA</b>	<b>5</b>
<b>PROGRESS IN IMPLEMENTING THE ASSOCIATION AGREEMENT IN 2025</b>	<b>6</b>
<b>SECTION I. UKRAINE'S ACHIEVEMENTS TOWARDS THE OPENING OF NEGOTIATION CLUSTERS IN 2025</b>	<b>8</b>
<b>SECTION II. ACTIVITIES OF BILATERAL ASSOCIATION BODIES AND HIGH-LEVEL DIALOGUE BETWEEN THE EU AND UKRAINE</b>	<b>16</b>
<b>SECTION III. EU ASSISTANCE TO UKRAINE</b>	<b>30</b>
<b>SECTION IV. RESULTS OF IMPLEMENTATION OF THE ASSOCIATION AGREEMENT IN 2025</b>	<b>40</b>

POLITICAL DIALOGUE, NATIONAL SECURITY AND DEFENSE

JUSTICE, FREEDOM, SECURITY AND HUMAN RIGHTS

TECHNICAL BARRIERS TO TRADE

SANITARY AND PHYTOSANITARY MEASURES

CUSTOMS MATTERS

ENTREPRENEURSHIP

PUBLIC PROCUREMENT

INTELLECTUAL PROPERTY

ENERGY EFFICIENCY AND HOUSING AND UTILITY INFRASTRUCTURE

ENERGY

TAXATION

STATISTICS AND INFORMATION EXCHANGE

ENVIRONMENT AND CIVIL PROTECTION

TRANSPORT, TRANSPORT INFRASTRUCTURE, POSTAL AND COURIER SERVICES

SCIENCE, TECHNOLOGY AND INNOVATIONS, SPACE, DIGITAL INTEGRATION

FINANCIAL SERVICES

PUBLIC FINANCE MANAGEMENT

HUMANITARIAN POLICY

AGRICULTURE

CONSUMER PROTECTION

SOCIAL POLICY AND LABOUR RELATIONS

PUBLIC HEALTH

EDUCATION, TRAINING AND YOUTH

FINANCIAL COOPERATION AND COMBATING FRAUD

DEEP AND COMPREHENSIVE FREE TRADE AREA

## **FOREWORD OF DEPUTY PRIME MINISTER FOR EUROPEAN AND EURO-ATLANTIC INTEGRATION OF UKRAINE TARAS KACHKA**

This year, Ukraine maintained a strong momentum on its path towards the EU membership, continuing to implement the course towards the European integration despite unprecedented challenges caused by the Russian Federation's full-scale war of aggression against Ukraine. Notwithstanding security risks and the considerable strain on public institutions, the European integration remained one of the key priorities of state policy.

One of the remarkable achievements of the year was the completion of the official screening process of Ukrainian legislation for compliance with the EU acquis. This stage was completed in record-breaking time, which convincingly demonstrated Ukraine's institutional capacity and readiness to move to the next stage of the European integration. In order to appreciate the scale and the depth of this process, it should be noted that, within the framework of the screening, 32 explanatory meetings and 34 bilateral meetings were held between Ukraine and the European Commission. Within the six negotiating clusters, the Ukrainian Party delivered over 700 presentations and provided responses to the European Commission questionnaires exceeding 9,000 pages.

At the same time, we worked on fulfilling the necessary prerequisites for the effective launch of the negotiations on Ukraine's accession to the European Union. This year, Ukraine's negotiating positions within all six relevant clusters were developed and submitted to the EU Party. For the opening of Cluster 1 "Fundamentals of the Accession Process", Ukraine approved the Rule of Law Roadmap and the Public Administration Reform Roadmap. In addition, two further strategic documents were adopted: the Roadmap on the Functioning of Democratic Institutions and the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine. These comprehensive documents define the key reform priorities in the respective areas and establish clear timelines for their implementation. It is important to note that work on their practical implementation has already commenced.

Systemic work on the implementation of the EU-Ukraine Association Agreement, including the Deep and Comprehensive Free Trade Area, is underway. The implementation of the provisions of the Agreement is critical for the economic resilience of the State, as it facilitates access of Ukrainian goods and services to the EU internal market, the integration of Ukraine into European value chains, the enhancement of the competitiveness of the national economy and the implementation of the European standards. Since 2014, the level of implementation of the Association Agreement has reached 84 percent, which confirms the high level of Ukraine's sectoral integration with the EU.

On 4 November, the European Commission presented the Ukraine Report under the 2025 EU Enlargement Package. In this Report, we received its highest score over the past three years. Overall, the Report contains 36 assessments across the negotiating chapters and specific roadmaps: in all areas, the European Commission noted positive progress and none received a negative assessment.

Ukraine enters the coming year with a clear vision and ambitious plans, including the opening of all negotiating clusters with the European Union. In parallel with the negotiation process, we intend to further deepen sectoral integration, progressively integrating into the EU internal market. Despite the exceptionally large volume of tasks and obligations facing Ukraine, we remain consistently committed to success, fully aware of the strategic importance of the European integration for the future of the State.

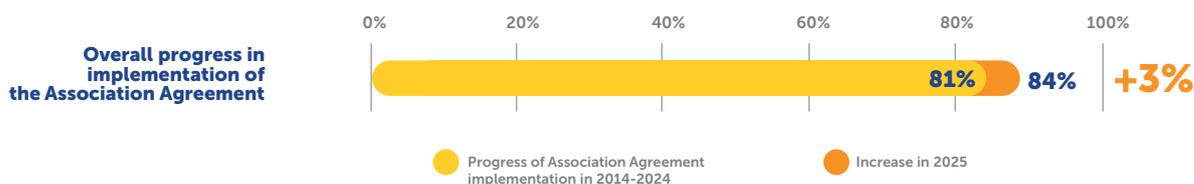
**GLORY TO UKRAINE!**  
**GLORY TO THE ARMED FORCES OF UKRAINE!**

## PROGRESS IN IMPLEMENTING THE ASSOCIATION AGREEMENT IN 2025

Overall progress in the implementation of the Association Agreement between the European Union, the European Atomic Energy Community and their member states, on the one part, and Ukraine on the other part (hereinafter referred to as the Association Agreement) for the period of 2014-2025 increased from 81% in 2024 to 84% in 2025, i.e. by 3%.

Overall progress for 2014-2025:

- The Cabinet of Ministers of Ukraine – 81% of the tasks were completed.
- the Verkhovna Rada of Ukraine – 74% of the tasks were completed.
- Other public authorities<sup>1</sup> – 68% of the tasks were completed.

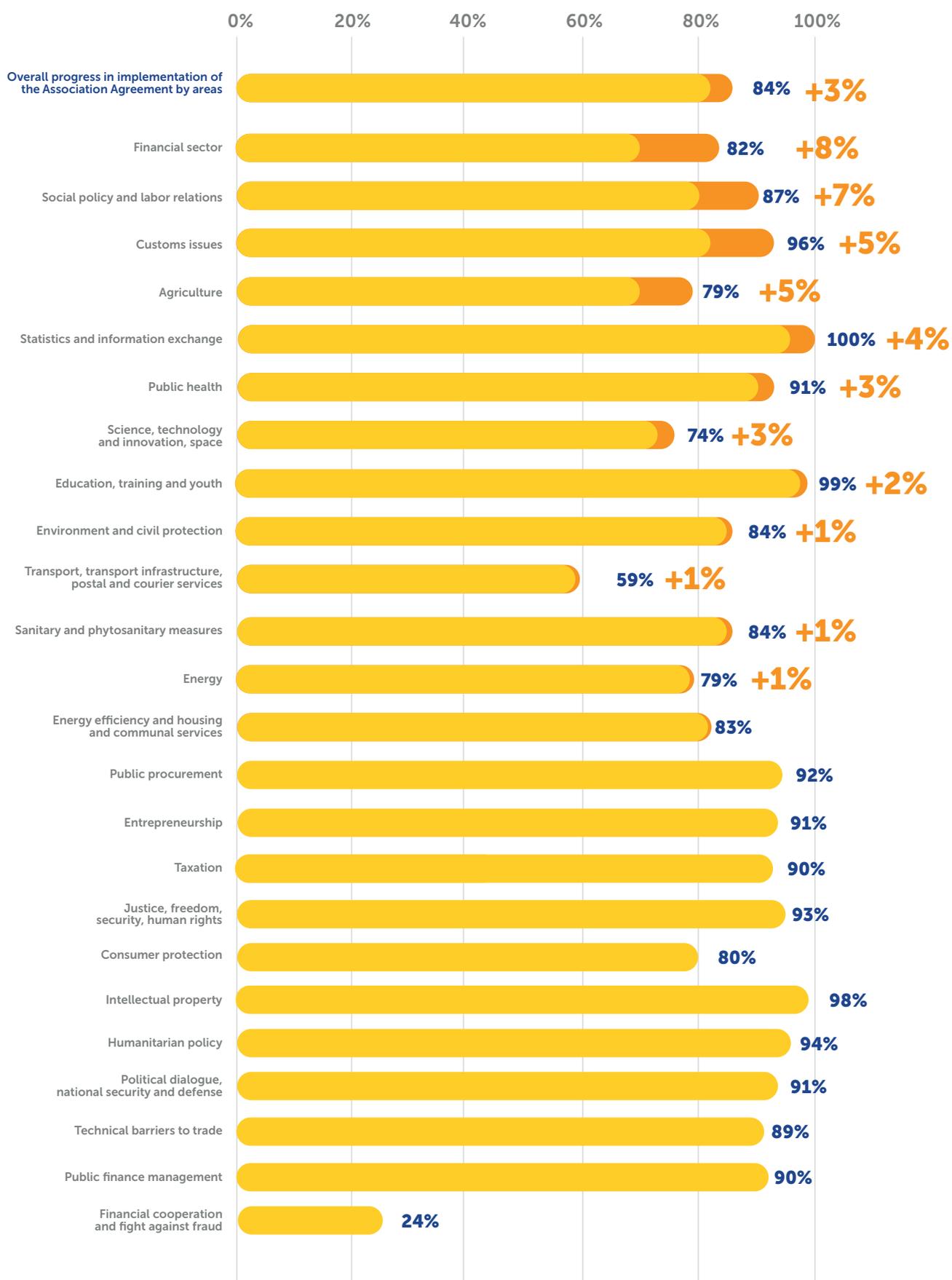


### Overall progress by three groups of responsible bodies for 2014-2025:



<sup>1</sup> It includes all public authorities that do not belong to the legislative and executive branches of government (for example, the NBU, NABU, SBU, etc.)

## OVERALL PROGRESS IN IMPLEMENTATION OF THE ASSOCIATION AGREEMENT BY AREAS



## SECTION I.

### UKRAINE'S ACHIEVEMENTS TOWARDS THE OPENING OF NEGOTIATION CLUSTERS IN 2025

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## PREPARATION FOR THE OPENING OF NEGOTIATING CLUSTERS

In 2025, the Government of Ukraine approved Ukraine's negotiating positions in the negotiations with the EU on the conclusion of the Agreement on Ukraine's Accession to the EU under all relevant chapters of the Negotiating Framework (Clusters 1 to 6):

- On 5 May 2025, a meeting of the Interagency Working Group on Ensuring the Negotiation Process on Ukraine's Accession to the European Union and Adaptation of Ukrainian Legislation to the EU Law (hereinafter referred to as the "Interagency Working Group") was held, during which the draft negotiating position of the Ukrainian Party within Cluster 1 "Fundamentals of the EU Accession Process" was approved. This negotiating position was approved by Ordinance of the Cabinet of Ministers of Ukraine No. 475-p of 14 May 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process'";
- On 27 May 2025, a meeting of the Interagency Working Group was held, during which the draft negotiating positions of the Ukrainian Party within Cluster 2 "Internal Market" and Cluster 6 "External Relations" were approved. The negotiating positions were approved by Ordinances of the Cabinet of Ministers of Ukraine No. 534-p of 30 May 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 2 'Internal Market'" and No. 533-p of 30 May 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 6 'External Relations'";
- On 13 October 2025, a meeting of the Interagency Working Group was held, during which the draft negotiating position of the Ukrainian Party within Cluster 3 "Competitiveness and Inclusive Growth" was approved. This negotiating position was approved by Ordinance of the Cabinet of Ministers of Ukraine No. 1193-p of 29 October 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 3 'Competitiveness and Inclusive Growth'";
- On 11 December 2025, a meeting of the Interagency Working Group was held, during which the draft negotiating positions of the Ukrainian Party within Cluster 4 "Green Agenda and Sustainable Connectivity" and Cluster 5 "Resources, Agriculture and Cohesion Policy" were approved. The negotiating positions were approved by Ordinances of the Cabinet of Ministers of Ukraine No. 1459-p of 17 December 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 5 'Resources, Agriculture and Cohesion Policy'" and No. 1460-p of 17 December 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 4 'Green Agenda and Sustainable Connectivity'".

According to the assessment of the European Commission, all six negotiating clusters are ready for opening.

### **Completion of the official screening of the compliance of Ukrainian legislation with the EU acquis**

In 2025, the official screening of the compliance of Ukrainian legislation with the EU acquis continued. Twenty-three meetings with the European Commission were held, in

particular under Chapter 8 “Competition Policy” (27–29 January), Chapter 30 “External Relations” (30 January), Chapter 28 “Consumer and Health Protection” (10–12 February), Chapter 9 “Financial Services” (13–14 February), Chapter 1 “Free Movement of Goods” (3–6 March), Chapter 31 “Foreign, Security and Defence Policy” (7 March), Chapter 6 “Company Law” (13 March), Chapter 25 “Science and Research” (14 March), Chapter 19 “Social Policy and Employment” (24–25 March), Chapter 10 “Digital Transformation and Media” (31 March – 1 April), Chapter 29 “Customs Union” (10–11 April), Chapter 20 “Enterprise and Industrial Policy” (28–29 April), Chapter 26 “Education and Culture” (30 April), Chapter 17 “Economic and Monetary Policy” (4 June), Chapter 16 “Taxation” (5–6 June), Chapter 27 “Environment and Climate Change” (16–20 June), Chapter 14 “Transport” and Chapter 21 “Trans-European Networks” (24–27 June), Chapter 15 “Energy” and Chapter 21 “Trans-European Networks” (8–9 July), Chapter 11 “Agriculture and Rural Development” (8–10 September), Chapter 33 “Financial and Budgetary Provisions” (11 September), Chapter 12 “Food Safety, Veterinary and Phytosanitary Policy” (15–19 September), Chapter 13 “Fisheries” (25–26 September), Chapter 22 “Regional Policy and Coordination of Structural Instruments” (29–30 September).

On 30 September 2025, the bilateral screening was completed. It proved to be one of the fastest compared to other candidate countries.

Overall, since 8 July 2024, when the first bilateral meeting under Chapter 5 “Public Procurement” took place, 34 meetings were held with a total duration of 66 days. They were attended by representatives of more than 70 public authorities, including the Verkhovna Rada of Ukraine, the Cabinet of Ministers of Ukraine, ministries, the judiciary and anti-corruption infrastructure, law enforcement authorities, independent regulators and other institutions, which prepared more than 700 presentations and 9,000 pages of answers to the European Commission’s questionnaires. The largest delegation (participation in the meeting under Chapter 24 “Justice, Freedom and Security”) comprised 343 persons.

### **Approval of reform roadmaps and the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities)**

In accordance with paragraphs 39 and 40 of the Negotiating Framework approved by the Council of the European Union on 21 June 2024 (hereinafter referred to as the “Negotiating Framework”), on 14 May 2025, the Government of Ukraine adopted Ordinance No. 475 “Certain issues of ensuring the negotiation process on Ukraine’s accession to the European Union under Cluster 1 ‘Fundamentals of the EU Accession Process’”, by which it approved four strategically important documents defining a comprehensive approach of the State to the fulfilment of commitments within the framework of Ukraine’s accession to the European Union, namely: the Rule of Law Roadmap, the Public Administration Reform Roadmap, the Roadmap on the Functioning of Democratic Institutions, and the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine (hereinafter referred to as the “Transformation Documents”).

The Transformation Documents should become a basis for the systemic and consistent advancement of the European integration, as well as for the approximation of national legislation, institutional capacity and public administration practices to the EU standards. They cover all fundamental reforms defined by the Negotiating Framework and reflect the cross-sectoral nature of the changes required for Ukraine’s further progress along the path towards the European integration.

The Transformation Documents have a clear and unified structure: they are divided

into thematic blocks, each containing specific measures with defined implementation timeframes, performance indicators and responsible bodies. Such approach ensures transparency, predictability and the possibility of effective monitoring of the fulfilment of commitments undertaken by Ukraine.

In particular:

- The Rule of Law Roadmap, covering the reform of the judiciary, strengthening anti-corruption efforts, ensuring fundamental rights, developing the justice system, as well as issues of freedom, security and law enforcement, comprises 529 measures aimed at strengthening institutional independence, legal certainty and effective law enforcement.
- The Public Administration Reform Roadmap includes 91 measures and focuses on establishing a modern strategic framework for public administration, improving policy-making and coordination processes, developing a professional and politically neutral civil service, enhancing the accountability of public authorities, improving the quality of administrative service delivery and strengthening the effectiveness of public finance management.
- The Roadmap on the Functioning of Democratic Institutions, which contains 96 measures, is aimed at strengthening the democratic foundations of the State, improving the electoral process, enhancing the role and capacity of parliamentary institutions within the democratic system, as well as developing civil society and its participation in the development and implementation of state policy.
- The Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine includes 122 measures grouped under 9 strategic objectives and is aimed at ensuring equality, non-discrimination, preservation of cultural identity, linguistic rights and the effective participation of representatives of national minorities in public and political life.

Almost 165 implementing entities are involved in the implementation of the envisaged measures, including central executive authorities, the Verkhovna Rada of Ukraine, local self-government bodies, other public authorities and institutions. Such a broad institutional composition of implementing entities highlights the comprehensive and inter-agency nature of the reforms, as well as the need for close coordination between all levels of government to achieve the defined objectives.

At the same time, in order to ensure proper oversight of the implementation of the measures provided for in the Transformation Documents, a clear reporting mechanism has been established, covering both horizontal and vertical coordination. In particular, it provides for mandatory quarterly reporting by ministries, other central executive authorities, oblast, Kyiv City and Sevastopol City State (Military) Administrations to the Cabinet of Ministers of Ukraine on the progress in implementation of the measures.

In addition to conventional administrative reporting, in order to enhance transparency, openness and the effectiveness of the monitoring, the information system “Pulse of Accession” for monitoring the implementation of Ukraine’s commitments in the field of European integration (hereinafter referred to as the “Pulse of Accession”) is used — a digital online platform that ensures dynamic updating of information on the progress in fulfilment of Ukraine’s European integration commitments.

In addition, quarterly reporting to the European Commission on Ukraine’s implementation of the Transformation Documents is performed. Therefore, the

aforementioned instruments will not only allow for the structuring of systematic reporting, but also ensure a constructive dialogue on the state of implementation of reforms, which will contribute to the formation of an objective picture of changes.

At the same time, such approach strengthens the coordinating function of the Government with regard to the direct implementation of the aforementioned strategic documents, the development of further steps for the implementation of reforms, as well as monitoring their completeness and compliance with the implementation deadlines.

The roadmaps are important because without the implementation of their measures the Council of the European Union will not be able to adopt a decision on the opening of the Fundamental Rights cluster and to set interim benchmarks for the negotiating chapters on the rule of law. These interim benchmarks will be specifically aimed at the adoption of legislation, the establishment and strengthening of administrative structures, as well as at intermediate results and will be closely linked to the actions and stages of implementation of the roadmap. No negotiating chapter will be provisionally closed until these interim benchmarks are met.

### **Implementation of the European Commission's recommendations under the EU Enlargement Package**

With a view to ensuring the systemic implementation of the recommendations provided by the European Commission to Ukraine under the 2024 European Union Enlargement Package, Ordinance of the Cabinet of Ministers of Ukraine No. 300-p of 28 March 2025 "On the approval of the Action Plan for the Implementation of the Recommendations of the European Commission Presented in the Report on Ukraine's Progress under the 2024 European Union Enlargement Package" was adopted.

This Action Plan contains approximately 380 measures aimed at the approximation of national legislation to the EU legislation and the strengthening of institutional and administrative capacity under the negotiating chapters grouped within 6 clusters.

The results of the implementation of the Action Plan were reflected in Ukraine's contributions to the European Commission's 2025 Enlargement Package Report, which were sent to Brussels on 23 April and 10 September 2025.

In addition, the measures of the Action Plan for the Implementation of the European Commission's Recommendations were incorporated into the digital module for monitoring of the implementation of Ukraine's and/or the Cabinet of Ministers of Ukraine's commitments to the European Union, foreign states and international organisations (Reform Matrix) in accordance with Resolution of the Cabinet of Ministers of Ukraine No. 634 of 4 June 2024 "Certain issues of monitoring of the implementation of the Reform Matrix" with a view to ensuring unified and prompt tracking of the fulfilment of Ukraine's commitments in the field of European integration and the proper informing of international partners thereof.

On 4 November 2025, the European Commission published the 2025 Ukraine Report under the Enlargement Package (hereinafter referred to as the "Report"), which contains an assessment of Ukraine's progress in aligning its legislation with the EU acquis and an evaluation of the dynamics of reform.

In the last year's Report, within Cluster 1 "Fundamentals of the EU Accession Process",

the European Commission noted progress under Chapter 24 “Justice, Freedom and Security”, and also upgraded its score under Chapters “Public Administration Reform”, 32 “Financial Control” and “Economic Criteria”.

Within Cluster 2 “Internal Market”, a higher score was received under Chapter 2 “Freedom of Movement for Workers” and a good level of preparation was noted under Chapter 28 “Consumer and Health Protection”. The restoration of market surveillance and the transition to sectoral control in line with the European standards were acknowledged.

Cluster 3 “Competitiveness and Inclusive Growth” became one of the most dynamic areas in 2025: Ukraine achieved significant progress in six out of eight chapters: 16 “Taxation”, 17 “Economic and Monetary Policy”, 20 “Enterprise and Industrial Policy”, 25 “Science and Research”, 26 “Education and Culture”, 29 “Customs Union”. This clearly demonstrates Ukraine’s capacity for the rapid implementation of the EU acquis.

Ukraine also demonstrated good progress in the field of environment and climate policy (Cluster 4 “Green Agenda and Sustainable Connectivity”). In particular, the updating of the National Energy and Climate Plan was launched, the reform of the energy security system is ongoing, and the alignment with the European policy on trans-European networks continues.

As for the results within Cluster 5 “Resources, Agriculture and Cohesion Policy”, in 2025 Ukraine received a higher overall score under Chapter 11 “Agriculture and Rural Development”, which constitutes an important outcome of systemic work on the alignment of Ukraine’s agricultural policy.

In the area of external relations (Cluster 6), Ukraine traditionally demonstrates a high level of alignment with the EU policy. The European Commission highlighted good progress under Chapter 31, which covers the Common Foreign and Security Policy. Ukraine ensured 99% alignment with the EU positions in the field of foreign policy and sanctions practice, supporting 79 out of 80 EU foreign policy declarations.

Based on the new assessment of the European Commission, a new Action Plan for the Implementation of the Recommendations of the European Commission Presented in the 2025 Ukraine Report under the EU Enlargement Package will be developed, which will define the priorities of further reforms and detailed steps for their implementation.

### **Preparation of the National Programme for the Adaptation of Ukrainian Legislation to the EU Acquis**

*In accordance with paragraph 25 of the Negotiating Framework: “Accession [of Ukraine] will entail the acceptance of all rights and obligations attached to the Union membership and its institutional framework, known as the acquis. Ukraine will be obliged to apply the acquis in force at the date of accession. In addition to legislative alignment, the accession entails, in particular, the timely and effective implementation of the acquis”.*

With a view to ensuring the timely and effective implementation of the EU acquis, the Government has developed and plans to approve the National Programme for the Adaptation of Ukrainian Legislation to the EU Acquis (hereinafter referred to as the “National Programme”).

The National Programme provides for the achievement of approximately 1,000

objectives through which more than 1,700 acts of the EU acquis will be implemented. The achievement of the objectives of the National Programme is planned through the fulfilment of nearly two thousand tasks, including amendments to Ukrainian legislation, institutional reforms, and tasks aimed at preventing corruption.

The timeframe for the fulfilment of the tasks provided for by the National Programme has been established in accordance with the negotiating positions approved by the Government, as well as other documents in the field of European integration. Most tasks are scheduled for completion by December 2027. The National Programme also includes tasks with the deadlines determined in accordance with transitional periods agreed with the European Union.

The tasks of the National Programme are grouped under 31 negotiating chapters within six negotiating clusters in accordance with the revised European Union enlargement methodology. The Roadmap on the Functioning of Democratic Institutions, the Public Administration Reform Roadmap and the Rule of Law Roadmap, as well as the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine, approved by Ordinance of the Cabinet of Ministers of Ukraine No. 475 of 14 May 2025, constitute integral parts of the National Programme for the remaining relevant negotiating areas and chapters.

During the development of the National Programme, all available materials received from the EU during the official EU assessment (screening) of the progress in implementation of the EU acquis into the national legislation of Ukraine were taken into account, namely screening reports, presentations delivered by Ukraine at the meetings with the European Commission, questionnaires and negotiating positions under all negotiating clusters.

With a view to ensuring comprehensive stakeholder engagement during the drafting of the National Programme, proposals from the Chairs of the Committees of the Verkhovna Rada of Ukraine, Members of Parliament of Ukraine, ministries, other central executive authorities, public institutions, enterprises, local self-government bodies, associations, academic and research institutions and representatives of civil society were taken into account, including as a result of consideration at the meetings of the working (negotiating) groups on the preparation of Ukraine's negotiating positions in the negotiations with the European Union on the conclusion of the Agreement on Ukraine's Accession to the European Union.

The draft was preliminarily approved at the meeting of the Interagency Working Group held on 30 December 2025 and chaired by Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine Taras Kachka.

It is expected that, as a result of the implementation of the National Programme, Ukraine will be able to successfully complete the negotiations on accession to the European Union.

### **Launch of the information system "Pulse of Accession"**

On 10 December 2025, Resolution of the Cabinet of Ministers of Ukraine No. 1624 "Certain issues of reporting, monitoring and performance evaluation of the implementation of Ukraine's commitments in the field of European integration"

was adopted, approving the Regulation on the information system for monitoring the implementation of Ukraine's commitments in the field of European integration "Pulse of Accession" (hereinafter referred to as the "Regulation").

In accordance with point 8 of the Regulation, the main tasks of the "Pulse of Accession" include:

- the automation and digitalisation of reporting, monitoring and performance evaluation processes relating to the implementation of Ukraine's European integration commitments;
- ensuring the collection, processing, storage and use of information in the field of European integration, including information relating to the adaptation of Ukrainian legislation to the EU acquis and the conduct of the negotiations on Ukraine's accession to the European Union;
- the aggregation, in the form of charts, dashboards, etc., of information on the progress in the implementation of Ukraine's European integration commitments.

Through the "Pulse of Accession", monitoring of the implementation of the following documents is performed: the Rule of Law Roadmap, the Public Administration Reform Roadmap, the Roadmap on the Functioning of Democratic Institutions, the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine (hereinafter referred to as the "Transformation Documents"), approved by Ordinance of the Cabinet of Ministers of Ukraine No 475 of 14 May 2025 "Certain issues of ensuring the negotiation process on Ukraine's accession to the European Union under Cluster 1 'Fundamentals of the EU Accession Process'", as well as other strategic documents in the field of European integration, including the National Programme for the Adaptation of Ukrainian Legislation to the EU Acquis upon its adoption.

The "Pulse of Accession" consists of two components: an internal web portal, which constitutes the private part, and a website, which constitutes the public part.

Information in the "Pulse of Accession" is structured by clusters, chapters, areas, objectives, tasks and measures.

Users of the "Pulse of Accession" include officials and staff members of the Verkhovna Rada of Ukraine, the Secretariat of the Cabinet of Ministers of Ukraine, ministries, other central executive authorities, other public authorities, as well as natural and legal persons who have been granted access rights to the information system in accordance with the established procedure.

A total of 267 objectives and 894 tasks from the Transformation Documents have been entered into the "Pulse of Accession".

In August and October 2025, 7 online trainings on the operation and practical use of the information system were conducted for the users of the "Pulse of Accession", during which representatives of public authorities were informed of the specifics of working within the system as well as of the submission and approval of reporting information.

In the information system, representatives of public authorities approved 24 tasks from the Transformation Documents as completed.

## SECTION II.

### ACTIVITIES OF BILATERAL ASSOCIATION BODIES AND HIGH-LEVEL DIALOGUE BETWEEN THE EU AND UKRAINE

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## THE EU-UKRAINE BILATERAL BODIES OF ASSOCIATION

In accordance with Title VII “Institutional, General and Final Provisions” of the EU-Ukraine Association Agreement, the Association Council was established, the Association Committee, the Association Committee in Trade Configuration, subcommittees and dialogues were set up, within the framework of which regular meetings between Ukraine and the European Union are held on the key areas defined by the Association Agreement.

The functions of the secretariat for bilateral association bodies between the European Union and Ukraine on the Ukrainian part were ensured by the Government Office for Coordination on European and Euro-Atlantic Integration of the Secretariat of the Cabinet of Ministers of Ukraine (EU-Ukraine Association Committee, its subcommittees and dialogues), the International Trade Policy Department of the Secretariat of the Cabinet of Ministers of Ukraine and the Ministry of Economy of Ukraine (Association Committee in Trade Configuration, subcommittees and dialogues).

In 2025, the Parties held a number of joint meetings within the framework of the EU-Ukraine Association Committee, including the EU-Ukraine Association Committee in Trade Configuration, its subcommittees and dialogues. The Parties discussed a broad range of sectoral issues, in particular within the framework of the following meetings:

### 10th meeting of the **Association Council** (9 April 2025)

On 9–10 April 2025, the 10th meeting of the EU-Ukraine Association Council took place. The Ukrainian delegation was chaired by the Prime Minister of Ukraine, Denys Shmyhal, and the EU delegation was chaired by the High Representative of the Union for Foreign Affairs and Security Policy, Kaja Kallas.

The agenda of the Association Council meeting included discussion of a range of issues related to the security, economic and humanitarian situation in Ukraine in the context of Russia’s ongoing war of aggression against Ukraine and the response to Russia’s aggression, as well as bilateral issues, including the implementation of the Association Agreement in the light of the EU–Ukraine cooperation since the beginning of Russia’s war of aggression and the process of Ukraine’s accession, recovery and reforms in Ukraine, and the EU financial assistance.

During the visit, bilateral meetings were held between the Head of the Ukrainian delegation and the President of the European Commission, Ursula von der Leyen, the President of the European Council, António Costa, the President of the European Parliament, Roberta Metsola, the High Representative of the Union for Foreign Affairs and Security Policy, Kaja Kallas, the European Commissioner for Economy and Productivity, Implementation and Simplification, Valdis Dombrovskis, the European Commissioner for Enlargement, Marta Kos, and the President of the European Investment Bank, Nadia Calviño.

During the event, the Prime Minister of Ukraine participated in the opening of the EU–Ukraine Business Summit together with the European Commissioner for Enlargement, Marta Kos, the Vice-President of the Council of Ministers and Minister of Foreign Affairs and International Cooperation of Italy, Antonio Tajani, and the Minister for European Union Affairs of Poland, Adam Szapka. The Summit primarily focused on the opportunities for foreign investors in Ukraine in the fields of security, energy, critical raw materials and digitalisation. Following the EU–Ukraine Business Summit, the Joint Statement on

Strengthening the EU–Ukraine Business Partnership was adopted.

During the Association Council meeting, five agreements were signed: 3 agreements with the European Investment Bank for a total amount of EUR 300 million (the Financial Agreement between the European Investment Bank and Ukraine “Ukraine Water Recovery”, the Financial Agreement between the European Investment Bank and Ukraine “Ukraine Recovery Programme III”, Tranche B, the Financial Agreement between the European Investment Bank and Ukreximbank Joint Stock Company “Ukraine District Heating”).

In addition, the Agreement between the European Union and Ukraine on Ukraine’s participation in the Copernicus component and the Space Weather Events and Near-Earth Objects sub-components of the Space Situational Awareness component of the EU Space Programme was signed. Ukraine also acceded to the Joint Procurement Agreement for Medical Countermeasures, which provides for the possibility for the Parties (currently 39 states) to procure medical countermeasures through the conclusion of contracts on the basis of a joint procurement procedure.

Following the Association Council meeting, a joint press conference of the Prime Minister of Ukraine, the High Representative of the Union for Foreign Affairs and Security Policy and the European Commissioner for Enlargement took place, and a Joint Press Release was published.

#### 8th meeting of the **EU-Ukraine Association Committee** (21 March 2025, Brussels)

##### Key outcomes:

- The Parties discussed issues of bilateral relations between Ukraine and the European Union in the context of the Russian Federation’s war of aggression against Ukraine, including foreign and security policy.
- The Parties agreed to continue efforts to ensure accountability for international crimes committed by the Russian Federation against Ukraine, and discussed issues related to the establishment of a Special Tribunal for the crime of the Russian aggression against Ukraine.
- Further steps to strengthen cooperation in the area of justice, freedom and security were agreed.
- The state of implementation and further steps under the Ukraine Plan were discussed.
- The EU Party was informed about the implementation of the Public Administration Reform Roadmap and the Rule of Law Roadmap.
- The importance of and readiness for further cooperation in the implementation of reforms aimed at strengthening the independence, accountability, integrity and effectiveness of the Ukrainian justice system were underlined.
- The Parties discussed combating organised crime, including the approval of the Comprehensive Action Plan for Combating Organised Crime for 2025, cooperation in the field of migration and border management.
- Progress was discussed and further steps were agreed in the areas of economic, industrial and entrepreneurial policy, as well as critical raw materials.
- Results in the areas of space, consumer protection, taxation, revenue and

customs were highlighted.

- The Parties expressed their commitment to further deepening of cooperation for the joint development of the energy sector, strengthening regional energy security and promoting sustainable development, particularly in the context of post-war reconstruction.
- The positive results of the EU–Ukraine Solidarity Lanes were underlined, and key priorities in the areas of transport and regional policy were identified.
- The Parties discussed issues in the fields of science and technology, digital transformation and media, culture and education.
- Further action within the framework of the negotiation process on Ukraine's accession to the European Union were agreed, and information was provided on the progress in implementation of the Association Agreement in the context of Ukraine's accession to the EU.

### 9th Human Rights Dialogue (5 June 2025, Kyiv, hybrid format)

#### Key outcomes:

- Ukraine and the EU recalled the historic decisions of the European Council to grant Ukraine candidate status in June 2022 and to open negotiations on the accession in December 2023. The Parties recognised that ensuring respect for human rights constitutes an integral element of the Copenhagen criteria.
- The EU and Ukraine discussed violations by the Russian Federation of international human rights standards and international humanitarian law in the context of the full-scale invasion and war of aggression.
- The Parties paid particular attention to the impact of Russia's war of aggression on the rights to health, work, education, access to water and sanitation, as well as to adequate housing.
- Significant destruction, losses and damage to infrastructure directly affecting the provision of basic services necessary for the respecting human rights were discussed.
- Both Parties expressed concern regarding the deterioration of the situation in the territories temporarily occupied by Russia. In particular, the EU and Ukraine discussed enforced disappearances and torture, restrictions on civil and political rights, in particular coercion of Ukrainian citizens to change their citizenship and/or obtain a Russian passport, restrictions on freedom of expression, media freedom, freedom of assembly, freedom of religion or belief, forced conscription, as well as restrictions on access for international and non-governmental organisations.
- The EU and Ukraine reaffirmed their commitment to ensuring full accountability for international crimes committed in the context of Russia's war of aggression against Ukraine, including through the establishment of the Special Tribunal for the crime of aggression.
- An exchange of views took place on certain specific issues, such as support for investigations by the International Criminal Court, coordination of international

cooperation in investigation and prosecution processes, support for victim-centred approaches and trauma-sensitive steps, the establishment of the Register of Damage and a compensation mechanism. In this context, the EU reiterated the importance of Ukraine's ratification of the Rome Statute of the International Criminal Court.

- The EU welcomed Ukraine's efforts to fulfil the accession criteria despite the ongoing war, in particular as regards the stability of institutions guaranteeing democracy, the rule of law and human rights.
- Particular attention was paid to reforms of law enforcement authorities, the prevention of torture and cruel treatment, labour rights, freedom of expression, association and assembly, elections and electoral legislation, the rights of persons with disabilities and persons belonging to ethnic, linguistic, religious and national minorities, gender equality and the rights of the child.

### **The Sub-Committee for Economic and Other Sectoral Cooperation of the EU–Ukraine Association Committee** operates on the basis of a cluster approach.

In particular, during 2025, meetings of the clusters listed below were held.

9th meeting of **Cluster 1** "Macroeconomic cooperation, public financial management: budgetary policy, internal control and external audit, statistics, accounting and auditing, anti-fraud" (13 November 2025, Kyiv, hybrid format)

#### Key outcomes:

- In the area of economic and fiscal policy, further steps for the implementation of the National Revenue Strategy were discussed (including the reduction of the shadow economy, the reform of the simplified taxation system and the review of tax exemptions), as well as approaches to managing budget expenditure under challenging conditions, in particular pension expenditure and expenditure on support for veterans.
- In the area of public finance management (PFM), the implementation of the Public Finance Management Reform Strategy for 2022–2025 and the preparation of a new strategy for 2026–2030 were considered; the development of the internal financial control system, internal and external audit were discussed; Ukraine presented progress in public investment management, including experience in implementing the Single Project Pipeline for 2026 (SPP-2026) and the reform at the local level.
- In the context of developing cooperation in the financial sector, the impact of Russian aggression on financial stability was discussed; the progress of the privatisation of state-owned banks; the upgrade of financial sector regulation, including approximation to the Capital Requirements Regulation and the Capital Requirements Directive (CRR/CRD); the implementation of the Financial Sector Development Strategy; strengthening the institutional capacity and independence of the National Securities and Stock Market Commission and its cooperation with the International Organisation of Securities Commissions.

- In the anti-fraud area, the Parties considered further steps for the implementation of the anti-corruption and anti-fraud provisions of the Association Agreement and discussed measures to strengthen the capacity of the State Audit Service of Ukraine with regard to the protection of the EU's financial interests.
- A separate discussion in the field of statistics addressed the state of development of amendments to the Law of Ukraine "On Official Statistics" to ensure full alignment with the EU standards; the resumption of statistical reporting by legal persons and plans for the production of official statistics for 2022–2024; progress in the preparation of macroeconomic statistics (GDP, public finance statistics, prices); coordination of the statistical system and interaction with data providers; plans for the experimental estimation of the population based on register data, data from mobile network operators and banks.

8th meeting of **Cluster 2** "Industrial and entrepreneurial policy, mining and metallurgy, tourism, space, legislation on companies and corporate governance, consumer protection, taxation" (21 October 2025, Kyiv, videoconference)

#### Key outcomes:

- The EU party was informed about the implementation in Ukraine of a comprehensive policy in the fields of regional development, entrepreneurship and industrial sustainability. It was emphasised that work continues on the implementation of the Strategy for Recovery, Sustainable Development and Digital Transformation of Small and Medium-Sized Enterprises until 2027. Key areas include support for businesses affected by Russian aggression, innovation, digitalisation, the green transition and enhanced competitiveness. As of mid-2025, 18 measures have been implemented and a further 55 are under implementation.
- The Ukrainian Party, with reference to Resolution of the Cabinet of Ministers of Ukraine No 1275 of 11 November 2022 "Certain issues of defence procurement for the period of martial law", noted that in 2025 a new phase of reform commenced, combining institutional transformations with the development of the defence industrial base. It was also announced that Ukraine intends to review the Law of Ukraine "On Defence Procurement" in order to align it with Directive 2009/81/EC.
- The challenging situation in the hospitality sector was highlighted in view of the partial occupation of key tourist regions of Ukraine and the destruction or damage to infrastructure. Information was provided on key initiatives and measures of the Government aimed at mitigating the consequences and compensating for losses in the tourism sector.
- It was reported that work continues to ensure the stable operation of the Copernicus Regional Data Centre in Ukraine.
- Ukraine informed about the implementation of the National Revenue Strategy until 2030, which defines key areas of reform of the tax and customs systems, as well as the approximation of legislation to the EU standards. In this context, reference was made to the relevant laws adopted by the Verkhovna Rada of Ukraine in 2024–2025, as well as to the ongoing preparation of the necessary legislation (in particular concerning DAC7 and Council Directive (EU) 2016/1164 (ATAD)).

- Information was presented on the reform of the consumer protection legislation, in particular the preparation of the draft Law of Ukraine “On the Protection of Collective Consumer Interests”, which transposes Directive (EU) 2020/1828. A list of EU legal acts to be transposed into the national legislation of Ukraine by the end of 2027 was also provided.

11th meeting of **Cluster 3** “Energy cooperation, including nuclear issues, environment, including climate change and civil protection, transport” (3 December 2025, Kyiv, videoconference)

Key outcomes:

- The Parties discussed the alignment of Ukraine’s energy legislation with the EU legal framework and further steps for the implementation of the EU acquis in the field of energy, including security of supply, internal market reforms, renewable energy, energy efficiency, nuclear safety and governance.
- The results of the screening of legislation under Chapter 15 “Energy”, the preparation of Ukraine’s negotiating position and further steps in the European integration process were discussed.
- The European Union identified key areas for further cooperation with Ukraine, in particular the restoration and protection of critical energy infrastructure, the energy sector reform and the reform of governance in the energy sector.
- Representatives of the European Commission positively assessed the work of the Ukrainian Party in the field of environment under Chapter 27 “Environment and Climate Change”, as well as Ukraine’s aspiration to join the European Environment Agency, which will open broad opportunities for the gradual integration of Ukraine into the European system for the collection, analysis and dissemination of environmental information.
- The EU Party was informed about the progress in infrastructure development and alignment with the EU rules, in particular in the fields of road and rail transport; the Common Aviation Area Agreement and the ongoing negotiations between Ukraine and the European Union Aviation Safety Agency (EASA) were discussed.
- The latest developments in the field of civil protection were discussed, as well as the state of cooperation between Ukraine and the EU under the Civil Protection Mechanism.

10th meeting of **Cluster 4** “Cooperation in the field of science and technology, information society, audiovisual policy, education, training and youth, culture, cooperation in sports and physical culture” (26 November 2025, Kyiv, hybrid format)

Key outcomes:

- The Parties discussed progress achieved in the course of regular dialogues and the state of implementation of sectoral commitments under the Association Agreement, including the positive assessment of Ukraine’s progress under Chapters 25 “Science and Research” and 26 “Education and Culture” in the Ukraine Report under the

2025 Enlargement Package. The Ukrainian Party informed about the approval of the negotiating position for Cluster 3 “Competitiveness and Inclusive Growth” and the work on the National Programme for the Adaptation of Ukrainian Legislation to the EU Acquis.

- Large-scale transformations in the field of education were discussed, including the implementation of the “Education for Life” policy, the continuation of the New Ukrainian School reform, the launch of piloting of specialised secondary education and the adoption of the new Law of Ukraine “On Professional Education”. Particular attention was paid to the creation of safe conditions in educational institutions (LEARN programme, construction of shelters), the digitalisation of the educational process (scaling up of the Mriia system and the Diia.Education platform) and the development of mechanisms for the recognition of learning outcomes for students residing abroad and in temporarily occupied territories. The EU Party outlined the prospects for the full association of Ukraine to the European Union Programme Erasmus+ from 2028 and presented new initiatives regarding the introduction of the European Degree.
- Updates were presented in the fields of science and innovation: the introduction of a new performance-based funding model for research institutions and the completion of the state attestation of institutions. The Parties discussed the preparation of the Roadmap for Integration into the European Research Area (2025–2027), Ukraine’s successful participation in the Horizon Europe Programme (over EUR 64 million mobilised) and the activities of the International Coalition for Science, Research and Innovation in Ukraine.

#### 9th meeting of **Cluster 6** “Cooperation in employment, social policy and equal opportunities, health” (15 May 2025, Kyiv, hybrid format)

- The Parties discussed Ukraine’s progress in implementing its commitments under the Association Agreement in the fields of health, social policy and employment. The state of play and further steps regarding the implementation of Directive 2011/24/EU on patients’ rights, Regulation (EU) 2021/2282, as well as prospects for the implementation of Regulation (EU) 2025/327 on the European Health Data Space and the development of digital services in the field of health were presented.
- Issues relating to the prevention and control of infectious diseases were discussed, including the reform and certification of laboratories, the implementation of the State Strategy to Combat Antimicrobial Resistance through 2030, the implementation of the Regulation on serious cross-border threats to health, as well as cooperation with the European Centre for Disease Prevention and Control (ECDC) and preparation for the implementation of Regulation (EU) 2024/1938 (SoHO). Progress in approximating the pharmaceutical legislation to Directive 2001/83/EC was also presented.
- The Parties exchanged assessments of the impact of the Russian Federation’s full-scale armed aggression on the socio-economic situation in Ukraine, in particular on the labour market. In this context, measures aimed at developing employment policy, professional education and training and enhancing the competitiveness of the workforce were discussed, as well as the preparation of the Employment Strategy within the framework of the Ukraine Facility.
- Issues relating to labour relations and occupational safety and health were discussed,

in particular the preparation of the draft Law of Ukraine “On Occupational Safety and Health of Workers”, aimed at implementing Council Directive 89/391/EEC and introducing the European approach to occupational risk management.

- In the social sphere, progress in the implementation of strategies under the Ukraine Facility was presented, in particular in the fields of demographic policy, the protection of children’s rights and the deinstitutionalisation of care for persons with disabilities. The EU Party was informed of measures to support internally displaced persons, the development of targeted social assistance, the introduction of the “money follows the person” approach, as well as the adoption of Law of Ukraine No. 4219-IX of 15 January 2025 “On Amending Certain Legislative Acts of Ukraine Regarding Ensuring the Right of Persons with Disabilities to Work” as a key catalyst for change in the employment of persons with disabilities and the development of an inclusive labour market in line with the European standards.

10th meeting of the **Association Committee in Trade Configuration** (10 December 2025, Brussels, hybrid format)

#### Key outcomes:

- The strategic nature of the EU–Ukraine trade relations was reaffirmed: the EU remains Ukraine’s principal trading partner, while Ukraine has risen to the 16th place among the EU’s trading partners, demonstrating growing integration into the European market.
- Appropriate progress in the implementation of the Deep and Comprehensive Free Trade Area (DCFTA) was noted: effective implementation of the Priority Action Plan for 2025–2026 was acknowledged and it was agreed to conduct quarterly monitoring of the implementation of measures in 2026.
- Significant achievements in digital and regulatory integration were highlighted: the EU positively assessed Ukraine’s progress in the field of electronic identification and trust services, including the acquisition of membership in FESA, as well as the readiness of the Parties to update the relevant Annexes to the Association Agreement.
- Practical arrangements were reached on further market opening: the launch of the “roam like at home” regime as of 1 January 2026 was confirmed, progress in customs reform (preparation of a new Customs Code) was noted, and the EU expressed readiness to hold bilateral consultations in 2026 regarding new EU trade measures to counteract the negative impact of global overcapacity on the EU steel market related to trade.
- The EU confirmed its readiness to continue supporting Ukraine’s economic resilience: work has commenced on financial support mechanisms aimed at expanding the presence of Ukrainian exports in the markets of Asia and Africa, representing an unprecedented approach for a candidate country.

In addition, during the 2025 meetings of the *sub-committees of the Association Committee in Trade Configuration* listed below were held.

8th meeting of the **Sub-Committee for Trade and Sustainable Development**  
(7 November 2025, videoconference)

Key outcomes:

- The Ukrainian Party informed that it considers itself an integral part of the European Green Deal and undertakes to contribute to cooperation aimed at achieving a climate-neutral European continent by 2050, in particular within the framework of the Paris Agreement, the UN Sustainable Development Goals for 2030 and the Association Agreement.
- The EU Party was informed that on 29 October 2025 the Cabinet of Ministers of Ukraine adopted the Ordinance approving Ukraine's Second Nationally Determined Contribution under the Paris Agreement. In the conditions of war, Ukraine is building the institutional capacity to fulfil its international climate obligations and to contribute to a climate-neutral Europe.
- In the context of the National Energy and Climate Plan adopted in June 2024 (hereinafter referred to as the "NECP"), it was reported that in March 2025 Ukraine submitted to the Energy Community its first progress report on the implementation of the NECP, and that in May 2025 the Interagency Working Group was established to monitor the implementation of all 144 policies and measures under this Plan. An interactive online system for transparent tracking of progress is being developed. By the end of 2025, Ukraine plans to finalise the update of the NECP, taking into account the recommendations of the Energy Community and the extraordinary conditions of martial law.
- The state of implementation of the project "Circular Economy — Promotion of Sustainable Production and Consumption Patterns in Ukraine", financed by the EU and aimed at facilitating the introduction of circular economy principles in Ukraine and the achievement of the Sustainable Development Goals in the future, was presented.
- The Ukrainian Party informed of the work carried out to modernise the legal and institutional framework for social dialogue, including the drafting of an updated Law of Ukraine "On Social Dialogue in Ukraine", the resumption of the National Tripartite Social and Economic Council and the preparation of a new General Agreement with the social partners. The Verkhovna Rada of Ukraine has registered the draft Law of Ukraine "On Collective Labour Disputes" (Reg. No. 12034 of 16 September 2024), the main provisions of which have been incorporated into the draft Labour Code of Ukraine.
- The EU Party presented the EU Water Resilience Strategy adopted in June 2025, which provides for improved water management to ensure water security and address water-related risks, and in September 2025 the EU Soil Monitoring Law, aimed at establishing a single system for assessing and monitoring soil conditions in the Member States.
- The EU Party informed that from December 2025 the European Commission will organise a Water Resilience Forum every two years. This forum will bring together stakeholders and participants to assess progress in strengthening water resilience at all levels — public administration, business and civil society — and to monitor the implementation of this Strategy.

- The Ukrainian Party informed about the documenting and assessment of damage and losses caused to Ukraine as a result of Russia's war of aggression against Ukraine. Seven methodologies for assessing damage to land resources, soils, ambient air, water resources and the nature reserve fund, including forests, marine waters and subsoil, have been approved and registered. As of October 2025, the total amount of assessed environmental damage amounts to almost UAH 5.9trillion. The greatest losses have been suffered by forest ecosystems, water resources, soils, ambient air and protected areas, more than 30% of which have been affected by hostilities or pollution.

### 10th meeting of the **Sub-Committee for the Management of Sanitary and Phytosanitary Measures** (27 November 2025, videoconference)

#### Key outcomes:

- The State Service of Ukraine on Food Safety and Consumer Protection informed about the completion of the procedure for the official recognition by the European Union of the regionalisation approach with regard to African swine fever, as well as the subsequent amendments to all existing import prohibitions on pigmeat products applied to the EU Member States.
- Comments from the European Commission were received regarding the process of authorising exports of pigmeat and beef from Ukraine to the Member States of the EU; it was reported that additional questions remain in relation to the questionnaires (certification of production sites and compliance with the EU acquis) completed by specialists of the State Service of Ukraine on Food Safety and Consumer Protection, which the EU Party will provide through official channels.
- The Ukrainian Party noted that work is ongoing to approximate Ukraine's legislation to the EU requirements in the field of animal welfare and to conduct training of state inspectors in this area (as part of the implementation of the Animal Welfare Roadmap). The European Commission expressed its readiness to hold consultations and technical meetings in order to assist Ukraine in implementing the requirements of the EU acquis in the field of animal welfare.
- Further expansion of the use of the Trade Control and Expert System (TRACES NT) with new certificates for phytosanitary and other purposes was discussed.
- The possibilities of including Ukraine in Annex II, Part 2 to Commission Implementing Regulation (EU) No 577/2013 concerning the procedure for the European Commission's assessment of Ukraine's compliance with the EU requirements for the purpose of granting the right to non-commercial movement of pet animals were discussed. The process provides for the analysis of the national control system, legislation and official supervision procedures.
- A discussion was held with the European Commission regarding the possibility of including Ukraine in Annex XVII to Regulation (EU) 2021/404 in respect of milk and dairy products. During the discussion, the EU requirements and the criteria to be fulfilled for granting export authorisation were examined. The European Commission provided clarifications regarding the further procedure, including the completion of the relevant questionnaires and the conduct of the relevant audits.

9th meeting of the **Sub-Committee for Customs Cooperation**  
(7 October 2025, Uzhhorod)

Key outcomes:

- The Ukrainian Party informed about the updated Medium-Term Action Plan under the National Revenue Strategy until 2030, approved by Ordinance of the Cabinet of Ministers of Ukraine No 835-p of 4 August 2025, noting that it constitutes the principal strategic document of the customs reform and that the measures envisaged therein are in line with the EU recommendations and represent an important step in strengthening the institutional capacity of the State Customs Service of Ukraine.
- The Parties considered the ongoing implementation of amendments to the Customs Code of Ukraine, as well as the preparation of the new draft Customs Code, including the further legislative procedure for its consideration, including public consultations, finalisation of the updated version and its examination by the Verkhovna Rada of Ukraine. The EU Party informed about the main areas of the EU customs reform, in particular about the legislative procedure for the adoption of the new Union Customs Code.
- The Parties agreed to continue technical consultations between experts from Ukraine, the European Commission and the EU Member States in order to align further practical steps for the implementation of the mechanism for the exchange of advance customs information.
- The Ukrainian Party informed about the results of cooperation between the State Customs Service of Ukraine and the customs administrations of the EU Member States in the field of verification of EUR.1 certificates and about the launch in Ukraine of an online real-time verification service for these certificates through the Single Window for International Trade web portal.
- The Parties outlined further plans for cooperation in the provision of mutual administrative assistance in customs matters and in cooperation between Ukraine and the European Anti-Fraud Office (OLAF).
- The Ukrainian Party presented the results of cooperation between Ukraine and the European Union within the framework of the activities of the World Customs Organisation for 2024–2025. The Parties discussed further coordination of actions during meetings of working groups and committees and agreed on common approaches aimed at preventing the participation of the Russian Federation in the governing bodies of the World Customs Organisation.

8th meeting of the **EU–Ukraine High-Level Dialogue on Horizontal Issues and Specific Industrial Sectors** (5 June 2025, Rzeszów, Republic of Poland, hybrid format)

Key outcomes:

- The Progress in the preparation for the launch of formal negotiations on the conclusion of the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA) was noted. The EU Party emphasised that the ACAA constitutes a key instrument for Ukraine’s integration into the EU internal market and a central element of the updated Action Plan for the Implementation of the Deep and Comprehensive Free Trade Area.

- Information was provided on progress in the preparation of the recast of the Law of Ukraine “On Public Procurement” (Reg. No. 11520), developed in accordance with the requirements of the EU Directives.
- The Parties discussed the implementation of the Strategy for the Development of Small and Medium-Sized Enterprises of Ukraine for 2024–2027, which provides for the implementation of 86 measures across five key areas. It was reported that 10 measures have already been completed and 57 are under implementation. The launch of digital support instruments, e-residency, advisory programmes, as well as reskilling and migrant return programmes is envisaged.
- The Ukrainian Party presented an update on the state of implementation of the provisions of the revised EU Construction Products Regulation (CPR). At the same time, the need for enhanced dialogue with the European Commission regarding the inclusion of construction products in a potential update of the scope of the ACAA and the development of national standards for construction products concerning the reuse of demolition and construction waste was emphasised.
- The EU Party was informed about progress in implementing an integrated approach to the prevention of industrial pollution. The Law of Ukraine “On Integrated Prevention and Control of Industrial Pollution”, adopted on 16 July 2024, was presented, providing for the introduction of the integrated environmental permit based on best available techniques (BAT) and the mandatory digitalisation of all procedures.

## 22nd meeting of the EU–Ukraine Intellectual Property Law Dialogue (6 November 2025, videoconference)

### Key outcomes:

- Progress in the implementation of the intellectual property law reform and the development of legislation in the areas of copyright, trade secrets, trade marks, patents and utility models were discussed.
- The issue of transitional periods for the implementation of intellectual property law during the period of martial law was raised.
- The Parties discussed the process of establishing of the High Court on Intellectual Property in Ukraine and the development of the national Strategy for the Development of the Intellectual Property Sphere.
- Issues relating to the activities of law enforcement and customs authorities, international cooperation and the EU technical assistance were discussed.

### Particular attention was paid to legislative initiatives, in particular:

- the improvement of patent legislation;
- the development of the system for the protection of industrial designs and trade marks in line with the EU standards;
- the protection of intellectual property rights under martial law;

- ensuring transparency and efficiency in the activities of collective management organisations (CMOs);
- strengthening the fight against piracy through instruments of international cooperation, in particular WIPO ALERT.

The participants of the Dialogue also noted the successful implementation of the EU regional project, EU4IP, cooperation with the European Union Intellectual Property Office (EUIPO) and the European Patent Office (EPO).

The Parties agreed on the further approximation of Ukrainian legislation to the EU acquis, which is key to the opening of Chapter 7 “Intellectual Property Law” and will contribute to Ukraine’s investment attractiveness and economic recovery.

## SECTION III.

### EU ASSISTANCE TO UKRAINE

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## INTERNATIONAL TECHNICAL ASSISTANCE FROM THE EU

In 2025, the assistance to Ukraine was provided through the EU national and regional assistance programmes, cross-border cooperation programmes, the Twinning instrument, the Erasmus+ education programme, the Creative Europe programme, the Connecting Europe Facility (CEF), LIFE, EU4Health, the Digital Europe Programme, the Union Civil Protection Mechanism, the Instrument for Nuclear Safety Cooperation and the sector budget support programme in the field of public administration in the total amount of EUR 90 million.

At present, 491 EU technical assistance projects with a total value of EUR 1,219.5 million have undergone state registration.

## INTERNATIONAL AGREEMENTS ON TECHNICAL COOPERATION SIGNED IN 2025

In 2025, the EU and Ukraine signed 8 international agreements on financing new and continuing existing EU assistance programs for Ukraine, including:

- five additional agreements amending existing agreements, in particular to extend the duration of the following programmes: Support to Public Finance Management for Ukraine – EU4PFM, Energy Efficiency Support Programme for Ukraine – EE4U, Energy Efficiency Support Programme for Ukraine – EE4U-II, the Technical Cooperation Facility for 2018, the Annual Action Programme for Nuclear Safety Cooperation 2018 and the Annual Action Programme for Nuclear Safety Cooperation 2019;
- the Agreement establishing a new programme “Technical Cooperation Facility for Ukraine 2025” (with a total budget of EUR 154.1 million);
- two additional agreements to the Financing Agreement for the action “Technical Cooperation Facility for Ukraine 2025” in connection with an increase of the EU contribution by EUR 270.8 million. The amendments increased the budget of the Technical Cooperation Facility for Ukraine 2025 up to EUR 424.9 million.

**The assistance under the Financing Agreement for the action “Technical Cooperation Facility for Ukraine 2025” is directed towards:**

- strengthening the institutional and administrative capacity of the public authorities of Ukraine to coordinate and implement reforms and deliver services;
- the recovery of the country and ensuring the liability of the Russian Federation for international crimes through the provision of technical assistance, training, advisory support and the procurement of equipment;
- the restoration of the energy infrastructure damaged as a result of the Russian Federation’s military aggression through the procurement of equipment and materials;
- strengthening the capacity of business to contribute to Ukraine’s economic recovery and further economic integration with the EU through training, advisory services and financial support to businesses;
- strengthening the capacity of civil society organisations and the media to participate in the reform implementation processes, service delivery and recovery, and in promoting human rights, gender equality, the rights of persons belonging

to national minorities, culture, diversity and social cohesion of Ukrainian society through training and financial support.

## UKRAINE FACILITY

In 2025, the National Coordinator (the Ministry of Economy of Ukraine) systematically carried out explanatory work with public authorities responsible for the implementation of the steps of the Ukraine Plan regarding the processes of monitoring, control, reporting and implementation of such steps.

Transparency in the implementation of the Ukraine Plan and the involvement of the public in the monitoring of the implementation of reforms are ensured by the Ministry of Economy of Ukraine through updating the public dashboard of the Cabinet of Ministers of Ukraine reflecting the status of implementation of the steps set out in the Ukraine Plan.

In 2025, the Ukraine Plan provided for the implementation of 57 steps, which constitutes the maximum annual number of measures, of which 41 were completed.

### **In Q1 2025** — 15 steps, in particular:

- amendments to the Law of Ukraine “On Civil Service” entered into force;
- amendments to the Law of Ukraine “On the National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes” entered into force;
- the Roadmap on the Separation of Public Service Obligations was adopted;
- the Law of Ukraine “On Pre-School Education” entered into force;
- the Strategy for the Development of Ukrainian Culture was adopted;
- amendments to the Law of Ukraine “On Local State Administrations” entered into force;
- the Law of Ukraine “On Public Consultations” entered into force;
- the automated system for public monitoring of land relations was put into operation;
- the Long-Term Development Plan for the Irrigation Complex of Ukraine until 2050 was approved;
- the electronic subsoil user’s cabinet was updated;
- amendments to the Resolution of the Cabinet of Ministers of Ukraine approving the Plan for Allocation and Use of the Radio Frequency Spectrum in Ukraine entered into force;
- the Resolutions of the Cabinet of Ministers of Ukraine on alignment with the NIS and NIS2 Directives entered into force;
- the Ordinance of the Cabinet of Ministers of Ukraine “On approval of the Action Plan for the Digitalisation of Public Services until 2026” entered into force;

- the Law of Ukraine “On the Basic Principles of State Climate Policy” entered into force;
- the Ordinance of the Cabinet of Ministers of Ukraine “On approval of the Action Plan for the Establishment of a National Greenhouse Gas Emissions Trading System” entered into force.

Reform of Public Administration in Ukraine”, “EU Emergency Support Program for Ukraine”.

The Report on the implementation of the Q1 steps of the Ukraine Plan of 5 June 2025 successfully passed the assessment by the European Commission, which enabled the disbursement of EUR 3.056 billion in financial assistance in August 2025.

### **In Q2 2025** – 9 steps:

- the Strategy for the Resolution of Non-Performing Loans was adopted;
- the Law of Ukraine “On Professional Education” entered into force;
- the Resolution of the Cabinet of Ministers of Ukraine on the procurement of social services at the expense of the State Budget entered into force;
- the Small and Medium-Sized Enterprises Strategy was adopted;
- a study on the possibility of granting legal personality to territorial communities was published;
- the implementation of the Roadmap for Separating the Renewable Energy Surcharge from the Transmission Tariff continued;
- the portfolio of investment projects in the extraction of critical raw materials was published;
- international competitive tenders for Production Sharing Agreements were launched;
- the Ordinance of the Cabinet of Ministers of Ukraine on the establishment of a National Greenhouse Gas Emissions Trading System entered into force.

The Report on the implementation of the Q2 steps of the Ukraine Plan of 9 September 2025 successfully passed the assessment by the European Commission, which enabled the disbursement of EUR 1.8 billion in financial assistance in November 2025.

Step 4.7 of the Ukraine Plan from Q1 2025 concerning the entry into force of the amendments to the Law of Ukraine “On the National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes” was also credited in the Q2 tranche.

### **In Q3 2025** – 9 steps:

- the DREAM digital recovery management tool was implemented;
- at least 20% of judicial vacancies were filled;
- a new High Administrative Court was established;

- legislation on the sale of state-owned banks entered into force;
- harmonised standards for three groups of industrial goods were adopted;
- amendments to the Law of Ukraine “On State Support for Agriculture of Ukraine” entered into force;
- the report on the verification of reserves of strategic minerals in Ukraine was published;
- the Ordinance of the Cabinet of Ministers of Ukraine approving Ukraine’s Second Nationally Determined Contribution under the Paris Agreement entered into force;
- the National Waste Management Plan until 2033 was adopted.

The Report on the implementation of the Q3 2025 steps of 11 November 2025 successfully passed the assessment by the European Commission, which enabled the disbursement of EUR 2.3 billion in financial assistance in December 2025. Step 9.1 of the Ukraine Plan from Q1 2025 concerning the entry into force of the amendments to the Law of Ukraine “On Local State Administrations” was also credited in the Q3 tranche.

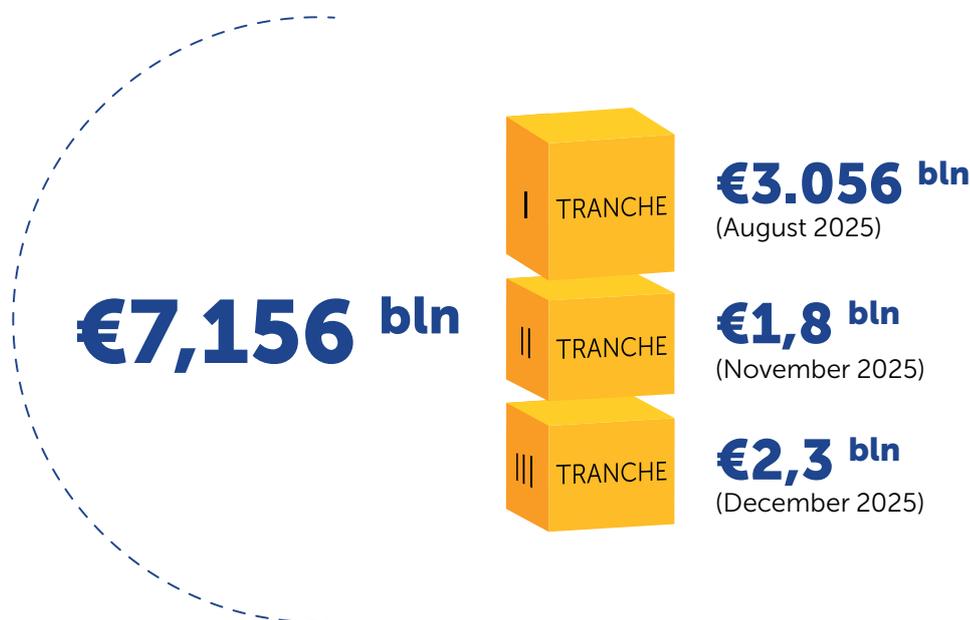
**In Q4 2025** – 8 steps:

- the Medium-Term Public Debt Management Strategy was approved;
- amendments to the Resolutions of the Cabinet of Ministers of Ukraine on state financial control entered into force;
- 20% of old disciplinary proceedings (cases) pending as of the end of 2023 were resolved;
- qualification assessment of 50% of judges was conducted with the involvement of the Public Integrity Council;
- a system for collecting data on the enforcement of court decisions is operational;
- the Law of Ukraine on improving state regulation of capital markets and organised commodity markets entered into force;
- the State Target Economic Programme for Energy Modernisation of Heat Supply Enterprises until 2030 was adopted;
- a study assessing the current legislation on the introduction of ESG reporting for the extractive sector was published.

A positive assessment of the Report for Q4 2025 by representatives of the European Commission will enable the disbursement of EUR 2.7 billion in financial assistance.

After the agreement with the European Commission, the Cabinet of Ministers of Ukraine adopted Ordinance No. 817-p of 1 August 2025 “On Amending the Ukraine Plan”, as a result of which the budget support schedule was synchronised.

# In 2025, a total of EUR 7.156 billion was effectively received under the EU's Ukraine Facility



During the first 9 months of 2025, UAH 5 billion was spent in the education sector, including the arrangement of shelters, major repairs of canteens, procurement of buses and the purchase of equipment within the framework of the New Ukrainian School programme and for vocational education centres.

In 2025, UAH 4.1 billion was allocated for the implementation of 27 public investment projects, of which 14 projects were financed through subventions. During the first 9 months of 2025, measures were financed in the total amount of UAH 900 million.

The planned amount of funding for compensation for the purchase of housing for war veterans and family members of fallen Defenders of Ukraine for 2025 amounted to UAH 3.9 billion. According to the Ministry of Veterans Affairs of Ukraine, this amount will cover applications from approximately 1,500 persons.

During the first 9 months of 2025, more than 1,200 persons received compensation in the total amount of UAH 3.1 billion.

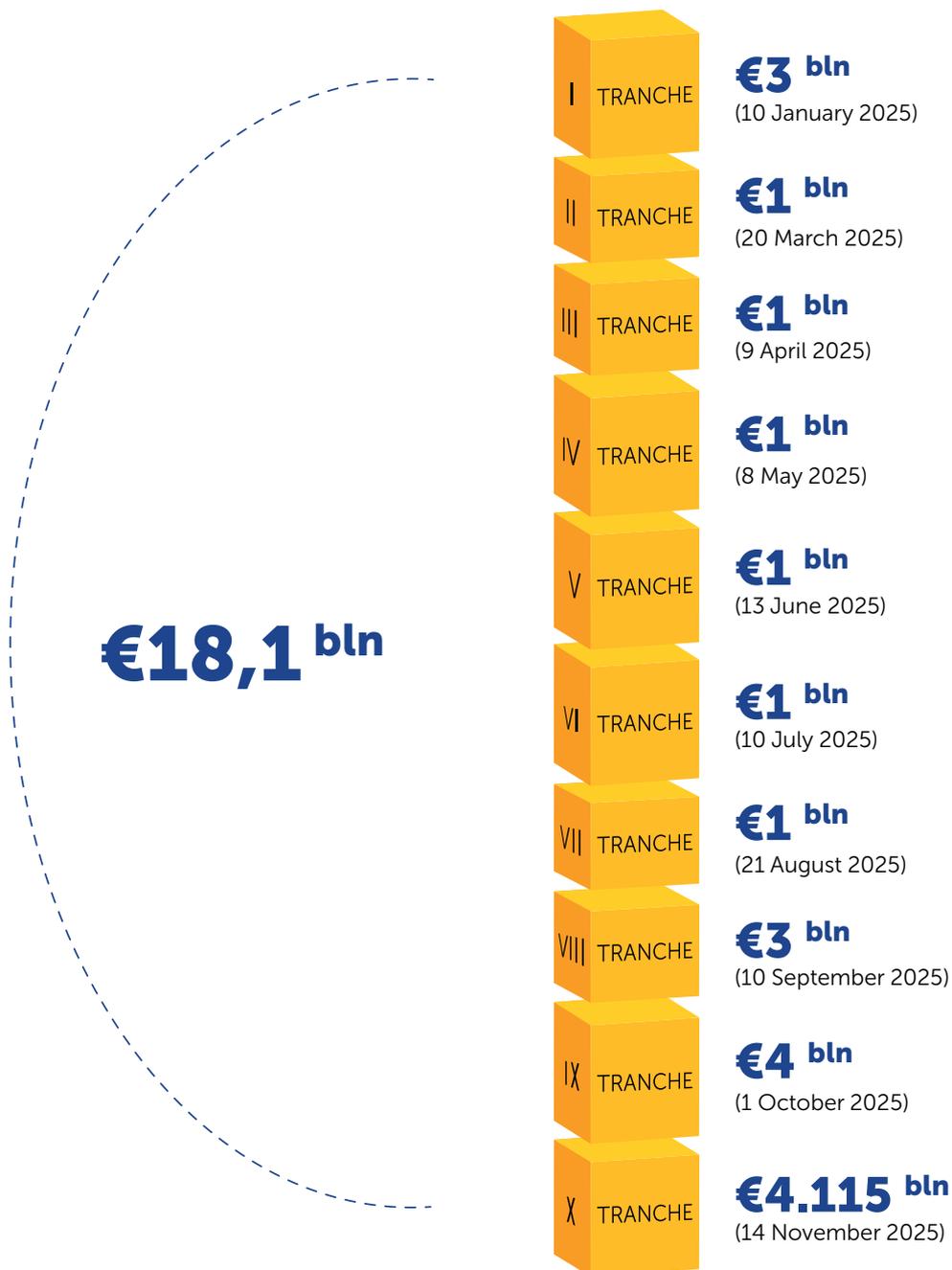
Within the framework of humanitarian demining of agricultural land, as of the end of September 2025, UAH 854 million was reimbursed to agricultural producers under 81 contracts concluded between the Humanitarian Demining Centre and certified demining operators for the clearance of agricultural land.

Demining under these contracts covers a total area of 14,500 hectares in Kyiv, Mykolaiv, Kherson and Kharkiv oblasts. Kharkiv oblast accounts for the largest share of demining – more than 11,000 hectares.

## COOPERATION UNDER THE EXTRAORDINARY REVENUE ACCELERATION (ERA)

In 2025, under the ERA mechanism, Ukraine received 10 tranches from the European Union in the total amount of EUR 18.1 billion.

**In 2025, under the ERA Facility,  
Ukraine received 10 tranches from  
the European Union, amounting  
to a total of EUR 18.1 billion**



The aforementioned financial resources received by Ukraine from the European Union, in line with previous EU Macro-Financial Assistance programmes implemented in 2014–2023, were directed towards covering the State Budget deficit and financing the expenditure of the General Fund of the State Budget.

## INTERNATIONAL AGREEMENTS ON COOPERATION WITH INTERNATIONAL FINANCIAL ORGANISATIONS IN 2025

In 2025, the following international agreements with the **European Bank for Reconstruction and Development** (EBRD) were concluded and/or entered into force:

- On 23 January 2025, the Guarantee Agreement (Emergency Hydro Power Plants Restoration Project) between Ukraine, the EBRD and the Government of the Italian Republic and the Loan Agreement (Emergency Hydro Power Plants Restoration Project) between Ukrhydroenergo PJSC and the EBRD, signed on 17 February 2024, entered into force, and a state-guaranteed loan in the amount of EUR 200 million (EUR 100 million from the EBRD and EUR 100 million from Italy) was attracted to support the liquidity and operational resilience of Ukrhydroenergo PJSC and to assist in financing the supply and installation of critically important equipment for the Dnipro and Middle Dnipro HPPs.
- On 20 May 2025, the Guarantee Agreement (Naftogaz of Ukraine Emergency Gas Finance Project (III)) between Ukraine and the EBRD of 25 April 2025 and the Loan Agreement (Naftogaz of Ukraine Emergency Gas Finance Project (III)) between Naftogaz of Ukraine NJSC and the EBRD of 25 April 2025 entered into force, and a state-guaranteed loan in the amount of EUR 270 million was attracted for the procurement of imported natural gas to ensure the stable 2025/2026 heating season and to support the liquidity and operational resilience of Naftogaz of Ukraine NJSC.
- On 23 May 2025, the Guarantee Agreement (Ukraine: Workover Rigs Procurement and Energy Efficiency Improvement of Ukrgasvydobuvannya JSC) between Ukraine and the EBRD of 31 July 2020 and the Loan Agreement (Ukraine: Workover Rigs Procurement and Energy Efficiency Improvement of Ukrgasvydobuvannya JSC) between the EBRD and Ukrgasvydobuvannya JSC of 31 July 2020 entered into force, and a state-guaranteed loan in the amount of EUR 36.4 million was attracted to increase domestic gas production of Ukrgasvydobuvannya JSC and improve extraction efficiency by reducing well downtime through the renewal of the workover rig fleet.
- On 16 June 2025, the Guarantee Agreement under the UZ Electric Locomotives project (Renewal of UZ Electric Locomotive Fleet Project) between Ukraine and the EBRD of 5 February 2025 and the Loan Agreement under the UZ Electric Locomotives project (Renewal of UZ Electric Locomotive Fleet Project) between Ukrzaliznytsia JSC and the EBRD of 18 December 2024 entered into force, and a state-guaranteed loan in the amount of EUR 300 million was attracted for the procurement of eighty (80) dual-voltage (AC/DC), including 25 kV, mainline electric locomotives with a minimum operating speed of 120 km/h.

- On 22 December 2025, the Guarantee Agreement under the RLF – Ukrnafta II (New Construction of a 250 MW CHPP in Kamianske Raion, Dnipropetrovsk Oblast, Ukraine) project between Ukraine and the EBRD of 11 July 2025 and the Loan Agreement under the RLF – Ukrnafta II (New Construction of a 250 MW CHP in Kamianske Raion, Dnipropetrovsk Oblast, Ukraine) project between Ukrnafta PJSC and the EBRD of 11 July 2025 entered into force, and a state-guaranteed loan in the amount of EUR 160 million was attracted for the installation of gas engine cogeneration units with a total capacity of 216 MW, located in central Ukraine.
- On 29 December 2025, the Guarantee Agreement under the Ukraine RLF – UZ Energy (Participation of Ukrzaliznytsia JSC in the National Distributed Generation System) project between Ukraine and the EBRD of 18 December 2024 and the Loan Agreement under the Ukraine RLF – UZ Energy (Participation of Ukrzaliznytsia JSC in the National Distributed Generation System) project between Ukrzaliznytsia JSC and the EBRD of 18 December 2024 entered into force, and a state-guaranteed loan in the amount of EUR 180 million was attracted to finance urgent capital expenditure on the procurement of small-scale gas-fired power generation equipment with a total capacity of up to 270 MW.

In addition, in 2025 the following international agreements with the **European Investment Bank** (EIB) and the **Council of Europe Development Bank** (CEB) were concluded and/or entered into force:

- On 29 January 2025, the Financing Agreement for the Ukraine Digital Emergency Response Services (Implementation of the Single Emergency Number 112 System with Consideration of the Needs of Persons with Disabilities) project was signed, providing for an EIB loan of EUR 40 million to finance the establishment of a new 112 emergency call system based on a modern platform, operational model and European standards.
- On 12 July 2025, the Financing Agreement for the Improvement Road Networks Solidarity Lanes FL (Restoration of Transport Networks) project was signed. The EIB loan of EUR 134 million will be directed towards mitigating the impact of damaged, destroyed or disrupted transport networks on the population and the economy of Ukraine. Viable medium-term solutions were identified for the rapid rehabilitation of road infrastructure in the western and southern regions to ensure effective and timely humanitarian aid and to support the recovery of war-affected communities.
- On 6 June 2025, the Grant Agreement for the Renewable Energy Solutions (RES) programme between Ukraine and the EIB entered into force, providing EUR 16.5 million to enhance the energy efficiency of public buildings, promote the sustainable development of municipalities and reduce dependence on traditional energy sources.
- On 18 September 2025, the Financing Agreement for the Ukraine Water Recovery project between Ukraine and the EIB entered into force, aimed at modernising and expanding water supply and treatment systems, sewerage networks, pumping

stations, treatment facilities and the procurement of specialised equipment in the amount of EUR 100 million. On 18 September 2025, the Financing Agreement for the Ukraine Recovery Programme III – Tranche B project between Ukraine and the EIB entered into force, providing EUR 100 million under the Ukraine Facility instrument for the recovery, reconstruction and improvement of critical and social infrastructure, in particular in regions most affected by the war or experiencing significant pressure due to the influx of internally displaced persons.

- On 9 July 2025, the Framework Loan Agreement for the HOME: Compensation for Destroyed Housing. Additional Financing project between Ukraine and the CEB entered into force in the amount of EUR 100 million, to be directed towards ensuring the right to housing for Ukrainian citizens whose homes were destroyed as a result of hostilities, terrorist acts or sabotage caused by the armed aggression of the Russian Federation against Ukraine, and towards creating conditions for the return of citizens to war-affected territorial communities through compensation for destroyed immovable property (which cannot be restored through current or major repair, reconstruction or restoration or where such restoration is unfeasible) using housing certificates.
- On 9 July 2025, the Framework Loan Agreement for the Housing for Internally Displaced Persons project between Ukraine and the CEB entered into force in the amount of EUR 50 million, to finance the acquisition of housing through loans provided to internally displaced persons who lost their homes or access thereto as a result of the armed aggression of the Russian Federation against Ukraine.
- On 9 September 2025, the Framework Loan Agreement for the Support to Internally Displaced Persons in Ukraine project between Ukraine and the CEB entered into force in the amount of EUR 200 million, to be directed towards financing budget expenditure to support vulnerable internally displaced persons.

## SECTION IV.

### RESULTS OF IMPLEMENTATION OF THE ASSOCIATION AGREEMENT IN 2025

EUWA

УКРАЇНА

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ЄВРОПА

## POLITICAL DIALOGUE, NATIONAL SECURITY AND DEFENCE

### POLITICAL DIALOGUE

In 2025, high dynamics of political dialogue between Ukraine and the European Union was observed at all levels. Ten visits at the highest level took place, as well as a number of meetings between the leaders of Ukraine and the European Union within the framework of high-level international events, including joint meetings with the participation of the President of the European Council, António Costa, and the President of the European Commission, Ursula von der Leyen. In addition, the President of the European Commission and the President of the European Council participated in all meetings of the Coalition of the Willing dedicated to supporting Ukraine. The Prime Minister of Ukraine visited Brussels, and the Chairperson of the Verkhovna Rada of Ukraine visited Strasbourg.

Owing to the continued prioritisation of Ukraine-related issues on the agenda of the key institutions of the European Union, Ukraine was invited to participate in the meetings of the EU governing bodies at the highest and high levels, in particular in the European Council and the Foreign Affairs Council.

Active exchanges were maintained at the level of the heads of foreign affairs departments of Ukraine and of the European Union. Four visits by the Minister for Foreign Affairs of Ukraine, Andrii Sybiha, to the EU institutions in Brussels took place, as well as a number of bilateral contacts with the High Representative of the Union for Foreign Affairs and Security Policy, Kaja Kallas. Andrii Sybiha participated in all scheduled (monthly) meetings and several informal meetings (including in the Gymnich format) of the Foreign Affairs Council. On 9 March 2025, an informal off-site meeting of the Foreign Affairs Council was held in Lviv.

In order to advance the negotiations on Ukraine's accession to the European Union, an active interaction was maintained with the EU Party at the level of the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine (a total of 10 visits).

On 24 February 2025, the College of Commissioners of the European Commission visited Kyiv to hold a joint meeting with the Government of Ukraine, and on 10–11 December 2025, an informal meeting of the General Affairs Council was held in Lviv, which enabled to take stock of the reform progress in Ukraine and to define priorities for further cooperation in the field of European integration.

The high intensity of the European integration dialogue was reinforced by meetings of the Association bodies: the 8th meeting of the EU–Ukraine Association Committee and the 10th meeting of the EU–Ukraine Association Council.

During the year, active cooperation with the European Parliament continued, with a key event being the opening of the European Parliament Liaison Office in Kyiv during the visit of its President, Roberta Metsola, to Kyiv. In addition, during 2025, a number of contacts took place between the President of Ukraine, the Prime Minister of Ukraine and the Chairperson of the Verkhovna Rada of Ukraine and the President of the European Parliament, Roberta Metsola. The interparliamentary dialogue was conducted within the framework of the established parliamentary cooperation formats: the EU–Ukraine Parliamentary Association Committee, Euronest, COSAC, inter-committee cooperation, as well as communication at the informal level. Within the framework of cooperation between committees of the Verkhovna Rada of Ukraine and the European Parliament,

visits of delegations of the Verkhovna Rada of Ukraine to Brussels were organised to hold joint committee meetings in the fields of economy and education. Informal contacts took place both in the form of regular visits and participation of Members of Parliament of Ukraine in the European Parliament's events and within the framework of the Friends of Ukraine Group in the European Parliament. In pursuance of the Memorandum of Understanding between the European Parliament and the Verkhovna Rada of Ukraine on a common framework for supporting parliamentary democracy in the context of Ukraine's recovery and accession to the European Union, training programmes and study visits for representatives of the Verkhovna Rada of Ukraine to Brussels were conducted.

Important developments in 2025 included the adoption by the European Parliament of documents directly concerning Ukraine or the Russian Federation's aggression against Ukraine, in particular the resolutions: Russia's disinformation and historical falsification to justify its war of aggression against Ukraine (23 January), Continuing the unwavering EU support for Ukraine, after three years of Russia's war of aggression (12 March), Return of Ukrainian children forcibly transferred and deported by Russia (8 May), The human cost of Russia's war against Ukraine and the urgent need to end Russian aggression: the situation of illegally detained civilians and prisoners of war, and the continued bombing of civilians (9 July), EU position on the proposed plan and EU engagement towards a just and lasting peace for Ukraine (27 November), and the Report on the 2023 and 2024 Commission reports on Ukraine (9 September).

## NATIONAL SECURITY AND DEFENCE

The year 2025 was marked by close interaction between Ukraine and the European Union at multiple levels.

### EU MILITARY ASSISTANCE MISSION IN SUPPORT OF UKRAINE (EUMAM UKRAINE)

The number of the trained personnel of the Armed Forces of Ukraine increased.

The EU Mission reports that in 2025, within the framework of collective and individual training, 641 training modules were delivered and 16,920 service personnel of the Defence Forces of Ukraine were trained.

As of the end of 2025, over the entire period of the Mission's activities, 2,009 training modules were delivered and 86,941 service personnel of the Defence Forces of Ukraine were trained.

Work was carried out with the EU Party on changing the format of the Mission by extending its mandate to the territory of Ukraine, as a result of which the EU Military Staff proposed a Strategic Review of EUMAM Ukraine (EUMAM 2.0) setting out the main lines of effort for military assistance to Ukraine within a potentially new architecture of the EU Mission's activities:

- LoE 1: "Regenerate Ukraine's combat power" — extending the EU Mission's mandate to the territory of Ukraine through the conduct of training activities both in Ukraine and in the European Union with the possibility of reimbursement of costs related to equipping and training the Defence Forces of Ukraine ("Equipping and Training"), as well as allocation of financial resources for the development of Ukraine's military infrastructure (provision of the necessary training equipment to Ukrainian training centres);
- LoE 2: "Education and leadership" — support to the Armed Forces of Ukraine in the field of military education;
- LoE 3: "Reform and advice" — support to the Armed Forces of Ukraine in the long-term reform of Ukraine's security and defence sector, including (establishing a Multidimensional Force Headquarters (MFHQ) in Kyiv).

At present, the EU Party is considering the implementation of the draft Mission Plan for 2026, in particular the financing of the construction of designated Training Centres in Ukraine (EUMAM UA-2.0).

### FINANCIAL INSTRUMENTS IN THE FIELD OF SECURITY AND DEFENCE *SECURITY ACTION FOR EUROPE (SAFE)*

Consultations were held with the EU institutions and Member States regarding the possible involvement of Ukraine in joint procurement projects for critical defence products, primarily in Ukraine, with the use of financing under the new SAFE instrument. As of the end of 2025, 15 EU Member States expressed their intention to implement projects jointly with Ukraine.

## *IMPLEMENTATION OF THE FIRST AND SECOND TRANCHES OF EXTRAORDINARY REVENUES GENERATED BY IMMOBILISED ASSETS OF THE RUSSIAN FEDERATION IN EUROPE FOR THE DEFENCE NEEDS OF UKRAINE*

As for the first tranche, the overall state of implementation of the project stands at 100%. All obligations on the part of the European Union have been fulfilled.

As for the second tranche, the overall state of implementation of the project stands at 67%. By agreement between Ukraine and the European Union, the funds in question were allocated across the following principal Lines of Effort:

- LoE 1 – Artillery & Ammunition (Czech Republic, Germany, France, Finland) – approximately 34% of the total amount;
- LoE 2 – Air Defence (Germany, Italy) – approximately 11% of the total amount;
- LoE 3 – Ukrainian Defence Industry (Denmark, France, Italy, the Netherlands) – approximately 55% of the total amount.

### *REPARATIONS LOAN*

In consultation with the EU Party, a key element of the package was the decision to establish a new instrument based on frozen Russian assets.

The overall potential of the mechanism is estimated at EUR 186–210 billion. For the period of 2026–2027, an amount of EUR 40–50 billion is considered realistic. It would establish a long-term financing architecture enabling sustained support for Ukraine, without increasing the debt burden.

On 19 December 2025, the European Union approved a decision to provide financing to Ukraine in the amount of EUR 90 billion for 2026–2027.

### *EUROPEAN DEFENCE FUND (EDF)*

Engagement with the EU Party was pursued with a view to involving Ukraine in European defence institutions and programmes. Ukrainian defence undertakings were granted the opportunity to participate in projects under the European Defence Fund (EDF). This step strengthens the integration of Ukraine's defence sector into the European Defence Technological and Industrial Base and creates a platform for the development of joint technologies and production.

In December 2025, Ukraine officially obtained the status of an associated participant in the European Defence Fund, which provides for the following opportunities:

- access for Ukrainian defence undertakings to European financing programmes for defence research and innovation;
- the possibility to participate in collaborative research projects and cooperation with the EU defence companies.

### *TRANSITION TO JOINT DEFENCE PRODUCTION (EDIP)*

### *ENHANCING COOPERATION WITH THE EUROPEAN SECURITY AND DEFENCE COLLEGE (ESDC)*

In the context of granting military educational institutions within the system of the Ministry of Defence of Ukraine the status of the Associated Partner within the network

of the European Security and Defence College (11 institutions, as of 21 March 2025), work was undertaken to develop joint educational products (including courses) and to deliver them jointly with partner institutions from the EU Member States.

### *COOPERATION WITH THE EUROPEAN DEFENCE AGENCY (EDA)*

The draft Technical Arrangement on the exchange of classified information between the Ministry of Defence of Ukraine and the European Defence Agency (EDA) is currently under consideration. The signing of the Arrangement will contribute to the deepening of ongoing cooperation and will enable the Ukrainian side to participate in initiatives and projects under the auspices of the EDA, taking into account the experience gained in countering Russian aggression.

### **SANCTIONS AGAINST RUSSIA**

In 2025, the European Union adopted four new sanctions packages (16th to 19th). Restrictive measures were imposed in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine against 101 natural persons and 181 legal persons. A further 411 ships originating from third countries were added to the sanctions list (the total number of listed ships is 557).

The sanctions target key sectors sustaining Russia's illegal invasion of Ukraine, including the energy, financial and military industrial sectors. Controls on the movement of Russian diplomats within the territory of the European Union were strengthened and additional measures were taken against persons responsible for the abduction of Ukrainian children. In addition, the European Union introduced further restrictive measures across the entire value chain of the Russian Federation's shadow fleet.

Furthermore, the 19th package includes sanctions against five persons associated with the Belarusian military industrial sector and the Lukashenko regime. Trade measures against Belarus increasingly mirror those imposed against Russia. In particular, measures will be applied against cryptocurrency payment services, the prohibition on the supply of certain categories of software is being expanded, including software for the banking sector, financial services, commercial space services, technical testing and analysis, artificial intelligence and quantum computing.

### **PUBLIC ADMINISTRATION REFORM**

Within the framework of the implementation of public administration reform, the draft Public Administration Reform Strategy for 2026–2030 has been developed, and work on the document is ongoing taking into account comments received from the European Commission and the SIGMA Programme/OECD.

The draft Strategy identifies three strategic areas: 1) the development of a professional, motivated and resilient civil service capable of operating effectively in the conditions of change and ensuring the delivery of the State's strategic objectives; 2) the establishment of a coherent, financially sustainable and legally predictable system for the provision of administrative services with a clear distribution of competences, responsibilities and financing between the levels of government, the maximum proximity of services to citizens and the consistent application of administrative procedures in line with the European standards of good governance; 3) ensuring systematic, coherent and analytically substantiated development of state policy and legal and normative acts on

the basis of data, impact forecasting and a clear results logic, with a strengthened role of the Government in preparing high-quality decisions and effective coordination at the level of the centre of government.

The draft Public Finance Management System Reform Strategy for 2026–2030 has been developed, taking into account the consolidated comments of the European Commission, the SIGMA Programme/OECD and the experts of the EU4PFM project. The draft has been submitted for consideration by the Cabinet of Ministers of Ukraine.

The draft Strategy covers five areas: 1) ensuring alignment of the national tax and customs system with the EU and OECD standards and strengthening its fiscal capacity; 2) establishing a predictable, coherent and sustainable public finance management system; 3) ensuring effective execution of the State Budget and local budgets under martial law and in the context of post-war recovery; 4) ensuring transparent and effective oversight and control of public finance in accordance with the EU standards; 5) developing a transparent, digitalised and institutionally capable public finance management system.

Within the framework of implementation of the public administration reform, the reform of the remuneration system for civil servants continues, taking into account the capacity of the State Budget of Ukraine, through the adoption of laws of Ukraine and secondary legislation and the introduction of the necessary legislative amendments in line with the indicators of the Ukraine Plan approved by Ordinance of the Cabinet of Ministers of Ukraine No 244-p of 18 March 2024.

In 2025 the following acts were developed and adopted:

- Law of Ukraine No. 4282-IX of 11 March 2025 “On Amending Certain Laws of Ukraine As Regards the Implementation of Unified Approaches to Remuneration of Civil Servants Based on Position Classification”;
- Resolution of the Cabinet of Ministers of Ukraine No. 369 of 1 April 2025 “Certain issues of conducting position classification in civil service” (updating the Catalogue of Typical Civil Service Positions and the Criteria for Classification Thereof; the Algorithm for Conducting Position Classification in Civil Service under Martial Law);
- Resolution of the Cabinet of Ministers of Ukraine No. 419 of 11 April 2025 “Certain issues of remuneration of civil servants of the secretariat of the legislative authority” (the basic salary scheme for civil service positions taking into account position families and levels within the secretariat of the legislative authority);
- Resolution of the Cabinet of Ministers of Ukraine No. 667 of 6 June 2025 “On amending Resolution of the Cabinet of Ministers of Ukraine No. 1409 of 29 December 2023” (the amounts of bonuses to basic salaries for civil service ranks in public authorities that have conducted position classification; the Procedure for assigning bonuses to civil servants holding category “A” civil service positions);
- Resolution of the Cabinet of Ministers of Ukraine No. 668 of 6 June 2025 “On approval of the Procedure for forming the payroll budget of civil servants in the public authority”.

In the context of restoring merit-based competitive recruitment to civil service positions, support is being provided in the Verkhovna Rada of Ukraine for the draft Law of Ukraine “On Amending Certain Laws of Ukraine Regarding the Restoration of Competitive Recruitment and the Improvement of the Procedure for Entry to, Performance and Termination of Civil Service” (reg. No. 13478-1 of 16 July 2025). The draft Law is aimed at improving procedures for recruitment, performance and termination of civil service and at restoring competitive selection for civil service positions in accordance with the indicators of the Ukraine Plan for 2024–2027.

Within the framework of the implementation of the Human Resource Management Information System (HRMIS), 1,096 public authorities were connected thereto during 2025 (19 ministries, 54 other central executive authorities, 23 other local executive authorities, 3 collegial bodies and 997 territorial bodies). A total of 64,390 personnel records of employees of public authorities were entered into HRMIS. Work is being finalised with a view to the full launch of HRMIS in Q1 2026.

As regards the implementation of the Law of Ukraine “On Administrative Procedure”, amendments were introduced to 216 laws and codes, as well as to approximately 300 acts of secondary legislation.

With a view to improving the system of strategic planning, the Concept of the National Strategic Planning System was approved (Ordinance of the Cabinet of Ministers of Ukraine No. 853 of 13 August 2025). The Concept provides for a comprehensive legislative reform to establish a system for defining and achieving Ukraine’s long-term development objectives through the coordination of all financial instruments and their focusing on ensuring the financial support for long-term goals.

In order to improve the accessibility and quality of public (electronic public) services, the following acts were adopted:

- Ordinance of the Cabinet of Ministers of Ukraine No. 263-p of 21 March 2025 “On approval of the Action Plan for the Digitalisation of Public Services until 2026”;
- Resolution of the Cabinet of Ministers of Ukraine No. 1226 of 1 October 2025 “Certain issues of provision of administrative services through administrative service centres”.

With regard to expanding the list of electronic public services (including integrated electronic public services) provided through the Unified State Web Portal of Electronic Services, as of the end of 2025, access was ensured to 165 electronic public services as well as to 110 services through the Diia mobile application, including 76 electronic public services and the display of 33 electronic documents, and 16 additional services were implemented.

The follow-up is carried out in the Verkhovna Rada of Ukraine to the following:

- the draft Law “On Administrative Fee” (reg. No. 4380, adopted as a basis on 5 June 2025 and being prepared for the second reading);
- the draft Law “On Digital Accessibility in Ukraine” (reg. No. 14278).

Work is underway on the draft Law of Ukraine “On the Peculiarities of Provision of Public (Electronic Public) Services” with a view to regulating the consideration and resolution of administrative cases in the field of delivery of public (electronic public) services.

The development of a draft law on the implementation of the European Digital Identity Framework has commenced.

## JUSTICE, FREEDOM, SECURITY AND HUMAN RIGHTS

### JUSTICE

#### On conducting the competition for one vacant position of member of the High Qualification Commission of Judges of Ukraine

On 6 February 2025, the Competition Commission for conducting the competition for the position of member of the High Qualification Commission of Judges of Ukraine (hereinafter referred to as the "Competition Commission") announced the competition for one vacant position of member of the High Qualification Commission of Judges of Ukraine (HQCJ). Applications were accepted from 10 February to 3 March 2025. Thirteen candidates were admitted to the competition, of whom, following shortlisting and interviews held on 28–29 May 2025, 2 candidates were included in the final list.

On 30 May 2025, the HQCJ recommended them for appointment. On 12 August 2025, the High Council of Justice appointed I. V. Kushnir as a member of the HQCJ.

#### On conducting the qualification assessment of the judiciary

For the purposes of ongoing qualification assessment procedures in 2025, the HQCJ announced the convening of a meeting of representatives of public associations to establish the Public Council of Integrity and examined the documents submitted by candidates. On 4 August 2025, the meeting of representatives of public associations elected the members of the Public Council of Integrity.

In 2025, following the qualification assessment for suitability for the position held, the HQCJ adopted decisions in respect of 745 judges, of whom: 42 judges were found to be suitable for the position held, 13 judges were found to be not suitable for the position held, in respect of 2 judges submissions were made to the High Council of Justice (HCJ) for dismissal from office due to their refusal to undergo the qualification assessment for suitability for the position held, and in respect of 688 judges the qualification assessment was terminated in the process (due to termination of powers, dismissal from office, or confirmation of the ability to administer justice in the High Anti-Corruption Court or a court of appeal). The qualification assessment for suitability for the position held has not been completed in respect of 1,346 judges. In respect of 35 persons appointed to the position of judge for a five-year term whose powers expired upon completion of that term, the HQCJ submitted recommendations to the High Council of Justice for appointment.

#### On ensuring the full functioning of the High Anti-Corruption Court

Following the competition for 25 vacant positions of judge of the High Anti-Corruption Court (HACC), including 15 positions of judge of the HACC as a court of first instance and 10 positions of judge of the HACC Appeals Chamber, announced by decision of the HQCJ No. 145/зп-23 of 23 November 2023 (as amended), the HQCJ submitted to the High Council of Justice recommendations for the appointment of two candidates to the position of judge of the HACC. They were appointed to the respective positions by Decree of the President of Ukraine No. 378/2025 of 3 June 2025.

By decision of 3 June 2025, the HQCJ announced a new competition for 23 vacant judicial positions in the HACC, including: 10 vacant positions in the Appeals Chamber of the HACC and 13 vacant positions of other judges in the HACC. A total of 205 persons applied to participate in the competition.

Within this competition, candidates may simultaneously apply for vacant positions both in the Appeals Chamber and in the court of first instance. Such candidates underwent the single competitive procedure comprising a qualification examination and an interview. On the basis of its results, the HQCJ will form a general ranking of participants and will recommend for appointment to the Appeals Chamber those candidates who rank highest.

Furthermore, in connection with legislative amendments, certain conditions of the competition will be modified:

- candidates who participated in the competition announced in 2023 but did not successfully pass the qualification examination may reapply;
- the HQCJ will independently determine the passing score for the cognitive abilities test and the test on the history of Ukrainian statehood (previously the legislation set this at 75%);
- the repeated interview with successful candidates following the qualification assessment has been abolished.

In the second half of 2025, the HQCJ completed the first stage of the qualification assessment within the competition, namely the qualification examination. Seventy-three candidates successfully completed the fourth stage of the qualification examination, namely the practical assignment on the specialisation of the HACC, including its Appeals Chamber. The competition is ongoing.

The Public Council of International Experts, as an auxiliary body to the HQCJ, ensures that candidates for judicial positions in the High Anti-Corruption Court meet the criteria of integrity, expertise and practical skills.

In addition, in 2025 the HQCJ continued the selection procedure for the positions of judges of a local court, announced by decision No. 366/зп-24 of 11 December 2024, and the acceptance of applications from judges intending to be transferred to another local court (the Commission Decision No. 367/зп-24 of 11 December 2024. A total of 9,339 persons applied to the HQCJ: 8,744 candidates intending to become judges and 595 judges.

As of 31 December 2025, the HQCJ completed the following stages of the qualification examination: the first stage – testing on the history of Ukrainian statehood; the second stage – testing of general legal knowledge and knowledge in the relevant court specialisation; the third stage – testing of cognitive abilities; the fourth stage – a practical assignment on the relevant court specialisation, with 3,049 persons admitted to complete the practical assignments; the assessment of papers is ongoing.

The HQCJ also submitted to the High Council of Justice recommendations for the appointment of three candidates to the position of judge of a local court (following the competition announced by decision No. 95/зп-23 of 14 September 2023).

The competition for **550 vacant judicial positions in courts of appeal**, announced by Decision No. 94/зп-23 of 14 September 2023 (as amended), is ongoing.

The HJC submitted to the High Council of Justice recommendations for the appointment of 42 candidates to the positions of judges of administrative courts of appeal, 55 candidates to the positions of judges of commercial courts of appeal and 81 candidates to the positions of judges of general courts of appeal.

Seventy-one candidates were appointed to the respective positions of judges of courts of appeal by Decrees of the President of Ukraine of 13 December 2025, of which: 30 candidates were appointed to commercial courts of appeal, 17 candidates to administrative courts of appeal and 24 candidates to general courts of appeal.

As of 31 December 2025, the examination of dossiers and interviews with 568 candidates for the positions in general courts of appeal were ongoing.

By Decisions of the HJC No. 193/зп-25 and No. 194/зп-25 of 29 October 2025, a competition was announced for 17 vacant judicial positions in the Specialised District Administrative Court and 10 vacant judicial positions in the Specialised Administrative Court of Appeal.

### **On the commencement of the activities of the Specialised District Administrative Court and the Specialised Administrative Court of Appeal**

By Law of Ukraine No. 4602-IX of 16 September 2025 "On the Establishment of the Specialised District Administrative Court and the Specialised Administrative Court of Appeal", the Specialised District Administrative Court and the Specialised Administrative Court of Appeal were established with their seat in the city of Kyiv.

On 29 October 2025, the HJC announced competitions for 17 vacant judicial positions in the Specialised District Administrative Court and 10 vacant judicial positions in the Specialised Administrative Court of Appeal and approved the conditions for conducting those competitions (Decisions No. 193/зп-25 and No. 194/зп-25 respectively).

A total of 225 persons applied to participate in the competition for the Specialised District Administrative Court and 131 persons applied for the Specialised Administrative Court of Appeal.

In order to assist the HJC in determining whether candidates for judicial positions in the Specialised District Administrative Court and the Specialised Administrative Court of Appeal meet the criteria of integrity and professional competence for the purposes of the qualification assessment, the Expert Council was established by decision of the HJC and is operating as a new auxiliary and advisory body to the HJC.

The State Budget of Ukraine for 2026 provides for the expenditure to ensure the administration of justice by the Specialised District Administrative Court in the amount of UAH 34,308.8 thousand and by the Specialised Administrative Court of Appeal in the amount of UAH 19,996.8 thousand.

### **Appointment of members of the High Council of Justice who have undergone international vetting**

The High Council of Justice is deemed competent provided that at least 15 of its members are elected (appointed), the majority of whom are judges. Currently, the High Council of Justice comprises 17 members with valid mandates, including two members

appointed by the President of Ukraine in October 2025, while 4 positions remain vacant (2 under the quota of the Congress of Judges of Ukraine and 2 under the quota of the Congress of Advocates of Ukraine).

### **On the establishment of the Service of Disciplinary Inspectors of the High Council of Justice following a transparent and merit-based competition**

On 23 December 2024, the Service of Disciplinary Inspectors of the High Council of Justice commenced its activities with 20 disciplinary inspectors, 1 Deputy Head of the Service of Disciplinary Inspectors and the Head of the Service of Disciplinary Inspectors of the High Council of Justice.

On 29 April 2025, by Decision No. 885/0/15-25, the High Council of Justice resolved to announce a competition for 4 vacant positions of disciplinary inspector of the Service of Disciplinary Inspectors of the High Council of Justice and to publish on the official website of the High Council of Justice and on the official web portal of the Judiciary of Ukraine a notice of the competition for the positions of disciplinary inspector of the Service of Disciplinary Inspectors of the High Council of Justice.

Following interviews with five successful candidates in the competition, by decisions of 18 December 2025, the High Council of Justice resolved to appoint three candidates to the positions of disciplinary inspector of the Service of Disciplinary Inspectors of the High Council of Justice for a five-year term and to refuse the appointment of two candidates to the position of disciplinary inspector of the Service of Disciplinary Inspectors of the High Council of Justice.

At present, two positions of disciplinary inspector remain vacant within the Service of Disciplinary Inspectors of the High Council of Justice.

### **On strengthening the institutional capacity of prosecutorial self-governance bodies and other matters**

In 2025, the Office of the Prosecutor General developed an algorithm for random allocation of criminal proceedings among prosecutors (at the stage of their registration), one of the components of which is the determination of the complexity of criminal proceedings.

Work is ongoing on the draft Laws of Ukraine "On Amending the Law of Ukraine 'On the Prosecutor's Office'", in particular regarding the evaluation of the quality of prosecutors' work and the selection of prosecutors for administrative positions, and "On Amending the Law of Ukraine 'On the Prosecutor's Office'" (regarding the implementation of the recommendations of the Group of States against Corruption and the requirements of the Anti-Corruption Strategy for 2021–2025 concerning the improvement of the disciplinary procedure in respect of prosecutors).

A functional audit of the Qualification and Disciplinary Commission of Prosecutors and of the Council of Public Prosecutors of Ukraine is being ensured in cooperation with international partners and will be conducted until 31 March 2026. Work is underway on a draft law aimed at strengthening the institutional capacity of the Qualification and Disciplinary Commission of Prosecutors.

## FUNDAMENTALS OF ANTI-CORRUPTION POLICY

### Implementation of the Anti-Corruption Strategy for 2021-2025 and the State Anti-Corruption Program for 2023-2025

The Anti-Corruption Strategy for 2021–2025 was implemented through the State Anti-Corruption Program for 2023–2025, approved by Resolution of the Cabinet of Ministers of Ukraine No. 220 of 4 March 2023.

Consolidated and summarised information on the state of implementation and on addressing the issues identified in the Anti-Corruption Strategy for 2021–2025 is contained in the National Report on the Effectiveness of the Implementation of State Anti-Corruption Policy.

In view of the fact that some measures under the State Anti-Corruption Program for 2023–2025 remain unimplemented for objective reasons primarily related to the introduction and operation of martial law in Ukraine, the implementation period of the aforementioned Program was extended by Resolution of the Cabinet of Ministers of Ukraine No. 1786 of 31 December 2025 until the entry into force of the State Anti-Corruption Program for the subsequent period in order to ensure continuity and consistency in the implementation of anti-corruption policy.

### Development of the Anti-Corruption Strategy for 2026–2030

The development of the Anti-Corruption Strategy for 2026–2030 was carried out in coordination and cooperation with representatives of the European Commission and the Organisation for Economic Co-operation and Development, as well as with the participation of international technical assistance projects, including the Digitalisation for Growth, Integrity and Transparency (UK DIGIT)/ Eurasia Foundation/ UK Dev project, the European Union Anti-Corruption Initiative in Ukraine, the Basel Institute on Governance, the OSCE Support Programme for Ukraine and UNDP in Ukraine.

In order to ensure a high level of openness and inclusiveness in the preparation of the draft Strategy, from October to December 2025 the National Agency on Corruption Prevention conducted 26 public consultations covering each subsection of the draft<sup>1</sup>.

As of the end of 2025, work on the draft Strategy is ongoing.

### Development of the whistleblowing framework, modernisation of the Unified Whistleblower Reporting Portal (“Portal”) and ensuring connection of organisations to the Portal

The number of organisations connected to the Unified Whistleblower Reporting Portal increased during 2025 to 11,232 (their number was 7,904 as of the end of 2024).

<sup>1</sup> Materials published for public consultations on each subsection are available at: <https://nazk.gov.ua/uk/antikoruptsiyna-strategiya-na-2026-2030-roky/>.  
The report on the results of public consultations is published at: <https://surl.li/qpuvww>.

On 20 August 2025, the National Agency on Corruption Prevention issued and presented a new guide, *Heroes Among Us: A Guide for Corruption Whistleblowers* (available at [surl.lu/vnjgcb](http://surl.lu/vnjgcb)), which was disseminated by more than 100 organisations, including educational platforms.

In the Verkhovna Rada of Ukraine, the draft Law of Ukraine “On Amending the Criminal Procedure Code of Ukraine and Other Legislative Acts of Ukraine Regarding the Regulation of the Payment of Remuneration to Whistleblowers” (reg. No. 14274 of 4 December 2025) is pending, and work is underway on the concept of a draft law aimed at aligning Ukrainian legislation with the international standards on whistleblower protection.

### Lifestyle monitoring

During 2025, lifestyle monitoring was conducted in respect of 12 declarants belonging to a specific category of persons defined in the first indent of Article 52-1(1) of the Law of Ukraine “On Prevention of Corruption”.

As a result of the lifestyle monitoring conducted in 2025, the National Agency on Corruption Prevention prepared and submitted materials/ reasoned opinions concerning 5 declarants from among the aforementioned specific category of persons. Within the framework of monitoring of the timely submission of declarations in respect of 2 persons holding responsible or particularly responsible positions, 4 administrative offence reports were drawn up for offences under Article 172-6(1) of the Code of Ukraine on Administrative Offences.

During the period from 1 October 2025 to 31 December 2025, 20 full verifications of declarations of persons authorised to perform functions of the State or of local self-government from among the specific category of persons defined in the first indent of Article 52-1(1) of the Law of Ukraine “On Prevention of Corruption” were conducted. As a result of full verifications of declarations, no indications of violations related to the submission of inaccurate information in declarations entailing administrative or criminal liability were identified.

### Monitoring and control over compliance with the legislation on ethical conduct and the prevention and resolution of conflicts of interest

In 2025, the National Agency on Corruption Prevention approved:

- the Procedure for monitoring and control over compliance with the legislation on ethical conduct and the prevention and resolution of conflicts of interest in the activities of persons authorised to perform functions of the State or of local self-government and persons with equivalent status (Order of the National Agency on Corruption Prevention No. 339/25 of 20 November 2025, registered with the Ministry of Justice of Ukraine on 9 December 2025 under No. 1843/45249);
- the Procedure for drawing up administrative offence reports within the National Agency on Corruption Prevention (Order of the National Agency on Corruption Prevention No. 169/25 of 10 June 2025, registered with the Ministry of Justice of Ukraine on 20 June 2025 under No. 956/44362).

As a result of the activities carried out in 2025, a systematic and comprehensive

approach was ensured to the identification and analysis of corruption risks, the conduct of monitoring and control over compliance with the legislation on ethical conduct and the prevention and resolution of conflicts of interest, inspections of public authorities and local self-government bodies regarding the organisation of work on the prevention and detection of corruption, as well as the application of preventive response measures.

The monitoring and control measures carried out served as a basis for the preparation, in 2025, of 56 reasoned opinions, 34 of which (60%) concerned corruption-related criminal offences involving damages exceeding UAH 434 million.

The results of the identified violations were taken into account during subsequent inspections of the relevant authorities, which made it possible to enhance the effectiveness of control and preventive measures.

As a result of the monitoring and control measures implemented in the area of conflicts of interest, authorised officials of the National Agency on Corruption Prevention issued 76 binding orders to heads of public authorities, institutions, organisations and local self-government bodies requiring the elimination of identified violations of anti-corruption legislation, the conduct of internal investigations and bringing of responsible persons to liability.

In addition, 11 corruption-related administrative offence reports were drawn up in respect of 11 persons.

Proactive detection of violations of the requirements of the Law of Ukraine "On Prevention of Corruption" was strengthened, as a result of which 46% (or 118 measures) of the measures initiated in 2025 were implemented at the initiative of authorised officials of the National Agency on Corruption Prevention.

The majority of these measures were initiated on the basis of information discovered from the mass media or from the declarations of persons authorised to perform functions of the State or of local self-government.

In order to increase the proportion of proactive measures, the National Agency on Corruption Prevention updated the rules of logical and arithmetic control, thereby enabling automated processing of information from the Unified State Register of Declarations of Persons Authorised to Perform Functions of the State or of Local Self-Government for the purpose of detecting potential violations in the area of conflicts of interest. This also enabled to reduce the time required for manual processing of information contained in declarations, registers and databases.

In total, in 2025 the National Agency on Corruption Prevention completed 258 monitoring and control measures concerning compliance with the legislation on ethical conduct and the prevention and resolution of conflicts of interest.

### **Implementation of the Law of Ukraine "On Lobbying"**

On 1 September 2025, the Law of Ukraine "On Lobbying" entered into force, establishing the legal framework for the development of a transparent and responsible lobbying culture, defining rules for influencing the legislative process and ensuring its accountability to society. Simultaneously with the entry into force of this Law, the National

Agency on Corruption Prevention put<sup>2</sup> into industrial operation the key instrument for its implementation, namely the Transparency Register<sup>3</sup>, an open public platform that collects, processes and publishes data on lobbyists and their reporting.

As of 31 December 2025, 132 lobbyists (63 natural persons and 69 legal persons) were registered in the Transparency Register.

On 3 October 2025, the National Agency on Corruption Prevention issued Order No. 303/25 “On approval of the Procedure for monitoring compliance with lobbying legislation”, which defines the procedure for the National Agency on Corruption Prevention to monitor compliance with lobbying legislation in order to ensure legal certainty, optimisation, accountability and transparency of the results of such procedure.

## STRENGTHENING INSTITUTIONAL CAPACITY AND INDEPENDENCE

### Strengthening the institutional capacity of the National Anti-Corruption Bureau of Ukraine

The Law of Ukraine No. 3502-IX of 8 December 2023 “On Amending the Law of Ukraine ‘On the National Anti-Corruption Bureau of Ukraine’” provides for a phased increase of the staffing level of the National Anti-Corruption Bureau of Ukraine by 300 persons as part of strengthening its institutional capacity:

from 1 January 2024 — by 100 persons, including 10 civil servants;

from 1 January 2025 — by 100 persons, including 20 civil servants;

from 1 January 2026 — by 100 persons, including 20 civil servants.

### E-platform

In 2025, the Office of the Prosecutor General ensured the publication on the E-platform of data on criminal proceedings concerning serious and particularly serious criminal offences committed by organised crime groups, including offences related to money laundering, cybercrime, drug production, terrorism, trafficking in human beings, migrant smuggling, firearms-related offences, high-level and lower-level corruption, and asset freezing and confiscation for 2024.

When aggregating these data, the updated guidance requirements of the European Commission concerning the e-platform were taken into account, including the prioritisation of indicators where organised crime constitutes the highest priority and migrant smuggling the lowest priority.

Data on the outcomes of court proceedings in criminal cases of the above categories, as provided by the judicial authorities, were also entered.

In addition, in view of amendments to the requirements of the EU Party regarding the formation of indicators, data for 2019–2023 were updated accordingly.

<sup>2</sup> <https://www.golos.com.ua/article/386351>

<sup>3</sup> <https://transparency.nazk.gov.ua/home>

## IMPROVEMENT OF ANTI-DISCRIMINATION LEGISLATION WITH REGARD TO COMBATING MULTIPLE DISCRIMINATION

In the Verkhovna Rada of Ukraine, the draft Law “On Amending Certain Legislative Acts of Ukraine (Regarding the Harmonisation of Legislation in the Field of Prevention and Combating Discrimination with the EU Acquis)” (reg. No 0931 of 29 August 2019) is pending, which is aimed at eliminating gaps in the legislation concerning liability for violations of the legislation in the field of prevention and combating discrimination in Ukraine, ensuring the proper exercise of the powers of the Ukrainian Parliament Commissioner for Human Rights in monitoring compliance with legislation in this field, and clarifying the provisions of the Law of Ukraine “On the Principles of Prevention and Combating Discrimination in Ukraine” in accordance with the EU acquis, the implementation of which is envisaged by the Association Agreement.

The State Service of Ukraine for Ethnic Policy and Freedom of Conscience continues its work on the draft Law “On Amending the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine Regarding the Prevention and Combating of Hate Speech”, which is aimed at comprehensively addressing issues of human rights protection and the implementation of international standards.

In the Verkhovna Rada of Ukraine, the draft Law of Ukraine “On Amending the Disciplinary Statute of the Armed Forces of Ukraine and the Internal Service Statute of the Armed Forces of Ukraine Regarding the Improvement of Mechanisms for Ensuring Military Discipline, Preventing and Combating Manifestations of Discrimination and Sexual Harassment” (reg. No 13037 of 21 February 2025), which provides for the enhancement of mechanisms for the prevention of, prompt response to and combating sexual harassment, manifestations of discrimination on the grounds of sex among military personnel, gender-based violence, and criminal offences against sexual freedom and sexual inviolability within the Armed Forces of Ukraine.

## GENDER EQUALITY AND COMBATING DOMESTIC VIOLENCE

In the area of ensuring equal rights and opportunities for women and men and combating domestic violence during 2025:

the application of gender-responsive budgeting at the national and local level was provided for (Law of Ukraine No. 4225-IX of 16 January 2025);

amendments were introduced to the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030 and an operational action plan for its implementation in 2025–2027 was approved (Ordinance of the Cabinet of Ministers of Ukraine No. 1321-p of 2 May 2025);

90,288 persons affected by domestic violence and gender-based violence received assistance from specialised support services, of whom 80% were women.

Monitoring of the effectiveness of specialised services for persons affected by domestic violence and gender-based violence was conducted. There are 1,130 such specialised services operating in Ukraine. The results of the monitoring will be taken into account in the development of the State Programme for the Prevention of and Combating Domestic Violence and Gender-Based Violence.

## IMPROVEMENT OF MECHANISMS FOR COMBATING TORTURE AND CRUEL TREATMENT

The Ministry of Justice of Ukraine continues work on the draft Laws of Ukraine “On Compensation for Damage to Victims of Violent Criminal Offences” and “On Amending the Code of Ukraine on Administrative Offences and the Criminal Procedure Code of Ukraine Regarding the Establishment of a Mechanism for Compensation for Damage to Victims of Violent Criminal Offences”.

In addition, in 2025:

- the Operational Plan for the Penitentiary System Reform for 2025–2026 was approved (Ordinance of the Cabinet of Ministers of Ukraine No. 1188-p of 29 October 2025);
- the functioning of the Unified Register of Convicted and Detained Persons was ensured (as of November 2025, it contained more than 36,000 active records);
- the existing website of the State Criminal-Executive Service of Ukraine was modernised, an electronic application form was created and individual online meetings with frequent complainants were introduced;
- the implementation of the Custody Records system within the National Police of Ukraine was further expanded, and as of December 2025 it was introduced in 137 units and 280 inspector posts were established to ensure safe custody, proper conditions of detention and nutrition in temporary detention facilities in compliance with fundamental human rights and procedural safeguards provided for by the legislation of Ukraine and by the international standards;
- the Additional Channel for Receiving Electronic Requests from Citizens pilot project for persons deprived of liberty was introduced;
- by Joint Order of the Ministry of Justice of Ukraine and the Ministry of Health of Ukraine, the mechanism for informing the State Bureau of Investigation of cases of torture was improved.

The Office of the Prosecutor General, jointly with the State Bureau of Investigation, took measures to ensure the effective pre-trial investigation of allegations of torture and cruel treatment, including with a view to addressing systemic problems identified by the European Court of Human Rights in its judgments concerning Ukraine.

As a result of the measures taken in 2023–2024, for the first time since 2005 the Committee of Ministers of the Council of Europe terminated its supervision of 11 cases belonging to the Kaverzin/ Afanasyev/ Belousov group of cases.

As of 31 December 2025, a further 13 final decisions in criminal proceedings of this category were secured (20 since the last reporting to the Committee of Ministers of the Council of Europe).

On 20 October 2025, the Government submitted to the Parliament the draft Law “On Amending Certain Laws of Ukraine Regarding the Strengthening of the Existing and Introduction of an Additional Mechanism of Parliamentary Oversight over the Activities of Law Enforcement Authorities and the Prosecutor’s Office, Including the Introduction

of Annual Public Reporting on the Activities of the State Bureau of Investigation and the Office of the Prosecutor General Concerning the Investigation of Cases of Torture and Other Ill-Treatment and the Protection of Victims” (reg. No. 14130), which is aimed at clarifying legislative provisions concerning the reporting of heads of certain law enforcement authorities on their activities to the Verkhovna Rada of Ukraine and introducing separate reporting on the investigation of cases of torture and other ill-treatment and the protection of victims.

## SAFEGUARDING THE RIGHTS OF VICTIMS

The Office of the Prosecutor General continues to develop the mechanism for supporting victims and witnesses of war crimes and other international crimes, which is implemented through a specialised unit, the Coordination Centre for Victims and Witnesses Support (hereinafter referred to as the “Coordination Centre”).

Within the framework of expanding the network of victim support units based at regional prosecutor’s offices, 12 specialised units were established, 9 of which have been operating for one year.

In order to ensure broader access to justice by expanding the categories of crimes in respect of which victims are provided with assistance by the Coordination Centre, comprehensive support by victim support specialists is available to minor victims, victims of trafficking in human beings, victims of gender-based and domestic violence, and victims of criminal offences under the procedural supervision of specialised defence prosecutor’s offices.

In order to ensure a unified approach to working with victims and witnesses, the Communication Strategy in the Work with Victims and Witnesses of War Crimes and Other International Crimes was developed.

Communication has been established with investigative authorities conducting pre-trial investigations in criminal proceedings in which victims are receiving support. In order to establish systematic cooperation with civil society organisations, working meetings were held with their representatives and a number of memoranda of cooperation were signed.

The development of the technical specifications for the establishment of the Register of Victims of War has been completed.

## TRAFFICKING IN HUMAN BEINGS

In the field of combating trafficking in human beings, measures were implemented within the framework of the State Targeted Social Programme for Combating Trafficking in Human Beings until 2025.

Work is underway on the preparation of the draft State Targeted Programme for Combating Trafficking in Human Beings until 2030, including holding 2 strategic sessions on the development of the Programme with the participation of central and local public authorities, international organisations and civil society organisations.

Regular exchange of information with the EU Anti-Trafficking Coordinator has been ensured.

In June 2025, the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA), in its report, welcomed the legislative and policy measures taken by Ukraine to ensure access to justice and effective remedies for victims of trafficking in human beings, notwithstanding the difficulties and constraints caused by the ongoing war.

In June 2025, representatives of the National Police of Ukraine and the State Border Guard Service of Ukraine participated in the activities of the coordination unit within the framework of the Global Chain joint action of the European Multidisciplinary Platform Against Criminal Threats (EMPACT), aimed at combating trafficking in human beings.

The national information campaign “DO YOU RECOGNISE THIS?” was conducted to inform the public about available services for victims of trafficking in human beings and exploitation, including the operation of the National Toll-Free Counter-Trafficking and Migrant Advice Hotline (527) and the thematic website [www.stoptrafficking.org](http://www.stoptrafficking.org) for obtaining qualified information and submitting requests for assistance from the IOM Protection Programme in Ukraine and its implementing partner civil society organisations.

During 2025, the Ukrainian Parliament Commissioner for Human Rights organised and conducted 15 monitoring visits and desk reviews in order to assess the state of implementation of state policy in the field of combating trafficking in human beings, during which the current state of compliance with the right of persons to information on the risks and consequences of trafficking in human beings, the provision of assistance to victims and the interaction of responsible entities was analysed. Following these monitoring activities, reports were issued setting out identified shortcomings and recommendations for their elimination.

In 2025, the Ukrainian Parliament Commissioner for Human Rights, jointly with the International Charitable Foundation “Caritas Ukraine”, developed the brochure, *Your Rights – Your Protection: Assistance to Victims of Trafficking in Human Beings*<sup>4</sup>.

The brochure contains information on the concept of trafficking in human beings, its forms and manifestations, and the assistance available to victims. It also provides an action algorithm for obtaining the status of a person recognised as a victim of trafficking in human beings. The brochure serves as an informational tool facilitating the exercise of victims’ rights and strengthening the system for combating trafficking in human beings.

## CIVIL SOCIETY DEVELOPMENT

On 21 March 2025, by its Ordinance No. 246, the Government approved the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026. The measures in the Action Plan were developed in accordance with the objectives of the Strategy and are aimed at implementing its strategic areas, in particular providing for:

- improvement of the practice of public consultations and the involvement of residents in addressing issues of local importance (regulatory support, recommendations,

<sup>4</sup> [https://www.ombudsman.gov.ua/storage/app/media/uploaded-files/tvoi-prava-tvii-zakhist-50.pdf?fbclid=IwZXh0bgNhZWUOCMTAAAYnJpZBExQUpDMEFIZGpOcWE0amJLbgEeBmc0Nv70CS6CnYOeOjYzt58-ec1Sz3fbE0KJf-1CZlqCKpTFAHtS0vbijMg\\_aem\\_Bw-Bg-aoWC2MrpM7lgrvrcRQ](https://www.ombudsman.gov.ua/storage/app/media/uploaded-files/tvoi-prava-tvii-zakhist-50.pdf?fbclid=IwZXh0bgNhZWUOCMTAAAYnJpZBExQUpDMEFIZGpOcWE0amJLbgEeBmc0Nv70CS6CnYOeOjYzt58-ec1Sz3fbE0KJf-1CZlqCKpTFAHtS0vbijMg_aem_Bw-Bg-aoWC2MrpM7lgrvrcRQ)

training and information measures, etc.); improvement of procedures for stakeholder involvement in the preparation of regulatory acts, and the introduction and promotion of dialogue instruments and deliberative forms of discussion;

- introduction of registration of civil society organisations on the Diia Portal and the possibility of their operation on the basis of the model articles of association; improvement of the conditions for the functioning of bodies of self-organisation of the population; improvement of legislation on humanitarian aid and its application in practice; handling the issue of improvement of mechanisms for financial support to civil society institutions; and promotion of volunteer activity;
- improvement of the framework for the provision of social services by these institutions, development of draft legislation on support for social entrepreneurship, and inclusion in regional socio-economic development programmes and other strategic documents of measures to involve civil society institutions in social entrepreneurship;
- strengthening communication between law enforcement authorities and human rights and other civil society institutions; involvement of civil society institutions in monitoring, collection and analysis of information on compliance with international humanitarian law in connection with the armed aggression of the Russian Federation; and establishment of cross-sectoral cooperation to prevent and counter fraud in the field of charitable and volunteer activities, etc.

An important component of the Action Plan is the work on aligning the legislation of Ukraine with the EU acquis and with documents of other international organisations concerning public participation, the operation of civil society institutions and the security of their representatives.

Implementation of the Action Plan at both national and regional levels will be carried out in cooperation with civil society institutions, international and other interested institutions and organisations identified as partners in the implementation of the measures, which will have a positive impact on ensuring that the interests of all stakeholders are taken into account.

## NATIONAL MINORITIES

In 2025, Ordinance of the Cabinet of Ministers of Ukraine No. 475-p of 14 May 2025 approved the Action Plan for the Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine (hereinafter referred to as the "Action Plan"). Currently, its implementation is ongoing in cooperation with public associations of national minorities (communities) of Ukraine.

In pursuance of the Action Plan:

the State Service of Ukraine for Ethnic Policy and Freedom of Conscience developed and continues working on the draft Law of Ukraine "On Amending Certain Legislative Acts of Ukraine Regarding the Strengthening of Protection of the Rights of Persons Belonging to National Minorities (Communities) of Ukraine", aimed at improving legal mechanisms for the exercise of the rights of persons belonging to national minorities (communities) of Ukraine and creating appropriate conditions for the preservation of their linguistic, cultural and national identity.

The draft Law of Ukraine “On Amending the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine Regarding Combating Manifestations of Discrimination” (reg. No. 13597 of 4 August 2025) was submitted to the Verkhovna Rada of Ukraine and is aimed at strengthening legal protection for victims of discrimination, introducing effective response mechanisms to cases of discrimination and bias-motivated offences, and approximating national legislation to the European Union standards in the field of human rights protection.

On 23 April 2025, a public discussion was held on the state of implementation of the recommendations of the Special Report of the Ukrainian Parliament Commissioner for Human Rights on the observance of the rights of national minorities (communities) and indigenous peoples in the conditions of the armed aggression of the Russian Federation against Ukraine for the period from 24 February 2022 till 31 December 2023, with the participation of Members of Parliament of Ukraine, representatives of central executive authorities, oblast military administrations and representatives of civil society organisations of national minorities (communities). During the discussion, the Report on the State of Implementation of the Recommendations of the Special Report was presented, recording the actual situation and systemic barriers complicating the implementation of necessary changes in the context of ensuring an appropriate level of observance of the rights and freedoms of national minorities (communities) and indigenous peoples in Ukraine.

At the year-end of 2025, out of 75 recommendations provided by the Ukrainian Parliament Commissioner for Human Rights to public authorities and local self-government bodies, 51 were implemented (68%), 10 are in the process of implementation (13%), and 14 remain unimplemented (19%), which means that 81% of the recommendations have been or are being implemented.

The Ukrainian Parliament Commissioner for Human Rights, in cooperation with the OSCE High Commissioner on National Minorities, developed Methodological Recommendations for Conducting Monitoring Visits and Desk Reviews on Observance of the Rights of National Minorities (Communities) of Ukraine and Indigenous Peoples of Ukraine, approved by Order of the Ukrainian Parliament Commissioner for Human Rights No. 163.15//25 of 29 December 2025.

The Methodological Recommendations will serve as a practical tool to be used by staff of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, including regional offices, when conducting monitoring visits and desk reviews in order to assess the state of compliance with the rights of persons belonging to national minorities (communities) of Ukraine, strengthen their legal protection and social integration, prevent cases of discrimination and ensure equal treatment, and support public authorities, civil society organisations and service providers in developing effective policies concerning these communities, including recommendations for the preparation of reports and acts of response.

On 18 June 2025, the Secretariat of the Ukrainian Parliament Commissioner for Human Rights officially summarised the results of the joint pilot project of the Ukrainian Parliament Commissioner for Human Rights and the Council of Europe Office in Ukraine “Registration of Persons Belonging to the Roma National Minority and Development of Legal Mechanisms for Simplifying This Procedure” for 2023–2024 in the city of Mukachevo, Zakarpattia oblast, and announced the launch of the joint project of the Ukrainian Parliament Commissioner for Human Rights, the European Union and

the Council of Europe “Social Atlas of Roma Communities of Zakarpattia”, which will also be implemented during 2026.

As compared with the aforementioned pilot project, the project “Social Atlas of Roma Communities of Zakarpattia” has a broader geographical scope and includes additional components, including assessment of the needs of Roma people, including Roma internally displaced persons, aimed at ensuring effective response and service provision in communities, improving access to administrative services and facilitating the exercise of the rights of the Roma community.

In 2025, within the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, the Department for the Protection of the Rights of Persons Belonging to the Roma National Minority (Community) was established. This Department is entrusted, inter alia, with the following tasks:

- ensuring the exercise of parliamentary oversight by the Ukrainian Parliament Commissioner for Human Rights over observance of the constitutional rights, freedoms and legitimate interests of persons belonging to the Roma national minority (community)
- monitoring, within its mandate, compliance with the principle of non-discrimination in respect of the rights of persons by public authorities, local self-government bodies, public associations, enterprises, institutions and organisations, regardless of their form of ownership.

In 2025, within the State Service of Ukraine for Ethnic Policy and Freedom of Conscience, the following entities were established and are operational:

- the Sector for the Promotion of Interethnic Harmony, aimed at ensuring the rights of national minorities (communities) of Ukraine, including the prevention and combating of manifestations, such as antisemitism and anti-Gypsyism, with a staffing level of 3 employees;
- the Department for European Integration and International Cooperation with 6 staff members.

## CHILDREN’S RIGHTS

On 14 July 2025, by Ordinance of the Cabinet of Ministers of Ukraine No 708-p, the National Strategy for Protecting Children’s Rights in the Justice System until 2028 was approved and the Operational Action Plan for its implementation in 2025–2028 was adopted.

The draft Law of Ukraine “On Amending the Criminal Code of Ukraine, the Criminal Procedure Code of Ukraine and Other Legislative Acts Regarding Child-Friendly Justice” was developed and submitted for consideration by the Government.

During 2025, the Ukrainian Parliament Commissioner for Human Rights continued to strengthen cooperation with international networks and organisations in the field of children’s rights protection, in particular with the European Network of Ombudspersons for Children (ENOC). In March–May 2025, the national phase of the ENYA (European

Network of Young Advisors) project “Let’s Talk Young, Let’s Talk About Protecting and Promoting Children’s Right to Physical Health” was conducted. The initiative was aimed at ensuring children’s participation in processes relating to the protection of their rights.

Within the framework of the 29th Annual Conference of the European Network of Ombudspersons for Children and the 29th General Assembly meeting held on 17–18 September 2025 in Bucharest, the Representative of the Commissioner for Children’s Rights was elected to the Youth Advisory Support Officer team tasked with implementing initiatives for the protection of children’s rights.

## JUDICIAL COOPERATION

In 2025, work continued under Article 24 of the Association Agreement with a view to further developing judicial cooperation in civil and criminal matters, making full use of the relevant international instruments.

The following draft laws are pending in the Verkhovna Rada of Ukraine:

- the draft Law of Ukraine “On the Accession of Ukraine to the Convention on International Access to Justice” (reg. No. 0304 of 27 February 2025);
- the draft Law of Ukraine “On Amending the Criminal Procedure Code of Ukraine and Certain Other Legislative Acts of Ukraine Concerning International Cooperation during Criminal Proceedings” (reg. No. 14292 of 11 December 2025), aimed at improving cooperation mechanisms in line with FATF standards and the recommendations of the European Commission;
- the draft Law of Ukraine “On Amending Certain Laws of Ukraine in Connection with the Ratification of the Council of Europe Convention on Offences relating to Cultural Property” (reg. No. 12309 of 12 December 2024) and the accompanying draft law amending the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine (reg. No. 12310 of 12 December 2024);
- the draft Law of Ukraine “On Amending Certain Legislative Acts of Ukraine to Ensure Ukraine’s Implementation of the Convention on the Civil Aspects of International Child Abduction” (reg. No. 14252 of 26 November 2025).
- In December 2025, the following draft laws were submitted to the President of Ukraine for subsequent introduction to the Verkhovna Rada of Ukraine:
- the draft Law of Ukraine “On the Accession of Ukraine to the Convention on the International Protection of Adults”;
- the draft Law of Ukraine “On Amending the Criminal Code of Ukraine, the Criminal Procedure Code of Ukraine and the Law of Ukraine ‘On the Prosecutor’s Office’ in Connection with the Ratification of the Agreement on the Establishment of a Special Tribunal for the Crime of Aggression against Ukraine”;
- work is underway on the draft Law of Ukraine “On the Accession of Ukraine to the Convention on the Recognition of Divorces and Legal Separations”.

## ROME STATUTE

In pursuance of Article 8 of the Association Agreement, on 25 October 2024, Ukraine deposited its instrument of ratification of the Rome Statute of the International Criminal Court. On 1 January 2025, Ukraine became a full State Party to the Rome Statute of the International Criminal Court.

In January 2025, the Interagency Working Group was established to address issues related to the harmonisation of the legislation of Ukraine in connection with the ratification of the Rome Statute of the International Criminal Court.

It comprises representatives of the Office of the Prosecutor General, the Office of the President of Ukraine, the Verkhovna Rada of Ukraine, the Supreme Court, the National Police of Ukraine, the Ministry of Internal Affairs of Ukraine, the Ministry of Foreign Affairs of Ukraine, the Ministry of Justice of Ukraine, as well as a number of international and national governmental and non-governmental organisations.

The Working Group is developing legislative amendments aimed at improving the legal regulation of criminal liability for international crimes, in particular the crime of aggression and war crimes. A draft law amending the Criminal Code of Ukraine has been prepared in order to align the provisions on the crime of aggression and war crimes with the Rome Statute, taking into account national law enforcement practice established since the beginning of the full-scale invasion by the Russian Federation.

In accordance with the Law on the Ratification of the Rome Statute of the International Criminal Court and the amendments thereto, Ordinance of the Cabinet of Ministers of Ukraine No. 857-p of 13 August 2025 “On the signing of the Agreement between the Cabinet of Ministers of Ukraine and the Office of the Prosecutor of the International Criminal Court on the Secondment of Personnel to the Office of the International Criminal Court in Ukraine” was adopted.

## INTERNATIONAL REGISTER OF DAMAGE

As of the end of December 2025, applications to the Register of Damage are accepted under 14 categories. On 15–16 December 2025, the Convention on the Establishment of an International Claims Commission for Ukraine – the second element of the compensation mechanism – was adopted at a diplomatic conference. The Commission will examine applications submitted to the Register for compensation for damage caused by the aggression of the Russian Federation; its establishment will commence following the entry into force of the Convention. In parallel, work is underway on the establishment of the International Compensation Fund, the primary source of which is intended to be immobilised assets of the Russian Federation.

## MIGRATION AND READMISSION, BORDER MANAGEMENT

In 2025, implementation of the Integrated Border Management Strategy until 2025 continued. The drafts of the new Integrated State Border Management Strategy of Ukraine and the Action Plan for 2026–2028 for its implementation have been prepared.

In 2025, the Integrated State Border Management Coordination Centre commenced

preparations for information exchange with counterpart centres of neighbouring states, including through working meetings with representatives of the national coordination centres of the Slovak Republic and the Republic of Poland.

A new strategic area of activity in the field of border management has been the preparation of the Schengen Action Plan as part of the development in Ukraine of a national Schengen governance system.

Cooperation with the European Border and Coast Guard Agency (Frontex) continues: a national delegation has been established to participate in the negotiations with the European Union on the conclusion of an agreement concerning the Agency's operational activities in Ukraine. A decision of the EU Party on the launch of negotiations is pending. The State Border Guard Service of Ukraine continues to train its personnel in accordance with the standards of the Frontex Agency programmes.

Modernisation of the HART-1 national IT system for state border protection has commenced. Territorially distributed data processing centres have been established to ensure the round-the-clock functioning of information systems. The concept for an analytical cluster is under development, the entire fleet of border control hardware and software at border crossing points is being replaced, and software is being upgraded to implement facial recognition functions.

All border crossing points are equipped with automated workstations with passport document readers, including devices capable of reading biometric data (digitised facial images) from contactless electronic chips, as well as fingerprint scanners.

Measures have been taken to modernise the HART-1 Border Control Information and Communication System, in particular the Biometric Control subsystem based on CABIS™ 6.2 specialised software upgraded to CABIS 7.0, enabling multimodal processing, editing, searching and storage not only of fingerprint data but also of digitised facial images.

Measures are currently underway to replace automated workstations for first- and second-line border control officers (900 stationary automated workstations, 900 AT10K Thales biometric passport readers and 300 web cameras); to upgrade the specialised software of the HART-1 Border Control Information and Communication System with regard to biometric verification (identification) of persons by matching real-time facial images with photographs from the RFID chip and the OCR zone of a passport document or visa; and to carry out a comprehensive modernisation of the Second Line Control subsystem of the HART-1 Border Control Information and Communication System.

The process of establishing a regulatory framework for the organisation of joint control at border crossing points with Member States of the European Union is ongoing.

The State Migration Policy Strategy of Ukraine until 2025 was implemented.

Work continues on the development of the draft State Migration Policy Strategy for the period beyond 2025.

Preparations for the signing of the Implementing Protocols to the Agreement between the European Community and Ukraine on the Readmission of Persons with the Governments of Hungary, Spain and Bulgaria are at the final stage. Their texts have been approved by the Government of Ukraine and the Head of the State Migration Service of Ukraine has been authorised to sign them.

In 2025, work continued on the conclusion of readmission agreements with Bosnia and Herzegovina, Montenegro, Kazakhstan, Armenia, Libya, Georgia, Lebanon, Tajikistan, Azerbaijan, Afghanistan, India, Sri Lanka, Bangladesh, Iraq, Nigeria, Vietnam and Pakistan.

Measures are being taken to prepare for the signing of the Agreement between Ukraine and the Republic of Serbia on the Readmission of Persons and the Implementing Protocol thereto.

The functioning of the Coordination Centre for Cooperation with the European Migration Network and the National Contact Point of the European Migration Network in Ukraine has been ensured: the composition of the Coordination Centre has been approved and the Regulation on the National Contact Point of the European Migration Network in Ukraine has been adopted.

## FIGHT AGAINST ORGANISED CRIME

The Cabinet of Ministers of Ukraine approved the Drug Policy Strategy until 2030 and the Operational Action Plan for its implementation for 2025–2027 (Ordinance No. 920-p of 20 August 2025).

In 2025, the institutional capacity of the National Police of Ukraine was strengthened: by internal orders, the Sector for Combating the Sexual Exploitation of Children on the Internet was established within the Migration Police Department, as well as the Directorate for Combating Environmental Crime and the Directorate for Combating Organised Criminal Groups and Criminal Organisations, and Abuses in the Field of State Regulation within the Department for Strategic Investigations.

With a view to introducing transparent human resources management in law enforcement authorities and the prosecutor's office, in compliance with the principles of ensuring equal rights and opportunities for women and men and non-discrimination, the Human Resources Management Strategy in Law Enforcement Authorities and the Prosecutor's Office until 2030 was approved (Joint Order of the Ministry of Internal Affairs of Ukraine, the Office of the Prosecutor General, the Security Service of Ukraine, the State Bureau of Investigation, the Economic Security Bureau of Ukraine and the Ministry of Finance of Ukraine No. 22/3/4/3/1/5 of 5 January 2026).

In February 2025, the Comprehensive Action Plan to Combat Organised Crime for 2025 was approved, as developed with due regard to the priorities for tackling serious and/or organised crime identified on the basis of the Serious and Organised Crime Threat Assessment (SOCTA Ukraine) for the period of 2019–2022. The implementation of the Comprehensive Plan was ensured by 12 Ukrainian public authorities.

In November 2025, the assessment of threats of serious and organised crime under the SOCTA Ukraine methodology for the period of 2021–2024 (hereinafter referred to as "SOCTA Ukraine 2021–2024") was finalised. Base on the results of SOCTA Ukraine 2021–2024, taking into account current features of the security environment and the likely transformation of relevant criminal threats in the future, the following priorities for combating serious and/or organised crime were identified:

- commission of property-related offences;
- fraud, including cyber-enabled fraud;

- irregular migration and trafficking in human beings;
- illicit trafficking in drugs, psychotropic substances and precursors (synthetic drugs, new psychoactive substances and precursors, as well as cannabis and its derivatives);
- environmental crime (illegal logging, as well as illegal extraction of minerals and amber);
- illicit activities involving excise goods (primarily alcohol);
- illicit trafficking in firearms;
- establishment or dissemination of criminal influence;
- violent crime (including hate crime);
- acquisitive and violent crime.

An open version of the SOCTA Ukraine Serious and/or Organised Crime Threat Assessment Report for 2021–2024 will be published electronically and made available on the official website of the Ministry of Internal Affairs of Ukraine, and the English version will be submitted to Europol.

Work is underway on the development of the new Strategy for Combating Organised Crime for 2026–2030.

In 2025, the National Police of Ukraine continued to participate in the implementation of 223 operational actions within 15 Operational Action Plans of the European Multidisciplinary Platform Against Criminal Threats (EMPACT) cycle 2022–2025 aimed at combating organised crime, as well as in joint actions with the European Union to prevent the illicit outflow of firearms beyond the state border.

The functioning of the Coordination Centre for Countering the Illicit Trafficking of Firearms, Their Parts and Components and Ammunition was ensured. In February 2025, the inaugural meeting was held with the participation of international partners. In order to establish information exchange and coordinated action between central executive authorities and other state bodies in countering the illicit trafficking of firearms, their parts and components, and ammunition, a permanent working group, the Contact Point, was established.

Work is underway on the development of the draft Strategy for Countering the Illicit Trafficking of Weapons, Their Parts, Ammunition and Explosives until 2030.

In June 2025, by Order of the Office of the Prosecutor General No. 127, the Interagency Working Group was established to address criminal offences involving the misappropriation of property or acquisition of property rights by deception or abuse of trust. On 12 December 2025, a meeting of this Working Group was held at the Office of the Prosecutor General with the participation of representatives of the National Police of Ukraine and the Economic Security Bureau of Ukraine, during which the most pressing issues of countering fraud were discussed and decisions were taken to implement additional organisational and practical measures in order to enhance the effectiveness of combating this category of crime and to remedy identified shortcomings.

## INVESTIGATION OF WAR CRIMES

From 24 February 2022 till 31 December 2025, 232,421 crimes related to the aggression of the Russian Federation against Ukraine were registered. This figure includes 208,721 crimes against peace, the security of mankind and international legal order (of which 203,283 constitute war crimes).

Based on the outcomes of the investigations into war crimes (Article 438 of the Criminal Code of Ukraine), 1,062 persons have been served with the notice of charges, indictments have been referred to court in respect of 780 persons, and 233 persons have been convicted of offences under Article 438 of the Criminal Code of Ukraine.

In relation to the conduct by the military and political leadership of the Russian Federation, with the assistance of other persons, of an aggressive war against Ukraine (Article 437 of the Criminal Code of Ukraine), the violation of its territorial integrity (Article 110 of the Criminal Code of Ukraine), and other aggression-related crimes, 738 persons have been served with the notice of charges, including 449 persons under Article 110 of the Criminal Code of Ukraine, 43 persons under Article 437 of the Criminal Code of Ukraine, and 246 persons under Articles 110 and 437 of the Criminal Code of Ukraine. Indictments have been referred to court in respect of 509 persons, and 270 persons have been convicted.

The joint investigation into the crime of aggression, war crimes, crimes against humanity and genocide within the framework of the Joint Investigation Team (JIT) in Ukraine, established by Ukraine, the Republic of Lithuania, the Republic of Poland, the Republic of Estonia, the Republic of Latvia, the Slovak Republic and Romania as members, with Eurojust, the Office of the Prosecutor of the International Criminal Court and the European Union Agency for Law Enforcement Cooperation (Europol) as participants, is ongoing.

In 2025, as a result of cooperation with the competent authorities of the Republic of Poland within the activities of the JIT, in January 2025 one person was served with the notice of charges under Article 438(1) of the Criminal Code of Ukraine. In April 2025, the indictment in the criminal proceedings was referred to court.

Following a set of investigative measures conducted jointly with prosecutors and investigators of the Republic of Lithuania, in June 2025 the competent authorities of Ukraine served the notice of charges of war crime on one person. Subsequently, the suspect was extradited to the Republic of Lithuania for the completion of the pre-trial investigation and referral of the case to court.

In December 2025, the law enforcement authorities of the Republic of Lithuania also served the notice of charges on another person.

Overall, by the end of 2025, there were executed more than 30 requests for mutual legal assistance from the competent authorities of foreign states and requests within the framework of the JIT concerning investigative actions in relation to war crimes committed by the armed forces of the Russian Federation against foreign nationals, as well as against citizens of Ukraine currently residing in other countries.

Since its establishment in July 2023, the International Centre for the Prosecution of the Crime of Aggression against Ukraine (ICPA) has made significant progress in developing a joint investigation and prosecution strategy for cases concerning the crime of aggression. The ICPA is a unique judicial centre integrated within Eurojust to support na-

tional investigations into the crime of aggression related to the war in Ukraine, enabling independent prosecutors from different states to work together on a daily basis in one location, to exchange evidence swiftly and effectively, and to agree on a common investigation and prosecution strategy.

In 2023, the Core International Crimes Evidence Database (CICED) was established at Eurojust to store and analyse evidence of war crimes, the crime of aggression and other most serious international crimes in a secure environment.

During 2023–2025, 10,187 files containing information on evidence of international crimes committed in the territory of Ukraine were uploaded to the CICED database. The Eurojust staff responsible for the functioning of the CICED database prepared more than 20 analytical reports on the basis of the examination of this information and of evidence submitted by other countries. Most of these reports were prepared at the request of the Ukrainian Party and were subsequently used in the work of the Office.

## FIGHT AGAINST TERRORISM

The Security Service of Ukraine approved:

- the Procedure for the formation and maintenance of the list of terrorist organisations (groups) (April 2025);
- the Regulation on the training of persons who may be entrusted with conducting negotiations during an anti-terrorist operation (February 2025).

The following acts have been drafted:

- the draft Law “On Amending the Law of Ukraine ‘On Combating Terrorism’”, which provides for the definition of “prevention of terrorism”, the determination of the list of entities authorised to carry out activities for the prevention of terrorism, the conferral on the Cabinet of Ministers of Ukraine of powers to establish the Coordination Centre for the Prevention of Terrorism, as well as the definition of its structure and operating procedures;
- the draft Law “On Amending the Criminal Code of Ukraine and Certain Legislative Acts of Ukraine Regarding the Establishment of Criminal Liability for the Propaganda of Terrorism or the Ideology of Terrorism”;
- the draft Concept of Combating Terrorism in Ukraine.

## TECHNICAL BARRIERS TO TRADE

Ukraine's commitments in the area of "Technical Barriers to Trade" are set out in Chapter 3 "Technical Barriers to Trade" of Title IV "Trade and Trade-Related Matters" of the Association Agreement.

In 2025, Ukraine continued to take measures to ensure the fullest possible consideration of the recommendations provided by the EU Party following the assessments of the state of alignment of horizontal and sectoral legislation with the EU acquis, as well as of the readiness of Ukraine's quality infrastructure for the conclusion of the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA Agreement), and of the first and second priority recommendations received from the European Commission in December 2023.

Following the assessments and with a view to initiating the formal evaluation by the EU, five out of seven first-priority recommendations were fully implemented. The implementation of two further recommendations of the EU Party was partially ensured, in particular through the development of the draft laws:

- "On Amending Certain Laws of Ukraine Regarding the Improvement of State Market Surveillance and the Technical Regulation System in accordance with the Requirements of the European Union" (reg. No. 12426 of 20 January 2025), aimed at ensuring compliance with the EU acquis in the field of market surveillance (Regulation (EU) 2019/1020 of the European Parliament and of the Council);
- "On Amending Certain Laws of Ukraine regarding the Harmonisation of the Accreditation of Conformity Assessment Bodies and the Technical Regulation System with the Requirements of the European Union" (reg. No. 12221 of 18 November 2024), aimed at harmonising the accreditation and technical regulation systems with the European systems and introducing all provisions of Regulation (EC) No. 765/2008 of the European Parliament and of the Council and Decision No. 768/2008/EC of the European Parliament and of the Council recommended by European experts.

At the plenary meeting of the Verkhovna Rada of Ukraine on 26 March 2025, the draft laws were adopted as a basis in the first reading.

The revised draft laws, taking into account the recommendations received from the European experts, were considered by the Committee of the Verkhovna Rada of Ukraine on Economic Development, which decided to recommend their adoption by the Verkhovna Rada of Ukraine in the second reading.

In 2025, work also continued on the implementation of 13 second-priority recommendations, of which 6 were implemented, 4 are implemented on a permanent basis, and 3 are in progress.

By Resolution of the Cabinet of Ministers of Ukraine No. 1630 of 10 December 2025, the Technical Regulation on Machinery was approved, developed on the basis of Regulation (EU) 2023/1230 of the European Parliament and of the Council of 14 June 2023 on machinery and repealing Directive 2006/42/EC of the European Parliament and of the Council and Council Directive 73/361/EEC.

In pursuance of the Law of Ukraine “On Technical Regulations and Conformity Assessment”, 29 lists of national standards and amendments thereto were adopted for the purposes of applying technical regulations concerning the safety of machinery, low-voltage electrical equipment, toy safety, equipment and protective systems intended for use in potentially explosive atmospheres, lifts and safety components for lifts, and personal protective equipment.

Work continued on the adoption of national standards and approval of lists of national standards for the purposes of applying technical regulations identified as priorities for the ACAA Agreement. In particular, in 2025, 364 national standards were adopted, of which 273 were harmonised with international and European standards, and 3 lists of national standards for the purposes of applying technical regulations developed on the basis of the EU acquis were approved.

In accordance with the recommendation of the European Commission on the urgent withdrawal of obsolete national standards that contradict the European harmonised standards, the State Enterprise “Ukrainian Scientific-Research and Training Centre for Standardisation, Certification and Quality” (SE “UkrNDNC”) ensured the withdrawal of approximately 3,500 national standards whose provisions contradict the European standards.

The National Accreditation Agency of Ukraine (NAAU) is a signatory to the recognition arrangements of the European co-operation for Accreditation (EA MLA), the International Laboratory Accreditation Cooperation (ILAC MRA) and the International Accreditation Forum (IAF MLA). Accreditation granted by NAAU in the relevant fields is equivalent to accreditation granted by national accreditation bodies that are signatories to the ILAC MRA and IAF MLA in more than 80 countries worldwide.

At the second meeting of the General Assembly of the Global Accreditation Cooperation (hereinafter referred to as the “Cooperation”), held on 23–24 October 2025 in Bangkok (Kingdom of Thailand), pursuant to Resolution 2025-10, NAAU was admitted as a full member of the Cooperation established through the merger of the International Accreditation Forum (IAF) and the International Laboratory Accreditation Cooperation (ILAC). The Cooperation will replace both organisations, will adhere to the same principles and objectives of accreditation, and will commence its activities in January 2026.

Currently, there are 1,202 accredited conformity assessment bodies in Ukraine: 749 testing laboratories, 92 medical laboratories, 39 calibration laboratories, 61 management systems certification bodies, 18 personnel certification bodies, 128 product, process and service certification bodies, 72 inspection bodies, 10 greenhouse gas verification bodies and 8 proficiency testing providers.

In May 2025, four scientific metrology centres (NSC “Institute of Metrology”, SE “Ukrmetrteststandart”, SE Research Institute “Systema” and SE “Ivano-Frankivskstandardmetrologiya”) underwent an assessment of their quality management systems within the regional metrology organisation, European Association of National Metrology Institutes (EURAMET).

Under wartime conditions, the functioning of 58 national measurement standards was ensured, as well as their traceability through international comparisons and calibrations against national standards of other States.

## SANITARY AND PHYTOSANITARY MEASURES

Ukraine's commitments in the area of "Sanitary and Phytosanitary Measures" (SPS) are laid down in Chapter 4 "Sanitary and Phytosanitary Measures" of Title IV "Trade and Trade-Related Matters" and Annex V to the Association Agreement.

In 2025, in pursuance of the Association Agreement and with a view to transposing the EU acquis:

### 1. The following acts were adopted:

Law of Ukraine No. 4718-IX of 16 December 2025 "On Amending Certain Laws of Ukraine As Regards Aligning Regulation in the Areas of Veterinary Medicine, Animal Welfare and Feed with the Acts of the EU Acquis", which provides for a systemic and comprehensive review of regulation in the fields of veterinary medicine, animal welfare and feed. It also regulates the performance of official controls and other official activities in these areas in accordance with the legal acts of the European Union.

### 2. The following issues are being considered:

Taking into account the results of the bilateral meeting between Ukraine and the European Commission within the framework of the official screening of the compliance of Ukrainian legislation with EU acquis, in particular under negotiating Chapter 12 "Food Safety, Veterinary and Phytosanitary Policy", active work is being carried out with the scientific community and business representatives on the development of a new framework draft law in the field of plant protection products and agrochemicals management.

Ukraine's position for negotiations with the European Union on the conclusion of the Agreement on the Accession of Ukraine to the European Union in the area of food safety, veterinary and phytosanitary policy has been formulated and proposals have been submitted to the National Programme for the Adaptation of Ukrainian Legislation to the EU Acquis.

### 3. With a view to establishing comprehensive and complete regulation in the SPS area, taking into account the relevant provisions of the EU acquis, the following acts were adopted:

- Resolution of the Cabinet of Ministers of Ukraine No. 121 of 4 February 2025 "Certain issues of implementation of Article 86 of the Law of Ukraine 'On Veterinary Medicine'";
- Resolution of the Cabinet of Ministers of Ukraine No. 345 of 28 March 2025 "On amending Resolution of the Cabinet of Ministers of Ukraine No. 537 of 7 May 2022";
- Resolution of the Cabinet of Ministers of Ukraine No. 451 of 15 April 2025 "On approval of the Procedure for maintaining the State Register of Genetically Modified Organisms" (it shall enter into force on 16 September 2026);

- Resolution of the Cabinet of Ministers of Ukraine No. 584 of 21 May 2025 "Certain issues of state registration of genetically modified organisms" (it shall enter into force on 16 September 2026);
- Resolution of the Cabinet of Ministers of Ukraine No. 640 of 4 June 2025 "Certain issues of implementation of the Law of Ukraine 'On Animal By-Products Not Intended for Human Consumption'";
- Resolution of the Cabinet of Ministers of Ukraine No. 806 of 7 July 2025 "On amending Resolutions of the Cabinet of Ministers of Ukraine No. 176 of 18 February 1997 and No. 1402 of 16 November 2011";
- Resolution of the Cabinet of Ministers of Ukraine No. 831 of 14 July 2025 "On amending Resolution of the Cabinet of Ministers of Ukraine No. 537 of 7 May 2022";
- Resolution of the Cabinet of Ministers of Ukraine No. 1216 of 25 September 2025 "On approval of the Procedure for the establishment and operation of veterinary quarantine posts and disinfection facilities at border crossing points across the State Border of Ukraine";
- Resolution of the Cabinet of Ministers of Ukraine No. 1571 of 3 December 2025 "On amending Resolution of the Cabinet of Ministers of Ukraine No. 637 of 7 May 1998".

#### **4. In addition, the following ministerial orders were approved:**

- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 361 of 28 January 2025 "On approval of Methods of sampling and laboratory testing (examination) for the determination of levels of plant toxins in foodstuffs for the purposes of official control", registered with the Ministry of Justice of Ukraine on 13 February 2025 under No. 225/43631;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 478 of 30 January 2025 "On approval of the Requirements for the Establishment of the Rapid Alert System for Food and Feed", registered with the Ministry of Justice of Ukraine on 5 March 2025 under No. 350/43756;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1045 of 17 February 2025 "On amending certain orders regarding the stamping of leather and fur raw materials and the sanitary treatment of poultry facilities", registered with the Ministry of Justice of Ukraine on 5 March 2025 under No. 349/43755;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1345 of 26 February 2025 "On approval of Methods of sampling and laboratory testing (examination) for the determination of the level of total volatile basic nitrogen in unprocessed fishery products for the purposes of official control", registered with the Ministry of Justice of Ukraine on 28 March 2025 under No. 492/43898;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1366 of 28 February 2025 "On approval of the Procedure for issuance of veterinary documents and maintenance of the Unified State Register of Veterinary Documents", registered with the Ministry of Justice of Ukraine on 2 April 2025 under No. 510/43916;

- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1464 of 14 March 2025 "On approval of the Procedure for electronic registration of persons in the automated Phytosanitary Inspection System, determination of user roles and functioning of the personal electronic account", registered with the Ministry of Justice of Ukraine on 28 March 2025 under No. 491/43897;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1534 of 27 March 2025 "On approval of Hygiene Requirements for Edible Caseins and Caseinates", registered with the Ministry of Justice of Ukraine on 1 May 2025 under No. 648/44054;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1690 of 23 April 2025 "On approval of Methods of sampling and laboratory testing (examination) for the determination of nitrate levels in certain food for the purposes of official control", registered with the Ministry of Justice of Ukraine on 22 May 2025 under No. 791/44197;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1817 of 5 June 2025 "On approval of the Procedure for periodic testing (examination) of feed by market operators for the presence of substances the content of which is restricted or prohibited", registered with the Ministry of Justice of Ukraine on 20 June 2025 under No. 955/44361;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1916 of 3 July 2025 "On approval of Instructions for the detection, localisation and eradication of certain regulated potato pests", registered with the Ministry of Justice of Ukraine on 14 August 2025 under Nos. 1194/44600, 1195/44601, 1196/44602 and 1197/44603;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1954 of 15 July 2025 "On amending Order of the Ministry of Agrarian Policy and Food of Ukraine No. 244 of 25 April 2022", registered with the Ministry of Justice of Ukraine on 23 July 2025 under No. 1093/44499;
- Order of the Ministry of Economy of Ukraine No. 770 of 16 October 2025 "On approval of Methods of sampling and laboratory testing (examination) for the determination of microbiological criteria for food", registered with the Ministry of Justice of Ukraine on 31 October 2025 under No. 1588/44994;
- Order of the Ministry of Economy of Ukraine No. 789 of 17 October 2025 "On approval of Requirements for the traceability of animal by-products", registered with the Ministry of Justice of Ukraine on 6 November 2025 under No. 1621/45027;
- Order of the Ministry of Economy of Ukraine No. 798 of 20 October 2025 "On amending Order of the Ministry of Agrarian Policy and Food of Ukraine No. 813 of 20 October 2022", registered with the Ministry of Justice of Ukraine on 6 November 2025 under No. 1619/45025;
- Order of the Ministry of Economy of Ukraine No. 935 of 28 October 2025 "On amending Order of the Ministry of Agrarian Policy and Food of Ukraine No. 987 of 25 April 2023", registered with the Ministry of Justice of Ukraine on 13 November 2025 under No. 1675/45081;

- Order of the Ministry of Economy of Ukraine No. 952 of 30 October 2025 “On amending Order of the Ministry of Agrarian Policy and Food of Ukraine No. 158 of 26 March 2018”, registered with the Ministry of Justice of Ukraine on 26 November 2025 under No. 135971/2025;
- Order of the Ministry of Economy of Ukraine No. 953 of 30 October 2025 “On approval of the Procedure for monitoring and reporting on antimicrobial resistance of zoonotic pathogens and commensal bacteria”, registered with the Ministry of Justice of Ukraine on 13 November 2025 under No. 1674/45080;
- Order of the Ministry of Economy of Ukraine No. 976 of 31 October 2025 “On approval of the form of the report drawn up following a scheduled (unscheduled) official control measure (inspection) regarding compliance by market operators with legislation on materials and articles intended to come into contact with food”, registered with the Ministry of Justice of Ukraine on 17 November 2025 under No. 1685/45091;
- Order of the Ministry of Economy of Ukraine No. 2886 of 9 December 2025 “On approval of Special Requirements for sampling and methods (methodologies) of laboratory testing (examination) for certain groups of materials and articles intended to come into contact with food”, registered with the Ministry of Justice of Ukraine on 24 December 2025 under No. 1941/45347.

## CUSTOMS MATTERS

Ukraine's commitments in the area of "Customs Matters" are set out in Chapter 5 "Customs and Trade Facilitation" of Title IV "Trade and Trade-Related Matters" of the Association Agreement, as well as in the relevant Annexes thereto.

### APPROXIMATION OF NATIONAL CUSTOMS LEGISLATION TO THE EU CUSTOMS LAW

#### During 2025, the following acts were adopted:

1. Law of Ukraine No. 4323-IX of 25 March 2025 "On Amending the Customs Code of Ukraine and Other Laws of Ukraine Concerning Certain Issues of Administrative Liability for Violations of Customs Rules, Clarification of the Procedure for the Performance of Certain Customs Formalities and Elimination of Terminological Inconsistencies", the provisions of which provide for a review of approaches to certain issues relating to the application of administrative penalties for violations of customs rules, the introduction of a more flexible mechanism for holding persons administratively liable for violations of customs rules, as well as the introduction into the activities of customs authorities of Ukraine of modern European practices in combating customs offences.

2. Secondary legislation aimed at implementing the provisions of Law of Ukraine No. 3926-IX of 22 August 2024 "On Amending the Customs Code of Ukraine Regarding the Implementation of Certain Provisions of the Customs Code of the European Union", which entered into force on 19 June 2025, in particular:

- **Resolutions of the Cabinet of Ministers of Ukraine** regulating issues, including:
  - switching to the European approach to the application of customs procedures, as well as the system of authorisations for customs brokers and keepers of customs warehouses and temporary storage facilities;
  - updating the forms of documents accompanying the authorisation process (application forms and authorisation forms), supplementing the procedure for assessing compliance with the conditions and criteria for granting authorisations, etc.;
  - updating terminology;
  - approving the procedures for the establishment and maintenance of certain registers by customs authorities;
  - approving the requirements for the arrangement and operation of video surveillance systems at the premises of undertakings granted authorisations to operate customs warehouses and temporary storage facilities, as well as permits to operate duty-free shops and commercial or service-type free customs zones;
- **Orders of the Ministry of Finance of Ukraine** regulating issues, including:
  - updating of departmental classifiers of information on state customs matters used in the process of processing customs declarations;

- determining the form of the temporary storage declaration;
- amending the Specifics of Performing Customs Formalities when applying the simplification “location-based release procedure”;
- amending the Procedure for the Establishment of Customs Control Zones;
- approving the Procedure for the opening and closing of places of delivery, the requirements for the arrangement of places of delivery and the procedure for determining goods that may be delivered to another place agreed with the customs office of destination;
- amending the Procedure for the Operation of a Customs Warehouse;
- amending the Procedure for the Customs Authorities to Plan Documentary On-Site Inspections.

3. Secondary legislation aimed at implementing the provisions of Law of Ukraine No. 3977-IX of 17 September 2024 “On Amending the Customs Code of Ukraine regarding the Establishment of Specific Features of Service in Customs Authorities and the Conduct of Certification of Officials of Customs Authorities”, in particular the following acts were approved:

- the Procedure for conducting psychophysiological interviews of officials of customs authorities and candidates for civil service positions in customs authorities using a polygraph;
- the Procedure for conducting integrity checks and lifestyle monitoring of officials of customs authorities and the frequency thereof, and the procedure for submitting an integrity declaration by officials of customs authorities;
- the Catalogue of standard positions of officials of customs authorities; the Algorithm for the formation of customs competency groups for standard positions of officials of customs authorities; the basic salary scheme for officials of customs authorities; the rates of allowances for special ranks; the Procedure for establishing, suspending, reducing or cancelling allowances and for granting bonuses to officials of customs authorities;
- the Procedure for organising and conducting certification and for assessing the integrity and professional competence of officials of customs authorities during certification;
- the composition of the commission for conducting the competition for the position of Head of the State Customs Service of Ukraine.

Issues relating to the functioning of the Disciplinary Committee of the State Customs Service of Ukraine and the rotation mechanism were also regulated.

## **DRAFT NEW CUSTOMS CODE OF UKRAINE**

On 26 August 2025, the Cabinet of Ministers of Ukraine endorsed (Minutes of the meeting of 26 August 2025 No. 18) the draft Customs Code of Ukraine (recast), developed by the Ministry of Finance of Ukraine jointly with the State Customs Service of Ukraine with the support of experts from EU-funded technical assistance projects, for the

purpose of launching consultations with the European Commission and representatives of the public.

On 27 August 2025, the draft Customs Code of Ukraine (recast) was submitted to the European Commission for assessment of its compliance with EU acquis.

The draft new Customs Code of Ukraine has been prepared with a view to ensuring compliance with the EU acquis in the customs field and is based on the provisions of the key EU Regulations in the customs area included in the list of the EU acquis under negotiating Chapter 29 "Customs Union":

- Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code;
- Commission Delegated Regulation (EU) 2015/2446 of 28 July 2015 supplementing Regulation (EU) No 952/2013 of the European Parliament and of the Council as regards detailed rules concerning certain provisions of the Union Customs Code;
- Commission Implementing Regulation (EU) 2015/2447 of 24 November 2015 laying down detailed rules for implementing certain provisions of Regulation (EU) No 952/2013 of the European Parliament and of the Council laying down the Union Customs Code;
- Regulation (EU) 2022/2399 of the European Parliament and of the Council of 23 November 2022 establishing the European Union Single Window Environment for Customs and amending Regulation (EU) No 952/2013;
- Council Regulation (EC) No 1186/2009 of 16 November 2009 setting up a Community system of reliefs from customs duty;
- Regulation (EU) No 608/2013 of the European Parliament and of the Council of 12 June 2013 concerning customs enforcement of intellectual property rights and repealing Council Regulation (EC) No 1383/2003.

Consultations with representatives of the public on the text of the draft Code, launched in September 2025, are currently ongoing.

## **AUTHORISED ECONOMIC OPERATOR (AEO) PROGRAMME AND OTHER SIMPLIFICATIONS**

Since the beginning of 2025, the State Customs Service of Ukraine has examined 82 applications for authorisation for the Authorised Economic Operator "granting the right to apply simplifications" (AEO-C) and 9 applications for authorisation for the Authorised Economic Operator "for confirmation of security and safety" (AEO-S).

In 2025, 33 AEO-C authorisations and 2 AEO-S authorisations were granted.

As of 31 December 2025, 110 undertakings in Ukraine obtained AEO authorisations, of which 105 obtained AEO-C authorisation and 5 undertakings obtained both types of AEO authorisations, AEO-C and AEO-S.

In addition, the State Customs Service of Ukraine granted 1,351 authorisations for the use of simplifications, of which 814 authorisations for the use of simplifications provided for by the Customs Code of Ukraine and 537 authorisations for the use of

transit simplifications provided for by the Convention on a Common Transit Procedure.

In 2025, 308 authorisations for the use of simplifications provided for by the Customs Code of Ukraine and 104 authorisations for the use of transit simplifications provided for by the Convention on a Common Transit Procedure were granted.

## OPERATION OF THE NCTS

In 2025, Ukraine continued the application of NCTS Phase 5 (New Computerised Transit System).

In 2025, almost 142,000 movements under the common transit procedure were successfully discharged. In more than 96,000 cases, Ukraine acted as the customs office of departure, and in more than 45,000 cases the transit movement was discharged in Ukraine.

Overall, since the start of the application of the common transit procedure in Ukraine (from 1 October 2022), almost 280,000 movements have been discharged. In more than 203,000 cases, Ukraine acted as the customs office of departure, and in more than 74,000 cases the transit movement was discharged in Ukraine.

In 2025, in accordance with the provisions of the Convention on a Common Transit Procedure, 87 comprehensive guarantees and 22,701 individual guarantees were registered in the Guarantee Management System (GMS).

## IMPLEMENTATION OF POST-CLEARANCE CONTROL FUNCTIONS

In 2025, Ukraine continued to strengthen the implementation of post-clearance control functions in line with the recommendations of the International Monetary Fund and within the framework of the implementation of Article 344<sup>1</sup> "Post-Clearance Control" of the Customs Code of Ukraine (as amended by Law of Ukraine No. 3926-IX of 22 August 2024 "On Amending the Customs Code of Ukraine Regarding the Implementation of Certain Provisions of the Union Customs Code"), pursuant to which post-clearance control is carried out through pre-audit analysis of customs declarations in respect of which customs clearance has been completed, and through on-site (planned and unplanned) and desk documentary audits of compliance with the legislation of Ukraine on customs matters.

As a result of the application of the risk management system in 2025, 3,308 customs declarations in respect of which customs clearance had been completed were selected. Violations or discrepancies were identified in 2,593 customs declarations, representing 78% of the total number of customs declarations for which the pre-audit analysis was initiated.

## DIGITALISATION MEASURES FOR CUSTOMS PROCESSES

Digitalisation measures for customs processes are being continuously implemented by the State Customs Service of Ukraine, in particular in the areas of integration and harmonisation of the national domain with the EU systems, focus on information exchange with the customs administrations of the EU Member States, establishment

of a flexible and scalable architecture at national level, and preparation for information interoperability taking into account the EU Customs Data Model (EUCDM).

The main concepts of Commission Implementing Decision (EU) 2023/2879 as regards the deployment of the electronic systems provided for in the Union Customs Code have been reflected in the general principles of the Long-Term National Strategic Plan for Digital Development, Digital Transformation and Digitalisation of the State Customs Service of Ukraine and its territorial bodies based on the Multi-Annual Strategic Plan for Electronic Customs (MASP-C) (hereinafter referred to as the “Strategic Plan”).

In accordance with the Strategic Plan, during 2025 the State Customs Service of Ukraine implemented a number of significant digital solutions which changed approaches to customs clearance, brought customs procedures closer to the EU standards and made customs more user-friendly for both businesses and citizens.

In 2025, the State Customs Service of Ukraine repeatedly presented national IT systems to representatives of the European Commission, DG TAXUD, EU4PFM and other EU representatives and received positive assessments, in particular:

- the results of the EU’s official assessment (screening) of the state of implementation of EU acquis under Chapter 29 “Customs Union” confirmed that the State Customs Service of Ukraine has achieved a high level of alignment (including in respect of IT systems) in areas such as registration of economic operators, Authorised Economic Operators, customs decisions, binding tariff information (BTI) and binding origin information (BOI), and full alignment as regards the functioning in Ukraine of the NCTS IT system and the application of the risk management system in the conduct of customs control;
- during the bilateral meeting between Ukraine and the European Commission (official screening of the compliance of Ukrainian legislation with the EU acquis under negotiating Chapter 33 “Financial and Budgetary Provisions”), IT systems ensuring compliance with the EU requirements in respect of import customs clearance, collection of customs duties and accounting of customs debt were presented (the Unified Automated Information System of the Customs Authorities and its components such as ACCS “Centre”, ACCS “Inspector” and its local subsystems, the Single Window for International Trade, the Electronic Guarantee Management System, the Integrated Customs Tariff, etc.);
- in July 2025, the State Customs Service of Ukraine received from DG TAXUD a list of EU IT systems required for accession to the European Union.

Taking into account the recommendations of representatives of the European Commission and DG TAXUD following their review of Ukraine’s progress in the development of customs IT systems, the draft updated Strategic Plan has been prepared, in particular with regard to the list of IT systems prioritised for candidate countries taking into account the state of development of national IT systems, amendments to the EU acquis, and the stages and timelines for the implementation of IT projects included in the list of the EU IT systems.

## ENTREPRENEURSHIP

As part of the preparation for the implementation of Directive (EU) 2024/1760 of the European Parliament and of the Council on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859, a number of measures were carried out in 2025, in particular:

- expert discussions “Responsible Business in Ukraine: Key Issues for the EU Accession Negotiations” (18 February 2025, Wageningen, Kingdom of the Netherlands, and 6 March 2025, Kyiv);
- a two-day business school on corporate sustainability standards for representatives of small and medium-sized enterprises of Ukraine (3–4 March 2024, Kyiv);
- pilot training under the advanced training programme “Responsible Business Conduct: Tools for Public Administration and Local Self-Government in the Context of Ukraine’s European Integration” for public authorities and municipal bodies (10–11 March 2025 offline for representatives of central executive authorities, 2–4 April 2025 online for representatives of local self-government bodies). Following the results of the pilot training, Order of the National Agency of Ukraine on Civil Service No. 122-25 of 5 September 2025 approved the standard general short-term advanced training programme “Responsible Business Conduct: Tools for Public Administration and Local Self-Government in the Context of Ukraine’s European Integration”;
- the international conference “Responsible Business for Ukraine’s Recovery: A Path to Sustainable Investment and European Integration” (16 October 2025, Kyiv);
- training of trainers on responsible business conduct for public authorities and municipal bodies in cooperation with the High School of Public Governance (17–19 November 2025, Kyiv). Draft sectoral methodological recommendations on responsible business conduct during the recovery of Ukraine were also developed.

## ACCOUNTING, FINANCIAL REPORTING AND AUDIT

During 2025, the implementation of systemic measures aimed at fulfilling the European integration requirements was continued, in particular:

– as regards the transposition of Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings (as amended by Directive (EU) 2022/2464 and Commission Delegated Directive (EU) 2023/2775), the draft Law of Ukraine “On Amending the Law of Ukraine ‘On Accounting and Financial Reporting in Ukraine’ regarding the introduction of sustainability reporting” was developed, approved by the Cabinet of Ministers of Ukraine and submitted to the Verkhovna Rada of Ukraine (reg. No. 13598 of 4 August 2025);

– a legislative framework was prepared to improve the system of regulation of audit activities in line with the requirements of the EU acquis and to enhance the transparency and reliability of sustainability reporting. In particular, with a view to implementing the

provisions of the EU acquis on the provision of assurance on sustainability reporting (Directive (EU) 2022/2464), the draft Law of Ukraine “On Amending the Law of Ukraine ‘On Audit of Financial Statements and Auditing Activities’ and Certain Laws of Ukraine Regarding the Improvement of Legislation in the Field of Auditing Activities” was developed and submitted to the Verkhovna Rada of Ukraine (reg. No. 14016 of 5 September 2025);

– with a view to implementing measures related to the implementation of the EU acquis on sustainability reporting, the Ministry of Finance of Ukraine established the Interagency Working Group on the Introduction of Sustainability Reporting by Undertakings, the principal task of which is to coordinate the actions of central executive authorities, public authorities, institutions and professional organisations (associations) regarding the introduction of sustainability reporting by undertakings and to provide, within the limits of competence, clarifications and consultations on the introduction by undertakings of European sustainability reporting standards;

- National Accounting Regulations (Standards) 12 “Financial Investments” and 26 “Employee Benefits” were aligned with the requirements of International Financial Reporting Standards;

- the Agreement was concluded between the Ministry of Finance of Ukraine and the IFRS Foundation (United Kingdom) granting permission to translate and use materials and works copyrighted by the IFRS Foundation (United Kingdom), including those relating to the introduction of sustainability reporting by undertakings;

- Annexes A18, A19 and A20 to the Agreement between the Ministry of Finance of Ukraine and the International Federation of Accountants (USA) granting permission to translate and publish copyrighted materials (reg. No. UA-MOF-T-OA-2018) were concluded, namely the following works:

- the International Code of Ethics for Professional Accountants (including International Independence Standards), 2024 edition (August 2024); International Standard on Sustainability Assurance 5000 “General Requirements for Sustainability Assurance Engagements” (November 2024);

- IPSAS 50, Exploration for and Evaluation of Mineral Resources (November 2024), Amendments to IPSAS Standards as a Result of the Application of IPSAS 46, Measurement (August 2025);

- the translation and publication in the official language on the official website of the Ministry of Finance of Ukraine of two new International Financial Reporting Standards, namely: IFRS 18 “Presentation and Disclosure in Financial Statements” and IFRS 19 “Subsidiaries without Public Accountability: Disclosures”, were ensured. In addition, 44 International Financial Reporting Standards, 2025 edition, were updated and published on the official website of the Ministry of Finance of Ukraine ([https://mof.gov.ua/uk/translation\\_of\\_international\\_financial\\_reporting\\_standards\\_2025\\_to\\_be\\_completed-827](https://mof.gov.ua/uk/translation_of_international_financial_reporting_standards_2025_to_be_completed-827)).

- the package of International Standards on Auditing, including the International Code of Ethics for Professional Accountants (including International Independence Standards), was updated and published on the official website of the Ministry of Finance of Ukraine (<https://www.mof.gov.ua/uk/mizhnarodni-standarti-audit>).

## **Improvement of the regulatory framework for public sector accounting**

During 2025, the regulatory framework for public sector accounting was improved in accordance with international standards and the EU best practices, in particular National Public Sector Accounting Regulations (Standards) 126 "Leases", 121 "Property, Plant and Equipment", 129 "Investment Property", 133 "Financial Investments", 101 "Presentation of Financial Statements", 102 "Consolidated Financial Statements", 103 "Segment Reporting", the Chart of Accounts for the Public Sector and the procedure for its application, the standard financial reporting form No. 5-дс "Notes to the Annual Financial Statements", the Procedure for completing financial reporting forms in the public sector, and the Methodological Recommendations on Accounting Policies of Public Sector Entities were improved.

## COMPETITION AND STATE AID

### Functioning of the state aid control system under martial law

During 2025, certain provisions of the Law of Ukraine “On State Aid to Undertakings” (hereinafter referred to as the “Law”) remained suspended due to the application of martial law in Ukraine. At the same time, the draft law on amending the Law of Ukraine “On State Aid to Undertakings” regarding the reinstatement of certain of its provisions, the specificities of their application during the period of martial law and the improvement of monitoring of state aid to undertakings was registered with the Verkhovna Rada of Ukraine (reg. No. 14345 of 30 December 2025).

The key provisions of the draft law are as follows:

- reinstatement of the provisions of the Law which are currently not applied, except in the territories of Ukraine where active hostilities are taking place or which are temporarily occupied by the Russian Federation and for which no dates for the end of hostilities or temporary occupation have been determined, as well as for a period of one year from the date of cessation of hostilities or temporary occupation; during the period of martial law, the provisions of Articles 9 to 10 of the Law shall not apply to state aid granted to compensate for damage caused by emergency situations (i.e. notifications of such aid shall not be submitted), while state aid grantors shall submit information on such aid to the State Aid Register; the provisions of the Law shall not apply to increases in the statutory capital of systemically important banks;
- alignment of the provisions of the Law with the EU acquis, in particular as regards services of general economic interest (SGEI) and de minimis aid;
- improvement and digitalisation of the State Aid Register.

### Monitoring of state aid granted during the martial law

Pending the reinstatement of the provisions of the Law of Ukraine “On State Aid to Undertakings” concerning the submission of state aid notifications, heads of central executive authorities and heads of military administrations submit to the Antimonopoly Committee of Ukraine, on a quarterly basis, information on measures implemented during the martial law to support undertakings (Instruction of the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine No. 23872/2/1-24 of 7 August 2024).

In addition, throughout 2025, the Antimonopoly Committee of Ukraine, in accordance with its approved plan, conducted monitoring of state support in certain sectors, in particular energy, aircraft manufacturing, investment projects with significant investments, concessions, forestry, as well as financial instruments of the Entrepreneurship Development Fund.

Within the framework of the monitoring, a comprehensive analysis was carried out of the relevant national legislation forming a legal basis for granting such support, the actual conditions for its granting, and the relevant provisions of the EU acquis were taken into account. Following the monitoring, the Antimonopoly Committee of Ukraine issued a number of clarifications on the application of state aid legislation, in particular regarding

the existence of state aid elements and the conditions for its compatibility:

- in the context of the imposition of public service obligations on undertakings to ensure the affordability of electricity for household customers pursuant to Resolution of the Cabinet of Ministers of Ukraine No. 483 of 5 June 2019 (Clarification No. 1-pp/дд of 26 June 2025);
- concerning state support to undertakings operating in the aircraft manufacturing industry (Clarification No. 2-pp/дд of 14 August 2025);
- within the framework of the implementation of investment projects with significant investments (Clarification No. 3-pp/дд of 25 September 2025);
- concerning support to undertakings involved in forestry activities (Clarification No. 4-pp/дд of 9 October 2025);
- in the context of the implementation of public-private partnerships and concession contracts (Clarification No. 5-pp/дд of 16 October 2025);
- in the context of the imposition of public service obligations on undertakings in the operation of the natural gas market (Clarification No. 6-rr/dd of 11 December 2025);
- concerning support granted through the Entrepreneurship Development Fund.

### **Inventory of existing state aid schemes**

In January 2025, the Report on the inventory of support schemes for undertakings financed through state or local resources in place as of the date of entry into force of the Law, approved by Order of the Antimonopoly Committee of Ukraine No. 22-пн of 28 November 2024, was transmitted to the EU Party, identifying 56 schemes containing elements of existing state aid.

In this context, the European Commission's Ukraine Report under the 2025 EU Enlargement Package noted certain progress in carrying out the state aid inventory. Furthermore, following the tenth meeting of the EU–Ukraine Association Committee in Trade Configuration held on 2 December 2025, Ukraine agreed to provide the EU Party with an updated version of the Inventory Report in the second quarter of 2026.

At the same time, the completion of the full inventory of state aid schemes existing as of the date of entry into force of the Law is expected following the reinstatement of certain provisions of the Law.

### **Improvement of state aid legislation**

The Cabinet of Ministers of Ukraine approved:

- • the Amendments to the Criteria for assessing the compatibility of state aid to undertakings for regional development and to the Criteria for assessing the compatibility of state aid to undertakings for the support of small and medium-sized enterprises (Resolution of the Cabinet of Ministers of Ukraine No. 462 of 18 April 2025);
- • the Criteria for assessing the compatibility of state aid to undertakings for

professional training of employees (Resolution of the Cabinet of Ministers of Ukraine No. 673 of 11 June 2025);

- the Criteria for assessing the compatibility of certain categories of state aid to undertakings granted to promote certain economic activities or certain economic areas (Resolution of the Cabinet of Ministers of Ukraine No. 805 of 7 July 2025).
- By Order of the Antimonopoly Committee of Ukraine No. 5-пн of 29 May 2025, registered with the Ministry of Justice of Ukraine on 7 July 2025 under No. 1033/44439, amendments were introduced, inter alia, to:
  - the Procedure for monitoring state aid to undertakings;
  - the Procedure for maintaining and accessing the State Aid Register;
  - the Procedure, forms and requirements for submitting information on existing state aid to undertakings to the Antimonopoly Committee of Ukraine;
  - the Procedure for submitting and processing of notifications of new state aid and amendments to the conditions of existing state aid.

## PUBLIC PROCUREMENT

Throughout 2025, work was focused on improving the legal framework with a view to its gradual full harmonisation with European Union standards and the establishment of transparent mechanisms for post-war recovery.

The key vector of work in the first half of the year was the support and preparation for second reading of the draft Law of Ukraine "On Public Procurement" (reg. No. 11520 of 23 August 2024), which aims to substantially approximate Ukraine's public procurement framework to the provisions of the EU acquis, namely:

- Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC;
- Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC.

This, in its turn, will ensure the transparency and efficiency of procurement necessary for the country's recovery following the full-scale war.

In the second half of 2025, comprehensive analytical and expert support for draft Law No. 11520 was continued in the context of its preparation for adoption in the second reading. The work included further alignment of certain provisions with the EU acquis, as well as refinement of the draft Law taking into account comments from the EU experts and the European Commission.

Draft Law No. 11520 is being further finalised by the Ministry of Economy of Ukraine in cooperation with the Committee of the Verkhovna Rada of Ukraine on Economic Development for subsequent consideration in the second reading by the Verkhovna Rada of Ukraine.

In addition, in 2025, Law of Ukraine No. 4510-IX of 19 June 2025 "On Public-Private Partnership" (hereinafter referred to as "Law No. 4510-IX") was adopted, aimed at improving

mechanisms for attracting private investment through public-private partnership and concession instruments, including in support for post-war recovery and infrastructure development, as well as aligning the legislation with Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts.

The adoption of Law No. 4510-IX is regarded as a step forward towards modernising the regulatory framework for the implementation of infrastructure projects and the development of cooperation mechanisms between the public and private sectors.

At the same time, with a view to full approximation of the national legislation in the field of public-private partnerships and concessions to the EU acquis, further regulatory improvements are envisaged in order to eliminate existing inconsistencies and align specific provisions with the requirements of the EU acquis.

Furthermore, in 2025 a new phase of reforms commenced, combining institutional transformation with the development of the defence-industrial base. It was also announced that Ukraine intends to review the Law of Ukraine "On Defence Procurement" in order to align it with Directive 2009/81/EC.

## INTELLECTUAL PROPERTY

Ukraine's commitments in the field of Intellectual Property are set out in Chapter 9 "Intellectual Property" of Title IV "Trade and Trade-Related Matters" of the Association Agreement.

## ADOPTED ACTS OF NATIONAL LEGISLATION

During 2025, the Ministry of Economy of Ukraine, with the participation of the State Organisation "Ukrainian National Office for Intellectual Property and Innovations" (UANIPPO), developed and submitted to the European Commission proposals concerning the draft Laws "On the Protection of Trade Marks", "On Patents and Utility Models", "On Amending Certain Legislative Acts of Ukraine in the Field of Copyright and Related Rights with a View to Aligning the Legal Regulation with the EU Acts", and "On the Protection of Trade Secrets" in order to align national legislation with the EU acquis.

Within the framework of aligning sectoral secondary legislation with the provisions of the Law of Ukraine "On Amending Certain Legislative Acts of Ukraine in Connection with the Adoption of the Law of Ukraine 'On Administrative Procedure'" No. 4017-IX of 10 October 2024, as well as in fulfilment of tasks identified in the European Commission's 2024 Ukraine Report under the EU Enlargement Package, the following regulatory acts were adopted:

- Resolution of the Cabinet of Ministers of Ukraine No. 585 of 21 May 2025 "On amending the Procedure for acquiring and losing the status of orphan works, phonograms, videograms and performances fixed therein, the conditions of their permitted use and the maintenance of the register";
- Order of the Ministry of Economy of Ukraine No. 2521 of 26 May 2025 "On amending the Order of the Ministry of Economic Development and Trade of Ukraine No. 1707 of 20 November 2018", registered with the Ministry of Justice of Ukraine on 9 June 2025 under No. 883/44289, approving the application form for collective management organisations and clarifying the form and content of the annual activity report of a collective management organisation, information on founders, the composition of

supervisory and executive bodies and the staff of the legal person;

- Order of the Ministry of Economy of Ukraine No. 337 of 27 August 2025 “On amending the Order of the Ministry of Economy of Ukraine No. 11319 of 16 August 2023”, registered with the Ministry of Justice of Ukraine on 9 October 2025 under No. 1469/44875, introducing relevant amendments to the Procedure for state registration of copyright and agreements related to property rights to a work.

On 5 June 2025, Law of Ukraine No. 4454-IX of 15 May 2025 “On Amending Certain Laws of Ukraine Regarding the Implementation of the Bolar Provision” entered into force, establishing the conditions for the state registration of generic medicinal products prior to the expiry of the patent term for the original medicinal product and clarifying certain provisions concerning export during the term of a supplementary protection certificate.

Order of the Ministry of Economy of Ukraine of 19 March 2025 No. 1803 “On approval of the Procedure for considering an application for supplementary protection of invention rights”, registered with the Ministry of Justice of Ukraine on 2 May 2025 under No. 661/44067, was also adopted.

With a view to improving and ensuring a uniform approach to the application of legislation in the examination of applications for inventions and utility models and for trade marks, Order of UANIPIO No. 102/2025 of 6 May 2025 approved the Methodological Recommendations on the Examination of Applications for Inventions and Utility Models, and Order of UANIPIO No. 249/2025 of 17 October 2025 approved the Methodological Recommendations on Certain Issues of the Examination of Trade Mark Applications.

On 31 May 2025, Law of Ukraine No. 4362-IX of 16 April 2025 “On Repealing the Law of Ukraine ‘On the Protection of the Interests of Persons in the Field of Intellectual Property during the Period of Martial Law Introduced in Connection with the Armed Aggression of the Russian Federation against Ukraine’” entered into force, thereby reinstating the standard time limits for actions related to the protection of intellectual property rights, the procedures for acquiring such rights and the payment of relevant fees, taking into account the period elapsed prior to the suspension of time limits (from 24 February 2022), and establishing conditions for a transitional period.

## MEASURES TO ENHANCE THE LEVEL OF PROTECTION OF INTELLECTUAL PROPERTY RIGHTS

On 30 June 2025, the Analytical Report of the UANIPIO IPR Infringement Monitoring Centre (IPR Monitoring Centre), State of Intellectual Property Rights Protection in Ukraine in 2024, was published, providing a systemic analysis of the state of intellectual property rights protection in Ukraine and containing consolidated statistical data on enforcement for the relevant period.

On 10 April 2025, during the annual international conference AGM2025, the Memorandum of Cooperation between UANIPIO and the REACT Anti-Counterfeiting Network was signed with a view to strengthening international cooperation, facilitating information exchange to enhance the effectiveness of combating the circulation of counterfeit goods, and further engaging REACT experts in joint activities.

The IPR Monitoring Centre holds meetings and training sessions with representatives of the National Police of Ukraine, the Cyber Police Department of the National Police of

Ukraine, the Office of the Prosecutor General, the State Customs Service of Ukraine and the Economic Security Bureau of Ukraine in order to promote inter-agency cooperation, enhance effectiveness and improve coordination of practical actions in the field of combating intellectual property rights infringements.

During 2025, national awareness raising campaigns were implemented to address and provide recommendations on key sectoral challenges: the ANTIPIRACY: MUSIC, aimed at examining current issues and counteracting infringements in the music industry, and the Trust the Original, aimed at combating counterfeiting on online marketplaces.

## COOPERATION WITH THE EU

On 9 July 2025, UANIPIO concluded an updated Memorandum of Understanding on Reinforced Technical and Strategic Partnership with the European Patent Office, providing for technical support in the field of patent examination, data exchange, and joint work on the Roadmap for Ukraine's Accession to the European Patent Convention until 2027 and on the alignment of patent legislation with the EU acquis and the European Patent Convention.

In 2025, more than 600,000 Ukrainian trade marks were integrated into TMview, a free online search tool of the European Union Intellectual Property Office covering trade marks of all participating offices, and preparations were undertaken for the integration into DesignView in 2026.

Representatives of law enforcement authorities and specialists of UANIPIO participated in the events organised by the European Union Intellectual Property Network, the European Intellectual Property Prosecutors Network and the European Observatory on Infringements of Intellectual Property Rights.

Within the framework of the EU4IP: Strengthening Intellectual Property Rights in Moldova and Ukraine (EU4IP) international technical assistance project, participation was ensured in the European Multidisciplinary Platform Against Criminal Threats (EMPACT) seminar "Investigating and Prosecuting IP Crime Across Borders", the 12th Annual Workshop of the European Intellectual Property Prosecutors Network (EIPPN), the International Intellectual Property Enforcement Summit, a study visit of representatives of the State Customs Service of Ukraine and UANIPIO to the Republic of Croatia, and other relevant events. Implementation of activities and cooperation under other components of the EU4IP project are ongoing.

## ENERGY EFFICIENCY, HOUSING AND UTILITIES

Ukraine's commitments in the field of energy efficiency and housing and utilities are set out in Chapter 1 "Energy Cooperation, Including Nuclear Issues" of Title V "Economic and Sector Cooperation" of the Association Agreement.

In order to implement the Law of Ukraine "On Energy Efficiency", which implements Directive 2012/27/EU, the following acts were **adopted**:

- Ordinance of the Cabinet of Ministers of Ukraine No. 1125-p of 10 October 2025 "On approval of the target for annual energy consumption reduction", establishing a target for annual energy consumption reduction of 304 thousand tonnes of oil equivalent for the period until 31 December 2030;
- Ordinance of the Cabinet of Ministers of Ukraine No. 1181-p of 29 October 2025 "On establishing the energy saving target for buildings of public authorities", setting a target of 133.8 thousand kWh, or 253.3 thousand kWh in primary energy terms.

### **In particular, in 2025 the following acts were adopted:**

- Ordinance of the Cabinet of Ministers of Ukraine No. 694-p of 14 July 2025 "On approval of the State Targeted Economic Programme for Supporting Thermal Modernisation of Buildings until 2030";
- Ordinance of the Cabinet of Ministers of Ukraine No. 1083-p of 1 October 2025 "On approval of the State Targeted Economic Programme for Energy Modernisation of Heat Energy Producing Enterprises in State or Communal Ownership until 2030";
- Order of the Ministry for Communities and Territories Development of Ukraine No. 168 of 6 February 2025 (registered with the Ministry of Justice of Ukraine on 21 February 2025 under No. 284/43690) approving the Requirements for Nearly Zero-Energy Buildings.

### **In particular, in 2025 the following acts were adopted:**

- Resolution of the Cabinet of Ministers of Ukraine No. 512 of 2 May 2025 "On approval of the Technical Regulation on Ecodesign Requirements for Refrigerating Appliances with a Direct Sales Function";
- Resolution of the Cabinet of Ministers of Ukraine No. 1482 of 19 November 2025 "On approval of the Technical Regulation on Requirements for Alternative Motor Fuels".
- In addition, the State Agency on Energy Efficiency and Energy Saving of Ukraine developed and submitted for consideration by the Ministry for Communities and Territories Development of Ukraine and other central executive authorities:
  - a draft technical regulation on ecodesign requirements for servers and data storage products;
  - a draft technical regulation on ecodesign requirements for external power supplies;
  - a draft technical regulation on energy labelling of refrigerating appliances with a direct sales function.

## ENERGY

Ukraine's commitments in the area of "Energy" are set out in Chapter 1 "Energy Cooperation, Including Nuclear Issues" of Title V "Economic and Sector Cooperation" of the Association Agreement. The alignment with the EU acquis in the energy sector is carried out in accordance with Annex XXVII to the Association Agreement and within the framework of the commitments under the Treaty establishing the Energy Community.

### ELECTRICITY SECTOR

With a view to aligning the legal framework of Ukraine with the acts of the EU acquis, in particular Regulations (EU) No 2019/942 and No 2019/943, Commission Regulations (EU) No 2015/1222, No 2016/1719, No 2017/1485, No 2017/2195 and No 2017/2196, Directive (EU) 2019/944, as well as Regulation (EU) No 2019/941, which have been incorporated into the Energy Community law as part of the so-called Electricity Integration Package, and with the aim of establishing a legislative framework for the integration of the electricity market of Ukraine into the single European market, the following draft laws were developed:

- the draft Law of Ukraine "On Amending the Laws of Ukraine Concerning Coupling of the Electricity Markets of Ukraine and the European Union" (reg. No. 12087 of 2 October 2024);
- the alternative draft Law of Ukraine "On Amending Certain Laws of Ukraine Concerning the Implementation of the European Law on the Integration of Energy Markets and the Enhancement of Security of Supply and Competitiveness in the Energy Sector" (reg. No. 12087-1 of 18 October 2024).

On the basis of the above draft laws, the revised draft Law of Ukraine "On Amending Certain Laws of Ukraine Concerning the Implementation of the European Law on the Integration of Energy Markets and the Enhancement of Security of Supply and Competitiveness in the Energy Sector" was prepared and registered with the Verkhovna Rada of Ukraine on 27 June 2025 under No. 12087-д.

On 22 July 2025, draft Law No 12087-д was adopted as a basis in the first reading during the plenary meeting of the Verkhovna Rada of Ukraine. The draft Law will be considered by the Verkhovna Rada of Ukraine in the second reading.

During 2025, taking into account the adoption of the Law of Ukraine No. 4213-IX of 14 January 2025 "On Amending Certain Laws of Ukraine in the Areas of Energy and Heat Supply Concerning the Improvement of Certain Provisions Related to Economic Activity and the Operation of Martial Law in Ukraine", the National Energy and Utilities Regulatory Commission introduced the relevant amendments to legal and normative acts improving the practical implementation of the requirements of Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (REMIT), through the adoption of:

- Resolution of the National Energy and Utilities Regulatory Commission No. 682 of 6 May 2025 "On approval of the Procedure for the aggregation and disclosure of inside information on the wholesale energy market";
- Resolution of the National Energy and Utilities Regulatory Commission No. 2195

of 23 December 2025 “On approval of Methodological Recommendations on Ensuring Integrity and Transparency on the Wholesale Energy Market”.

With a view to implementing the requirements of Commission Regulation (EU) No 2016/1719 establishing guidelines on forward capacity allocation, in the context of enabling coordinated capacity allocation auctions, the following acts were adopted:

- Resolution of the National Energy and Utilities Regulatory Commission No. 963 of 24 June 2025 “On approval of the Rules for intraday capacity allocation at the Ukraine–Moldova interconnection”;
- Resolution of the National Energy and Utilities Regulatory Commission No. 1156 of 29 July 2025 “On approval of the Rules for long-term capacity allocation at Ukraine’s cross-border interconnections”, approving the rules for monthly capacity allocation at the Ukraine–Hungary, Ukraine–Slovakia and Ukraine–Romania interconnections;
- Resolution of the National Energy and Utilities Regulatory Commission No. 1437 of 16 September 2025 “On approval of the Rules for intraday capacity allocation at the Ukraine–Romania interconnection”;
- Resolution of the National Energy and Utilities Regulatory Commission No. 1929 of 25 November 2025 “On approval of the Rules for intraday capacity allocation at the Ukraine–Slovakia and Ukraine–Hungary interconnections”.

In addition, the maximum electricity import capacity to Ukraine from the power systems of neighbouring countries was increased to 2,450 MW (for January 2026).

With a view to implementing Regulation (EU) 2017/2195, by Resolution No. 1205 of 5 August 2025 the National Energy and Utilities Regulatory Commission amended the Market Rules, introducing the possibility of transferring obligations for the provision of ancillary services relating to frequency and active power control.

Furthermore, in pursuance of Regulations (EU) 2017/1485 and 2017/2196, by Resolution No. 677 of 6 May 2025 “On approval of the Amendments to the Transmission System Code”, the National Energy and Utilities Regulatory Commission amended the Transmission System Code regulating the functioning of the Integrated Power System of Ukraine under emergency and restoration conditions, defining emergency conditions, the application of emergency measures, improving power system protection planning and harmonising terminology with the EU acquis.

## OIL SECTOR

In pursuance of the requirements of Directive 2009/119/EC imposing an obligation on Member States to maintain minimum stocks of crude oil and/or petroleum products, in 2023 the Law of Ukraine No. 3484-IX “On Minimum Stocks of Oil and Petroleum Products” was adopted.

The Ministry of Energy of Ukraine designated Market Operator Joint-Stock Company as the administrator of the electronic reporting system on minimum stocks of oil and petroleum products, which carries out monitoring of the creation, storage and use of minimum stocks, exchange of relevant data, monitoring of the volumes of the

oil, petroleum products and liquefied gas market, as well as quality and safety indicators of petroleum products. The relevant Order of the Ministry of Energy of Ukraine No. 41 of 29 January 2025 was adopted in pursuance of the Law of Ukraine "On Minimum Stocks of Oil and Petroleum Products".

Also in 2025, a number of legal and normative acts were adopted in pursuance of the said Law, in particular:

- Order of the Ministry of Energy of Ukraine No. 118 of 19 March 2025 "On approval of the Model Form of a ticket contract for reservation of oil and petroleum products included in minimum stocks of oil and petroleum products";
- Resolution of the Cabinet of Ministers of Ukraine No. 601 of 23 May 2025 "Certain issues of implementation of Article 4 of the Law of Ukraine 'On Minimum Stocks of Oil and Petroleum Products'".

## GAS SECTOR

With a view to implementing the requirements of Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010, as adapted for the Contracting Parties of the Energy Community by Ministerial Council Decision 2021/15/MC-EnC of 30 November 2021, the draft Law of Ukraine "On Amending the Law of Ukraine 'On the Natural Gas Market'" was developed.

The draft Law is aimed at strengthening energy security in accordance with the EU standards and provides for the updating of terminology, designation of the competent authority, introduction of requirements for preventive action plans and contingency plans, procedures for filling gas storage facilities, mechanisms for declaring a crisis situation and international cooperation, obligations to provide information, as well as liability for violations in the field of security of gas supply. The draft Law was submitted to the Cabinet of Ministers of Ukraine.

In addition, in the gas sector the implementation of EU Regulations No 312/2014, 2017/459 and 2015/703 on gas balancing, capacity allocation and data exchange continued. From 1 April 2025, the neutrality charge for balancing mechanism was introduced, as applied to transmission service users in accordance with the calculations of the Gas Transmission System Operator.

By Resolution of the National Energy and Utilities Regulatory Commission No. 1182 of 5 August 2025 "On approving and amending certain Resolutions of the National Energy and Utilities Regulatory Commission", the implementation of certain provisions of the above Regulations identified during the screening under Chapter 15 "Energy" as requiring further alignment was completed.

## ENERGY INFRASTRUCTURE

With a view to implementing the requirements of Regulation (EU) No 347/2013 on guidelines for trans-European energy infrastructure, the draft Law of Ukraine "On Projects of National Interest in the Energy Sector" (reg. No. 9138 of 22 March 2023) was developed.

Taking into account Ukraine's obligations to implement the provisions of the updated Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009,

(EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013, the new draft Law of Ukraine “On Infrastructure Projects of Public Interest in the Energy Sector” (reg. No. 13450 of 4 July 2025) was registered, implementing the provisions of the said Regulation.

In this context, the draft Law of Ukraine “On Energy Projects of National Interest” (reg. No. 9138 of 22 March 2023) lost its relevance and was withdrawn on 17 July 2025.

On 4 November 2025, the draft Law of Ukraine “On Infrastructure Projects of Public Interest in the Energy Sector” (reg. No. 13450) was adopted as a basis in the first reading. The draft Law will be considered by the Verkhovna Rada of Ukraine in the second reading.

## RENEWABLE ENERGY SOURCES

With a view to implementing Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources, the following acts were adopted:

- Resolution of the National Energy and Utilities Regulatory Commission No. 839 of 3 June 2025 “On approval of the Amendments to Resolution of the National Energy and Utilities Regulatory Commission No. 641 of 26 April 2019”, introducing amendments to the Procedure for the purchase by the Guaranteed Buyer of electricity produced from alternative energy sources (hereinafter referred to as the “Procedure”);
- Resolution of the National Energy and Utilities Regulatory Commission No. 1602 of 7 October 2025 “On approval of the Amendments to certain Resolutions of the National Energy and Utilities Regulatory Commission”, introducing amendments to the Procedure with regard to regulating the accrual and payment in favour of the Guaranteed Buyer of contributions for the establishment of a special (targeted) fund intended to cover the arbitration costs of the Guaranteed Buyer in cases of loss of the status of an “enterprise with foreign investment”.

Within the framework of the financial support programme of the Ukraine Plan under the Ukraine Facility, with the aim of improving the existing mechanism of public service obligations to ensure an increase in the share of electricity production from alternative energy sources and to stimulate the attraction of investment in the development of electricity generation from alternative energy sources, the Cabinet of Ministers of Ukraine by Ordinance No. 612-p of 25 June 2025 approved the Roadmap for Separating the Renewable Energy Surcharge from the Transmission Tariff and the Action Plan for the Implementation of the Roadmap for Separating the Renewable Energy Surcharge from the Transmission Tariff for 2025 and 2026.

In pursuance of points 4 and 7 to 9 of the Action Plan for the implementation of the above Roadmap, the National Energy and Utilities Regulatory Commission developed the draft Law of Ukraine “On Amending Certain Laws of Ukraine Concerning Separating the Renewable Energy Surcharge from the Transmission Tariff”, according to which the requirements and provisions defined by the Roadmap were integrated into the Laws of Ukraine “On the Electricity Market”, “On Alternative Energy Sources” and “On the National Energy and Utilities Regulatory Commission”. On 12 December 2025, the draft Law of Ukraine was submitted for consideration by the Cabinet of Ministers of Ukraine.

With a view to aligning the national legal framework in the field of renewable energy sources with the requirements of the EU acquis, in particular Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy

from renewable sources (as amended), the Ministry of Energy of Ukraine developed the draft Law of Ukraine “On Amending Certain Laws of Ukraine Concerning the Implementation of the EU Acquis in the Field of Renewable Energy Sources”, which was approved by the Cabinet of Ministers of Ukraine on 3 December 2025 and registered with the Verkhovna Rada of Ukraine (reg. No. 14271). The draft Law is currently being prepared for consideration in the first reading.

The draft Law defines the rules for calculating the share of renewable energy sources (RES) in gross final energy consumption, the mechanisms for statistical transfers and joint projects with the EU, the principles for the establishment of dedicated RES and energy storage areas, and also updates the requirements regarding sustainability criteria and greenhouse gas emission reductions for biofuels and biomass fuels.

Within the framework of the Ukrainian–Danish Energy Partnership Programme, Ea Energy Analyses carried out a study of the territory of Ukraine, based the findings of which RES acceleration areas were identified in accordance with Article 15b of Directive (EU) 2018/2001.

Within the framework of the Cross-Border Sustainable Renewable Energy Acceleration in Ukraine project, with the support of the Energy Community Secretariat, the identification of renewable energy acceleration areas is being carried out in accordance with Article 15c of Directive (EU) 2018/2001.

For the purpose of conducting green auctions, the Cabinet of Ministers of Ukraine adopted Ordinance No. 1195-p of 29 November 2024 “Certain issues of conducting auctions for the allocation of renewable energy support quotas for 2025 and establishing indicative forecast annual support quotas for 2026–2029”.

On 31 July 2025, an auction for the allocation of a 150 MW annual support quota for wind generation was held in the electronic trading system of Prozorro.Sale JSC. The allocation of support quotas exceeding 1.8 GW is planned by 2029.

The draft Law of Ukraine “On Amending Certain Laws of Ukraine Concerning the Improvement of Competitive Conditions for the Production of Electricity from Alternative Energy Sources” (reg. No. 13219 of 28 April 2025) was also developed, which provides for a transition from the contracts for difference model to the feed-in premium model, which will contribute to increasing the investment attractiveness of auctions. On 21 August 2025, it was adopted as a basis in the first reading. The draft Law is currently pending reconsideration in the second reading.

In 2024, the register of guarantees of origin of electricity from renewable energy sources was launched. As of 31 December 2025, 1,128 accounts were created and 1,513 generating installations were registered. Work is underway on the development of the domain protocol for Ukraine with a view to submitting it to the Association of Issuing Bodies (AIB) and further ensuring the integration of the Ukrainian register of guarantees of origin of electricity produced from renewable energy sources with the registers of the EU Member States.

Joint work with the Energy Community Secretariat on the draft Decision of the Energy Community Ministerial Council concerning the recognition in the European Union of guarantees of origin of electricity from renewable sources issued by the Contracting Parties is ongoing.

In pursuance of the Association Agreement, on 21 February 2023, the Memorandum of Understanding between the EU and Ukraine on a Strategic Partnership on Biomethane, Hydrogen and Other Synthetic Gases was signed. Its implementation is being carried out jointly with the European Commission in accordance with the Roadmap, the update of which is ongoing.

During 2024–2025, coordination with the European Commission and national stakeholders was ensured to remove regulatory and technical barriers and to open the EU market for Ukrainian biomethane. In February 2025, the first export of biomethane to the EU was carried out; as of the end of 2025 approximately 11.5 million m<sup>3</sup> were exported.

## COAL SECTOR

Article 339 of the Association Agreement provides that the Parties shall exchange information and experience, as well as provide relevant support to the process of regulatory reforms, which include the restructuring of the coal sector in order to increase its competitiveness, enhance mine safety and occupational safety and reduce its environmental impact, while bearing in mind the regional and social impact.

Paragraph 742 of the Action Plan for the Implementation of the Association Agreement, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1106 of 25 October 2017, sets out tasks concerning the restructuring of the coal sector of Ukraine (steam coal and coking coal) in order to increase its competitiveness, enhance mine safety and occupational safety and reduce its environmental impact, while bearing in mind the regional and social impact.

In pursuance of subpoint 2 of point 2 of the Final Provisions of the Law of Ukraine No. 3577-IX of 7 February 2024 “On Amending Certain Legislative Acts of Ukraine Concerning the Restoration of Solvency of Certain State-Owned Enterprises in the Energy Sector in a Critical Condition”, the Ministry of Energy of Ukraine developed the Programme of Activities of State-Owned Coal Mining Enterprises until 2030, approved by Ordinance of the Cabinet of Ministers of Ukraine No 1454-p of 26 November 2025. The Programme provides for the structural optimisation of the sector, the concentration of resources for increasing coal extraction and the production of coal products, improvement of the financial and economic performance of enterprises, their gradual transition to operation without state subsidies, and the enhancement of investment attractiveness with a view to potential privatisation. The implementation of the Programme will also contribute to addressing environmental and social issues and to the transformation of mining regions.

## NUCLEAR ENERGY

Issues of cooperation in the field of nuclear safety are defined by Article 342 of the Association Agreement and the updated Annex XXVII (Section “Nuclear Energy”), which provides for the implementation of the Euratom Directives, in particular 2013/59/Euratom, 2006/117/Euratom, 2014/87/Euratom, 2009/71/Euratom and 2011/70/Euratom.

In 2025, within the framework of the approximation of national legislation to the EU acquis, the State Nuclear Regulatory Inspectorate of Ukraine adopted a number of secondary regulatory acts aimed at completing the implementation of Directive 2013/59/Euratom in the part concerning the introduction of the institution of the radiation protection expert, in particular with regard to the establishment of an attestation commission and the procedure for training, professional development and knowledge assessment of such experts.

The draft Law of Ukraine on the accession of Ukraine to the Agreement on the Early Exchange of Information in the Event of a Radiological Emergency (ECURIE) was also developed, which is one of the priorities of Ukraine’s negotiating position under Chapter 15 “Energy” and is aimed at ensuring Ukraine’s full participation in the EU mechanisms for nuclear and radiation safety.

The draft Law of Ukraine “On the National Nuclear Regulatory Commission” is being finalised, taking into account the requirements of the EU acquis, international conventions and the comments of the European Commission. In 2025, the State Nuclear Regulatory Inspectorate of Ukraine ensured the preparation and transmission, through the Government Office for Coordination on European and Euro-Atlantic Integration of the Secretariat of the Cabinet of Ministers of Ukraine, of responses to the questions and comments of the EU Party; additional comments are currently being processed. A proposal has been submitted to include the draft Law in the plan of law-drafting activities of the Verkhovna Rada of Ukraine for 2026.

In addition, the finalisation of the draft Resolution of the Cabinet of Ministers of Ukraine on improving the mechanism for interaction between executive authorities in the event of the detection of radioactive materials in illicit trafficking is at the final stage, with its alignment to the provisions of Directive 2013/59/Euratom and international treaties.

In accordance with the measures for the implementation of the provisions of Council Directive 2011/70/Euratom into national nuclear legislation and in connection with the expiry of the State Economic Programme for the Management of Spent Nuclear Fuel of Domestic Nuclear Power Plants for the Period until 2025, approved by Resolution of the Cabinet of Ministers of Ukraine No. 847 of 11 August 2021, the Ministry of Energy of Ukraine developed, agreed with the relevant authorities and social partners and duly submitted for consideration by the Cabinet of Ministers of Ukraine the draft Concept of the State Economic Programme for the Management of Spent Nuclear Fuel of Domestic Nuclear Power Plants for the Period until 2030.

In 2022, the Cabinet of Ministers of Ukraine approved the Concept of the National Targeted Environmental Programme for Radioactive Waste Management, pursuant to which the State Agency of Ukraine on Exclusion Zone Management developed the draft Law of Ukraine “On the National Targeted Environmental Programme for Radioactive Waste Management” (reg. No. 12356 of 23 December 2024), which was adopted as a basis on 27 February 2025. The draft Law will be considered by the Verkhovna Rada of Ukraine in the second reading.

## TAXATION

### IMPLEMENTATION OF INTERNATIONAL STANDARDS FOR THE EXCHANGE OF INFORMATION FOR TAX PURPOSES

During 2025, a legislative framework was prepared to introduce international automatic exchange of information on income received through digital platforms in Ukraine. The relevant draft Law (reg. No. 14025 of 9 September 2025) "On Amending the Tax Code Of Ukraine and the Law of Ukraine 'On Banks and Banking' Regarding The Implementation of International Automatic Exchange of Information on Income Received through Digital Platforms" is under consideration by the committees of the Verkhovna Rada of Ukraine.

Adoption of the Law will ensure the implementation of the provisions of Council Directive (EU) 2021/514 of 22 March 2021 amending Directive 2011/16/EU on administrative cooperation in the field of taxation (DAC7 Directive).

The Ministry of Finance of Ukraine approved an updated Procedure for exchange of tax information with the competent authorities of foreign states, which transposed into national legislation certain provisions of Council Directive 2011/16/EU of 15 February 2011 on administrative cooperation in the field of taxation and repealing Directive 77/799/EEC.

The updated Procedure provided for the introduction of clear procedures for international exchange of information on request (including time limits for processing incoming requests, rules on group requests, and compliance with the principle of "foreseeable relevance") and for spontaneous exchange of information for tax purposes.

### NATIONAL REVENUE STRATEGY UNTIL 2030

In pursuance of the National Revenue Strategy until 2030 approved by Ordinance of the Cabinet of Ministers of Ukraine No. 1218-p of 27 December 2023, in 2025:

- on 27 February 2025, the Verkhovna Rada of Ukraine adopted Law of Ukraine No. 4278-IX "On Amending Article 1 of Law No. 4278-IX 'On Ratification of the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting'", which had been drafted by the Ministry of Finance of Ukraine;
- amendments were introduced to subpoint 197.1.7 of point 197.1 of Article 197 of the Tax Code of Ukraine regarding the application of the value added tax exemption to transactions involving the provision of social services in accordance with the Law of Ukraine "On Social Services" by social service providers included in the Register of Providers and Recipients of Social Services (Law of Ukraine No. 4505-IX of 18 June 2025). The adopted amendments comply with subpoint "g" of Article 132 of Council Directive 2006/112/EC of 28 November 2006 on the common system of value added tax;
- the Cabinet of Ministers of Ukraine approved draft international treaties for the elimination of double taxation with respect to income taxes and the prevention of tax evasion and avoidance between the Government of Ukraine and the Government of the Republic of Angola, and between the Government of Ukraine and the Government of Australia (Ordinance of the Government No. 527 of 15 May 2025 and No. 1002 of 17 September 2025, respectively);

- an electronic desk audit (“E-audit”) for large taxpayers was introduced: amendments were adopted to legislative and legal and normative acts, and the intellectual property item “E-audit” was put into industrial operation;
- the Cabinet of Ministers of Ukraine implemented a range of measures aimed at institutional changes within the State Customs Service of Ukraine, including reform of the State Customs Service in critically important areas to reduce corruption risks and strengthen its capacity to combat fraud;
- the medium-term action plan to achieve the objectives of customs authorities reform was approved (Ordinance of the Cabinet of Ministers of Ukraine No. 835-p of 4 August 2025).

## STATISTICS AND EXCHANGE OF INFORMATION

The cooperation between Ukraine and the EU is based on the provisions of Chapter 5 “Statistics” of Title V “Economic and Sector Cooperation” of the Association Agreement.

One of the main achievements in the field of statistics was the adoption by the Verkhovna Rada of Ukraine of Law No. 4505-IX of 18 June 2025 “On Amending the Tax Code of Ukraine and Other Laws of Ukraine Regarding the Expansion of Patients’ Access to Medicinal Products Subject to Procurement by the Entity Authorised to Carry Out Procurement in the Field of Healthcare, by Concluding Managed Access Agreements” (hereinafter referred to as “Law No. 4505-IX”), which resumed the submission of statistical reporting to the state statistics bodies. This will make it possible to update statistical indicators for 2022–2025.

### POPULATION STATISTICS

In order to carry out estimates of the population of Ukraine in the absence of necessary administrative data and given the impossibility of conducting a population census, taking into account international experience and expertise, the State Statistics Service of Ukraine continued its cooperation with the United Nations Population Fund (UNFPA) in Ukraine. With financial support from UNFPA, and based on data from mobile network operators, the State Statistics Service of Ukraine continued experimental calculations and estimated the population of Ukraine for 2024 and for January–June 2025.

### ASYLUM AND MANAGED MIGRATION STATISTICS

Within the framework of cooperation between the State Statistics Service of Ukraine and the Administration of the State Border Guard Service of Ukraine, in 2025 a dataset and metadata concerning third-country nationals who were refused entry at the external borders, by citizenship and grounds for refusal, for 2024 were transmitted to Eurostat.

### SOCIAL STATISTICS

During 2025, with a view to aligning with the requirements of the national and European legislation in the field of statistics, the following were prepared:

- in the area of tourism — guidelines the state statistical surveys (hereinafter referred to as the “SSS”) “Collective Accommodation Establishments” and the “Methodology for calculating indicators of the state statistical survey ‘Collective Accommodation Establishments’, taking into account the activities of individual entrepreneurs” (for the purpose of implementing Regulation (EU) No 692/2011);
- in the area of education — guidelines on the SSS “Network and Activities of Educational Institutions” (for the purpose of implementing Commission Regulation (EU) No 912/2013 of 23 September 2013); the “Methodology for forming the sample for the state statistical survey ‘Vocational Training in Enterprises’ and extrapolating its results to the general population”; and updated guidelines on the SSS “Vocational Training in Enterprises” (for the purpose of implementing Regulation (EU) No 1552/2005);

- in the area of the labour market — guidelines on the SSS “Enterprises’ Labour Costs” (for the purpose of implementing Regulation (EU) No 530/1999).

In addition, to ensure the implementation of Regulation (EU) 2019/1700 of the European Parliament and of the Council of 10 October 2019, guidelines on the SSS “Adult Participation in Lifelong Learning” and the SSS “Time Use Survey” were developed, respectively.

## HOUSEHOLD SURVEYS

In accordance with the legal regime of martial law introduced from February 2022, the state statistics bodies did not conduct sample surveys of the population (households), so no information based on their results was obtained for 2022–2025.

In connection with the adoption of Law No. 4505-IX, preparatory work has been initiated to resume the conduct of such sample surveys.

## NATIONAL ACCOUNTS

In 2025, final data on gross domestic product for 2024 were calculated and published on the official website of the State Statistics Service of Ukraine. Following the amendments to the Law of Ukraine “On Protection of the Interests of Reporting Entities and Other Documents during the Period of Martial Law or a State of War”, publication of statistical products was resumed in 2025, including the quarterly preliminary estimate of GDP for 2025, the “input–output” table at purchasers’ prices for 2024, and household income and expenditure for 2024. For the first time, an entrepreneurial income account was identified within the sectoral national accounts. The statistical information was published on the official website of the State Statistics Service of Ukraine<sup>1</sup>.

As part of implementing Regulation (EU) 2023/734 of the European Parliament and of the Council of 15 May 2023, the guidelines on the SSS “Quarterly National Accounts”, the SSS “Regional Accounts”, and the SSS “Annual National Accounts”, as well as the Methodology for calculating gross domestic product, were updated.

During 2025, seven datasets of Ukraine’s national accounts were transmitted to Eurostat via the EDAMIS platform. Key indicators of Ukraine’s national accounts, including GDP for the period from 2014 to 2023, were published on the official website of Eurostat.

## REGISTER OF STATISTICAL SURVEY RESPONDENTS AND BUSINESS DEMOGRAPHY

In order to bring the national statistical practice closer to EU standards and requirements, in particular the requirements of Regulation (EU) 2019/2152, in 2025 the following were developed and approved:

- the methodology for constructing enterprise groups in the statistical register “Register of Statistical Survey Respondents (SBR)”;
- the Procedure for forming, within the statistical register “Register of Statistical Survey Respondents (SBR)”, the characteristics of statistical units “number of employees”, “number of persons employed”, “legal size” and “statistical size”.

<sup>1</sup> [https://stat.gov.ua/sites/default/files/2025-12/rakhunky\\_instytutsiynykh\\_sektoriv\\_ekonomiky\\_2024.xlsx](https://stat.gov.ua/sites/default/files/2025-12/rakhunky_instytutsiynykh_sektoriv_ekonomiky_2024.xlsx)

To ensure further alignment of the methodology and indicators of state statistical surveys with EU statistical requirements, during 2025 measures were taken to keep aligning the methodology of the state statistical survey “Business Demography” with the requirements of Regulation (EU) 2019/2152.

During 2025, datasets concerning the quality report on the national statistical business register (BUSREG\_QR\_A) for 2022 and 2023, short-term business demography statistics on the number of newly created legal persons and individual entrepreneurs and on those in respect of which a court decision was issued to institute bankruptcy proceedings (BCS\_QBD\_Q) for Q1–Q3 2025, as well as historical data for each quarter of 2021–2024, were transmitted to Eurostat via the EDAMIS platform. At the same time, metadata relating to national statistical business registers (BUSREG\_METAES\_A) for 2022 and 2023 and short-term business demography statistics (BCS\_QBDES\_A) for 2024 were entered into the ESS Metadata Handler system (ESS MH). Starting from 2025, the transmission of the above datasets and metadata has been introduced on a regular basis within the deadlines set by Eurostat.

In addition, during 2025 measures were taken to transmit to Eurostat via the EDAMIS platform, on a test basis, the dataset on annual business demography (EBSBDS\_ALL\_A) for 2021, which passed validation. At the same time, the relevant metadata (RSBSBD\_21NSIMS\_A) for 2021 were entered into the ESS system (ESS MH) on a test basis.

## STRUCTURAL BUSINESS STATISTICS

In order to keep aligning the methodology and indicators of national state statistical surveys (SSS) with EU statistical requirements, amendments were made to the Guidelines of the SSS “Structural Changes in the Economy of Ukraine and Its Regions” with regard to the description of the structural survey on the volume of enterprises’ services, broken down by product type in accordance with the Statistical Classification of Products (harmonised with CPA rev. 2.2) and by the customer’s location (Order of the State Statistics Service of Ukraine No. 148 of 28 August 2025), and a draft set of statistical reporting documentation was developed for this survey for 2026.

In addition, datasets on structural business statistics were transmitted to Eurostat via EDAMIS (EBSSBS\_REG\_A, EBSSBS\_ALL\_A for 2022; EBSSBS\_SBC\_3 for 2023).

## PRODCOM STATISTICS; SHORT-TERM STATISTICS

In the area of PRODCOM statistics (Regulation (EU) 2019/2152 of the European Parliament and of the Council of 27 November 2019; and Commission Implementing Regulation (EU) 2020/1197 of 30 July 2020 implementing Regulation (EU) 2019/2152), the Nomenclature of Industrial Products (NIP-2025) was prepared. It is harmonised with the European Union List of Industrial Products of (PRODCOM list, 2025), takes into account energy products (in accordance with Regulation (EC) No 1099/2008), and is linked to the EU Statistical Classification of Products by Activity (CPA, ver. 2.2) and the EU statistical classification of economic activities (NACE, rev. 2.1).

As part of implementing Regulation (EU) 2019/2152 and Commission Implementing Regulation (EU) 2020/1197 in the area of short-term business statistics:

- guidelines on the SSS “Economic Indicators of Short-Term Statistics of Non-Financial Services” were developed;
- experimental calculations of seasonally adjusted indicators were carried out in respect of the total floor area of residential and non-residential buildings at the start of construction and the number of dwellings in residential buildings at the start of construction;
- a standard quality report under SIMS for the SSS “Sales and Stocks of Goods (Products) in Wholesale Trade” was prepared and published on the official website of the State Statistics Service of Ukraine;
- datasets were prepared and sent to Eurostat on building permits statistics for Q1–Q3 2025 and for 2018–2024, and on statistics on the production of industrial products by type for 2021.

## STATISTICS ON FOREIGN ECONOMIC ACTIVITY

In 2025, cooperation with Eurostat, the Organisation for Economic Co-operation and Development (OECD) and other international organisations was ensured in the areas of statistics on external trade in goods, services and energy through participation in themed workshops and training sessions, Eurostat working groups and other events.

Within the work to support Ukraine’s negotiation process with the European Union under negotiating Chapter 18 “Statistics”, in particular in the context of the State Statistics Service of Ukraine transmitting to Eurostat datasets and metadata provided for by the Statistical Requirements Compendium (Compendium-2025), a dataset on international trade in goods statistics COMEXT\_XTCOM\_M was transmitted to Eurostat via the EDAMIS platform. In addition, on an own initiative, a dataset on external trade in goods statistics by currency of contract COMEXT\_INVCUR\_2 was prepared (implementation had been planned for 2028).

Cooperation with experts of the International Trade Centre (ITC) was also continued within a new five-year project, “Eastern Partnership and EU Trade Helpdesk”, which forms part of the EU4Business project, and data on external trade in goods statistics continue to be transmitted in accordance with the agreed structure and format.

## PRICE STATISTICS

The Methodology for selecting enterprises to calculate import price indices was approved.

Pilot surveys were conducted on changes in import prices and on changes in prices on the primary and secondary housing markets, based on asking prices, for Q1–Q4 2025.

Experimental calculations were carried out for producer price indices for information services, computer programming and consultancy services for Q1–Q3 2025, as well as experimental calculations of housing price indices using the “time-dummy hedonic” regression method, based on administrative data on apartments and residential houses for Q1–Q3 2025.

A questionnaire survey of users of statistical information regarding producer price indices for industrial products was conducted. Its results were summarised and published on the official website of the State Statistics Service of Ukraine, and users’ needs were documented.

Datasets and metadata were transmitted in accordance with Eurostat’s work programme within the framework of the International Comparison Programme.

Datasets on changes in producer prices for industrial products and changes in construction prices for 2025, as well as metadata for 2024 on producer prices for industrial products, were prepared and transmitted to Eurostat.

## SCIENCE, TECHNOLOGY AND INNOVATION STATISTICS

In order to ensure further alignment of the methodology and indicators of national state statistical surveys (SSS) with EU statistical requirements:

- amendments were made to the Guidelines on the SSS “Performance of Scientific Research and Development” with regard to calculating indicators on government budget allocations for R&D (GBARD) using administrative data of the Ministry of Education and Science (taking into account the experimental calculations of GBARD indicators for 2024) (Order of the State Statistics Service of Ukraine No. 186 of 16 October 2025);
- the Guidelines on the SSS “Use of Information and Communication Technologies in Enterprises” were updated to reflect the provisions of Regulation (EU) 2025/1310 of 3 July 2025, which sets technical specifications for data requirements in “ICT Use and E-commerce” for the 2026 reference year, and new statistical reporting documentation was prepared for the survey in 2026 (Orders of the State Statistics Service of Ukraine No. 139 of 21 August 2025 and No. 86 of 6 June 2025, respectively). At the same time, statistical information on the use of information and communication technologies in enterprises in 2024–2025, calculated on the basis of the results of this SSS in 2025 (taking into account the requirements of Regulation (EU) 2024/1883 of 9 July 2024), was published on the official website of the State Statistics Service of Ukraine<sup>2</sup>;
- information on enterprises’ innovation activity for 2022–2024, in line with the “Community Innovation Survey 2024”, was published on the official website of the State Statistics Service of Ukraine<sup>3</sup>;
- information (data and metadata) on the specific indicators of the Digital Economy and Society Index (1.2.3, 3.1.1, 3.2.1–3.2.6, 3.3.1–3.3.3) was disseminated in the “Digital Economy and Society Index (DESI)” section on the official website of the State Statistics Service of Ukraine<sup>4</sup>.

To ensure the integration of the national statistical system with the European Statistical System, a national dataset on science statistics RD\_RDP\_A for 2024 was transmitted to Eurostat via EDAMIS, as well as a test transmission of datasets on ICT statistics in enterprises (INFOSOC\_ENT\_A for 2024) was carried out.

## AGRICULTURE, FORESTRY AND ENVIRONMENT

In order to ensure further alignment of the methodology and indicators of national state statistical surveys (SSS) in the area of agriculture with EU statistical requirements, implementation of Regulation (EU) No. 2023/2379 of 23 November 2022, and for the purpose of implementation of Implementing Regulation (EU) No. 2023/2745 of 8 December 2023, the following were approved:

- guidelines on the SSS “Supply of Raw Milk for Processing and Production of Dairy Products Therefrom”, as well as its updated annual statistical reporting documentation;
- guidelines on the SSS “Production of Livestock Products, Number of Farm Animals and Their Feed Availability” and the statistical reporting toolkit thereto, which also provide for indicators

<sup>2</sup> <https://stat.gov.ua/uk/datasets/vykorystannya-informatsiyno-komunikatsiynykh-tekhnologiy-na-pidpryemstvakh>

<sup>3</sup> <https://stat.gov.ua/uk/datasets/innovatsiyna-diyalnist-pidpryemstv>

<sup>4</sup> <https://stat.gov.ua/uk/node/5652>

on the number of organic farm animals and the products obtained from them.

With a view to implementing Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000, and to form indicators for completing Eurostat questionnaires on water statistics, the Guidelines on the SSS “Water Resources, Water Supply and Wastewater Disposal” were approved.

In addition, during 2025, the preparation and transmission to Eurostat via the EDAMIS platform of 32 datasets provided for by the Compendium of Statistical Requirements was ensured; validation reports were received for 21 of those datasets.

## ENERGY STATISTICS

Cooperation with Eurostat, the IEA and the Energy Community was ensured, including the transmission to Eurostat of available information on energy statistics under the legal regime of martial law in Ukraine, in accordance with EU regulations.

In 2025, 6 annual datasets on energy statistics provided for by Regulation (EC) No 1099/2008 as well as 4 semi-annual datasets and 2 sets of metadata on electricity and natural gas prices for consumers, in accordance with Regulation (EU) 2016/1952, were prepared and transmitted to Eurostat.

The methodology of the SSS on energy statistics was improved:

- the Methodology for forming the sample of units for the state statistical survey “Use and Stocks of Fuel” and extrapolating the results of the sample survey to the general population was approved as part of the research project, on the basis of which an updated sample for 2026 was formed;
- the guidelines on the state statistical surveys “Use and Stocks of Fuel”, “Energy Supply and Use”, and “Prices of Natural Gas and Electricity Supplied to Consumers” were approved.

During 2025, participation continued in measures and work on the digital transformation of the State Statistics Service of Ukraine to implement (integrate, improve and refine) the SSS “Use and Stocks of Fuel” within the statistics production information system for the state statistics bodies (SPIS for the SSB).

## TRANSPORT STATISTICS

During 2025:

- the guidelines on the new SSS “Transport of Freight and Passengers by Inland Maritime Transport” were approved to implement Directive 2009/42/EC and Commission Delegated Decision (EU) 2018/1007 of 25 April 2018 supplementing Directive 2009/42/EC and repealing Commission Decision 2008/861/EC;
- the guidelines on the new SSS “Transport of Freight and Passengers by Inland Waterway Transport” were developed to implement Regulation (EU) 2018/974 of the European Parliament and of the Council of 4 July 2018;
- Eurostat L1 and L2 datasets for 2020–2023 on simplified rail transport statistics (Annex L to Regulation (EU) 2018/643 of the European Parliament and of the Council of 18 April 2018) were prepared and sent;
- the transmission of data to the Eurostat/ITF/UNECE Common Questionnaire for Transport

Statistics was resumed (data starting from 2021);

- the Methodology for calculating indicators on newly registered vehicles using data published as open data was approved, and experimental calculations of indicators for 2019–2024 were carried out (the data were transmitted to Eurostat through the Eurostat/ITF/UNECE Common Questionnaire for Transport statistics) (for information: the calculations may be used for the purposes of Regulation (EU) 2023/1804 within negotiating Chapter 14 “Transport”).

## REGIONAL STATISTICS

The State Statistics Service of Ukraine developed a new version of the Statistical Classification of Territorial Units of Ukraine (NUTS-UA), which was approved by Eurostat in October 2025 and adopted by Order of the State Statistics Service of Ukraine No. 216 of 1 December 2025. The new version of NUTS-UA enters into force on 1 January 2027, which is synchronised with the next three-year review cycle of the European NUTS (Nomenclature of Territorial Units for Statistics) system and ensures territorial comparability of Ukraine’s regional statistics with those of the EU Member States.

## METHODOLOGY

In 2025, with a view to implementing the EU statistical classification of economic activities (NACE, Revision 2.1) in Ukraine, established by Commission Delegated Regulation (EU) 2023/137 of 10 October 2022, the State Statistics Service of Ukraine developed and approved, by Order No. 191 of 28 October 2025, the Classification of Economic Activities (NACE 2.1-UA) harmonised with NACE Revision 2.1. Eurostat confirmed the conceptual conformity of the classification with NACE Revision 2.1.

In addition, to keep introducing the European NACE Revision 2.1 classification into state statistical activity, correspondence tables to NACE 2.1-UA were prepared and approved by decision of the meeting of the Commission on Improving the Methodology and Reporting Documentation No. КПУМ/27-25 of 26 December 2025, and work is under way to prepare a draft set of explanatory notes to NACE 2.1-UA.

The State Statistics Service of Ukraine also continuously assesses the quality of official state statistical information in accordance with the principles of relevance, reliability, timeliness and accessibility.

In order to implement Regulation (EU) 2023/397, as of the end of 2025, quality reports on statistical data for 95% of state statistical surveys had been prepared and published on the official website of the State Statistics Service of Ukraine.

## DISSEMINATION OF INFORMATION

On 5 November 2025, the State Statistics Service of Ukraine launched a new official statistics portal. Users of the new portal were offered consolidated access to official statistical information; the “Data Bank” with flexible indicator filtering and the ability to download datasets in various formats (Excel, CSV, etc.); interactive visualisations (dashboards) with filtering functions to create custom selections; machine-readable formats and an API for integration into external systems; convenient search; and support from the StatGPT AI assistant.

The AI assistant (StatGPT) helps reduce the time required to search for data and prepare materials. It turns work with statistics into a simple conversation, without the need to know complex terminology

or to download bulky datasets. Similar solutions have already received international recognition and are widely used by leading institutions to simplify access to data. StatGPT interacts with data in the international SDMX (Statistical Data and Metadata eXchange) standard used by Eurostat, the OECD, the World Bank and the IMF. Thus, Ukraine is implementing the latest global practices that will accelerate the country's integration into the global statistical ecosystem.

## ENVIRONMENT AND CIVIL PROTECTION

### CLIMATE POLICY

In 2025, implementation of the Law of Ukraine “On the Fundamental Principles of the State Climate Policy” and fulfilment of Ukraine’s international commitments in the field of climate change continued.

The following acts of the Cabinet of Ministers of Ukraine were adopted:

- Ordinance No. 146-p of 21 February 2025 “On approval of the action plan for establishing a national greenhouse gas emissions trading system”;
- Ordinance No. 1172-p of 29 October 2025 “On approval of Ukraine’s Second Nationally Determined Contribution to the Paris Agreement”.

On 29 October 2025, the first Biennial Transparency Report (BTR) of Ukraine, prepared in accordance with the requirements of the Paris Agreement, was published on the website of the United Nations Framework Convention on Climate Change.

In 2025, the development of the Long-term Low-Carbon Development Strategy of Ukraine until 2050 was launched. The Strategy is being developed in accordance with the Law of Ukraine “On the Fundamental Principles of the State Climate Policy”, Article 4(19) of the Paris Agreement, and taking into account the requirements of Regulation (EU) 2018/1999 as regards the consistency of long-term strategic and planning documents in the field of climate and energy.

On 16 December 2025, the draft Strategy was approved at a meeting of the interagency working group on coordinating climate change response. A draft Ordinance of the Cabinet of Ministers of Ukraine “On approval of the Long-term Low-Carbon Development Strategy of Ukraine until 2050” was prepared and sent for approval to the relevant central executive authorities and local self-government bodies.

In 2025, the following were also developed:

- a draft Resolution of the Cabinet of Ministers of Ukraine “Some issues of the national system for inventory of anthropogenic greenhouse gas emissions by sources and removals by sinks”;
- a draft Resolution of the Cabinet of Ministers of Ukraine “On approval of national weighted greenhouse gas emission factors arising from final energy consumption”.

The Scientific and Expert Council on Climate Change and Ozone Layer Protection was established by Resolution of the Cabinet of Ministers of Ukraine No. 34 of 14 January 2026.

In 2024–2025, a draft Law (registration No. 0303) “On Ratification of the Amendment to the Montreal Protocol on Substances that Deplete the Ozone Layer” was prepared and processed with the relevant executive authorities and included on the agenda of the Verkhovna Rada of Ukraine.

## CHEMICAL SAFETY

In 2025, the alignment of the national legislation in the field of chemical safety and the management of chemical products with the EU acquis (REACH, CLP) continued under the Law of Ukraine “On Ensuring Chemical Safety and Management of Chemical Products”.

The following were adopted:

- Resolution of the Cabinet of Ministers of Ukraine No. 1497 of 19 November 2025 “On approval of the Rules for joint submission of information in applications for the state registration of an identical chemical substance”;
- Resolution of the Cabinet of Ministers of Ukraine No. 1598 of 5 December 2025 “On amending Resolutions of the Cabinet of Ministers of Ukraine No. 539 of 10 May 2024 and No. 847 of 23 July 2024”;
- Resolution of the Cabinet of Ministers of Ukraine No. 588 of 21 May 2025 “On approval of the Procedure for state registration of hazards”.

A draft Ordinance of the Cabinet of Ministers of Ukraine was developed regarding the Government of Ukraine’s request to the Organisation for Economic Co-operation and Development (OECD) with a view to acceding to the OECD Council Recommendation on the Systematic Investigation of Existing Chemicals.

## NATURE PROTECTION

In 2025, Law No. 4188-IX “On Amending the Law of Ukraine ‘On the Nature Reserve Fund of Ukraine’ Regarding Ensuring the Preservation of Territories and Sites of the Nature Reserve Fund and Expanding Their Classification” was adopted. In the area of biodiversity conservation and alignment of the legislation with the EU acquis.

By Resolution of the Cabinet of Ministers of Ukraine No. 45 of 17 January 2025, the procedure for monitoring biological and landscape diversity was approved, which designates, inter alia, habitats and species provided for by the annexes to the EU Habitats Directive and the EU Birds Directive as monitoring objects.

With the support of international technical assistance, legislative and guidance materials were prepared to implement the EU Habitats Directive and the EU Birds Directive, in particular within the LIFE ConNaturLIFE Ukraine project and the EU4Environment programme.

Measures were taken to build institutional capacity; training materials were prepared; guidance on reporting under Article 12 of the Birds Directive and Article 17 of the Habitats Directive was translated; and the impact of the armed aggression of the Russian Federation on the Emerald Network sites was assessed.

## FORESTRY

In 2025, within the framework of the official screening of the compliance of Ukraine’s legislation with the EU acquis under Chapter 27 “Environment and Climate Change”, achievements and areas for reform of Ukraine’s forestry sector were presented.

Ukraine obtained the status of a low-risk country for deforestation, which demonstrates that the national control system is approaching the requirements of the EU Regulation on deforestation prevention (EUDR).

An experimental project was launched to implement the EU acquis requirements for collecting and verifying information on exported timber and timber products by Resolution of the Cabinet of Ministers of Ukraine No. 1552 of 28 November 2025. This contributes to increasing supply chain transparency and improving access of Ukrainian exporters to the EU market.

Preparations are ongoing for the second reading of draft Law No. 9116 of 17 March 2023 "On Forest Reproductive Material", which is aimed at preserving the genetic diversity of forests and harmonising legislation with the EU acquis.

In 2025, the corporatisation process of the State Enterprise "Forests of Ukraine" was initiated, and the implementation of close-to-nature forestry approaches was continued.

## INDUSTRIAL POLLUTION

On 8 August 2025, the Law of Ukraine "On Integrated Prevention and Control of Industrial Pollution" entered into force, introducing an integrated permitting system and the application of best available techniques and management practices.

In 2025, a set of secondary legal and normative acts was adopted to regulate the procedures for issuing integrated environmental permits, public consultations, development of conclusions on best available techniques and management practices, cross-border consultations, and the functioning of the electronic permits register.

An electronic system for issuing integrated environmental permits was introduced on the "EcoSystem" platform. With the support of GIZ, translations of 10 Best Available Techniques Reference Documents (BREFs) were published.

The Strategy for Reforming the System of State Supervision (Control) in the Field of Environmental Protection until 2029 was approved, and implementation of pilot projects in the field of environmental control was launched.

## AMBIENT AIR

In 2025, legal and normative acts were approved on the establishment and functioning of regional environmental monitoring centres, as well as the Procedure for informing the public of ambient air quality using the Air Quality Index.

The development of the network of ambient air quality monitoring stations and the integration of data into the national monitoring system are ongoing.

## WATER RESOURCES

In 2025, the Treaty under the United Nations Convention on the Law of the Sea on the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction was signed.

The Government of Ukraine's request to the OECD to accede to the OECD Council Recommendation on Water was approved, and the Operational Plan for the implementation of the Water Strategy of Ukraine until 2050 was also approved.

## WASTE MANAGEMENT

In 2025, implementation of the EU acquis in the field of waste management continued. A number of legal and normative acts were adopted to regulate the operation of landfills, waste incineration and waste treatment installations, as well as monitoring of sites for the generation, storage and disposal of waste.

Draft legal and normative acts were developed on reducing the environmental impact of plastic products, managing construction and demolition waste, recording ownerless waste, and introducing extended producer responsibility.

## CIVIL PROTECTION

Within the framework of the EU Civil Protection Mechanism, continuous 24/7 information exchange was ensured with the Emergency Response Coordination Centre (ERCC) of the European Commission Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO).

## TRANSPORT, TRANSPORT INFRASTRUCTURE, POSTAL AND COURIER SERVICES

### RAILWAY TRANSPORT

In 2025, draft Law No. 12142 “On the System and Specifics of the Functioning of the Railway Transport Market of Ukraine” was withdrawn from consideration for revision, in line with the recommendations of the European Commission. Two draft laws were developed on its basis, by separating the regulation:

- “On Safety and Interoperability of Railway Transport of Ukraine”, which will ensure the technical integration of railway transport in accordance with the EU legal requirements;
- “On the Railway Transport Market”, which will implement the EU legal requirements on establishing the Single European Railway Area and on providing passenger rail transport public service obligations (PSO).

At present, the draft Law of Ukraine (registration No. 14174 of 31 October 2025) “On Safety and Interoperability of Railway Transport of Ukraine” is being progressed.

At the same time, in 2025 work continued on establishing and ensuring the operation of the branches “Locomotive Company” and “UZ Wagon-Service”, as well as on implementing the related organisational and structural changes following the reform of the wagon sector and the establishment of the branch “UZ Wagon-Service”.

### ROAD TRANSPORT

In 2025, the Agreement on the liberalisation of freight transport was extended for a further 15 months. Accordingly, the “transport visa-free regime” will apply at least until March 2027. Ukrainian and European logistics companies are therefore exempt from the requirement to obtain permits for bilateral and transit transport.

Law of Ukraine No. 4337-IX of 27 March 2025 “On Amending the Law of Ukraine ‘On Road Transport’ Regarding Improved Regulation of the Market for Road Passenger and Freight Transport Services” was adopted in pursuance of Regulation (EC) No 1071/2009. By the end of 2026, Ukraine is to implement key provisions concerning companies’ good repute, the use of smart tachographs, and the training of transport managers. In particular, from 1 July 2026, the presence of smart tachographs will become a mandatory condition for the registration of new freight vehicles.

In order to align the legislation with the EU law in relation to implementing Regulation (EU) No 996/2010, Directive 2004/49/EC and other EU acts in the field of investigation of transport occurrences, in line with Ukraine’s obligations under the Association Agreement between the European Union and Ukraine, draft Law No. 13674 of 21 August 2025 “On the National Bureau for the Investigation of Transport Accidents and Incidents” was registered with the Verkhovna Rada of Ukraine. The draft Law sets out the legal basis for organising the activities of the National Bureau as a permanent independent body responsible for investigating transport accidents and incidents, including investigation obligations, qualification requirements for the Director of the National Bureau, key provisions on

oversight of the body's activities and its accountability, requirements governing the use of investigation materials, protection of confidential information, and provision of information on an accident or incident.

With a view to implementing Directive 2006/126/EC of 20 December 2006 and Directive (EU) 2025/2205 of 22 October 2025 on driving licences, which repeals Directive 2006/126/EC as from 26 November 2029, a draft Law of Ukraine "On Amending the Law of Ukraine 'On Road Traffic' Regarding the Implementation of Legislation" was developed (to replace draft Law No. 8082 "On Amending the Law of Ukraine 'On Road Traffic' Regarding the Implementation of Legislation"). The draft provides for further alignment of legislation, including: bringing vehicle categories into line with Article 4 of Directive 2006/126/EC and Articles 6 and 7 of Directive (EU) 2025/2205 as regards the determination of categories, technical characteristics and minimum ages; ensuring compliance with the principle of staged access to driving vehicles of the relevant categories, taking into account Article 6 of Directive 2006/126/EC and Article 9 of Directive (EU) 2025/2205; and defining the main conditions for granting persons the right to drive vehicles, taking into account Article 11 of Directive 2006/126/EC and Articles 13–16 of Directive (EU) 2025/2205 as regards the exchange, replacement, cancellation, withdrawal and recognition of driving licences.

## AVIATION TRANSPORT

Decree of the President of Ukraine No. 978/2025 of 23 December 2025 "On the delegation of Ukraine for participation in the work of the Joint Committee established pursuant to the Agreement between the European Union and its Member States, of the one part, and Ukraine, of the other part, on the Common Aviation Area" was issued, approving the composition of the delegation to represent Ukraine's interests in the Joint Committee responsible for implementing the "open skies" regime with the EU and for aligning Ukrainian aviation standards with European standards.

## POSTAL SERVICES

With a view to implementing the provisions of Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service (as amended), as regards establishing quality-of-service standards for the provision of universal postal services, a draft Order of the Ministry for Development "On approval of standards and standard delivery times for postal items" has been developed and submitted for approval.

In order to improve the current regulation in the field of postal services and to ensure the practical implementation of the provisions of Law No. 2722-IX "On Postal Communications", during 2025, inter alia, regulatory acts of the National Commission for the State Regulation of Electronic Communications, Radio Frequency Spectrum and the Provision of Postal Services (NCEC) were developed and adopted concerning the maintenance of the Unified State Register of Postal Operators and the submission by postal operators of reporting and information (Resolution of the NCEC No. 64 of 5 February 2025), as well as Maximum prices (tariffs) for postal services for the delivery of domestic ordinary and registered letters without declared value (recorded delivery) weighing up to 50 grams and postal cards (Resolution of the NCEC No. 646 of 12 November 2025).

### PARTICIPATION IN HORIZON EUROPE

In order to ensure Ukraine's active engagement in Horizon Europe, the necessary support infrastructure for Ukrainian participants was established and facilitated, in particular:

1) with financial support from the European Commission, the Horizon Europe Office in Ukraine operates on the basis of the National Research Foundation of Ukraine and performs the functions of the Programme's Coordination Centre;

2) funded by the Ministry of Education and Science of Ukraine, 22 National Contact Points (NCPs) for Horizon Europe operate across 18 thematic areas, hosted by higher education institutions (hereinafter referred to as the "HEIs"), research institutions and organisations in 12 localities within 10 oblasts of Ukraine (Order of the Ministry of Education and Science of Ukraine No. 838 of 13 August 2024, as amended by Order No. 405 of 4 March 2025).

In 2025, the Ministry of Education and Science of Ukraine provided financial support for NCP activities in the amount of UAH 11 million (UAH 500,000 per NCP). Ongoing communication with the NCPs is maintained in order to provide them with advisory and information support and to disseminate information about training events held by the European side.

To disseminate information about opportunities under Horizon Europe and to ensure the effective operation of the NCP network, in 2025 the Horizon Europe Office in Ukraine held over 200 events as the Coordination Centre, jointly with the NCP network.

The calendar of events of the Horizon Europe NCP network is published and regularly updated at <https://ms.nauka.gov.ua/events/calendar/>. Information on announcements and events held by the Horizon Europe Office in Ukraine is published at <https://horizon-europe.org.ua/>. In order to assess and enhance the effectiveness of the NCP network, in 2025 the Ministry of Education and Science of Ukraine, jointly with the Horizon Europe Programme's Coordination Centre, monitored NCP activities through the National Electronic Scientific Information System "URIS".

The list of 40 representatives of Ukraine for participation in meetings of 14 programme committees of the Horizon Europe Programme was updated by Order of the Ministry of Education and Science of Ukraine No. 1665 of 18 December 2025. The Ministry provides organisational and financial support to Ukraine's representatives to ensure their participation in programme committee meetings in an in-person format. In 2025, 212 nominations of Ukraine's representatives were made for participation in 82 events and meetings of programme committees and working groups under Horizon Europe, of which 207 were held remotely and 5 in person.

In addition, the Procedure for participation of representatives of Ukraine in meetings of committees responsible for monitoring the implementation of the European Union Framework Programme for Research and Innovation "Horizon Europe" was approved (Order of the Ministry of Education and Science of Ukraine No. 1663 of 18 December 2025).

As at 31 December 2025, over four years of participation in Horizon Europe, Ukraine achieved the following results: 2,423 project applications were submitted by Ukrainian

institutions and organisations, and 244 grant agreements were signed for a total amount of EUR 64.3 million. Overall, 236 Ukrainian organisations (0.75% of all participating organisations) participate in the Programme.

By comparison, 174 Ukrainian participants from Ukraine took part and signed 240 grant agreements for a total amount of EUR 44.53 million over the full seven-year participation in the previous EU Framework Programme for Research and Innovation Horizon 2020.

On 15 October 2025, the Third Meeting of the Ukraine–EU/Euratom Joint Committee on Research and Innovation took place in Brussels, serving as an annual platform to discuss the state and prospects of bilateral cooperation in the field of research and innovation, as well as Ukraine’s participation in Horizon Europe. During the meeting, the Ukrainian side officially announced Ukraine’s intention to join the 10th EU Framework Programme for Research and Innovation (2028–2034) as an associated country, and, following accession to the EU, as a full participant.

## UKRAINE’S INTEGRATION INTO THE EUROPEAN RESEARCH AREA

In order to align national science policy with the provisions of the European Research Area (hereinafter referred to as the “ERA”) Policy Agenda for 2025–2027, a working group was established and its composition approved, by Order of the Ministry of Education and Science of Ukraine No. 656 of 30 April 2025, to develop the Roadmap for Ukraine’s integration into the ERA for 2025–2027. The working group included representatives of the central executive authorities, the Scientific Committee of the National Council of Ukraine on Science and Technology Development, and the national and sectoral academies of sciences.

The Roadmap for Ukraine’s integration into the ERA until 2027, developed by the said working group and reviewed with European experts within the framework of the TAIEX Technical Assistance and Information Exchange Instrument, was approved by Order of the Ministry of Education and Science of Ukraine No. 1732 of 31 December 2025.

In order to involve Ukraine in the processes of shaping the ERA, in August 2025, 27 contact persons were designated to ensure Ukraine’s representation in 17 thematic sub-groups of the ERA Forum. Representatives from Ukraine have already started participating in meetings of the relevant ERA Forum working sub-groups.

## DEVELOPMENT OF THE INNOVATION ECOSYSTEM

In order to stimulate innovation activity, in accordance with Resolution of the Cabinet of Ministers of Ukraine No. 430 of 23 April 2024, an experimental project is being implemented to establish, on the basis of higher education institutions (hereinafter referred to as “HEIs”) and research institutions, a network of start-up schools–incubators–accelerators (hereinafter referred to as the “start-up schools”). Following a competitive selection in 2025, six representatives of HEIs and research institutions received funding. As at the end of 2025, the national network of start-up schools comprised 23 participants, bringing together HEIs and research institutions across 16 oblasts.

During 2025, the following were carried out:

- the official launch of the national network of start-up schools;

- six practical sessions with international partners (Aalto University, UC Berkeley, and innovation agencies of Poland, Estonia, Lithuania and Finland) to enhance the capacity of start-up schools to deliver innovation support programmes in line with the global best practice;
- a start-up competition for the national network of start-up schools, as a result of which 3 winning teams joined a trade mission at IT Arena (Ukraine's largest annual technology conference) and 1 team joined a trade mission at the Nordic Tech Business Summit (the largest business summit in Northern Europe, held annually in Finland, dedicated to deep tech and innovation and bringing together start-ups, investors, research institutions and corporations to develop businesses, attract funding and establish cooperation);
- the 6-month Science&Business Acceleration 2025 acceleration programme to support start-ups based at start-up schools;
- a large-scale PolyTech Summit conference bringing together leading Ukrainian engineering and technology HEIs and international partners. One of the key themes of the event was promoting start-up schools, incubators and accelerators within the student community.

Results of the start-up schools network's activities:

- more than 150 teams were supported;
- over 40 prototypes were developed;
- more than 60 training workshops and pitch events were held;
- horizontal interaction within the national start-up schools network was strengthened (joint hackathons and model testing).

In order to set out the fundamental principles for innovation activity, draft Law No. 13715 of 29 August 2025 "On Support and Development of Innovation Activity" was registered with the Verkhovna Rada of Ukraine and is being prepared for the first reading.

In order to revitalise the activities of science parks, facilitate technology transfer, create favourable conditions for commercialising the results of scientific research and scientific and technical (experimental) developments of HEIs and research institutions, and enhance their competitiveness in the innovation technology market, a concept for a separate legal regime for conducting scientific and innovation activity ("Science.City") was developed.

On 3 December 2025, the Cabinet of Ministers of Ukraine adopted a Resolution "On the implementation of an experimental project to establish centres of excellence for research", introducing a two-year experimental project to create a modern material and technical base for conducting applied scientific research and scientific and technical (experimental) developments, integrating applied scientific and technical results with practical application to strengthen national security and defence, and training a greater number of highly qualified specialists in the fields of natural and mathematical sciences and engineering and technology.

The centres of excellence for research will operate in priority fields defined by the Strategy for Digital Development of Innovation Activity of Ukraine until 2030, approved by Ordinance of the Cabinet of Ministers of Ukraine No. 1351 of 31 December 2024, in accordance with the priority areas defined in the Laws of Ukraine "On Priority Areas of Science and Technology Development" and "On Priority Areas of Innovation Activity in Ukraine", and will contribute to the implementation of the recommendations of the final report of the Horizon Europe Policy Support Facility project "PSF Country: Support to Ukraine on Research Infrastructure Policy" (PSF analysis).

The activities of the above centres will include conducting scientific research and scientific and technical (experimental) developments, developing and creating MVP solutions, testing technologies, and training specialists in the specified fields.

## SPACE

### **Global Navigation Satellite Systems (EGNOS)**

In 2025, work to integrate Ukraine into the European EGNOS navigation system continued. In pursuance of the arrangements made following the eighth meeting of Cluster 2 of the Subcommittee on Economic and Other Sectoral Cooperation of the EU–Ukraine Association Committee (21 October 2025), in November 2025 the State Space Agency of Ukraine submitted a request to the European Commission’s Directorate-General for Defence Industry and Space (DG DEFIS) regarding its interest in receiving support for the prospective deployment of the Safety-of-Life (SoL) service for aviation and, at the initial stage, maritime transport, within the EGNOS component. Technical expert-level consultations with the European Commission are planned for early 2026.

### **Earth Observation and Global Monitoring (Copernicus Programme)**

Cooperation under the EU Earth observation programme Copernicus continued within the framework of the Agreement between the State Space Agency of Ukraine and the European Commission on cooperation in access to and use of data from Copernicus Sentinel satellites of 25 May 2018, and the Agreement between the State Space Agency of Ukraine and the European Space Agency on technical operation of the space component of the Copernicus programme concluded in pursuance thereof on 28 March 2019.

In April 2025, the specialists of the National Centre for Control and Testing of Space Facilities of the State Space Agency of Ukraine, jointly with the European Space Agency, migrated Ukraine’s Regional Mirror Site of the programme to the new Copernicus Data Space Ecosystem, ensuring stable access for Ukrainian users to data from the Sentinel family of spacecraft. Operation of the programme’s Regional Mirror Site for access to and analysis of satellite data continued, and the receipt of Earth observation data from European institutions to the Ukrainian hub hosted by the National Centre for Control and Testing of Space Facilities of the State Space Agency of Ukraine was ensured.

On 9 April 2025, in Brussels, during the tenth meeting of the EU–Ukraine Association Council, the Agreement between the European Union, of the one part, and Ukraine, of the other part, on Ukraine’s participation in the Copernicus component and the “Space Weather Events” and “Near-Earth Objects” sub-components of the “Space Situational Awareness” component of the Union Space Programme was signed. The Agreement defines the terms and principles of Ukraine’s participation in specific components of the European Union Space Programme in accordance with Regulation (EU) 2021/696. The signing of the Agreement is an important step towards deepening Ukraine’s participation in components of the EU Space Programme. Domestic procedures necessary for the Agreement to enter into force were initiated.

On 4 November 2025, an Arrangement between the State Space Agency of Ukraine and the European Organisation for the Exploitation of Meteorological Satellites (EUMETSAT) on technical operation of the space component of the Copernicus programme was signed.

## Participation in the Implementation of the European Space Project “VEGA”

Ukraine’s participation in the “VEGA” project was ensured. In 2025, 3 successful launches of the VEGA-C launch vehicle were carried out. Ukrainian space industry enterprises continued supplying the fourth-stage main engines for the launch vehicle.

## Cooperation with the European Space Agency

In June 2025, the Agreement (in the form of an exchange of letters) between the Government of Ukraine and the European Space Agency on the resumption of the Agreement between the Government of Ukraine and the European Space Agency on cooperation in the peaceful uses of outer space of 5 and 24 July 2024 was ratified. The Agreement entered into force on 28 August 2025.

On 30 October 2025, an Implementing Agreement between the State Space Agency of Ukraine and the European Space Agency on technical and expert support was signed. The Agreement establishes a legal basis for the implementation of the 7 most priority and relevant projects identified by the State Space Agency of Ukraine and the European Space Agency in the course of their working-level cooperation. In pursuance of the provisions of the Implementing Agreement, a coordination meeting between the State Space Agency of Ukraine and the European Space Agency was held in November 2025, following which the main steps for 2026 were identified and agreed. The first online training session, to be delivered by the European Space Agency for representatives of the Ukrainian space industry, dedicated to an overview of the European Space Agency’s activities and an overview of cooperation between the European Space Agency and Ukraine, is scheduled for 22 January 2026.

## ROAMING WITH THE EU

Ukraine continues to cooperate actively with the European Commission in the field of roaming.

On 15 April 2025, Law No. 4345-IX “On Amending Certain Laws of Ukraine Regarding the Implementation of European Union Legislation on Electronic Communications” was adopted (draft Law registration No. 12150 of 25 October 2024), marking the final stage in the adoption of European legislation in the roaming area.

Following an assessment, the European Commission concluded that Ukraine meets the necessary requirements for the application of EU roaming rules and, on 17 June 2025, approved a proposal for a Council Decision on the position to be taken on behalf of the EU within the EU–Ukraine Association Committee in Trade Configuration regarding the mutual granting by the European Union and Ukraine of an internal market regime for the roaming sector in public mobile communications networks.

In particular, on 16 July 2025, the Decision of the EU–Ukraine Association Committee in Trade Configuration on the mutual granting of an internal market regime in the roaming sector in public mobile electronic communications networks between Ukraine and the European Union was signed (Decision AC/TC No. 2/2025 of 16 July 2025).

Pursuant to the said Decision, application of the internal market regime will commence on 1 January 2026. Ukrainians will be able to make calls, send SMS messages and use the internet within the EU without additional charges, at domestic tariffs.

A common roaming area is another step towards Ukraine’s full integration into the EU Single Digital Market.

## ELECTRONIC COMMUNICATIONS

On 4 June 2025, the Cabinet of Ministers of Ukraine approved the Strategy for the Development of the Electronic Communications Sector of Ukraine until 2030. The Strategy sets out key directions for the sector's development up to 2030, taking into account challenges related to the consequences of the war as well as global technological trends, in particular the development of 5G, gigabit infrastructure, digital resilience and Ukraine's integration into the EU Single Digital Market. The operational action plan for implementing the Strategy in 2025–2027 provides for enabling at least 75% of households to use gigabit fixed internet access and ensuring that 98% of the population has access to high-quality mobile broadband connectivity by 2030.

## RADIO FREQUENCY SPECTRUM REGULATION

On 13 August 2025, the Cabinet of Ministers of Ukraine adopted further amendments to the Plan for the Allocation and Use of the Radio Frequency Spectrum in Ukraine, ensuring full compliance with a number of EU measures on harmonisation of radio frequency spectrum use.

In particular, the amendments provided for the implementation of the requirements of Commission Implementing Decisions (EU) 2022/2324 (MCA) and 2024/340 (MCV), as well as Commission Implementing Decision (EU) 2021/1067 on the use of the lower 6 GHz band for WAS/RLAN systems.

In addition, the amendments provided for the implementation of Commission Implementing Decision (EU) 2019/784 regarding the 26 GHz band (5G NR standard) and Decision 2022/179 regarding the 5 GHz band (WAS/RLAN).

In August 2025, Ukraine set 2030 as the deadline for switching off UMTS (3G) networks in accordance with the Plan for the Allocation and Use of the Radio Frequency Spectrum in Ukraine.

## ELECTRONIC TRUST SERVICES

Ukraine seeks to obtain an EU internal market regime in the field of electronic identification, authentication and trust services. To this end, the process of adopting the EU Digital Identity Framework is being closely monitored, and groundwork is being laid both for the preparation of technical infrastructure and for the legal prerequisites for transitioning to the new model.

The Joint Work Plan in the field of electronic identification and trust services was updated.

A law aimed at implementing the revised eIDAS Regulation is being drafted.

On 24 October 2025, the Cabinet of Ministers of Ukraine adopted Resolution No. 1400 "Some issues of implementing an experimental project on the creation and use of electronic identification data credentials and electronic attribute credentials by means of a digital identity wallet as a functionality of the mobile application of the Unified State Web Portal of Electronic Services (Diia)".

The State Research Institute of Cybersecurity and Information Protection Technologies submitted an application to the National Accreditation Body of Ukraine (the National Accreditation Agency of Ukraine) for accreditation of a conformity assessment body in the field of electronic identification and electronic trust services.

Ukraine participates, as an observer, in the European Digital Identity Cooperation Group and in 2025 became a full member of the Forum of European Supervisory Authorities for trust service providers (FESA).

Active cooperation with the EU continues within large-scale pilot projects testing European digital identity wallets and the relevant ecosystem: Ukraine successfully participated in the POTENTIAL consortium and also joined the APTITUDE consortium.

## TECHNOLOGY AND INNOVATION

On 31 December 2024, the Cabinet of Ministers of Ukraine approved the Strategy for the digital development of innovation activity of Ukraine until 2030 (WINWIN). The Strategy sets out a comprehensive vision for building an innovation-driven economy and aims to make innovation a national priority and a key driver of Ukraine's recovery, resilience and European integration.

The Strategy focuses on ten key objectives, including development of innovation infrastructure; access to finance; development of human capital; protection of intellectual property rights; deregulation of innovation activity; promotion of knowledge-intensive and inclusive innovation; international cooperation and technology transfer; and the establishment of centres of excellence in priority sectors.

To ensure effective implementation of the Strategy, in August 2025 the WINWIN Project Office was established in Ukraine as a specialised coordination body responsible for the practical implementation of the Strategy. The Project Office operates across several strategic tracks:

- Artificial intelligence: launch of the WINWIN AI Centre of Excellence to support the integration of artificial intelligence into public services, defence, healthcare and education.
- AgroTech: development of an agri-innovation cluster in partnership with the IT Ukraine Association, including the development of regulatory roadmaps and scaling up agricultural technologies.
- MedTech and BioTech: establishment of regulatory "sandboxes" and accelerated certification procedures for innovative solutions in healthcare and biotechnology.
- Semiconductors: preparation of the Ukrainian Chips Act aligned with the European Chips Act, as well as development of pilot manufacturing capabilities (Clean Room).
- Other tracks under preparation: GovTech, GreenTech and the aerospace sector.

The WINWIN Strategy is aligned with the European Union's priorities in the field of digital development and innovation.

## INFORMATION SOCIETY

Ukraine continues to take active steps to approximate national legislation to Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act), and to Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act).

Ukraine cooperates with the European Commission on selecting an implementation approach appropriate for an EU candidate country, taking into account the comprehensive and complex nature of these acts and the specific features of supervision and enforcement of their implementation.

In 2025, following consultations with European experts, the draft Law "On Digital Services"

was technically separated into three separate draft laws.

During the year, the texts of two draft laws aimed at implementing Regulation (EU) 2022/1925 (Digital Markets Act) and Regulation (EU) 2019/1150 (P2B Regulation) were finalised and submitted for assessment by European experts under the EU4Digital project. In parallel, active work continued to finalise the draft law aimed at implementing Regulation (EU) 2022/2065 (Digital Services Act).

## PARTICIPATION IN DIGITAL EUROPE

Ukraine continues to participate in the EU Digital Europe Programme. Since accession, EUR 7.7 million in funding has been mobilised to develop projects in the digital transformation field.

There is a network of European Digital Innovation Hubs. Following an additional call in 2025 under the Programme, four Ukrainian consortia were recommended for the conclusion of grant agreements. This gives them access to direct European Union funding to develop digital technologies and support local businesses.

In July 2025, Ukraine and the EU signed the Agreement amending Article 1(1) of the Agreement between the European Union and Ukraine on Ukraine's participation in the European Union programme "Digital Europe" (2021–2027). Ratification of the Agreement will grant Ukraine access to the EU Cybersecurity Reserve – an instrument developed under the Cyber Solidarity Act for rapid response to large-scale cyberattacks in Member States and partner countries.

## INTRODUCTION OF THE SINGLE EUROPEAN EMERGENCY NUMBER 112

In 2025, in accordance with Directive 2002/22/EC and Directive (EU) 2018/1972, the operation and rollout of the emergency assistance system for the population via the single telephone number 112 across the entire territory of Ukraine were ensured.

In addition, on 11 December 2025, the official state mobile application "112 Ukraine" was launched to provide citizens with rapid communication with all emergency services.

The mobile application enables communication even in the absence of mobile coverage through the use of an internet connection and allows users to make voice calls with a single tap in any critical situation. The application has an extremely simple and intuitive interface, contains no complex menus, additional settings or excessive functions, and provides a single emergency call button. Data are transmitted via a secure and encrypted communication channel in accordance with state cybersecurity standards.

## FINANCIAL SERVICES

### BANKING SECTOR

In 2025, the National Bank of Ukraine implemented further steps to approximate the EU legislation in the field of regulation of the activities of banks and banking groups in Ukraine. In particular, the Board of the National Bank of Ukraine adopted the legal and normative acts which:

- updated the requirements for banks to calculate the minimum amount of credit risk-weighted exposures (Resolution of the Board of the National Bank of Ukraine No. 43 of 3 April 2025 “On approval of the Regulation on determining by banks of Ukraine the minimum amount of credit risk-weighted exposures”);
- approved the procedure for banks and banking groups to calculate the minimum amount of credit valuation adjustment (CVA) risk for transactions involving over-the-counter derivatives (Resolution of the Board of the National Bank of Ukraine No. 91 of 1 August 2025 “On amending certain legal and normative acts of the National Bank of Ukraine on regulation of the activities of banks and banking groups”);
- updated the approach to determining banks’ capital requirements to cover the minimum level of operational risk (Resolution of the Board of the National Bank of Ukraine No. 149 of 19 December 2025 “On amending the Regulation on the procedure for determining by banks of Ukraine the minimum level of operational risk”);
- updated the requirements for organising internal audit in banks of Ukraine and banking groups, providing for the introduction of the international professional practice of internal auditing established by the Global Internal Audit Standards of the Institute of Internal Auditors (Resolution of the Board of the National Bank of Ukraine No. 151 of 19 December 2025 “On amending certain legal and normative acts of the National Bank of Ukraine on the organisation of internal audit in banks of Ukraine and banking groups”);
- updated approaches to limiting the maximum risk to a single counterparty/group of connected counterparties (Resolution of the Board of the National Bank of Ukraine No. 161 of 27 December 2025 “On approval of the Regulation on the procedure for determining large exposures by banks of Ukraine and banking groups and calculating the value of the ratio of the maximum amount of a large exposure”);
- established minimum requirements for the scope and procedure for a bank to disclose prudential information, and templates for banks to disclose prudential information on risk management and on asset quality and collateral (Resolution of the Board of the National Bank of Ukraine No. 165 of 30 December 2025 “On approval of the Regulation on the procedure for disclosure of prudential information by banks of Ukraine and banking groups”). Further amendments to this Resolution will introduce additional templates for disclosure of prudential information by banks: on capital, leverage ratio, liquidity and remuneration policy – in 2026; and on the countercyclical capital buffer and ESG risks – in 2027.

At the same time, in order to improve banking supervision tools, in 2025 the National Bank of Ukraine adopted/approved:

- the Plan for conducting the Supervisory Review and Evaluation Process (SREP) of banks in 2025 (Order of the National Bank of Ukraine No. 477-pa of 11 February 2025) (as amended by Order of the National Bank of Ukraine No. 2065-pa of 18 June 2025);
- amendments to the Procedure for the National Bank of Ukraine's assessment of the level of organisation of corporate governance and internal control in banks (Decision of the Board of the National Bank of Ukraine No. 145-pш of 18 April 2025);
- amendments to the Procedure for ongoing monitoring of a bank's financial condition and banking group indicators (Decision of the Board of the National Bank of Ukraine No. 208-pш of 26 June 2025).

In addition, on 26 December 2025, Law No. 4465-IX of 3 June 2025 "On Amending Certain Legislative Acts of Ukraine Regarding the Development of Financial Inclusion in Ukraine" entered into force (it will become effective on 26 June 2026). The Law introduced a new type of financial services provider – financial inclusion banks, which will operate on the basis of a limited banking licence obtained from the National Bank of Ukraine or a reissued existing banking licence converted into a limited banking licence.

## STATE-OWNED BANKS

In order to ensure a reduction of state ownership in the banking sector and to fulfil international commitments undertaken by Ukraine within its cooperation with the IMF and the World Bank, on 19 September 2024 the Verkhovna Rada of Ukraine adopted the Law of Ukraine "On Specifics of the Sale of Shareholdings Owned by the State in the Authorised Capital of Banks" (hereinafter referred to as the "Sale Law").

The Sale Law sets out requirements for potential investors and provides that any state shareholding in a systemically important bank may be a subject of sale, except for JSC "Oschadbank" and JSC "Ukreximbank".

Paragraph 57 of the Memorandum of Economic and Financial Policies of 19 June 2025 provides for the preparation for sale of state shareholdings in the authorised capital of the systemically important banks JSC "Sense Bank" and JSB "UKRGASBANK".

Ordinance of the Cabinet of Ministers of Ukraine No. 1061-p of 1 October 2025 "On preparation for the sale of shareholdings owned by the state in the authorised capital of banks" was adopted.

In accordance with the requirements of Article 7 of the Sale Law, the Ministry of Finance of Ukraine ensured the development of the Procedure for engaging a sale adviser for bank shareholdings, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1385 of 29 October 2025.

The Ministry of Finance of Ukraine established a competitive selection commission to select a sale adviser for the shareholdings in systemically important banks, all or part of the shares in the authorised capital of which are owned by the state, and approved its composition.

## NON-BANK FINANCIAL SERVICES SECTOR

Throughout 2025, the work continued on developing/updating legal and normative acts of the National Bank of Ukraine in order to implement the provisions of: Law No. 1953-IX of 14 December 2021 "On Financial Services and Financial Companies"; Law No. 1909-IX of 18 November 2021 "On Insurance"; Law No. 3254-IX of 14 July 2023 "On Credit Unions", which updated the general regulation and supervision of the non-bank financial services market and take into account the provisions of Directive 2009/138/EC, Directive (EU) 2016/97, Directive 2002/87/EC, Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010 and repealing Directive 2007/64/EC (hereinafter referred to as "Directive (EU) 2015/2366"), as well as Law No. 3720-IX of 21 May 2024 "On Compulsory Insurance of Civil Liability of Owners of Land Vehicles", which takes into account the requirements of Directive 2009/103/EC.

In particular, the following legal and normative acts were approved:

- the Regulation on determining the methodology for valuation of assets and liabilities for the purposes of calculating an insurer's regulatory capital, approved by Resolution of the Board of the National Bank of Ukraine No. 71 of 21 June 2024 (as amended by Resolution of the Board of the National Bank of Ukraine No. 88 of 30 July 2025);
- the Regulation on the procedure for insurers' formation of technical provisions, approved by Resolution of the Board of the National Bank of Ukraine No. 203 of 29 December 2023 (as amended by Resolution of the Board of the National Bank of Ukraine No. 127 of 10 October 2025);
- the Regulation establishing requirements for ensuring an insurer's solvency and investment activity, approved by Resolution of the Board of the National Bank of Ukraine No. 201 of 21 July 2023, in order to align it with the requirements of the new Law of Ukraine "On Rating" (Resolution of the Board of the National Bank of Ukraine No. 154 of 22 December 2025);
- the Regulation on requirements for information (automated) systems and the procedure for maintaining personalised records in a credit union (Resolution of the Board of the National Bank of Ukraine No. 18 of 14 February 2025);
- the Regulation on the regulation of consumer lending activities involving credit intermediaries that are financial services providers (Resolution of the Board of the National Bank of Ukraine No. 94 of 1 August 2025);
- the Regulation on the criteria for determining the materiality of a financial company (Resolution of the Board of the National Bank of Ukraine No. 102 of 27 August 2025);
- the revised Regulation on requirements for ownership structure in the market for financial and payment services, approved by Resolution of the Board of the National Bank of Ukraine No. 30 of 14 April 2021 (as amended by Resolution of the Board of the National Bank of Ukraine No. 135 of 7 November 2025).

In order to regulate issues of oversight of credit history bureaus by the National Bank of Ukraine and to clarify processes within the administrative procedure, the Regulation on

oversight of the activities of credit history bureaus was approved (Resolution of the Board of the National Bank of Ukraine No. 162 of 27 December 2025).

## PAYMENT SERVICES

Throughout 2025, the National Bank of Ukraine developed/updated its legal and normative acts in accordance with the Law No. 1591-IX of 30 June 2021 “On Payment Services” (hereinafter referred to as the “Payment Services Law”), which reflects the main provisions of Directive (EU) 2015/2366.

The Regulation on requirements for the regulatory capital of non-bank payment service providers was approved (Resolution of the Board of the National Bank of Ukraine No. 64 of 13 June 2025), and the Regulation on the procedure for authorisation of the activities of providers of financial payment services and limited payment services, approved by Resolution of the Board of the National Bank of Ukraine No. 217 of 7 October 2022, was updated.

Chapter 4 of the Payment Services Law on open banking, which implements the provisions of Directive (EU) 2015/2366, entered into force and became effective on 1 August 2025.

For the purpose of regulating open banking, the National Bank of Ukraine:

1) approved a number of new legal and normative acts:

- the Regulation on the procedure for liability insurance of providers of non-financial payment services vis-à-vis users and account servicing payment service providers (Resolution of the Board of the National Bank of Ukraine No. 71 of 2 July 2025);
- the Regulation on requirements for the risk management system of a provider of non-financial payment services (Resolution of the Board of the National Bank of Ukraine No. 73 of 2 July 2025);
- the Regulation on open banking in Ukraine (Resolution of the Board of the National Bank of Ukraine No. 80 of 25 July 2025);
- the Regulation on the procedure for authorisation of the activities of providers of non-financial payment services (Resolution of the Board of the National Bank of Ukraine No. 81 of 25 July 2025);
- the Regulation on the use of electronic trust services when payment service providers obtain access to payment service users’ accounts (Resolution of the Board of the National Bank of Ukraine No. 82 of 25 July 2025);

2) introduced amendments to a number of legal and normative acts, in particular:

- to the Regulation on registration of payment systems, participants of payment systems and technological operators of payment services (Resolution of the Board of the National Bank of Ukraine No. 81 of 25 July 2025);
- to the Regulation on the National Bank of Ukraine’s supervision of compliance by supervised entities with the legislation of Ukraine on protection of the rights of consumers of financial, payment and limited payment services, and requirements on interaction with consumers in the settlement of overdue debt (Resolution of the

Board of the National Bank of Ukraine No. 75 of 8 July 2025);

- to certain legal and normative acts on supervision in the payment market (Resolution of the Board of the National Bank of Ukraine No. 90 of 30 July 2025);

3) implemented a specialised interface (API) containing information on providers of non-financial payment services (PISP/AISP) from the National Bank of Ukraine Register of Payment Infrastructure, enabling account servicing payment service providers (ASPSPs) to verify the authorisation of non-financial payment service providers (PISP/AISP).

In Q4 2025, the National Bank of Ukraine received the first applications from payment market participants for authorisation to operate as providers of non-financial payment services (PISP/AISP).

In 2025, the requirements of the Payment Services Law entered into force obliging all payment service providers that provide users with the service of executing credit transfers to ensure that users are also able to execute instant credit transfers.

In order to regulate the specifics of instant credit transfers executed through the National Bank of Ukraine's System of Electronic Payments (SEP), the National Bank of Ukraine updated the procedure for executing interbank payment transactions in Ukraine in the national currency (Resolution of the Board of the National Bank of Ukraine No. 11 of 6 February 2025 "On approval of the Amendments to the Instruction on executing interbank payment transactions in Ukraine in the national currency"), in particular, it:

- standardised the concept of an "SEP instant credit transfer" and regulated the specifics of its execution;
- defined the procedure for admitting and excluding participants of SEP instant transfers;
- defined the specifics of executing SEP instant transfers by non-bank payment service providers through a bank that is a participant of SEP instant transfers, etc.

In addition, in 2025 the National Bank of Ukraine introduced amendments to the Instruction on cashless payments in the national currency for users of payment services, approved by Resolution of the Board of the National Bank of Ukraine No. 163 of 29 July 2022. These amendments were approved by Resolution of the Board of the National Bank of Ukraine No. 14 of 7 February 2025 and defined the specifics of executing instant credit transfers.

Moreover, throughout 2025, the National Bank of Ukraine updated its legal and normative acts in accordance with the Payment Services Law (taking into account amendments introduced by Law No. 3994-IX). In particular, the following were approved:

- amendments to the Regulation on submitting claims and applying enforcement measures by the National Bank of Ukraine to oversight objects of payment infrastructure (Resolution of the Board of the National Bank of Ukraine No. 5 of 15 January 2025);
- amendments to the Regulation on conducting on-site and off-site monitoring of oversight objects of payment infrastructure (Resolution of the Board of the National Bank of Ukraine No. 129 of 20 October 2025 "On amending certain legal and normative acts of the National Bank of Ukraine on conducting on-site and off-site monitoring of oversight objects of payment infrastructure").

A number of resolutions of the Board of the National Bank of Ukraine were also adopted to improve the regulation of acquiring services, in particular on:

- certain issues related to identifying the features of acquiring of payment instruments (Resolution of the Board of the National Bank of Ukraine No. 103 of 28 August 2025);
- approval of the Amendments to the Regulation on the procedure for issuing licences for foreign exchange transactions (Resolution of the Board of the National Bank of Ukraine No. 104 of 28 August 2025);
- the specifics of a financial company acquiring the status of a payment institution without suspending the provision of financial payment services (Resolution of the Board of the National Bank of Ukraine No. 122 of 30 September 2025).

## INSURANCE

The National Securities and Stock Market Commission (hereinafter referred to as the "NSSMC") developed the White Paper "Reform of Voluntary Funded Pension Provision" (hereinafter referred to as the "White Paper"), taking into account the provisions of Directive (EU) 2016/2341 (IORP II). The White Paper was approved by Decision of the NSSMC No. 08/21/1710/K01 of 10 January 2025 and published on the NSSMC's official website. The same Decision established the Coordination Council comprising market representatives and NSSMC staff.

Following the work of the White Paper Coordination Council during 2025, the NSSMC is currently updating the provisions of the White Paper and preparing to draft a law on the relevant amendments to the Law of Ukraine "On Non-State Pension Provision" and other legislative acts.

## SECURITIES

In order to implement the EU *acquis* in the field of investment funds, in particular Directive 2009/65/EC (UCITS), Directive 2011/61/EU (AIFM), as well as EU regulations (EuVECA, EuSEF, ELTIF), on 1 May 2025 the Verkhovna Rada of Ukraine registered draft Law No. 13246 "On Investment Funds" (hereinafter referred to as "draft Law No. 13246") and draft Law No. 13247 "On Amending the Civil Code of Ukraine Regarding Investment Funds" (hereinafter referred to as "draft Law No. 13247"), which is related to draft Law No. 13246.

Draft Law No. 13246 provides for introducing comprehensive legal regulation of the establishment, operation and termination of investment funds, as well as asset management and custodian activities, with a view to approximating Ukraine's legislation to the EU standards in the field of collective investment.

Draft Law No. 13247 aims to amend the Civil Code of Ukraine in order to align civil law regulation with the provisions of draft Law No. 13246 and to establish the legal status of investment funds in accordance with the EU approaches.

In order to bring the NSSMC's legal and normative acts into line with Law No. 3981-IX

of 19 September 2024 "On Rating" (entry into force on 1 January 2026), during 2025 the following legal and normative acts were developed and adopted:

- Decision of the NSSMC No. 09/21/3402/K03 of 19 December 2025 "On approval of the Regulation on disclosure of information by authorised rating agencies", registered with the Ministry of Justice of Ukraine on 31 December 2025 under Nos. 1984/45390 and 1985/45391;
- Decision of the NSSMC No. 09/21/3403/K03 of 19 December 2025 "On certain issues of using credit ratings of international rating agencies during the period of martial law";
- Decision of the NSSMC No. 09/21/3404/K03 of 19 December 2025 "On approval of the Procedure for calculating the number of voting shares (participatory interests) owned by a natural or legal person in accordance with the financial instruments provided for in Article 29(10) of the Law of Ukraine 'On Rating'", registered with the Ministry of Justice of Ukraine on 31 December 2025 under No. 1968/45374;
- Resolution of the NSSMC No. 09/21/3405/K01 of 19 December 2025 "On approval of an indicative (non-exhaustive) list of financial instruments provided for in Article 29(10) of the Law of Ukraine 'On Rating'" (published on the NSSMC's official website on 19 December 2025);
- Decision of the NSSMC No. 09/21/3408/K03 of 19 December 2025 "On approval of the Procedure for authorisation of a rating agency and maintaining the register of authorised rating agencies", registered with the Ministry of Justice of Ukraine on 31 December 2025 under No. 1979/45385;
- Decision of the NSSMC No. 26/21/3409/K03 of 19 December 2025 "On approval of the Procedure and conditions for conducting rating activities", registered with the Ministry of Justice of Ukraine on 31 December 2025 under No. 1987/45393.

During 2025, the following were also adopted:

- Decision of the NSSMC No. 09/21/3370/K03 of 16 December 2025 "On approval of the Procedure for disclosure of information on managers' transactions";
- Resolution of the NSSMC No. 10/21/3422/K01 of 19 December 2025 "On determining and publishing an indicative non-exhaustive list of indicators relating to the submission of false or misleading signals, or price fixing, and the procedure for their calculation";
- Decision of the NSSMC No. 09/21/2643/K03 of 25 July 2025 "On approval of the Procedure for the return of assets, including funds, belonging to clients/depositors of a professional participant in the capital markets to which a sanction in the form of 'asset blocking' has been applied";
- Decision of the NSSMC No. 09/21/3187/K03 of 14 November 2025 "On approval of the Regulation on ownership structure of legal persons, the procedure and conditions for obtaining the approval of the National Securities and Stock Market Commission for an acquisition of a qualifying holding in professional participants in the capital markets and organised commodity markets";
- Decision of the NSSMC No. 14/21/2358/K03 of 30 May 2025 "On approval of the Procedure for recording the fact of a violation of the relevant legislation and considering cases on violations of the relevant legislation under martial law".

## PREVENTION OF LAUNDERING (LEGALISATION) OF PROCEEDS OF CRIME

On 23 December 2025, the Cabinet of Ministers of Ukraine submitted to the Verkhovna Rada of Ukraine three draft laws intended to ensure compliance with the criteria for accession to the Single Euro Payments Area (SEPA) as a jurisdiction, namely:

(1) "On Amending Certain Legislative Acts of Ukraine to Ensure Compliance with European Union Law and the Relevant Criteria Established by the European Payments Council, for the Purpose of Ukraine's Accession to the Single Euro Payments Area (SEPA)" (registration No. 14327 of 23 December 2025 (main));

(2) "On Amending the Civil Code of Ukraine to Ensure Compliance with European Union Law and the Relevant Criteria Established by the European Payments Council, for the Purpose of Ukraine's Accession to the Single Euro Payments Area (SEPA)" (registration No. 14326 of 23 December 2025 (supplementary));

(3) "On Amending the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine to Ensure Compliance with the Laws of the European Union Law and the Relevant Criteria Established by the European Payments Council, for the Purpose of Ukraine's Accession to the Single Euro Payments Area (SEPA)" (registration No. 14328 of 23 December 2025 (supplementary)).

Among other things, main draft Law No. 14327 provides for the establishment of a Register of Accounts and Individual Bank Safe Deposit Boxes of Natural Persons by supplementing the Law of Ukraine "On Prevention of and Counteraction to Legalization (Laundering) of the Proceeds of Crime, Terrorist Financing, and Financing Proliferation of Weapons of Mass Destruction" with a new Title IX, which will establish the tasks, obligations and rights of the holder and administrator of the Register, as well as requirements for notifying a natural person of the opening or closure of an account/ digital wallet and for notifying a natural person of the conclusion or termination of an agreement for the provision of an individual bank safe deposit box.

## PROTECTION OF THE RIGHTS OF CONSUMERS OF FINANCIAL SERVICES

In 2025, the National Bank of Ukraine modernised the procedure for supervising compliance with the legislation of Ukraine on protection of the rights of consumers of financial, payment and limited payment services, as well as requirements on interaction with consumers in the settlement of overdue debt, by approving amendments to the Regulation on supervision of compliance with legislation on protection of the rights of consumers of financial and payment services (Resolutions of the Board of the National Bank of Ukraine No. 15 of 11 February 2025 and No. 75 of 8 July 2025).

An important step towards protecting the rights of consumers of financial services was the strengthening of the protection of the rights and interests of credit union members as consumers of financial services during pre-contractual information disclosure and the conclusion of agreements for the service of acceptance of repayable funds and precious metals.

The requirements approved by Resolutions of the Board of the National Bank of Ukraine No. 111 and No. 112 of 5 September 2025 will contribute to the following: an adequate level of disclosure of material information on the terms of financial services provided by a credit union on the credit union's own website, in advertising and in the content of agreements; the operation of a consumer-friendly way to compare the terms of a financial service across offers from different credit unions (a calculator for comparing total returns under the service of acceptance of repayable funds and precious metals); and a proper procedure for concluding an agreement on the provision of a financial service in the form of an electronic document.

In the said legal and normative acts, the National Bank of Ukraine took into account the provisions of:

- Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council, as regards combating unfair (misleading, aggressive) commercial practices in the interests of consumers;
- Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council, and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council, as regards information provided to consumers at the pre-contractual stage and included in distance contracts;
- Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, as regards proper signing of agreements concluded in the form of an electronic document.

In order to improve state regulation and supervision of the activities of credit history bureaus in terms of proper observance of the rights of consumers as subjects of a credit history, in particular the protection of personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), on 7 October 2025 the Verkhovna Rada of Ukraine adopted, at first reading, the draft Law (registration No. 14013 of 5 September 2025) "On Credit History", with further review envisaged prior to adoption.

Protection of the rights of consumers of financial services relating to lending of funds and bank metals, as well as factoring services, is regulated by certain provisions of Law No. 4466-IX of 3 June 2025 "On Factoring", in particular as regards protecting the rights and interests of consumers when a claim under a financial service agreement is assigned.

The rights of certain consumers of insurance services (combatants and persons with disabilities as a result of war) are regulated by the provisions of Law of Ukraine No. 4369-IX of 17 April 2025 "On Amending the Law of Ukraine 'On Compulsory Insurance of Civil Liability of Owners of Land Vehicles' Regarding Compensation of Costs of Certain Categories of Persons".

Draft Law of Ukraine No. 14278 of 5 December 2025 "On Digital Accessibility in Ukraine", developed by the Ministry of Digital Transformation of Ukraine, is intended to ensure the accessibility of software tools and electronic information resources of financial institutions (websites, mobile and payment applications, online services) for consumers with disabilities and other persons with reduced mobility.

With a view to strengthening protection of consumers with disabilities, the National Bank of Ukraine monitors progress by providers of financial and payment services in complying with accessibility requirements (ensuring access for persons with reduced mobility to the services provided), including the efforts made by financial institutions to comply and to ensure such access, taking into account security risks during wartime.

## LIBERALISATION OF CAPITAL MOVEMENTS

In 2025, banks continued to operate taking into account the restrictions set out in Resolution of the Board of the National Bank of Ukraine No. 18 of 24 February 2022 “On the Operation of the Banking System Under Martial Law” (as amended) (hereinafter referred to as the “Resolution No. 18”).

The National Bank of Ukraine almost completed the measures under Stage I of the Roadmap for the Gradual Easing of FX Restrictions, continued implementing measures under Stage II, and started measures under Stage III of the Roadmap (in particular, since May 2025, incentive-based currency liberalisation has been under way, whereby easing measures incorporate incentives to attract foreign investments and loans). In implementing these measures, a number of foreign exchange restrictions were optimised by amending Resolution No. 18 through the following Resolutions of the Board of the National Bank of Ukraine:

- No. 4 of 13 January 2025, under which state-owned entities in the natural gas market were enabled to carry out cross-border transfers (on the terms and within the amounts agreed by the Government of Ukraine) for import transactions where the supply of goods to Ukraine was made before 23 February 2021, and for transactions performed in order to fulfil obligations under decisions of foreign arbitral tribunals;
- No. 7 of 17 January 2025, under which it became possible: for the state customer service in the defence sector to settle with a non-resident using an escrow account; and for legal persons purchasing defence goods under state contracts to make cross-border transfers to pay registration, arbitration and court fees and other payments related to enforcement proceedings;
- No. 34 of 19 March 2025, which expanded the list of exemptions from the prohibition on a client purchasing foreign currency where the client has its own funds in foreign currency;
- No. 35 of 20 March 2025, under which banks were enabled to meet significant ad hoc needs of state enterprises or business companies whose shares (participatory interests) are 100% state-owned and which are natural gas market entities, for the purchase of foreign currency;
- No. 53 of 9 May 2025, under which: (1) a further package of foreign exchange easing measures was introduced and implementation of incentive-based currency liberalisation measures was initiated; (2) as part of easing, opportunities for businesses to finance their foreign branches were expanded; cross-border transfers for the purpose of paying consular, registration, arbitration and court fees were permitted; the procedure for cross-border transfers using electronic payment instruments was improved; the procedure for certain transactions involving Russian roubles of bank clients was regulated; (3) as part of incentive-based currency liberalisation, businesses were allowed to transfer funds abroad for certain transactions (despite the existing restrictions) in amounts equivalent to foreign investments made from 12 May 2025 into the authorised capital of Ukrainian companies; (4) at the same time, in order to prevent unproductive capital outflow abroad, banks were prohibited from completing foreign exchange supervision on the basis of the statutory settlement deadlines for imports of goods where a non-resident refunds funds to the importer in hryvnias; restrictions on cross-border transfers by individuals using electronic payment instruments were also calibrated;
- No. 63 of 13 June 2025, which regulated the crediting of charitable donations/sponsorship contributions in the national currency to accounts of diplomatic missions and consulates of foreign states in Ukraine, and enabled state enterprises or business companies whose

shares (participatory interests) are 100% state-owned to conduct transactions in respect of debt securities issued by them abroad in connection with restructuring of the issuer's debt on the terms agreed by the Government of Ukraine;

- No. 70 of 2 July 2025, under which, for a bank that breached the limit on the total long open foreign exchange position (L13-1), the prohibition on participation in the National Bank of Ukraine's "tod" US dollar purchase and sale transactions was lifted;
- No. 95 of 5 August 2025, which introduced a further package of foreign exchange easing measures and expanded incentive-based currency liberalisation measures, in particular: enabling repatriation of dividends for 2023; expanding opportunities for hedging foreign exchange risks through "forward" transactions; permitting foreign currency transfers abroad for certain currency transactions; introducing steps to support the domestic jewellery industry with regard to purchasing bank metals for non-cash hryvnias; unifying approaches to regulating external borrowings; expanding the list of transactions that resident legal persons may perform despite the established restrictions within incentive-based currency liberalisation measures; introducing an additional incentive-based currency liberalisation measure whereby companies were enabled (despite existing restrictions) to transfer funds from Ukraine for a range of transactions within amounts equivalent to funds transferred from 7 August 2025 to support the Armed Forces of Ukraine (under certain conditions);
- No. 119 of 17 September 2025, under which postal operators and international carriers were allowed to carry out cross-border transfers in order to settle customs payments in favour of the customs/tax authorities of the United States of America;
- No. 144 of 10 December 2025, which expanded the list of cases where banks are permitted to make transfers abroad under guarantees and also enabled the Ministry of Defence of Ukraine to conduct certain foreign exchange transactions;
- No. 166 of 30 December 2025, under which residents of Defence City were enabled to purchase foreign currency for the import of goods without taking into account targeted funds held in their accounts, and to carry out cross-border transfers of funds from Ukraine within the framework of implementing international interdepartmental agreements and/or for forming/acquiring a participatory interest in the authorised capital of non-resident legal persons.

## DIGITAL FINANCE

On 3 September 2025, the Verkhovna Rada of Ukraine adopted at first reading, with further review envisaged prior to adoption, draft Law No. 10225-д of 24 April 2025 "On Amending the Tax Code of Ukraine and Certain Other Legislative Acts of Ukraine Regarding Regulation of the Circulation of Virtual Assets in Ukraine".

The draft Law aims to establish a legal framework for regulating the circulation of virtual assets in Ukraine, ensuring their lawful use, taxation and protection of the rights of market participants.

Adoption of the draft Law will enable Ukraine to meet international standards, strengthen the protection of the rights of consumers, investors and users, and create transparent conditions for transactions involving virtual assets.

Regulation in this area will also help prevent offences related to virtual assets by introducing mechanisms for control, reporting and taxation.

## ACTIVITIES OF THE DEPOSIT GUARANTEE FUND

To ensure proper implementation during 2025 of Annex XVII “Legal Approximation” of the Association Agreement between the European Union and Ukraine, the Deposit Guarantee Fund carried out methodological and law enforcement activities.

### **In the area of operation of the deposit guarantee system for natural persons, which falls within the scope of Directive 2014/49/EU of 16 April 2014 on deposit guarantee schemes:**

To implement, on a phased basis, the requirement to reduce the period for commencing payouts to depositors of an insolvent bank to seven days, amendments to Article 27 of the Law of Ukraine “On the System of Guaranteeing Deposits of Natural Persons” were initiated (reflected in draft Law No. 13007-д of 7 July 2025). These amendments will reduce by 3 days the statutory period for starting reimbursement payouts for deposits in insolvent banks.

To improve the Deposit Guarantee Fund’s procedure for paying deposit reimbursements to heirs, taking into account the requirements of certain provisions of Articles 7 and 8 of Directive 2014/49/EU, the following were adopted:

Decision of the Executive Directorate of the Deposit Guarantee Fund No. 181 of 20 February 2025 “On approval of the Amendments to the Regulation on the procedure for reimbursement by the Deposit Guarantee Fund of funds on deposits”;

Decision of the Executive Directorate of the Deposit Guarantee Fund No. 261 of 13 March 2025 “On amending Decision of the Executive Directorate of the Deposit Guarantee Fund No. 181 of 20 February 2025”.

In order to improve procedures for joint inspections in problem banks, a unified approach to the procedure for conducting such inspections was established, including defining the grounds for conducting the said inspections and for the Deposit Guarantee Fund adopting relevant administrative acts, as well as the procedure for interaction and exchange of information between the head of the inspected entity and the Deposit Guarantee Fund staff participating in the inspection. These changes are reflected in the following decisions:

- Decision of the Executive Directorate of the Deposit Guarantee Fund No. 703 of 17 July 2025 “On approval of the Rules for conducting inspections of banks by the Deposit Guarantee Fund and participation of the Deposit Guarantee Fund staff in on-site inspections conducted by the National Bank of Ukraine in problem banks, and declaring certain decisions of the Executive Directorate of the Deposit Guarantee Fund to have lost effect”;
- Decision of the Executive Directorate of the Deposit Guarantee Fund No. 732 of 24 July 2025 “On amending the Rules for conducting inspections of banks by the Deposit Guarantee Fund and participation of the Deposit Guarantee Fund staff in on-site inspections conducted by the National Bank of Ukraine in problem banks”;
- Decision of the Executive Directorate of the Deposit Guarantee Fund No. 1185 of 18 December 2025 “On amending point 1 of Title III of the Rules for the Deposit Guarantee Fund’s application of response measures to a bank and declaring Decision of the Executive Directorate of the Deposit Guarantee Fund No. 386 of 3 April 2023 to have lost effect”.

Taking into account that, under Article 4 of Directive 2014/49/EU, a credit institution may not accept deposits unless it has become a member of a deposit guarantee scheme, the Deposit Guarantee Fund continuously improves the procedure for maintaining the register of its participants, adapting it to new digital formats. This is addressed by Decision of the Executive Directorate of the Deposit Guarantee Fund No. 802 of 14 August 2025 “On approval of the Rules

for maintaining the register of participants of the Deposit Guarantee Fund and declaring certain decisions of the Executive Directorate of the Deposit Guarantee Fund to have lost effect”.

To improve the procedure for submission of reporting by banks participating in the Deposit Guarantee Fund, Decision of the Executive Directorate of the Deposit Guarantee Fund No. 803 of 14 August 2025 “On approval of the Amendments to the Rules for submission of reporting by participants of the Deposit Guarantee Fund and declaring Decisions of the Executive Directorate of the Deposit Guarantee Fund No. 1044 of 19 December 2022 and No. 490 of 27 April 2023 to have lost effect” was adopted.

To improve the process of forming and maintaining the database of depositors in banks and to ensure the Deposit Guarantee Fund’s ability to pay the guaranteed amount of reimbursement for deposits, Decision of the Executive Directorate of the Deposit Guarantee Fund No. 1231 of 25 December 2025 “On approval of the Amendments to the Rules for forming and maintaining databases of depositors” was adopted.

**In the area of applying resolution plans for insolvent banks on the basis of Directive 2014/59/EU of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms and amending Council Directive 82/891/EEC and Directives 2001/24/EC, 2002/47/EC, 2004/25/EC, 2005/56/EC, 2007/36/EC, 2011/35/EU, 2012/30/EU and 2013/36/EU, and Regulations (EU) No 1093/2010 and (EU) No 648/2012 of the European Parliament and of the Council**

The Deposit Guarantee Fund and the National Bank of Ukraine prepared draft amendments to legislation to address key existing legal and operational gaps relating to early intervention measures, temporary administration and the resolution mechanism. In February 2025, draft Law No. 13007-д “On Amending Certain Legislative Acts of Ukraine Regarding Regulation of Certain Issues of the Deposit Guarantee Fund, the Activities of the National Bank of Ukraine and Collective Investment Institutions” was registered. This draft law improves the existing mechanisms for resolving insolvent banks by the Deposit Guarantee Fund and includes several important innovations that create prerequisites for enhancing the effectiveness of the Deposit Guarantee Fund in terms of withdrawing banks from the market within the framework of the existing legislation, and increasing the amount recovered by creditors of insolvent banks.

In addition, on 28 January 2025, Decisions of the Executive Directorate of the Deposit Guarantee Fund No. 1269 of 5 December 2024 and No. 1412 of 26 December 2024 entered into force, introducing amendments to the Regulation on the withdrawal of an insolvent bank from the market, approved by Decision of the Executive Directorate of the Deposit Guarantee Fund No. 2 of 5 July 2012. The amendments regulate cases where the Deposit Guarantee Fund applies early response measures for the purpose of drafting a resolution plan for banks that may be classified as insolvent. Furthermore, by Decision of the Executive Directorate of the Deposit Guarantee Fund No. 870 of 25 August 2025, the Procedure for implementing early response measures was approved.

**In the area of liquidation of insolvent banks within the scope of Directive 2001/24/EC of 4 April 2001 on the reorganisation and winding up of credit institutions, the following were adopted:**

- Decision of the Executive Directorate of the Deposit Guarantee Fund No. 813 of 18 August 2025 “On approval of the Terms for restructuring the debt of natural persons – borrowers of banks being liquidated by the Deposit Guarantee Fund during the period of martial law in Ukraine, and declaring certain decisions of the Executive Directorate of the Deposit Guarantee Fund to have lost effect”;

- Decision of the Executive Directorate of the Deposit Guarantee Fund No. 911 of 11 September 2025 "On approval of the Rules for compiling the register of accepted creditors' claims and satisfying creditors' claims of banks being liquidated by the Deposit Guarantee Fund, and declaring certain decisions of the Executive Directorate of the Deposit Guarantee Fund to have lost effect";
- Decision of the Executive Directorate of the Deposit Guarantee Fund No. 1073 of 13 November 2025 "On approval of the Amendments to the Rules for compiling the register of accepted creditors' claims and satisfying creditors' claims of banks being liquidated by the Deposit Guarantee Fund".

## PUBLIC FINANCE MANAGEMENT

Despite the challenges posed by martial law, during 2025 the Government introduced systemic changes and achieved tangible progress in reforming the public finance management system.

### BUDGET POLICY

The practice of medium-term budget planning was continued. The Cabinet of Ministers of Ukraine approved the Budget Declaration for 2026–2028 (Resolution No. 774 of 27 June 2025), which includes information on the coverage of the general government sector. In particular, in addition to medium-term indicators for the state budget and local budgets, it also incorporates medium-term indicators for the budgets of social funds (the Pension Fund of Ukraine and the Unemployment Insurance Fund of Ukraine) and information on the calculations made for the baseline level of expenditure and the cost of new policies.

The Government also approved the Concept of the national strategic planning system (Ordinance of the Cabinet of Ministers of Ukraine No. 853-p of 13 August 2025), which provides for comprehensive legislative reform to develop a system for defining and achieving Ukraine's long-term development goals through coordination of all financial instruments and their focus on ensuring financial support for achieving long-term goals.

In order to increase the efficiency of using limited budgetary resources, the Government is introducing, on an annual basis, the practice of conducting spending reviews of the state budget (Ordinance of the Cabinet of Ministers of Ukraine No. 348 of 15 April 2025).

### PUBLIC INVESTMENT MANAGEMENT REFORM

In 2025, Ukraine achieved significant progress in implementing the public investment management reform. In particular, the development of the system's foundational architecture was completed, enabling a shift from a "budget maintenance" model to strategic planning and investment in the country's economic recovery.

As regards updating the legislative and institutional framework, the key achievement of 2025 was completing the formation of the reform's legal and normative foundation.

In January 2025, amendments were introduced to the Budget Code of Ukraine, making it possible to integrate public investment management processes into the national budget cycle.

Key institutional measures included:

- establishment of the Strategic Investment Council, which became the strategic planning body responsible for selecting priority projects at the state level;
- establishment of an interagency working group on public investment management (Resolution of the Cabinet of Ministers of Ukraine No. 10 of 7 January 2025 "On establishing an interagency working group on preparation of public investment projects"), which ensured effective coordination between government institutions and the expert community;

- approval of the Concept of the national strategic planning system (Ordinance of the Cabinet of Ministers of Ukraine No. 853-p of 13 August 2025 “On approval of the Concept of the national strategic planning system”), which laid the groundwork for aligning investment priorities with national objectives.

To ensure transparency and efficiency in the use of public resources, the Government adopted a number of legal and normative acts establishing unified procedures across all levels of governance, including:

- Resolution of the Cabinet of Ministers of Ukraine No. 294 of 28 February 2025 “On approval of the procedure for developing and monitoring implementation of the medium-term plan of the state’s priority public investments”, which established the procedure for developing and monitoring the Medium-term Plan of the state’s priority public investments;
- Resolution of the Cabinet of Ministers of Ukraine No. 527 of 28 February 2025 “Certain issues of public investment management”, which approved unified procedures for the preparation and appraisal of investment projects, formation of the project portfolio, and project implementation;
- Order of the Ministry of Economy of Ukraine No. 353 of 28 August 2025 “On approval of guidelines on conducting an analysis of environmental consequences and the impact of implementation of a public investment project on the environment, and an analysis of compliance with inclusiveness and accessibility requirements, as well as alignment with the Sustainable Development Goals, when preparing a public investment project at the state, regional and local levels”.

From the perspective of strategic planning and project portfolio formation, in 2025 Ukraine, for the first time, moved to systematic medium-term investment planning:

- the Medium-term Plan of priority public investments for 2026–2028 was approved by the Strategic Investment Council on 27 June 2025 and approved by Ordinance of the Cabinet of Ministers of Ukraine No. 671-p of 2 July 2025. The Plan identifies 12 priority sectors, including energy, transport, municipal infrastructure, education and healthcare, and 51 priority investment areas;
- a single project portfolio of public investments was approved on 26 August 2025. It included 131 projects and 64 programmes with a total value exceeding UAH 12.5 trillion. In particular, 100% of projects underwent sectoral and expert appraisal under the new rules;
- implementation of this measure enabled Ukraine to successfully meet the relevant IMF structural benchmark.

In 2025, the public investment management reform was actively rolled out at the regional and local levels, supporting decentralisation of the reform and strengthening the capacity of communities. In particular, guidelines were approved on the procedure for establishing and operating local investment councils and on the procedure for developing and monitoring implementation of the medium-term plan of priority public investments of a region (territorial community):

- as at the end of 2025, over 70% of territorial communities had approved regulations on local investment councils, and around 55% had approved their own Medium-term Plan of priority public investments;

- the Ministry of Economy of Ukraine approved model regulations for public investment management units at all levels and guidelines for developing local investment plans;
- training and consultations for local self-government staff are conducted on an ongoing basis to enhance their institutional capacity to prepare high-quality investment proposals.

Implementation of the full investment cycle — from preparation to monitoring — was integrated into the Unified Information System for Public Investment Project Management, which includes the DREAM ecosystem. This ensured:

- transparency and accessibility of data for international partners, international financial organisations and the public;
- real-time monitoring of the implementation status of each project;
- reduced corruption risks through automation of project appraisal and selection processes.

In terms of cooperation with international partners, an important instrument of financial support for the reform was the signing of a grant agreement with the World Bank for the project “Preparation of Resilient Projects to Advance Recovery of Ukraine” (PREPARE Ukraine) with total funding of US\$ 200 million. The first tranche of US\$ 44.3 million was allocated to form the public investment portfolio and strengthen the institutional capacity of the Public-Private Partnership Agency as a “project pipeline”.

Within the public investment management reform, the Project Preparation Framework was launched.

An interagency working group on preparation of public investment projects has been established. At the same time, two main project preparation programmes (Project Preparation Facilities (PPFs)) are operational: the UKRAINE Government PPF and the Ukraine Facility for Infrastructure Reconstruction (Ukraine FIRST). These project preparation programmes were established with the support of the European Commission, the World Bank, the EIB, the EBRD and partners.

In a pilot format, 4 public investment projects from the Unified Project Portfolio of the state’s public investments were allocated between the said project preparation programmes; their preparation is currently under way.

Approaches are being developed for organising the preparation of public investment projects and allocating them between project preparation programmes, which will make the selection and allocation procedure as open and transparent as possible.

This mechanism will support a structured approach by the Government of Ukraine to setting priorities for the use of limited resources available for project preparation and will reduce the administrative burden on beneficiaries — central executive authorities and local self-government bodies — in attracting funding for project preparation. In addition, such projects will comply with international practices, which will facilitate mobilising funds for their implementation.

The results of 2025 confirmed the effectiveness of the new public investment management system. Ukraine has established a transparent mechanism that makes it possible to align external financing with national priorities. In 2026, efforts are planned to focus on deepening analytical capacity, expanding the system’s functionality at the local

level, and further integration with international investment platforms to ensure sustainable economic growth.

## PUBLIC INTERNAL FINANCIAL CONTROL

In 2025, consistent implementation of measures in the field of development of public internal financial control (PIFC) continued as an integral part of the public finance management reform, in particular:

- the legal and methodological framework for internal control and internal audit was improved with a view to further approximation to the EU best practice, in particular:
  - amendments were introduced to the Budget Code of Ukraine, the Procedure for conducting internal audit and the Basic Principles for the functioning of internal control, including as regards updating terminology, strengthening managerial accountability, responding to deviations, etc.;
  - by Orders of the Ministry of Finance of Ukraine, the template of the manager's internal control declaration and the revised guidelines on the functioning of internal control for budget spending units were approved;
  - proposals for the revised national Internal Audit Standards aligned with the new Global Internal Audit Standards (GIAS) were prepared and submitted to experts of the EU4PFM for review and of proposals/comments. Comments and proposals received from the EU4PFM experts were discussed at a working meeting on 30 October 2025;
- further practical implementation of national certification of internal auditors of public authorities was ensured through the organisation and delivery of a training course under the Recommended Programme for preparing internal auditors for certification and 5 qualification exams, as a result of which 6 internal auditors successfully passed the exam and received certificates;
- further implementation of training programmes on internal control and internal audit was ensured, in particular, 9 training events were held aimed at deepening knowledge and improving professional competencies of civil servants in this area;
- the functioning of internal control and internal audit systems was assessed: reporting information on the state of PIFC for 2024, including proposals implemented through the relevant instruction, was prepared and submitted to the Government; 4 external quality assessments of internal audit were carried out and two such assessments were organised / initiated;
- institutional capacity of the Central Harmonisation Unit was strengthened through participation of its staff in various training events organised by the EU4PFM, the National Academy for Finance and Economics of the Ministry of Finance of the Kingdom of the Netherlands, PEMPAL, etc.

In order to implement the above measures, the Ministry of Finance of Ukraine continues cooperation with the technical support project of the National Academy for Finance and Economics of the Ministry of Finance of the Kingdom of the Netherlands and the EU4PFM Public Financial Management Programme in Ukraine.

## EXTERNAL AUDIT

In 2025, the Accounting Chamber continued to develop external audit in accordance with Articles 346 and 367 of the Association Agreement between the European Union and Ukraine and INTOSAI international standards, cooperating with EU programmes and institutions to introduce the IFPP (the INTOSAI Framework of Professional Pronouncements).

Law No. 4042-IX "On Amending the Law of Ukraine 'On Accounting Chamber' and Certain Other Legislative Acts of Ukraine", adopted in late 2024 (hereinafter referred to as the "Law No. 4042-IX"), granted the Accounting Chamber the official status as the supreme state collegial body of financial control (audit) applying INTOSAI and IFPP principles, and strengthened the institution's organisational, functional and financial independence.

In 2025, a comprehensive update of audit methodologies (financial, compliance and performance (effectiveness) audits) was completed, taking into account the amendments introduced by Law No. 4042-IX (in particular, repeal of provisions on unplanned measures, the requirement to draw up inspection reports based on audit results, changes to the time limits for auditees to review draft reports, etc.), organisational changes within the Accounting Chamber, regulatory documents adopted by the Accounting Chamber in 2025, as well as official Ukrainian translations of INTOSAI professional documents (IFPP).

In December 2025, the updated Methodological Guide on ensuring the functioning of the Accounting Chamber's quality management system was approved by Decision of the Accounting Chamber No. 32-4 of 23 December 2025. Under the quality management system established within the Accounting Chamber, all ongoing audits undergo oversight and quality review procedures to ensure compliance with IFPP requirements and internal regulatory documents.

In addition, starting from 2024, the Accounting Chamber introduced annual quality reviews of completed audits ("cold review") conducted in accordance with an approved methodology. In 2024–2025, cold reviews were carried out annually for seven completed audits. In 2025, the practice of annual assessment of the effectiveness of the Accounting Chamber's quality management system was continued, and a report with relevant recommendations for improvement was prepared and approved. In connection with the entry into force on 1 January 2025 of the new version of ISSAI 140 Quality Management for SAs, with the support of international experts under the EU4PFM, development of a new methodological guide on quality management was initiated.

In 2025, 11 financial audits, 17 compliance audits and 5 performance (effectiveness) audits were carried out in accordance with methodologies based on the International Standards of Supreme Audit Institutions (ISSAI 100, 200, 300, 400).

The Accounting Chamber continues to exercise its mandate to conduct financial audits of consolidated financial statements of public sector entities. In 2025, reports on the results of four such audits were approved.

Pursuant to the Roadmap for the introduction of financial audit of consolidated financial statements of public sector entities within the Accounting Chamber (Decision of the Accounting Chamber No. 26-4 of 28 October 2025), a phased increase in coverage of state budget expenditures by such audits is envisaged, from 6% of 2025 expenditures to 100% of expenditures in 2028.

During 2025, committees of the Verkhovna Rada of Ukraine began systematic consideration of the Accounting Chamber's reports in accordance with Law No. 4042-IX: in 2025, 24 Accounting Chamber reports were reviewed at committee meetings (25 meetings in total). At the same time, a survey of committees was conducted regarding their needs in cooperation with the Accounting Chamber (with the support of the Westminster Foundation), and work on recommendations to formalise the mechanism for committees' consideration of reports of the Verkhovna Rada of Ukraine is ongoing (planned implementation – by the end of 2026).

With a view to implementing ISSAI 150 (Auditor Competence) and fulfilling Article 18 of Law No. 4042-IX, in 2025 a package of HR documents was developed and approved: the Human Resources Management Policy, competency profiles for state auditor positions and managerial positions, qualification requirements, a list of required certificates, as well as the procedure for competitive selection and appointment of state auditors. In accordance with the established procedure, internal and open competitions for state auditor positions were held, with hundreds of candidates participating. As at 31 December 2025, contracts were concluded and 295 state auditors were appointed. In addition, the Procedure for professional training of state auditors to ensure their qualifications meet ISSAI 150 requirements (Decision of the Accounting Chamber No. 29-4 of 2 December 2025) as well as the Regulation on onboarding of newly appointed staff of the Accounting Chamber Secretariat (Order of the Secretary of the Accounting Chamber No. 176 of 9 December 2025) and the Procedure for youth internships in the Accounting Chamber Secretariat (Order of the Acting Secretary of the Accounting Chamber No. 128 of 23 September 2025) were approved.

Furthermore, to exchange the EU best practices in the field of external control and audit of public finances and to integrate the Accounting Chamber into the European audit community, throughout 2025 the institution participated as an observer in the activities of the EU inter-institutional grouping – the Contact Committee of the Supreme Audit Institutions of the EU Member States – and took part in events of the Network of Supreme Audit Institutions of EU candidate and potential candidate countries.

## HUMANITARIAN POLICY

On 1–2 February 2025, the first international conference “Cooperation for Resilience” took place in Uzhhorod, with the participation of 28 delegations from partner countries, as well as representatives of the European Commission and UNESCO.

Following the conference, the Declaration on strengthening the resilience of the cultural sector in Ukraine was adopted. The document provides for several areas of coordinated efforts by Ukraine and international partners to preserve and protect cultural heritage and to rebuild cultural infrastructure. In particular, it refers to: the establishment of the Ukrainian Heritage Fund; the establishment of a Cultural Recovery Platform; the establishment of a coalition to counter the illicit trafficking of Ukraine’s cultural property in the spirit of the 1970 UNESCO Convention; and support for the practice of sanctions for crimes against culture.

On 28 March 2025, the Cabinet of Ministers of Ukraine approved the strategy for culture development until 2030. Together with the Strategy, an operational plan for its implementation for 2025–2027 was approved.

This is the first strategic document in several years setting out the state’s vision of the current strategic framework for the development of the cultural sector. Approval of the Strategy by the end of March 2025 was one of the requirements of the Ukraine Facility.

The operational plan for 2025–2027 details the tasks, indicators and implementation instruments of the Strategy. In particular, it provides for the following: modernisation of cultural infrastructure, including in communities; strengthening of the capacity of cultural institutions and governance structures; development of cultural and creative industries; digital transformation of the cultural sector; support for cultural education and professional development; promotion of Ukrainian culture abroad; protection and restoration of cultural heritage; and inclusion and accessibility of cultural services for all population groups.

Ukrainian participants, on a par with European ones, may participate in competitive programmes and receive EU grants to implement international cultural initiatives.

Within the framework of the international conference URC2025 (Ukraine Recovery Conference) in Rome in July 2025, which brought together Ukraine’s strategic partners to discuss the recovery of our state, cultural matters took an important place.

As a result of URC2025 and bilateral meetings, a number of explicit arrangements were reached and new initiatives were launched in support of Ukrainian culture. In particular, a grant agreement between the Governments of Ukraine and Italy in the amount of EUR 32.5 million was signed to restore six cultural heritage sites in Odesa.

During the Ukraine Recovery Conference in Rome, the establishment of the Cultural Resilience Alliance (CRA) was also officially announced through the signing of the Rome Manifesto.

The first coordination meeting of CRA participants, dedicated to the practical launch of CRA activities, took place on 7 October 2025. The founding members of the CRA were the Italian Republic, the Kingdom of Spain, the Republic of Lithuania, the Republic

of Malta, Romania, the Kingdom of the Netherlands, the Republic of Moldova, UNESCO, and Europa Nostra. During 2025, new members also joined the CRA, including certain EU Member States as well as international and civil society organisations.

Ukraine also participated in UNESCO's World Conference on Cultural Policies and Sustainable Development MONDIACULT 2025, held in Barcelona (Kingdom of Spain), and, despite martial law, as every year, organised a series of events within the European Heritage Days, which took place in Ukraine from 14 September to 10 October 2025.

In 2025, several important informal meetings of EU Member States' ministers of culture took place, with Ukraine also participating.

On 7 April 2025, at the invitation of the Polish Presidency of the Council of the European Union, the Ukrainian delegation took part in the Informal Meeting of EU Culture Ministers in Warsaw. Key topics included protecting and preserving shared cultural heritage from disasters; coordinating assistance to Ukraine in restoring cultural sites and on its path towards EU membership. Discussions also covered recovery financing, combating illicit trafficking in artefacts, strengthening human resources in the cultural sector (including training restorers and specialists in the evacuation of cultural property), and developing effective mechanisms to protect cultural heritage.

The theme of the informal meeting on 3 November 2025, in Copenhagen was "Democratic resilience through culture and media". The issues discussed included countering disinformation, responsible use of artificial intelligence in the media, and preserving Ukraine's cultural identity. The outcome of the informal meeting of ministers in Copenhagen was a declaration on the importance of culture and media as guarantees of European democracies.

Ukraine also joined the Declaration adopted by the ministers of culture and media of the EU, as well as the United Kingdom, Norway and Switzerland.

During the conference in Copenhagen, Ukraine presented the concept of the Ukrainian Cultural Heritage Fund (hereinafter referred to as the "UCHF"). The mission of the UCHF is to mobilise international and national resources to protect, restore and develop Ukrainian cultural heritage and culture as the foundation of identity, democracy and European belonging.

On 30 October 2025, in Brussels, the UCHF was officially registered as an international multi-donor platform designed to support the preservation and restoration of cultural property damaged as a result of Russia's full-scale war against Ukraine.

The first partners of the newly established UCHF were Denmark, the Netherlands, Poland and the United Kingdom. In particular, the Netherlands announced its intention to contribute EUR 1 million to the UCHF; Poland – EUR 500,000; and the United Kingdom – GBP 200,000. In addition, the UCHF will receive DKK 10 million (EUR 1.3 million) from Denmark.

On 10 August 2025, the Law of Ukraine "On Ratification of the Agreement between Ukraine and the European Union Amending the Agreement on Ukraine's Participation in the EU programme 'Creative Europe' (2021–2027)" entered into force. Ukraine's full participation in this Programme opens additional broad opportunities for the development of Ukrainian culture, arts and creative industries.

In October 2025, the EU announced support for four projects in the field of culture and creative industries in Ukraine under the Creative Europe Programme. In total, the EU allocated EUR 7 million for these projects.

In December 2025, at the 20th meeting of the UNESCO Committee for the Protection of Cultural Property in the Event of Armed Conflict, a decision was adopted to add a further 19 Ukrainian sites to the International List of Cultural Property under Enhanced Protection. The total number of such sites from Ukraine reached 46.

The Ukrainian Cultural Foundation provided support for the cultural, linguistic and other needs of Ukraine's indigenous peoples and national minorities (communities), in particular through a dedicated programme supporting projects for representatives of national minorities (communities) and indigenous peoples of Ukraine. Under the relevant competitive programmes, in 2025, 41 projects were financed for a total amount exceeding UAH 52 million.

Despite martial law, support continues to be provided to ensure the stable operation of national public audiovisual media, in particular JSC "National Public Broadcasting Company of Ukraine", which is financed from the state budget. According to the Law of Ukraine "On the State Budget of Ukraine for 2026", UAH 2.472 billion is envisaged for financial support of JSC "NPBCU" in 2026, which is UAH 297 million more than in 2025. It should be noted that Law No. 2849-IX of 13 December 2022 "On Media" became the basis for aligning Ukrainian audiovisual legislation with European requirements, including the provisions of Directive (EU) 2018/1808 on audiovisual media services ("AVMSD").

Reporters Without Borders (RSF) published the Press Freedom Index in 2025, covering 180 countries worldwide. Ukraine ranked 62nd. Protecting freedom of expression and the rights of journalists is a priority for the Government of Ukraine. In particular, the Ministry of Culture ensures implementation of the action plan for the Council of Europe campaign "Journalists Matter" in Ukraine.

Under the Action Plan, a network of 6 Journalists' Solidarity Centres operates under the National Union of Journalists of Ukraine; there are also 13 regional hubs of the Institute of Mass Information "Mediabase", where journalists and other media representatives can use workspaces with internet access; obtain personal protective equipment for work in dangerous areas (body armour, helmets, tactical first aid kits); receive technical assistance (cameras, laptops and other professional equipment for journalists); and receive legal and psychological support.

The Ministry of Culture has begun implementing measures aimed at restoring a pluralistic, transparent and independent media space after the end of martial law. At the same time, a significant part of the Roadmap measures is planned for implementation within a year after the end of martial law, which limits full implementation at this stage. In addition, on 17 December 2025, the President of Ukraine signed Law No. 4212-IX of 14 January 2025 "On Amending Certain Laws of Ukraine Regarding Strengthening Certain Guarantees of the Activities of Media and Journalists and Ensuring Citizens' Right of Access to Information". The Law ensures transparency in the work of state and local authorities, as well as open access for citizens and the media to information on their activities.

As regards bringing Ukrainian legislation into line with the European Media Freedom Act, provisions of the relevant draft law are being developed by the expert group

established at the Committee of the Verkhovna Rada of Ukraine on Humanitarian and Information Policy. Work is also under way to align national legislation with Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (Anti-SLAPP Directive), in terms of improving legislation to protect the media, civic activists, human rights defenders, volunteers and other civil society representatives.

In particular, within the work of a working group established at the Committee of the Verkhovna Rada of Ukraine on Freedom of Speech, a draft Law of Ukraine "On Protection of Public Participation from Manifestly Unfounded Claims or Abusive Court Proceedings" was prepared, together with proposals for amendments to the Civil Procedure Code of Ukraine.

## AGRICULTURE

Ukraine's commitments in Agriculture track are set out in Chapter 17 "Agriculture and Rural Development" of Title V "Economic and Sectoral Cooperation" and Annex XXXVIII to the Association Agreement between the European Union and Ukraine.

In 2025, in pursuance of the Association Agreement and with a view to implementing the EU acquis, on 8 October 2025, the Verkhovna Rada of Ukraine adopted Law No. 4619-IX, which entered into force on 4 November 2025, "On Amending Certain Laws of Ukraine Regarding the Organisational Framework for Providing Support in the Agricultural Sector" (hereinafter referred to as "Law No. 4619-IX"). Law No. 4619-IX was developed to establish the institutions required to adapt Ukraine's agricultural sector to the European Union requirements.

The components of the adaptation process reflected in Law No. 4619-IX include:

- establishment of the Paying Agency. This provides for the creation of an independent and transparent structure responsible for allocating and monitoring the use of financial resources provided under state and international agricultural support programmes, ensuring effective expenditure control and compliance with the EU requirements and national legislation;
- introduction of the Integrated Administration and Control System (IACS), a key element of the governance and control system for financial resources, which should ensure effective administration and control of payments, reduce the risk of financial abuse, and increase transparency and accountability in the use of resources;
- introduction of the Farmer Sustainability Data Network (FSDN), a tool for collecting and analysing data on the sustainability of farms, with a focus on environmental, social and economic aspects of sustainable development;
- establishment of procedures for planning and monitoring state agricultural policy, to ensure coordination of actions at all levels of governance, improve the effectiveness of agricultural policy implementation, and ensure transparent decision-making, enabling Ukraine to meet the EU requirements for efficient and effective use of resources in the agricultural sector.

In pursuance of Law No. 4619-IX, the Cabinet of Ministers of Ukraine appointed the Ukrainian State Fund for Support of Farming Enterprises (hereinafter referred to as the "Ukrderzhfond") as the Paying Agency in the area of state support for agriculture and rural development (Ordinance of the Cabinet of Ministers of Ukraine No. 1526 of 31 December 2025 "On appointing the Paying Agency").

The appointment of Ukrderzhfond as the Paying Agency creates an institutional basis for adapting the domestic agricultural sector to the European Union requirements. This is necessary to introduce instruments of the EU Common Agricultural Policy (CAP) and for further mobilisation of European financial resources.

Within the powers of the Paying Agency defined by the Law of Ukraine "On the Principles of State Agricultural Policy and State Rural Development Policy", the Paying

Agency will perform functions for administering state support for agricultural producers in accordance with the EU requirements.

In addition, in 2025, Ordinance of the Cabinet of Ministers of Ukraine No. 880-p of 20 August 2025 "On amending Ordinance of the Cabinet of Ministers of Ukraine No. 1163 of 15 November 2024" was adopted, approving an updated operational action plan for implementing, in 2025–2027, the Strategy for the Development of Agriculture and Rural Areas in Ukraine until 2030.

Implementation of these measures will contribute to Ukraine's integration into the European agricultural space and to strengthening the country's food security.

Subpoint (g) of Article 404 of Chapter 17 of the Association Agreement provides for an obligation of the Parties to favour innovation through research, sharing information, and promoting extension services to agricultural producers. This provision corresponds to the European Union's approaches to establishing the Agricultural Knowledge and Innovation System (AKIS) as a key instrument for implementing the EU CAP.

In the context of Ukraine's EU accession negotiations, the development and institutionalisation of the AKIS system is considered a component of implementing the EU acquis in agriculture and rural development, in particular as regards strengthening administrative capacity, knowledge transfer, innovation and advisory services.

The legal framework for advisory activity in Ukraine is set out in Law No. 1804-IV of 17 June 2004 "On Agricultural Advisory Activity" and Resolution of the Cabinet of Ministers of Ukraine No. 897 of 3 July 2006 "On approval of regulations on registers of agricultural advisory services as well as agricultural advisers and expert advisers". Under these acts, the authorised central executive authority maintains the Register of Agricultural Advisers and Expert Advisers and the Register of Agricultural Advisory Services.

Throughout 2025, the Ministry of Economy of Ukraine, jointly with the European Union project IPRSA III, worked on developing a state platform for agricultural knowledge and innovation (AKIS) as an instrument for practical implementation of the European AKIS model in Ukraine.

At the same time, the following **ministerial Orders** were adopted:

- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 333 of 27 January 2025 "On approval of requirements for olive oils and establishing rules for verifying compliance with marketing standards and methods (procedures) of laboratory testing of olive oil characteristics", registered with the Ministry of Justice of Ukraine on 12 February 2025 under No. 211/43617;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1910 of 1 July 2025 "On amending Order of the Ministry of Agrarian Policy and Food of Ukraine No. 157 of 13 April 2016", registered with the Ministry of Justice of Ukraine on 23 July 2025 under No. 1107/44513;
- Order of the Ministry of Economy of Ukraine No. 812 of 20 October 2025 "On approval of minimum requirements for mixed fruit in syrup and/or natural fruit juice", registered with the Ministry of Justice of Ukraine on 5 December 2025 under No. 1825/45231;
- Order of the Ministry of Economy of Ukraine No. 3166 of 15 December 2025 "On

amending Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1450 of 31 July 2023”, registered with the Ministry of Justice of Ukraine on 30 December 2025 under No. 1963/45369;

- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 865 of 12 February 2025 “On approval of requirements for developing a draft plan for vineyard arrangement”, registered with the Ministry of Justice of Ukraine on 18 March 2025 under No. 435/43841;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1566 of 1 April 2025 “On defining viticulture zones of Ukraine”, registered with the Ministry of Justice of Ukraine on 9 April 2025 under No. 553/43959;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1705 of 29 April 2025 “On approval of the list of classified grape varieties, including aromatic varieties”, registered with the Ministry of Justice of Ukraine on 13 May 2025 under No. 728/44134;
- Order of the Ministry of Economy of Ukraine No. 814 of 20 October 2025 “On approval of procedures in the area of certification of wines/aromatised wine products with a geographical indication”, registered with the Ministry of Justice of Ukraine on 12 December 2025 under No. 1864/4527;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1434 of 11 March 2025 “On amending the Regulation on identification and registration of horses and the Instruction on describing horses’ markings and distinguishing features”, registered with the Ministry of Justice of Ukraine on 27 March 2025 under No. 486/43892, which defines the procedure for replacing an electronic identifier in horses;
- Order of the Ministry of Agrarian Policy and Food of Ukraine No. 1535 of 27 March 2025 “On approval of Guidelines in the field of seed production on maintaining varietal and sowing qualities of fodder crop seeds”, registered with the Ministry of Justice of Ukraine on 18 April 2025 under No. 599/44005, which establishes quality requirements for fodder crop seeds, including requirements for seed plots and the varietal and sowing qualities of seeds produced in Ukraine, in accordance with Council Directive 66/401/EEC of 14 June 1966 on the marketing of fodder plant seed;
- Order of the Ministry of Economy of Ukraine No. 813 of 20 October 2025 “On approval of the Guidelines in the field of seed production on maintaining varietal and sowing qualities of cereal seeds”, registered with the Ministry of Justice of Ukraine on 6 November 2025 under No. 1623/45029 (enters into force in 3 months), which establishes requirements for seed plots and the varietal and sowing qualities of cereal seeds produced in Ukraine, taking into account the requirements set out in Council Directive 66/402/EEC of 14 June 1966 on the marketing of cereal seed and the implementing acts thereto;
- Order of the Ministry of Economy of Ukraine No. 931 of 27 October 2025 “On amending the Guidelines in the field of seed production on maintaining varietal and sowing qualities of seed potatoes”, registered with the Ministry of Justice of Ukraine on 10 November 2025 under No. 1646/45052 (enters into force: for the domestic market — in three years; for import-export operations — from the date

of publication), which brings seed potato quality standards into line with Council Directive 2002/56/EC of 13 June 2002 on the marketing of seed potatoes.

## FISHERIES AND MARITIME POLICIES

Ukraine's commitments in Fisheries and Maritime Policies are set out in Chapter 18 "Fisheries and Maritime Policies" of Title V "Economic and Sector Cooperation" of the Association Agreement between the European Union and Ukraine.

In 2025, in pursuance of Articles 295, 407, 408 and 409 of the Association Agreement, the following legal and normative acts were adopted:

- Law No. 4398-IX of 30 April 2025 "On Ensuring Traceability of Aquatic Biological Resources and/or Products Produced from Aquatic Biological Resources";
- Law No. 4522-IX of 15 July 2025 "On Ukraine's Acceptance of the Agreement for the Establishment of the General Fisheries Commission for the Mediterranean";
- Resolution of the Cabinet of Ministers of Ukraine No. 1109 of 8 September 2025 "On approval of the Procedure for the functioning, filling and maintenance of the Unified State Electronic Management System for the Fisheries Sector 'eFisheries'".

Work also continued to develop a comprehensive draft Law of Ukraine "On Amending Certain Legislative Acts of Ukraine Regarding the Implementation of European Union Legislation in the Fisheries Sector", aimed at implementing provisions of EU regulations, in particular: 1380/2013, 1379/2013, 1224/2009, 2019/473, 1005/2008, 1010/2009, 2017/1004, 2012/1167, 2021/1168 and 708/2007. The draft Law is expected to be adopted by the end of 2026.

In addition, a draft operational action plan for implementing, in 2026–2029, the Strategy for the Development of Ukraine's Fisheries Sector until 2030 was developed and agreed with the relevant authorities, and is planned to be approved by an Ordinance of the Government of Ukraine by the end of Q1 2026.

During the participation of the Ukrainian Party in the 48th Session of the General Fisheries Commission for the Mediterranean (hereinafter referred to as the "GFCM") and the 15th Session of the GFCM Committee on Administration and Finance (4–9 November 2025, Malaga, Kingdom of Spain), Ukraine was officially announced as a Member State of the GFCM as from 11 September 2025.

## CONSUMER PROTECTION

Ukraine's commitments in Consumer Protection are set out in Chapter 20 "Consumer Protection" of Title V "Economic and Sector Cooperation" and Annex XXXIX to the Association Agreement between the European Union and Ukraine.

Throughout 2025, the Ministry of Economy of Ukraine continued work to obtain access to the European rapid alert system for dangerous consumer products (Safety Gate).

Granting Ukraine access to this system will facilitate swift implementation of measures aimed at preventing harm to consumers from dangerous products already placed on the market.

In accordance with the legislation on state market surveillance, state market surveillance is currently carried out to ensure that non-food products comply with the established requirements and that there are no threats to public interests. In addition, in order to ensure compliance with the legislation of Ukraine on market surveillance and product control in relation to non-food products imported into the customs territory of Ukraine, state control is carried out by customs authorities within the customs territory of Ukraine.

At present, 10 state market surveillance authorities have been designated and entrusted with powers to implement state policy in the field of state market surveillance within their respective areas of responsibility.

The State Service of Ukraine on Food Safety and Consumer Protection is responsible for compliance with legislation on the general safety of non-food products.

In view of the above, and in order to provide automated support for state market surveillance and state product control measures and enable prompt exchange of notifications between these bodies, the legislation of Ukraine provides for the establishment and operation of market surveillance information systems (hereinafter referred to as the "MS systems"), which is entrusted to the Ministry of Economy, Environment and Agriculture of Ukraine.

To date, the Ministry of Economy, Environment and Agriculture of Ukraine has ensured all necessary technical and technological work for the full functioning of the systems, in particular:

- out of 10 market surveillance authorities, all the declared users authorised to perform state market surveillance functions have been connected (7 authorities to the production/operational version and 3 to the test/training version);
- conditions are being created for further interoperability of the Unified Automated Information System of the customs authorities of Ukraine (hereinafter referred to as the "UAIS") with the market surveillance systems, which provides for further ongoing interaction with market surveillance authorities and, in the future, integration into the EU rapid alert system for dangerous products, Safety Gate;
- a public website (<https://uvaga.gov.ua/>) has been created and is being maintained and developed to inform, warn and protect consumers and meet their information needs regarding dangerous (non-food) products. For the same purpose, access

has been ensured to information on products presenting a serious risk contained in the European Safety Gate system.

In order to align the national legislation with the EU legislation, in 2025 the **Government adopted**:

- Resolution of the Cabinet of Ministers of Ukraine No. 144 of 11 February 2025 “On approval of the Rules for Trade Services”, the provisions of which correspond, inter alia, to Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and of the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC, as regards food-imitating products that pose a risk to consumers’ health and safety;
- Resolution of the Cabinet of Ministers of Ukraine No. 1030 of 26 August 2025 “On approval of the Procedure for assessing the use of unfair commercial practices by undertakings”, the provisions of which correspond to certain provisions of Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council;
- Resolution of the Cabinet of Ministers of Ukraine No. 1182 of 25 September 2025 “On amending Resolution of the Cabinet of Ministers of Ukraine No. 1200 of 11 November 2009” (enters into force nine months after the date of its publication), the provisions of which correspond to Directive 1999/94/EC of the European Parliament and of the Council of 13 December 1999 relating to the availability of consumer information on fuel economy and CO2 emissions in respect of the marketing of new passenger cars.

During 2025, the following were also **developed**:

- a draft Law of Ukraine “On Out-of-Court Resolution of Consumer Disputes”, which is currently under consideration by the Government. The draft law provides for the implementation of Directive 2013/11/EU of the European Parliament and of the Council of 21 May 2013 on alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC;
- a draft Law of Ukraine “On Amendment to Article 263 of the Civil Code of Ukraine”, which is systematically related to the draft Law of Ukraine “On Out-of-Court Resolution of Consumer Disputes”. The draft law provides for the implementation of Article 12 of Directive 2013/11/EU of the European Parliament and of the Council of 21 May 2013 on alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC;
- a draft Law of Ukraine “On Long-Term Holiday Product Contracts, Timeshare and Related Contracts”, which is undergoing legal review by the Ministry of Justice of Ukraine. The draft law provides for the implementation of Directive 2008/122/EC of the European Parliament and of the Council of 14 January 2009 on the protection of consumers in respect of certain aspects of timeshare, long-term holiday product, resale and exchange contracts;

- a draft Law of Ukraine “On Protection of the Collective Interests of Consumers”, which is being revised taking into account comments from the relevant authorities. The draft law provides for the implementation of Directive (EU) 2020/1828 of the European Parliament and of the Council of 25 November 2020 on representative actions for the protection of the collective interests of consumers and repealing Directive 2009/22/EC.

At the same time, in 2025 an analysis was carried out of:

- Regulation (EU) 2017/2394 of the European Parliament and of the Council of 12 December 2017 on cooperation between national authorities responsible for the enforcement of consumer protection laws and repealing Regulation (EC) No 2006/2004;
- national legislation to identify gaps remaining after transposition of Directive (EU) 2019/770 of the European Parliament and of the Council of 20 May 2019 on certain aspects concerning contracts for the supply of digital content and digital services; Directive (EU) 2019/771 of the European Parliament and of the Council of 20 May 2019 on certain aspects concerning contracts for the sale of goods; Directive 98/6/EC of the European Parliament and of the Council of 16 February 1998 on consumer protection in the indication of the prices of products offered to consumers; Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts; Directive 2005/29/EC of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market; and Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, as well as on further steps to address such gaps.

Based on the analysis, preparation of the relevant draft laws is planned for 2026, with adoption planned by the end of 2027.

## SOCIAL POLICY AND LABOUR RELATIONS

In order to align the national qualifications system, digitalise it and ensure synchronisation of the databases of the education system and the labour market, Law No. 4353-IX of 15 April 2025 was adopted in 2025. The Law provides for the establishment of the Unified Register of Qualifications – Classifier of Occupations, which will operate as an automated system for collecting, verifying, processing and protecting information on professional qualifications and occupations (types of activity). In pursuance of the said Law, the Government approved the procedure for establishment, amendment and maintenance of the Unified Register of Qualifications – Classifier of Occupations (Resolution of the Cabinet of Ministers of Ukraine No. 1387 of 29 October 2025).

In the context of alignment with the European standards for the recognition of professional qualifications and the development of human capital, the Government adopted Ordinance of the Cabinet of Ministers of Ukraine No. 448-p of 9 May 2025, approving an action plan for implementing institutional, analytical and informational measures aimed at creating an adequate basis for introducing the relevant instrument in Ukraine.

In addition, a working group was established to prepare for the implementation of Directive 2005/36/EC on the recognition of professional qualifications and Directive (EU) 2018/958 on a proportionality test before adoption of new regulation of professions (Order of the Ministry of Economy of Ukraine No. 2846 of 10 July 2025).

In 2025, an international treaty between Ukraine and the European Union on Ukraine's participation, as an associated member, in the Employment and Social Innovation (EaSI) Programme of the European Social Fund Plus (ESF+) was signed. Accession to ESF+ provides Ukraine with access to European Union financial resources to support reforms in employment, modernisation of labour legislation, development of employment services and implementation of social innovations. A draft Law of Ukraine on ratification of the said international treaty was registered with the Verkhovna Rada of Ukraine as draft Law No. 0359 of 24 December 2025.

In order to reduce the gender pay gap by creating favourable conditions and developing effective mechanisms to ensure progress in this area, the National Strategy for Closing the Gender Pay Gap until 2030 was developed and approved by the Government, and the operational action plan for its implementation in 2023–2025 was approved (Ordinance of the Cabinet of Ministers of Ukraine No. 815-p of 15 September 2023).

The operational action plan provides for improving legislation on equal pay; creating favourable conditions to overcome stereotypes and discrimination regarding occupations based on sex; and creating favourable conditions for a convenient balance between family and professional responsibilities.

In 2025, work continued on modernising labour legislation in the context of drafting the Labour Code of Ukraine, which implements provisions of a number of relevant EU legal acts, in particular Directive (EU) 2019/1158, Directive (EU) 2019/1152, Directive 2009/104/EC and Council Directive 94/33/EC, as well as the acts listed in Annex XL to the Association Agreement between the European Union and Ukraine. In addition, the draft Labour Code takes into account international labour standards of the International Labour Organization. The draft Labour Code was registered with the Verkhovna Rada of

Ukraine as draft Law No. 14386 of 15 January 2026.

In 2025, the laws were adopted which:

- created favourable conditions for the employment of persons with disabilities (Law of Ukraine No. 4219-IX of 15 January 2025);
- enhanced support for families with children and created conditions for combining parenthood with professional activity, in particular by providing for a comprehensive update of the benefits system – from pregnancy until a child is enrolled in school; the new benefits cover all families with children regardless of social status or place of residence (Law of Ukraine No. 4681-IX of 5 November 2025);
- established the legal, organisational and procedural framework for state policy in the field of mentoring and significantly expanded the range of persons who may receive such support (Law of Ukraine No. 4744-IX of 18 December 2025);
- introduced the Unified Information System of the Social Sphere (hereinafter referred to as the “UISSS”) into full-scale operation, on the basis of which functionality for providing 19 types of state social assistance was implemented (Law of Ukraine No. 4607-IX of 18 September 2025).

In addition, in the area of occupational safety:

- mechanisms for the prevention of occupational diseases related to working conditions were improved, in line with the requirements of Directive 89/391/EEC on medical surveillance of workers (Order of the Ministry of Health of Ukraine No. 1393 of 8 September 2025);
- criteria for permissible exposure to chemical factors affecting workers’ health were updated based on assessment of their toxicity (Order of the Ministry of Health of Ukraine No. 410 of 6 March 2025);
- government acts were approximated to Directive 98/24/EC, and further review of standards for chemical substance content in workplace air was provided for, in accordance with research results of specialised scientific institutions (Order of the Ministry of Health of Ukraine No. 1542 of 9 October 2025).

The **key achievements in the social sphere** in 2025, implemented for the first time, include digitalisation of social services, including the launch of the Ministry of Social Policy’s Social Web Portal of Electronic Services; introduction of basic social assistance; establishment of an automated system for recording humanitarian aid; simplification of adoption procedures so that families can reunite faster; ensuring procurement of high-quality components for prosthetics; and updating the benefits system – from pregnancy until a child is enrolled in school (benefits cover all families with children regardless of social status or place of residence).

In addition, the following were introduced: monthly antenatal support for uninsured pregnant women in connection with temporary incapacity for work in the amount of UAH 7,000; an increase of the one-off childbirth payment to UAH 50,000 (for women who gave birth from 1 January 2026); childcare assistance up to one year of age in the amount of UAH 7,000 per child and UAH 10,500 for families with children with disabilities; and the eYasla childcare benefit for working parents (UAH 8,000 per child

until the child reaches three years of age and UAH 12,000 for families of children with disabilities).

Stable support for older persons was ensured, in particular: UAH 849 billion was financed for pension payments; pensions for over 10 million Ukrainians were indexed by 11.5%; and pension reform was initiated with the aim of ensuring fairness, transparency and financial sustainability of the pension system.

The Government is currently developing a new model for reforming the solidarity pension system, providing for increased pension benefits for particularly vulnerable categories of the population and adherence to the principle that pension levels depend on the amount of insurance contributions paid into the pension system. In addition, the transformation of special pensions into a professional pension provision system is being considered, along with updating approaches to the funded pension provision system, which will be based on voluntary participation.

Despite the ongoing challenges caused by the Russian Federation's full-scale armed aggression against Ukraine, the Government implemented and scaled up a number of services and benefits to support families, in particular: 245 foster (patronage) families were created in 2025; procedures for adoption of orphans and children deprived of parental care were simplified; housing was purchased for 124 family-type children's homes; measures for children's rehabilitation were financed; and implementation of the Baby Box programme continued.

The first steps were taken to introduce the European Child Guarantee in Ukraine (Resolution of the Cabinet of Ministers of Ukraine No. 1558 of 19 November 2025). Existing and planned national, regional and local measures aimed at improving access for children in need to the package of key services covered by the European Child Guarantee were aligned, and efforts were made to ensure that every child in Ukraine at risk of poverty or social exclusion has access to the most basic rights, such as healthcare, education and social services.

In addition, the network of specialists providing early intervention services was expanded: 21 new teams (150 specialists) from 11 regions underwent training.

Targeted support for internally displaced persons (IDPs) was ensured, in particular: subsistence assistance for over 1.1 million IDPs — UAH 30.5 billion; compensation for free accommodation of IDPs under the Prykhystok Project — UAH 552.2 million; a housing rent subsidy for IDPs, which started operating in January 2025. In 2025, payments were assigned under 114 applications; state assistance to cover part of the first instalment and related payments under a mortgage for IDPs (1,013 applications, of which 118 persons received assistance) was introduced; UAH 60.65 million was credited to the escrow account; a subvention to local budgets for construction and reconstruction of temporary accommodation housing was granted in the amount of UAH 535.6 million.

Significant progress was also achieved in supporting persons with disabilities. In particular, in 2025 components for prostheses for defenders were provided; UAH 19.6 billion was allocated for payments to persons with disabilities since childhood and children with disabilities since childhood; 490,000 assistive rehabilitation devices were provided based on individual needs, with funding of UAH 6 billion.

The total number of persons who received rehabilitation services in state rehabilitation institutions under the management of the Ministry of Social Policy was 4,298. There is an online platform on the state free-of-charge prosthetics programme<sup>1</sup>.

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1 <https://protez.msp.gov.ua>

## PUBLIC HEALTH

In 2025, cooperation with international partners in the field of verification of medicinal products was enhanced, including in the context of alignment with the EU acquis. Consultative and information activities were carried out to explore possible models for the functioning of the national medicinal product verification system and its further integration with the EU system. In particular, representatives of the Ministry of Health of Ukraine and its subordinate institutions participated in the following events:

- an informal meeting of European Union health ministers in the format of the Council of the European Union (Employment, Social Policy, Health and Consumer Affairs configuration);
- the 120th meeting of the Heads of Medicines Agencies of the European Union Member States, as well as a special themed meeting “Ukraine and Friends – Together We Are Stronger”;
- the tenth meeting of the EU–Ukraine Association Council – participation of the Minister of Health of Ukraine as part of the Government of Ukraine delegation;
- the fifth meeting of senior officials of the European Union responsible for providing humanitarian aid to Ukraine (January 2025);
- meetings of the Board of the European Health Emergency Preparedness and Response Authority – on multiple occasions, as an observer;
- the 18th European Public Health Conference;
- the 19th Ministerial Conference of the Pompidou Group;
- activities of Council of Europe bodies in the field of pharmaceutical policy and the safety of medical products, in particular:
  - the European Pharmacopoeia Commission;
  - plenary meetings of the Committee of the Parties to the Convention on the Counterfeiting of Medical Products and Similar Crimes;
  - committees of experts on the classification of medicinal products, quality standards and safety of pharmaceutical practice, cosmetic products, and minimisation of public health risks.

In 2025, Ukraine acceded to the Joint Procurement Agreement (JPA) of medical countermeasures, which has been in place in the EU since 2014 and currently brings together 38 countries, including both EU Member States and candidate countries. This mechanism enables participating countries to pool their needs for the procurement of medicinal products, vaccines and other medical countermeasures in order to obtain them on favourable terms, more quickly and in stable volumes – particularly during crises such as pandemics. The Agreement was ratified by Law of Ukraine No. 4769-IX “On Ratification of the Joint Procurement Agreement of Medical Countermeasures”.

## TRANSPLANTATION SECTOR

In the field of transplantation, legal and normative acts were adopted regarding:

- establishing clear rules and procedures for healthcare institutions, forensic medical examination bureaux and other entities involved in tissue transplantation (Resolution of the Cabinet of Ministers of Ukraine No. 203 of 21 February 2025 “On approval of the procedure and conditions for the procurement, storage, testing, processing and use of anatomical materials intended for tissue transplantation”);
- regulating domino transplantation, in particular in the treatment of hereditary transthyretin amyloidosis (ATTRv) (Resolution of the Cabinet of Ministers of Ukraine No. 1092 of 3 September 2025 “Certain issues of organising domino transplantation”);
- the functioning of the National Transplantation Committee, an advisory collegial body operating on a permanent basis under the central executive authority responsible for shaping and implementing state policy in the field of healthcare, with a view to providing professional consultations, recommendations and assistance in this area, and considering complaints or appeals from healthcare institutions providing medical care using transplantation (Law of Ukraine “On Amending Certain Laws of Ukraine Regarding Improving the Organisation of Provision of Medical Care Using Transplantation and Other Issues in the Field of Healthcare”);
- approval of the Regulation on the National Transplantation Committee, taking into account action plan items under the Ukraine–EU agreement concerning the requirements “a mechanism for processing and implementing recommendations has been developed” and the subsequent fulfilment of “the first report has been prepared” (Order of the Ministry of Health of Ukraine No. 1368 of 1 September 2025).

## HUMAN BLOOD SYSTEM AND HUMAN TISSUES AND CELLS

Reform of the sector is being carried out in accordance with Law of Ukraine No. 931-IX of 30 September 2020 “On Safety and Quality of Donor Blood and Blood Components”, which is based on EU directives on quality/safety, traceability and haemovigilance for blood, as well as for human tissues and cells (Directives 2002/98/EC, 2004/23/EC, 2005/61/EC and 2005/62/EC).

For the purpose of implementing EU law in this area, the following measures were taken:

- a methodology for calculating the cost of blood and plasma for fractionation was introduced, creating a transparent financing mechanism for the blood system (Resolution of the Cabinet of Ministers of Ukraine No. 254 of 7 March 2025);
- the functions of the competent authority in the field of the blood system were regulated: safety, quality, traceability, documentation and haemovigilance (Resolution of the Cabinet of Ministers of Ukraine No. 867 of 15 July 2025);
- licensing conditions for blood system entities (institutions/facilities engaged in the collection, testing, processing, storage, distribution and supply of donor blood and blood components) were improved, including requirements for the quality system/organisational standards for blood establishments (Resolution of

the Cabinet of Ministers of Ukraine No. 1485 of 19 November 2025);

- licensing conditions for cord blood banks and other human tissues and cells were improved in accordance with legislation (Resolution of the Cabinet of Ministers of Ukraine No. 1486 of 19 November 2025).

## PHARMACEUTICAL SECTOR

Particular attention was paid to implementing the provisions of Directive 2001/83/EC. In May 2025, Law No. 4454-IX "On Amending Certain Laws of Ukraine Regarding the Implementation of the Bolar Provisions" was adopted, and the Guidelines on Good Distribution Practice of Medicinal Products were updated.

The procedure for maintaining state registers in the field of medicinal products (medicinal products; medicinal products imported into the territory of Ukraine in parallel; medicinal products placed on the market and imported into the territory of Ukraine) was regulated (Resolution of the Cabinet of Ministers of Ukraine No. 901 of 16 July 2025 "Certain issues of maintaining and functioning of state registers in the field of medicinal products").

With a view to implementing the provisions of Law No. 2469 of 28 July 2022 "On Medicinal Products":

- issues relating to the import of medicinal products were regulated (Resolution of the Cabinet of Ministers of Ukraine No. 287 of 14 March 2025 "On approval of the Procedure for importing medicinal products into the territory of Ukraine") and to the parallel import of medicinal products (Order of the Ministry of Health of Ukraine No. 277 of 17 February 2025 "Certain issues of implementation of Law of Ukraine No. 3860-IX of 16 July 2024 'On Amending Certain Laws of Ukraine Regarding Parallel Import of Medicinal Products'");
- criteria for determining categories of supply of medicinal products were approved, in order to consolidate international approaches to determining categories of supply of medicinal products (Order of the Ministry of Health of Ukraine No. 1 of 1 January 2025, which approved the criteria for determining categories of supply of medicinal products were approved, in order to consolidate international approaches to determining categories of supply of medicinal products);
- modern sanitary and hygienic rules for pharmacy institutions were introduced (Order of the Ministry of Health of Ukraine No. 1099 of 10 July 2025).

## PUBLIC HEALTH

With a view to ensuring implementation of the Association Agreement between the European Union and Ukraine in the field of public health, the Cabinet of Ministers of Ukraine approved the Drug Policy Strategy until 2030 and the operational action plan for its implementation for 2025–2027 (Ordinance of the Cabinet of Ministers of Ukraine No. 920-p of 20 August 2025 "On approval of the Drug Policy Strategy until 2030 and approval of the operational action plan for its implementation in 2025–2027").

In the area of countering serious cross-border threats to health, the following were

approved/updated:

- the procedure for conducting health risk assessment and ensuring sanitary and epidemiological wellbeing of the population and for carrying out preventive, advisory and other measures (Order of the Ministry of Health of Ukraine No. 1373 of 1 September 2025);
- amendments to the Regulation on the functional sub-system for medical protection of the population within the Unified State Civil Protection System, specifying the tasks, levels, composition of forces and resources, and the procedure for interaction and operation of the sub-system within the Unified State Civil Protection System (Order of the Ministry of Health of Ukraine No. 114 of 17 January 2025);
- amendments to the Regulation on the functional sub-system for ensuring sanitary and epidemiological wellbeing of the population within the Unified State Civil Protection System: planning of the sub-system's activities, the procedure for performing tasks and organising interaction in the field of public health and sanitary and epidemiological wellbeing were improved, including preparedness, prevention, response and consequence management measures in the field of public health emergencies within the Unified State Civil Protection System (Order of the Ministry of Health of Ukraine No. 257 of 13 February 2025);
- the healthcare prevention and preparedness system, including immunoprophylaxis, and the Vaccination Schedule was aligned with European standards, in particular through the introduction of HPV vaccination and full transition to inactivated polio vaccine (Orders of the Ministry of Health of Ukraine No. 1722 of 14 November 2025 and No. 396 of 5 March 2025);
- medical and sanitary measures at the border in line with international standards, through coordination of prevention/preparedness/response measures, including at the border and in relation to cross-border risks (Resolution of the Cabinet of Ministers of Ukraine No. 1020 of 20 August 2025);
- the list of healthcare institutions designated to conduct sentinel epidemiological surveillance of healthcare-associated infections (Order of the Ministry of Health of Ukraine No. 245 of 12 February 2025);
- a systematic approach to risk assessment at strategic (annual) and operational levels for effective planning of public health measures, including relevant preventive, screening, advisory and other measures (Order of the Ministry of Health of Ukraine No. 1373 of 1 September 2025 "On approval of the Procedure for conducting health risk assessment and ensuring sanitary and epidemiological wellbeing of the population and for conducting measures based on the results of such assessment").

In the field of coordination of social security and health insurance, Order of the Ministry of Health of Ukraine No. 1372 of 1 September 2025 was adopted, approving the Roadmap for implementing Regulation (EC) No 883/2004 and Directive 2011/24 on universal health insurance and the introduction of a health insurance card.

## ELECTRONIC HEALTHCARE SYSTEM (EHS)

In the area of the electronic healthcare system, the following were introduced and

approved:

- the procedure for the functioning of the electronic inventory management system for medicinal products and medical devices to ensure transparent accounting of stock, movements and balances (Resolution of the Cabinet of Ministers of Ukraine No. 262 of 7 March 2025);
- updated rules for the functioning of the blood donation information and communication system and its registers (as a component of “eBlood”) (Resolution of the Cabinet of Ministers of Ukraine No. 293 of 14 March 2025);
- the use of electronic signatures in the EHS and mechanisms for automated patient notifications through digital channels (Resolution of the Cabinet of Ministers of Ukraine No. 112 of 31 January 2025);
- the public health information platform for consolidating datasets, identifying data sources, update frequency and data submission requirements (Resolution of the Cabinet of Ministers of Ukraine No. 506 of 2 May 2025);
- rules for processing sensitive (medical) personal data, confidentiality and data security in digital processes, in accordance with Regulation (EU) 2016/679, when assessing a person’s daily functioning through an e-system (Resolution of the Cabinet of Ministers of Ukraine No. 1542 of 27 December 2024);
- provisions on the establishment of electronic registers in the field of mental health and rules for their creation and maintenance: the State Register of Self-Regulatory Organisations and the Register of Service Providers (Resolution of the Cabinet of Ministers of Ukraine No. 1538 of 26 November 2025);
- the procedure for providing mental health services using ICT (remotely), defining the mechanism and conditions for such assistance, interaction modes (synchronous/asynchronous), security requirements, and cases where remote provision is not permitted or where provision of mental health services is terminated (Resolution of the Cabinet of Ministers of Ukraine No. 1604 of 3 December 2025).

## EDUCATION, TRAINING AND YOUTH

### VOCATIONAL EDUCATION

The draft Law of Ukraine “On Vocational Education” is one of the indicators of the Ukraine Facility and was reviewed by experts of the European Commission (DG ENEST).

On 12 September 2025, the new Law of Ukraine “On Vocational Education” entered into force. It is prescribed by the Law that an integral part of a specialist diploma is the diploma supplement, which contains information on the award of a professional qualification (professional qualifications) at the relevant level of the National Qualifications Framework, the list of programme learning outcomes of the relevant educational programme, and the volume (in credits) of the European Credit Transfer and Accumulation System and of the educational components.

Implementation of dual education continues. The total number of learners studying in vocational education institutions under the dual form amounts to approximately 16.6 thousand persons. In the academic year of 2024/2025, 5,104 learners graduated under the dual form of study, of whom 4,037 were employed (79% of the total number of graduates), which demonstrates the effectiveness of cooperation between vocational education institutions and partner enterprises. In the academic year of 2025/2026, 4,873 persons started studying under the dual form in 115 working occupations in 163 vocational education institutions.

Under the auspices of the European Union Erasmus+ Programme, in 2025, 17 Ukrainian vocational education institutions were selected to implement 6 new international projects in the VET field. These projects provide for cooperation with partners from more than 15 EU countries and are aimed at building the capacity of Ukrainian institutions, improving programmes and enhancing the quality of training.

### HIGHER EDUCATION AND ADULT EDUCATION

Throughout 2025, the systematic transformation of higher education continued, aimed at creating a modern, inclusive system integrated into the European Higher Education Area (EHEA). Key reforms covered five areas: updating the governance system, optimising the network of institutions, modernising educational programmes, transforming the quality assurance system and ensuring equal access.

To improve governance effectiveness, key performance indicators (KPIs) for heads of higher education institutions (hereinafter referred to as the “HEIs”) were updated, including the introduction of a mechanism for verifying them through the Unified State Electronic Database on Education. The role of supervisory boards was enhanced, with their powers expanded on a pilot basis in three universities. A large-scale training programme for HEI management teams was launched, covering around 1,000 managers (vice-rectors and deans).

Modernisation of the HEI network is under way, providing for the reorganisation of 10% of institutions, accompanied by investments of US\$ 1.5 million for each reorganised institution. The project involves 9 merged HEIs. Since the beginning of 2025, equipment

worth US\$ 2.2 million has been procured and delivered to HEIs.

In 2025, a pilot project on state grants for higher education was successfully implemented, covering more than 15,500 students (total support amounted to approximately EUR 7.5 million). The list of specialities eligible for academic scholarships was expanded, and targeted grants for vulnerable population groups were introduced. Preparations for the second reading of draft Law No. 10399, which will formalise a new formula-based funding model, are ongoing.

A student-centred approach was ensured through the introduction of individual learning pathways and interdisciplinary programmes (1,997 learners as at 15 November 2025) implemented in 50 HEIs. Work was launched on developing second-generation higher education standards and on the basis of the list of fields of knowledge and specialities aligned with ISCED. The updated Guidelines on developing higher education standards were approved, as well as Descriptions of subject areas of specialities.

In the area of quality assurance, the use of the Unified State Qualification Examination (USQE) and independent assessment technologies for admission to Master's programmes was expanded. Accreditation procedures were updated, in particular for joint programmes and dual degree programmes. Recognition of non-formal learning outcomes was ensured.

Internationalisation of higher education was deepened: 35 Ukrainian universities joined European Universities Alliances as associated partners, and over 80 partnerships operate within the Twinning initiative. A modernised electronic admissions system for foreign students was introduced. To strengthen national resilience, basic military training was integrated into educational programmes.

By Ordinance of the Cabinet of Ministers of Ukraine No. 1406-p of 10 December 2025, an action plan for preparing for associated participation in the European Union Erasmus+ Programme was approved. The Plan includes institutional, analytical and informational measures aimed at ensuring a systemic basis for joining the Erasmus+ Programme as an associated country, taking into account the requirements of Regulation (EU) 2021/817.

In accordance with the Strategy of the National Agency for Higher Education Quality Assurance (hereinafter referred to as the "NAQA") until 2026, approved on 25 June 2024, which provides for NAQA obtaining membership in ENQA and EQAR, modernising the accreditation system, establishing independent bodies for assessing education quality and promoting innovation in HEIs through integration of research, education and business, since December 2025 NAQA has been undergoing evaluation by ENQA for membership, as well as by EQAR.

Important steps were taken in the process of referencing the National Qualifications Framework (NQF) to the European Qualifications Framework for Lifelong Learning (EQF). The draft referencing report was updated taking into account the new Law "On Vocational Education" and, in November 2025, was submitted for review by international experts (Poland, Latvia and the ETF).

A draft Resolution of the Cabinet of Ministers of Ukraine "On amending Resolutions of the Cabinet of Ministers of Ukraine No. 261 of 23 March 2016 and No. 44 of 12 January 2022" was prepared. The draft envisages amendments to the Procedure for training higher education applicants for the degree of Doctor of Philosophy and Doctor of

Sciences in higher education institutions (research institutions) and to the Procedure for awarding the degree of Doctor of Philosophy and cancelling the decision of a one-time specialised academic council of an HEI or research institution to award the degree of Doctor of Philosophy.

## SPORT

Within the framework of the official screening of the compliance of the Ukrainian legislation with the EU acquis under negotiating Chapter 26 “Education and Culture” (youth policy and sport), the current state of development and implementation of youth and sport policies, the level of their alignment with the European approaches, as well as challenges and achievements under the conditions of the full-scale war, were presented.

Law of Ukraine No. 4370-IX of 17 April 2025 “On Amending the Law of Ukraine ‘On Physical Culture and Sport’ Regarding Adaptive Sport” was adopted. It defines the concept of “adaptive sport” and singles it out as a separate area of physical culture, establishes conditions for the development of adaptive sport, and sets out the role of sports federations in promoting adaptive sport. As at the end of 2025, 200 adaptive clubs operate in 20 oblasts and the city of Kyiv, and almost 50 national sports federations have incorporated an adaptive sport component into their competition rules.

Implementation of the Law of Ukraine “On Anti-Doping Activities in Sport” is under way in order to ensure full compliance with international regulations.

The National Compliance Platform continued its important work on implementing UNESCO’s International Convention against Doping in Sport, ensuring a coordinated national anti-doping response. Ukraine successfully passed the national assessment, demonstrating a high level of compliance with the UNESCO Convention (93.3%).

In 2025, the National Platform of Sports Integrity established pursuant to the Council of Europe Convention on the Manipulation of Sports Competitions delivered more than 30 educational events involving more than 1,000 representatives of the sports movement, aimed at raising awareness of combating manipulation of sports competitions.

The official website of the National Platform for Sports Integrity ([www.fairsport.gov.ua](http://www.fairsport.gov.ua)) enables reporting cases of manipulation of sports competitions.

To strengthen liability for unlawful influence on the results of official sports competitions, the National Platform of Sports Integrity initiated the development of the draft Law of Ukraine “On Amending the Criminal Code of Ukraine” (draft Law No. 11339 of 14 June 2024), which has been prepared for second reading in the Verkhovna Rada of Ukraine.

Within the European Week of Sport, the Ministry of Youth and Sports of Ukraine, the National Olympic Committee of Ukraine, the Agency for School, Student and Mass Sport of Ukraine, and 67 sports federations organised 72 large-scale physical activity and mass sport events in the city of Kyiv and 19 oblasts of Ukraine, with more than 58,000 participants.

Under the Erasmus+ programme, in 2025 the European Commission selected 4 new capacity-building projects in the field of sport involving 7 Ukrainian organisations as coordinators and project partners.

## YOUTH POLICY

In 2025, the Concept of the State Target Social Programme “Youth of Ukraine: A Generation of Resilience 2030” was approved (Ordinance of the Cabinet of Ministers of Ukraine No. 840-p of 11 August 2025).

The State Targeted Social Programme “Youth of Ukraine: A Generation of Resilience 2030” was developed and approved (Resolution of the Cabinet of Ministers of Ukraine No. 20 of 2 January 2026).

To support the implementation of socially important youth initiatives, annual grants of the President of Ukraine were introduced for young people from territorial communities with a population of up to 5,000 residents (Decree of the President of Ukraine No. 784/2025 of 14 October 2025 “On grants of the President of Ukraine for youth from small territorial communities”).

While preparing to implement the European Union initiative called Youth Guarantee in Ukraine, the interagency working group developed a mechanism for its implementation in Ukraine. Together with the European Commission, the European Training Foundation (ETF) organised five webinars for members of the interagency working group and other stakeholders, with more than 150 participants, as well as two study visits to EU Member States (the Italian Republic and the Republic of Poland) to gain practical experience of implementing the Youth Guarantee initiative in the EU countries and to adapt effective mechanisms to the Ukrainian context.

Under the Erasmus+ programme, in 2025, the European Commission supported 8 capacity-building projects in the youth field involving 12 Ukrainian civil society organisations acting as coordinators and project partners.

## FINANCIAL COOPERATION AND COMBATING FRAUD

In 2025, the State Audit Service of Ukraine ensured performance of the functions of the Anti-Fraud Coordination Service in pursuance of Title VI of the Association Agreement between the European Union and Ukraine and its annexes, as well as the requirements of Articles 8 and 9 of the Framework Agreement between Ukraine and the European Union on special mechanisms for implementing Union funding for Ukraine through the Ukraine Facility instrument.

Pursuant to Article 8(2) of the Framework Agreement between Ukraine and the European Union on special mechanisms for implementing Union funding for Ukraine through the Ukraine Facility instrument, and the provisions of Resolution of the Cabinet of Ministers of Ukraine No. 1110 of 25 October 2017 "On introducing the national coordination mechanism for interaction of public authorities for the purpose of protecting the financial interests of Ukraine and the European Union", the Guideline on the by the Anti-Fraud Coordination Service processing information containing indications of irregularities and unlawful use in Ukraine of EU resources that may harm the EU's financial interests was approved by Order of the State Audit Service of Ukraine No. 15 of 16 January 2025. This Guideline No. 15 defines the procedure for the Anti-Fraud Coordination Service (hereinafter referred to as the "AFCOS") to process irregularity alerts.

As at 31 December 2025, AFCOS had processed 611 irregularity alerts based on the results of state financial control measures relating to expenditures connected with implementation of the Ukraine Plan under the Ukraine Facility instrument. In total, AFCOS sent 28 irregularity (breach) alerts to the European Anti-Fraud Office (hereinafter referred to as "OLAF").

In July 2025, AFCOS responsible officials received access to and were connected to the Irregularity Management System (hereinafter referred to as the "IMS"). Training on using the system's functionality was delivered, enabling a subsequent transition to submitting notifications to OLAF directly via IMS.

From October 2025, in accordance with OLAF guidelines, AFCOS began transmitting irregularity alerts through IMS.

At the same time, AFCOS promptly informs OLAF in cases where reliable information is obtained on fraud, corruption or any other unlawful activity that may harm the financial interests of the European Union, including by transmitting relevant information provided by the competent authorities of Ukraine. Working-level interaction between OLAF and AFCOS representatives also takes place to exchange information in response to OLAF requests.

In September 2025, AFCOS held an introductory meeting with cooperation stakeholders, during which participants were familiarised with Ukraine's obligations under Ukraine's international agreements in the field of protection of the EU's financial interests, the general principles of OLAF's activities, the current state of affairs, and further steps to ensure the coordinated functioning of the AFCOS network in the field of protection of the EU's financial interests in Ukraine.

In May 2025, a meeting of the Interagency Coordination Council on Countering Irregularities Affecting the Financial Interests of Ukraine and the EU was held under the

chairmanship of the Head of the State Audit Service of Ukraine.

The meeting was also attended by Deputy Director-General of OLAF Ms Salla Saastamoinen, who emphasised the importance of effective cooperation in protecting the EU's financial interests and noted Ukraine's positive progress in this area.

Among other matters, the draft National Anti-Fraud Strategy for the protection of the EU's financial interests was presented at the meeting.

In order to improve the mechanism for protecting the financial interests of the European Union, in particular as regards combating fraud, corruption and any other unlawful activity that negatively affects the financial interests of Ukraine and the European Union, in 2025 the following were adopted:

1) Resolution of the Cabinet of Ministers of Ukraine No. 1483 of 19 November 2025 "On approval of the Procedure for conducting state financial audit by the State Audit Service of Ukraine and its interregional territorial bodies within the framework of Ukraine's international treaties", which supports effective state financial audit in the context of implementing the Framework Agreement between Ukraine and the European Union on special mechanisms for implementing Union funding for Ukraine through the Ukraine Facility instrument and other international treaties of Ukraine;

2) Resolution of the Cabinet of Ministers of Ukraine No. 1473 of 13 November 2025 "On amending certain Resolutions of the Cabinet of Ministers of Ukraine regarding the activities of state financial control bodies", introducing amendments that clarify the procedure for state financial control bodies to conduct inspections upon a law enforcement request and support proper documentation and prevention of fraud, corruption and any other unlawful activity affecting the financial interests of the European Union.

The State Audit Service of Ukraine continues work to improve the mechanism for protecting the financial interests of the European Union in Ukraine, in particular:

1) the following draft Laws of Ukraine were developed: "On Amendment to the Budget Code of Ukraine Regarding Improving Certain Provisions for the Purpose of Protecting the Financial Interests of the European Union in Ukraine"; "On Amending the Tax Code of Ukraine Regarding Improving Certain Provisions for the Purpose of Protecting the Financial Interests of the European Union in Ukraine"; "On Amending the Customs Code of Ukraine Regarding Improving Certain Provisions for the Purpose of Protecting the Financial Interests of the European Union in Ukraine"; and "On Amending Certain Legislative Acts of Ukraine Regarding the Functioning of the National System of Interaction of Public Authorities of Ukraine for the Purpose of Protecting the Financial Interests of the European Union in Ukraine";

2) the draft Ordinance of the Cabinet of Ministers of Ukraine "On approval of the National Strategy on Countering Fraud and Other Irregularities for the Protection of the Financial Interests of Ukraine and the European Union and approval of an action plan for its implementation until 2028", which was presented on 14 May 2025 at the meeting of the Interagency Coordination Council (AFCOS Council), was developed. The draft National Strategy is aimed at developing a national system for preventing, detecting, investigating, addressing and reporting fraud, corruption, conflicts of interest, double funding and other irregularities affecting the financial interests of the EU and Ukraine.

At the same time, under seven financing agreements for the INTERREG and INTERREG NEXT programmes for the 2021–2027 programming period, the State Audit Service of Ukraine is designated as the National Controller and acts in accordance with the

principles of sound financial management. In exercising its powers, the State Audit Service of Ukraine takes effective measures aimed at preventing and countering fraud, corruption and other unlawful activity, including by providing mutual administrative assistance and ensuring legal support to project partners under the INTERREG and INTERREG NEXT programmes during management verifications.

In order to increase compliance with INTERREG and INTERREG NEXT programme requirements and prevent irregularities, in 2025 the State Audit Service of Ukraine delivered a series of trainings for INTERREG and INTERREG NEXT project partners on the specifics of preparing and submitting reporting. In addition, the programme managing authorities and experts of the TESIM project organised online and offline trainings for State Audit Service of Ukraine controllers on key aspects of programme implementation.

In 2025, State Audit Service of Ukraine controllers validated expenditures totalling EUR 9,316,196.38; verifications covered funds totalling EUR 9,384,005.75, of which EUR 73,311.52 were not validated. The total number of completed checklists and generated control certificates was 463.

In order to align the national legislation with the provisions set out in Annex XLIV to the Association Agreement between the European Union and Ukraine and to implement Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law (hereinafter referred to as "Directive (EU) 2017/1371"), the Bureau of Economic Security of Ukraine (hereinafter referred to as the "BES") developed draft Laws of Ukraine "On Amending the Criminal Code of Ukraine Regarding Liability for Unlawful Actions Involving Funds or Assets of European Union Budgets" and "On Amending the Criminal Procedure Code of Ukraine Regarding Liability for Unlawful Actions Involving Funds or Assets of European Union Budgets" (hereinafter referred to as the "draft laws").

In 2025, consultations with the EU Party continued regarding the compliance of the draft laws with EU legislation.

As a continuation of work on legislative changes, on 30 July 2025, a joint meeting of the BES, OLAF and DG JUST was held with the participation of the Mission of Ukraine to the EU and the Government Office for Coordination of European and Euro-Atlantic Integration of the Secretariat of the Cabinet of Ministers of Ukraine.

On 3 September 2025, OLAF informed the BES of its decision to provide the European Commission's official assessment of the draft Law "On Amending the Criminal Code of Ukraine Regarding Liability for Unlawful Actions Involving Funds or Assets of European Union Budgets", as well as an assessment of the implementation of Directive (EU) 2017/1371 in Ukrainian legislation based on a comprehensive review of the compliance of Ukrainian legislation with that Directive and OLAF Regulation (EU) No 883/2013 of 11 September 2013, which was planned to start at the end of 2025, in particular after, and taking into account, the adoption of legislative amendments aimed at protecting the EU's financial interests by means of criminal law.

In view of the above position of the EU Party and taking into account changes in the Government, in August 2025, interagency coordination of the developed draft laws was launched in accordance with the Rules of Procedure of the Cabinet of Ministers of Ukraine with the relevant authorities.

At present, the BES is taking steps to revise the draft laws taking into account comments and proposals received through the coordination procedures.

## DEEP AND COMPREHENSIVE FREE TRADE AREA

The European Union remains Ukraine's key trading partner: in January–September 2025, it accounted for over 50.2% of Ukraine's total trade in goods. Following the start of the Russian Federation's full-scale aggression, the EU market became Ukraine's main trade destination.

In 2024, trade in goods between Ukraine and the EU reached USD 60.5 billion, which is more than twice the 2016 level. The EU's share in Ukraine's trade in goods increased from 39.2% in 2016 to 53.8% in 2024. Ukraine ranked 16th among the EU's trading partners, with a further upward trend.

Exports of Ukrainian goods to the EU amounted to USD 24.8 billion in 2024 and USD 17.0 billion in January–September 2025. Imports from the EU increased to USD 35.7 billion in 2024 and USD 28.0 billion in January–September 2025.

Ukraine's export base continues to expand: in January–October 2025, 428 Ukrainian enterprises gained access to the EU market. During this period, 151,599 EUR.1 certificates were issued, and in total – since the EU–Ukraine DCFTA entered into force – over 1.4 million. The number of authorised exporters increased to 361 companies.

On 14 October 2025, the EU–Ukraine Association Committee in Trade Configuration adopted Decision No. 3/2025 on the reduction and abolition of import duties, which entered into force on 29 October 2025. This created conditions for maintaining the trade advantages achieved under the EU's autonomous trade measures, with a focus on products with higher added value.

Further trade liberalisation is envisaged to be considered in 2028, which may serve as a basis for further removal of trade barriers between Ukraine and the EU.

In addition, throughout 2025, the Ukrainian Party made significant progress in implementing key measures of the Priority Action Plan for the Implementation of the EU–Ukraine Deep and Comprehensive Free Trade Area (DCFTA) for 2025–2026:

- from 1 January 2026, Ukraine will be integrated into the EU roaming area;
- joint efforts by the Ukrainian and EU Parties ensured uninterrupted movement of freight between Ukraine and the EU (the Road Transport Agreement was extended until 31 March 2027);
- the European Union adopted a landmark decision recognising the equivalence of Ukraine's seed inspection and certification system;
- progress was achieved towards launching negotiations on the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA);
- progress was noted in aligning the national legislation with the EU energy acquis.



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