

Updated civil society proposals for amendments to the Ukraine Plan

Letter to the Directorate-General for Enlargement and the Eastern Neighbourhood, with Annex 1

To: **Ms Elena Višnar Malinovská**
Head of Unit, Reconstruction and Accession, Ukraine Service
Directorate-General for Enlargement and the Eastern Neighbourhood

12 October 2026

Subject: **Updated civil society proposals for the next amendments to the Ukraine Plan**

Dear Ms Višnar Malinovská,

We appreciate the EU's continued commitment to supporting Ukraine and welcome the [Council's approval on 30 July 2026](#) of the amendments to the [Ukraine Plan](#) that the Ukrainian government adopted in June 2026, which opened the way to an additional EUR 8.3 billion for Ukraine in 2026 through the Ukraine Support Loan.

On 4 March 2026, we wrote to you with 34 proposals for amendments to the Ukraine Plan, based on the [Roadmap for the Sustainable Recovery of Ukraine](#). The same proposals were submitted to the Ministry of Economy, Environment and Agriculture of Ukraine. The Verkhovna Rada Committee on Ukraine's Integration into the European Union asked the Cabinet of Ministers to take them into account when initiating changes to the steps of the Plan.

We have since compared the amended [Annex](#) to [Council Implementing Decision \(EU\) 2024/1447](#) with the original Plan. The July revision was shaped primarily by the conditionality of the Ukraine Support Loan Regulation and concentrated on the rule of law and anti-corruption. Two of our proposals are reflected in the adopted text: the amendments to the Procedure for State Water Monitoring and the new step extending Regulation (EC) No 1370/2007 to socially important rail passenger transport services. Of all the steps added in the revision, only one concerned the environment. Yet the [Ukraine Facility Regulation](#) requires that at least 20% of investments under the Ukraine Plan and support under the Ukraine Investment Framework contribute to climate and environmental objectives and that measures be compatible, to the extent possible, with the 'do no significant harm' principle.

Annex 1 to this letter now contains 47 proposals, reorganised by chapter of the Ukraine Plan. Each proposal is also mapped to the relevant negotiating chapter or cluster of the EU *acquis* and can therefore be read both as a measure of the Ukraine Plan and as a contribution to the preparation of Ukraine's negotiating

position in the corresponding chapter. The list is long because each proposal relates to a reform already in the Plan, either by changing an existing step or adding a new one, rather than making a general recommendation.

Article 4(6) of the [Ukraine Facility Regulation](#) provides for the involvement of civil society in the design and implementation of the Facility, and the Regulation requires the European Commission, when assessing amendments to the Ukraine Plan, to consider whether stakeholders' input has been taken into account. We kindly request that these proposals be considered for inclusion in the next round of amendments, and we would be grateful for your feedback on that possibility.

These proposals are being shared in parallel with the Ministry of Economy and Environment of Ukraine and the Verkhovna Rada Committee on Ukraine's Integration into the European Union.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'V. Martsynkevych', with a stylized flourish at the end.

Vladlena Martsynkevych – Ukraine Reconstruction Project Leader, CEE Bankwatch Network

For more information, contact vladlena@bankwatch.org.

Supported by Ecoaction – Center for Environmental Initiatives, WWF-Ukraine, Transport & Environment, Ecoclub, Razom We Stand, Zero Waste Alliance Ukraine, Eurogroup for Animals, Ro3kvit, and Ecosmart.

Annex 1. Civil society proposals for the next amendments to the Ukraine Plan based on the [Roadmap for the Sustainable Recovery of Ukraine](#)

#	Chapter of Ukraine Plan	Chapters of the EU <i>acquis</i>	Reform	Step	Agency responsible for implementation	Outcome
1	Chapter 2: Public financial management	Chapter 22: Regional policy and coordination of structural instruments	Reform 4: Improved public investment management	Development of a roadmap for implementing the ‘do no significant harm’ principle in Ukraine	Ministry of Finance of Ukraine (drafting and coordination), Ministry of Economy and Environment of Ukraine	Publication of a detailed action plan informed by inclusive public participation that leads to implementation of the ‘do no significant harm’ principle in Ukraine
2	Chapter 4: Fight against corruption and money laundering	Chapter 23: Judiciary and fundamental rights	Reform 1: Developing the institutional capacity of the anti-corruption framework	Strengthening the capacity of anti-corruption agencies	National Anti-Corruption Bureau, Specialised Anti-Corruption Prosecutor’s Office, National Agency on Corruption Prevention, Specialised Environmental Prosecutor’s Office	Establishment of new departments within anti-corruption agencies dedicated to combating corruption in natural resource management, in alignment with Regulation (EC) No 1221/2009 (Eco-Management and Audit Scheme Regulation), including for state-owned enterprises
3	Chapter 7: Human capital	Chapter 19: Social policy and employment	Reform 7: Ensuring access to housing for people in need	Establishing a framework for converting unused buildings into inclusive, energy-efficient social housing	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	Adoption of a financial and legal framework to repurpose existing unused buildings into social housing that meets high standards of energy efficiency and accessibility, including the conversion of non-residential premises into residential premises
4	Chapter 8: Business environment	Chapter 20: Enterprise and industrial policy	Reform 1: Improved regulatory environment	Development of a national industrial strategy	Ministry of Economy and Environment of Ukraine	Adoption of a national industrial strategy with a focus on technological modernisation, green transformation, high added value, and institutional capacity for strategy implementation
5	Chapter 9: Decentralisation and regional policy	Cluster 1: Fundamentals – public administration reform	Reform 1: Advancing decentralisation	Entry into force of legislation to ensure a better distribution of responsibilities between local governments and executive authorities. The following changes are proposed: ‘Develop a legislative framework (draft laws) providing for appropriate amendments to the Constitution to ensure a better distribution of powers between local governments and executive authorities.’	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, supported by the Ministry of Education and Science of Ukraine, the Ministry of Health of Ukraine, the Ministry of Culture of Ukraine, the Ministry of Social Policy, Family and Unity of Ukraine, the Ministry of Youth and Sports of Ukraine, the Ministry of Finance of Ukraine, and other relevant authorities	Legislative amendments lead to a better distribution of responsibilities between local governments and executive authorities based on the principles of subsidiarity and decentralisation, help eliminate conflicts of competence between different tiers of government (central, regional, district, and local) and across local self-government, and improve the quality of local public services and the efficient use of budgetary funds
6	Chapter 9: Decentralisation and regional policy	Cluster 1: Fundamentals – public administration reform	Reform 1: Advancing decentralisation (additional step based on the outcome of Step 9.2 of the Ukraine Plan)	Strengthening the autonomy and legal certainty of local self-government by recognising municipalities as legal entities, enabling clearer ownership and	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, Ministry of Justice of Ukraine, Ministry of Finance of Ukraine, Cabinet of Ministers of Ukraine	Phase 1: Approval and publication of a government roadmap setting out the measures needed to grant legal personality to municipalities, together with a drafting mandate for the necessary legislative

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				asset management, contractual capacity, and accountability, and bringing the framework into alignment with EU practice on local self-government (phase 1: roadmap and drafting mandate; phase 2: draft law package)		changes, based on the study ‘Municipality as a Legal Entity under Public Law: Ukraine in the context of European and World Experience’. This involves the: (i) establishment of an interministerial working group, including parliamentary committees and local government associations, and preparation of the draft roadmap; (ii) preparation of a concept note and impact assessment for constitutional and legislative changes; and (iii) public consultations based on the EU’s ‘better regulation’ principles, including with local government stakeholders. Phase 2: A draft law package is developed and submitted to establish the legal basis for granting legal personality to municipalities.
7	Chapter 9: Decentralisation and regional policy	Chapter 22: Regional policy and coordination of structural instruments	Reform 3: Development and implementation of regional policy	Implementation of the EU’s partnership principle	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	Creation of a monitoring committee for implementation of the State Target Program for the Just Transition of Ukraine’s Coal Regions until 2030
8	Chapter 9: Decentralisation and regional policy	Chapter 27: Environment and climate change	Reform 2: Increased involvement of citizens in decision-making at the local level	Develop a public participation policy accompanied by a training programme for moderators and public officials at all levels	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	The Ministry approves a public participation policy setting out neutral and transparent participation processes, the roles of national, regional and local authorities, and how results inform decisions. A training programme equips moderators and officials to manage these processes and engage with local communities.
9	Chapter 10: Energy sector	Chapter 15: Energy	Reform 2: Improved regulatory framework for increasing renewable energy and ensuring stable operation of the energy system (additional step)	Establishment of a legal and regulatory framework for resilient distributed energy systems, including microgrids and island-mode operation	Ministry of Energy of Ukraine, National Energy and Utilities Regulatory Commission of Ukraine, Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, system operators	Adoption of a legal and regulatory framework for resilient distributed energy systems, including microgrids and island-mode operation, with clear rules for connection, operation, protection, dispatch, local energy exchange, and coordination with the distribution system operator; explicit recognition of co-located energy storage and critical-load resilience for hospitals, water, heat, and other essential services

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10	Chapter 10: Energy sector	Chapter 15: Energy	Reform 2: Improved regulatory framework for increasing renewable energy and ensuring stable operation of the energy system (additional step)	Establishment of a framework for grid connection and flexibility for distributed generation and energy storage	National Energy and Utilities Regulatory Commission of Ukraine, Ministry of Energy of Ukraine, Ukrenergo, distribution system operators	Entry into force of rules for transparent connection queues, flexible or non-firm connections where technically feasible, transparent curtailment and redispatch principles, recognition of co-located storage in connection applications, and accelerated connection procedures for priority resilience projects and renewable or distributed generation
11	Chapter 10: Energy sector	Chapter 15: Energy Chapter 27: Environment and climate change	Connected to Reform 1: Integrated National Energy and Climate Plan (decarbonisation and methane dimensions) (additional step)	Reduction of methane emissions in the energy sector	Ministry of Energy of Ukraine, Ministry of Economy and Environment of Ukraine, National Energy and Utilities Regulatory Commission of Ukraine, relevant operators, Energy Community, EU (technical assistance)	Adoption and entry into force of a Ukrainian methane emissions framework aligned with Regulation (EU) 2024/1787 (Methane Regulation) and the Energy Community Decarbonisation Roadmap, covering measurement, monitoring, reporting and verification (MRV), leak detection and repair (LDAR), restrictions on routine venting and flaring, inventories of inactive or abandoned wells, public reporting, and a mitigation plan. The framework also prepares Ukrainian producers and exporters for the EU's methane-intensity requirements and its requirement for MRV equivalent to EU standards.
12	Chapter 10: Energy sector	Chapter 15: Energy	Reform 6: Improved efficiency in the district heating	Establishment of a financial instrument to support the modernisation of heat supply enterprises	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	Creation of the 'Heat Supply Enterprise Modernisation Fund', as part of the implementation readiness plan for Directive (EU) 2023/1791 (Energy Efficiency Directive), comprising: (i) a legal act establishing the Fund; (ii) governance and eligibility rules; and (iii) sources of capitalisation
13	Chapter 10: Energy sector	Chapter 15: Energy	Reform 6: Improved efficiency in the district heating	Development of an implementation action plan for Directive (EU) 2023/1791 (Energy Efficiency Directive)	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	Optimisation of tariff policy through adoption of a plan for the transition to two-tier tariff setting for district heating enterprises, with mandatory application, as part of the implementation readiness plan for Directive (EU) 2023/1791
14	Chapter 10: Energy sector	Chapter 15: Energy	Reform 7: Improved energy efficiency in public buildings and improvement of public procurement procedures	Development of an implementation action plan for Directive (EU) 2024/1275 (Energy Performance of)	Ministry of Reconstruction, Infrastructure and Transport of Ukraine	Preparation and definition of a transition period prior to adoption of Directive (EU) 2024/1275, including preparation for implementation of the EU's zero-emission

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				Buildings Directive), including its zero-emission building standard		building standard and requirements for charging infrastructure installations, including targets for new residential and non-residential buildings covering pre-cabling, pre-ducting, installation of charging infrastructure, and smart charging functionalities. With the growing number of battery electric vehicles (BEVs) in Ukraine, owners are granted a legally guaranteed 'right to plug'.
15	Chapter 10: Energy sector	Chapter 15: Energy	Reform 7: Improved energy efficiency in public buildings and improvement of public procurement procedures	Development of a legislative framework for implementing Directive (EU) 2024/1275 (Energy Performance of Buildings Directive), including its zero-emission building standard	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	Preparation of the legislative framework for implementing rules aimed at reducing carbon emissions throughout the entire life cycle of buildings
16	Chapter 11: Transport	Chapter 14: Transport policy	Reform 1: Comprehensive planning of transport sector	Transposition of Directive (EU) 2022/362 (Eurovignette Directive)	Ministry of Reconstruction, Infrastructure and Transport of Ukraine, State Agency for Infrastructure Restoration and Development of Ukraine	Directive (EU) 2022/362 is transposed into Ukrainian legislation together with the relevant EU <i>acquis</i> . This creates an internal road transport market with equal conditions of competition, strengthens application of the 'user pays' and 'polluter pays' principles, promotes financing of road infrastructure, and supports the decarbonisation objectives of the Ukrainian government under the revised National Transport Strategy until 2030. This culminates in a gradual transition to a distance-based tolling system for heavy-duty vehicles, with toll rates varying according to CO ₂ emission class, in line with the EU-Ukraine Association Agreement.
17	Chapter 11: Transport	Chapter 21: Trans-European networks	Reform 1: Comprehensive planning of transport sector	Development of an implementation action plan for Regulation (EU) 2024/1679 (Trans-European Transport Network Regulation)	Ministry of Reconstruction, Infrastructure and Transport of Ukraine	An action plan is drafted to ensure the smooth integration of Ukrainian road, rail, inland waterway, city node, and other multimodal network elements into the Trans-European Transport Network, with a focus on implementation of Regulation (EU) 2024/1679
18	Chapter 11: Transport	Chapter 14: Transport policy	Reform 1: Comprehensive planning of transport sector	Implementation of Regulation (EU) 2023/1804 (Alternative Fuels Infrastructure Regulation), based	Ministry of Reconstruction, Infrastructure and Transport of Ukraine	Regulation (EU) 2023/1804 is implemented, detailing fleet-based and distance-based BEV charging targets,

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				on the adopted implementation strategy		interoperability requirements, user-friendliness of the charging process, and data reporting and monitoring frameworks
19	Chapter 11: Transport	Chapter 14: Transport policy	Connected to Reform 1: Comprehensive planning of transport sector	Revision of Draft Law No 4583 on Amendments to Certain Laws of Ukraine on Socially Important Services for the Transportation of Passengers by Road and Urban Electric Transport, in line with Regulation (EC) No 1370/2007 (Public Service Obligations Regulation) and associated EU <i>acquis</i> on State aid and procurement for transport. Development of a methodology covering compensation principles, base rates, and the interpretation of reasonable profit for road transport operators.	Ministry of Reconstruction, Infrastructure and Transport of Ukraine	Draft Law No 4583 is revised in line with Regulation (EC) No 1370/2007 and its associated legislation, including Directive 2014/24/EU (Public Procurement Directive) and Directive 2014/25/EU (Utilities Directive). The revision sets out, among other measures, the introduction of key principles and procedures for public service obligations in alignment with EU <i>acquis</i> , including requirements concerning compensation formulas, exclusive rights on routes, and the designation of competent transport authorities.
20	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources	Adoption and implementation of a law on protecting waters against pollution caused by nitrates from agricultural sources, in line with Council Directive 91/676/EEC (Nitrates Directive)	Ministry of Economy and Environment of Ukraine	Development of a legislative framework for implementation of Council Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources
21	Chapter 12: Agri-food sector	Chapter 12: Food safety, veterinary and phytosanitary policy	Reform 1: Aligning the institutional framework on agriculture and rural development with the EU	Development of official animal welfare control systems covering the keeping, transport and slaughter of farm animals	Ministry of Economy and Environment of Ukraine	Adoption and implementation of Regulation (EU) 2017/625 (Official Controls Regulation), including: (i) development of animal welfare training for inspectorates and farmers; (ii) provision of sufficient staff within the competent authority to conduct official animal welfare inspections; (iii) development of harmonised documented procedures, including work instructions, standard operating procedures, and checklists, for official veterinarians and inspectors; (iv) establishment of an accredited training and certification body for operators; and (v) development of multi-annual national control plans (MANCPs)

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22	Chapter 13: Management of critical raw materials	Chapter 20: Enterprise and industrial policy	Reform 1: Strengthening strategic planning and ensuring optimum framework for strategic investors	Development of sustainability, governance, and transparency criteria for identifying and supporting priority strategic and critical raw materials projects	Ministry of Economy and Environment of Ukraine, in coordination with the State Service of Geology and Mineral Resources of Ukraine, and relevant environmental and investment authorities	Transparent criteria and procedures are adopted and published for identifying projects eligible for priority status, accelerated support, or dedicated public investment support in the strategic and critical raw materials sector. The criteria address, as applicable: (i) strategic relevance and contribution to supply security; (ii) economic feasibility; (iii) contribution to processing and value addition in Ukraine; (iv) environmental performance and compliance; (v) responsible management of mining waste and water-related risks; (vi) transparency of ownership and corporate structure; (vii) stakeholder and community engagement; and (viii) consistency with applicable EU sustainability requirements and Regulation (EU) 2024/1252. The government also publishes the projects selected and sufficient information explaining their assessment against the applicable criteria, subject to legitimate security and commercial confidentiality restrictions.
23	Chapter 13: Management of critical raw materials	Chapter 20: Enterprise and industrial policy	Reform 1: Strengthening strategic planning and ensuring optimum framework for strategic investors	Establishment of public reporting on implementation of the Strategy for the Development of Industries Based on Mineral Resources and Components of Strategic and Critical Importance until 2056 and its Operational Plan for 2026–2028	Ministry of Economy and Environment of Ukraine	Publication of a periodic implementation dashboard or progress report on the 2026–2028 Operational Plan of the Strategy for the Development of Industries Based on Mineral Resources and Components of Strategic and Critical Importance until 2056. Reporting reuses information already collected by the Ministry under Cabinet of Ministers Order No 569-r, which approves the Strategy and its Operational Plan, and therefore does not create an additional reporting burden for implementing authorities.
24	Chapter 13: Management of critical raw materials	Chapter 20: Enterprise and industrial policy	Reform 2: Improved administrative procedures or Reform 3: Use of modern extraction technologies and	Establishment of a publicly accessible transparency register for strategic and critical raw materials projects	State Service of Geology and Mineral Resources of Ukraine, in coordination with the Ministry of Economy and Environment of Ukraine, and other competent authorities	Launch of a searchable public digital register providing, where legally available and subject to narrowly defined security restrictions, project-level information on strategic and critical raw materials projects, including: (i) location of the relevant raw materials deposit and project; (ii) licence

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			integration of Ukraine into modern processing value chains			holder and project operator; (iii) beneficial ownership information or links to the relevant public register; (iv) licence and permit statuses; (v) method and date of allocation of subsoil rights; (vi) relevant tender or production-sharing-agreement (PSA) documentation and publicly available contractual terms; (vii) project development status; (viii) environmental impact assessment (EIA) and other relevant environmental documentation; (ix) relevant territorial communities; and (x) information on public consultation and stakeholder engagement processes. The register builds on existing government databases and the online subsoil licensing portal rather than establishing a duplicative information system.
25	Chapter 13: Management of critical raw materials	Chapter 20: Enterprise and industrial policy	Reform 3: Use of modern extraction technologies and integration of Ukraine into modern processing value chains	Establishment of an implementation framework for responsible, transparent, and accountable governance of strategic and critical raw materials projects	Ministry of Economy and Environment of Ukraine, in coordination with the State Service of Geology and Mineral Resources of Ukraine, and other competent authorities	Adoption and publication of a government implementation framework establishing minimum governance requirements applicable to strategic and critical raw materials projects, building on the 2026 Strategy for the Development of Industries Based on Mineral Resources and Components of Strategic and Critical Importance until 2056. The framework establishes requirements for: (i) transparency of licensing and project development; (ii) identification and disclosure of project ownership and beneficial ownership in accordance with applicable legislation; (iii) availability of relevant environmental and social information; (iv) meaningful engagement of stakeholders and territorial communities; (v) disclosure and monitoring of commitments made to affected communities; (vi) public monitoring of implementation; and (vii) consistency with the Extractive Industries Transparency Initiative Standard, EU critical raw materials policy, and applicable environmental and sustainability requirements.

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26	Chapter 13: Management of critical raw materials	Chapter 20: Enterprise and industrial policy	Reform 3: Use of modern extraction technologies and integration of Ukraine into modern processing value chains	Establishment of minimum requirements for participation by territorial communities and transparency regarding the sharing of local benefits from strategic and critical raw materials projects	Ministry of Economy and Environment of Ukraine, in coordination with the Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, the State Service of Geology and Mineral Resources of Ukraine, and relevant local self-government bodies	Adoption and publication of procedures establishing minimum standards for engagement with territorial communities affected by strategic and critical raw materials projects. The procedures include: (i) early provision of accessible project information before key project decisions are taken; (ii) identification of affected territorial communities and relevant stakeholders; (iii) transparent and documented consultation procedures; (iv) publication of consultation outcomes and responses to significant concerns raised; (v) accessible channels for communities to raise project-related grievances; (vi) disclosure of legally established fiscal transfers and other public economic benefits accruing to affected communities from raw materials projects; and (vii) public monitoring of implementation. The measure operationalises, rather than duplicates, the community participation and benefit-sharing objectives set out in the Strategy for the Development of Industries Based on Mineral Resources and Components of Strategic and Critical Importance until 2056.
27	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 1: Prevention, reduction and control of industrial pollution	Adoption of a new law on environmental inspection in accordance with EU standards	Ministry of Economy and Environment of Ukraine	Relaunch of environmental inspections and the national environmental control system in full alignment with EU standards
28	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Connected to Reform 1: Prevention, reduction and control of industrial pollution	Introduction of mandatory automated emissions monitoring systems	Ministry of Economy and Environment of Ukraine	Mandatory installation of continuous emission monitoring systems (CEMS) at emission sources across all regulated categories of enterprises, making monitoring data accessible to the public and regulatory authorities
29	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources	Development and adoption of a law on the Emerald Network	Ministry of Economy and Environment of Ukraine	The legal framework establishing standards for the designation and protection of Emerald Network sites as a precursor to Natura 2000 is enacted

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30	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Connected to Reform 1: Prevention, reduction and control of industrial pollution	Development of an early-adoption co-financing framework for best available techniques (BATs)	Ministry of Economy and Environment of Ukraine	Development and implementation of a co-financing model for the introduction of BATs and management methods, following the example of EU countries, where enterprises that implement BATs ahead of the deadline required by law are eligible for financial support
31	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources (additional step)	Development of a vision for the Emerald Network, including the protection of underground water resources, addressing historical and war-related environmental damage to Ukrainian soil and landscapes	Ministry of Economy and Environment of Ukraine (drafting and coordination), Verkhovna Rada of Ukraine	Approval of a strategic framework for integrated soil, water, air, and ecosystem protection networks, ensuring alignment with EU nature restoration policy
32	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources	Development and implementation of a drought management plan	Ministry of Economy and Environment of Ukraine, State Water Resources Agency of Ukraine	Implementation of a national drought management plan fully integrated into river basin management plans in accordance with Directive 2000/60/EC (Water Framework Directive)
33	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources	Electronic mapping of primeval, near virgin, and natural forests within the State Forest Management GIS	Ministry of Economy and Environment of Ukraine, State Forest Resources Agency of Ukraine	Development of an updated methodology for identifying primeval, near virgin, and natural forests, completion of supporting field inventories, formal designation of identified sites, and integration of corresponding spatial data layers into the State Forest Management GIS
34	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources (additional step)	Establishment of a national legal and governance framework for ecosystem restoration to strengthen biodiversity, climate resilience, and critical ecosystem services (water regulation, flood and drought buffering, pollination, and soil fertility), complementing the Ukraine Plan's broader commitments to nature protection and the transition from the Emerald Network to Natura 2000	Ministry of Economy and Environment of Ukraine (drafting and coordination), Verkhovna Rada of Ukraine	Entry into force of the 'Law of Ukraine on Nature Restoration', aligning Ukraine with Regulation (EU) 2024/1991 (Nature Restoration Law). Key provisions include: (i) legally binding restoration targets and a 'no deterioration' principle for priority habitats and ecosystems; (ii) public authority planning mandates; (iii) rules for identifying and restoring degraded ecosystems, including forests, wetlands, peatlands, grasslands, steppes, rivers, floodplains, and urban green spaces; (iv) rules for monitoring, reporting, open data, and public participation; and (v) integration with Emerald Network sites and the State Cadastre of the Nature Reserve Fund.

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						Adoption of Ukraine's 'Nature Restoration Plan' to operationalise the Law of Ukraine on Nature Restoration, covering: (i) baseline mapping of ecosystem conditions and restoration potential; (ii) criteria for prioritising restoration, including war damage, climate-risk hot spots, and protected area connectivity; (iii) a list of measures and financing sources, including from the state budget, donors, and international financial institutions, and carbon and climate instruments where relevant; and (iv) a national monitoring framework along with annual progress reporting.
35	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources (additional step)	Establishment of an EU-aligned soil health governance system to support sustainable agriculture, food security, pollution prevention, and climate resilience, consistent with the Ukraine Plan's approach to nature, biodiversity, and environmental governance (phase 1: framework law; phase 2: secondary legislation)	Ministry of Economy and Environment of Ukraine (drafting and coordination), Verkhovna Rada of Ukraine	Phase 1: Entry into force of primary legislation – 'Law of Ukraine on Soil Monitoring and Soil Health' – aligning Ukraine with Directive (EU) 2025/2360 (Soil Monitoring Law). Key provisions include: (i) EU-aligned definitions; (ii) a national soil monitoring framework and indicators; (iii) minimum sampling and reporting requirements; (iv) soil contamination risk screening and management triggers; (v) soil data governance, including interoperability with the State Land Cadastre and environmental data systems, and providing open access where security allows; and (vi) designation of a competent authority and coordination mechanism. Phase 2: Adoption of secondary legislation establishing the 'National Soil Monitoring Programme and Soil Information System', including: (i) a monitoring network design based on risk and representative sampling; (ii) laboratory quality assurance and quality control standards and accreditation procedures; (iii) data model and reporting templates; and (iv) a phased plan for the first national baseline soil assessment plan,

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						prioritising war-affected and high-risk areas.
36	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Establishment of a stable local financing mechanism for basic municipal solid waste services in line with the 'polluter pays' principle	Ministry of Economy and Environment of Ukraine, Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, Ministry of Finance of Ukraine (drafting and coordination)	Enactment of a legal framework establishing a local municipal solid waste management tax or mandatory municipal fee based on the 'polluter pays' principle, including: (i) amendments to the Tax Code of Ukraine allowing local self-government bodies to introduce a local municipal solid waste management tax; and (ii) approval of a calculation methodology, for example, based on Poland's existing model
37	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Realignment of economic incentives to ensure waste disposal costs consistently exceed those of prevention, reuse, and recycling, establishing investment certainty for sorting and recycling while reducing dependence on landfill	Ministry of Economy and Environment of Ukraine, Ministry for Communities, Territories and Internally Displaced Persons of Ukraine	Completion of a comprehensive study to determine the appropriate level and trajectory for a revised environmental tax covering landfilling and incineration. The study encompasses: (i) full-cost accounting, including after-care financial guarantees and environmental externality valuations covering climate impacts, pollution, and public health risks; (ii) market assessments of gate fees, price elasticity, and distributional impacts on households, businesses, and municipalities; (iii) EU benchmarking of environmental tax design and approaches to phasing in higher rates; (iv) scenario modelling of phased annual increases and measures to mitigate risks, such as illegal dumping and affordability impacts; and (v) recommendations for the targeted use of revenues, including grants or subsidies for separate collection, reuse and recycling infrastructure, and closure or remediation of non-compliant dumpsites.
38	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Use the findings of the comprehensive study on the level and trajectory of the environmental tax (see Outcome 37) to establish an effective fiscal 'price signal' that encourages reuse and recycling while reducing disposal	Ministry of Economy and Environment of Ukraine, Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, Ministry of Finance of Ukraine (drafting and coordination), Verkhovna Rada of Ukraine	Adoption of legislative amendments establishing or revising environmental tax rates for landfilling and incineration, and introducing a phased increase plan, comprising: (i) new rates and a tax base for disposal operations; (ii) a phased annual trajectory, such as multi-year increases up to 2030; (iii) administration and

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						enforcement provisions; and (iv) a mechanism to channel a portion of the revenues into measures enabling reuse and recycling, including those related to infrastructure, awareness, enforcement, and remediation
39	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Strengthening of institutional capacity to implement the Waste Management Law and the National Waste Management Plan by consolidating core administrative and regulatory functions, including permits, licensing, registers, and data systems, improving transparency and enforcement, and enabling the effective rollout of extended producer responsibility (EPR) and digital tools	Ministry of Economy and Environment of Ukraine (drafting, coordination, and implementation), Cabinet of Ministers of Ukraine (adoption)	Legal establishment of the ‘National Waste Management Agency’ as the central executive body responsible for implementing state waste management policy, pursuant to Article 21 of the Waste Management Law. Key outputs include: (i) adoption of an act by the Cabinet of Ministers establishing the Agency; (ii) approval of the Agency’s founding regulation, covering its mandate, governance, accountability, and organisational structure; and (iii) adoption of an institutional launch roadmap covering the transfer and initiation of key functions, including permits for waste treatment operations, hazardous waste licensing, registration of waste declarations and EPR organisations, administration of a waste information system, and public access to aggregated data.
40	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Development of an EU-aligned legal framework establishing EPR in packaging, ensuring stable financing of separate collection, sorting and recycling, reducing landfill dependence, supporting domestic recycling markets, and improving transparency and compliance	Ministry of Economy and Environment of Ukraine (drafting, coordination, and implementation), Verkhovna Rada of Ukraine	Entry into force of the ‘Law on Extended Producer Responsibility for Packaging and Packaging Waste’, aligned with EU EPR minimum requirements and the EU packaging <i>acquis</i> . Key provisions include: (i) a clear allocation of responsibilities for packaging waste management between local self-government – whether through executive bodies or communal service arrangements – and producer responsibility organisations (PROs), distinguishing between which party organises services and which finances net costs, together with contracting rules and performance oversight; (ii) mandatory producer registration and an obligation to join a PRO or establish an individual compliance scheme; (iii) PRO authorisation criteria and

#	Chapter of Ukraine Plan	Chapters of the EU <i>acquis</i>	Reform	Step	Agency responsible for implementation	Outcome
						governance and anti-monopoly safeguards, including transparency, auditing, and conflict-of-interest rules; (iv) a requirement for PRO fees to cover defined net costs – including collection, sorting, recycling, data reporting systems, public awareness campaigns, and litter prevention where applicable – together with eco-modulation of fees; (v) quantitative targets for preparation for reuse and recycling, and a phased plan for increasing these targets for PROs; (vi) data reporting obligations and public access to aggregated information; and (vii) a financial guarantee and enforcement mechanism for non-achievement of PRO targets.
41	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Creation of an EU-aligned obligatory deposit return system for plastic and glass bottles as well as metal cans, ensuring effective separate collection of these containers to meet recycling and reuse targets	Ministry of Economy and Environment of Ukraine, Verkhovna Rada of Ukraine	Entry into force of a law and bylaws implementing the EU <i>acquis</i> on packaging and packaging waste, establishing an obligatory deposit return system (DRS) as part of EPR for plastic and glass bottles and metal cans, to ensure their collection and subsequent recycling or reuse. The law sets out a clear allocation of responsibilities among DRS operators, municipalities and PROs; clear, measurable and time-bound targets for the reuse and refill of plastic and glass bottles and metal cans; and an effective non-compliance mechanism with clearly defined responsibilities and proportionate fees or penalties for failure to establish or participate in the DRS or to meet the prescribed targets.
42	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 5: Increased circular economy (additional step)	Effective phase out of single-use plastics in line with Directive (EU) 2019/904 (Single-Use Plastics Directive)	Ministry of Economy and Environment of Ukraine, Verkhovna Rada of Ukraine	Entry into force of a law and bylaws implementing Directive (EU) 2019/904, stipulating within the relevant scope the following provisions: market restrictions on certain single-use plastic (SUP) items; clear, measurable, and time-bound consumption reduction targets; separate collection and design requirements for SUP bottles; EPR incorporating the ‘polluter pays’ principle for SUP items; certification requirements for bioplastics; promotion of

#	Chapter of Ukraine Plan	Chapters of the EU <i>acquis</i>	Reform	Step	Agency responsible for implementation	Outcome
						reuse and refill alternatives; and a legal framework ensuring that substitutes for SUP products are safe, sustainable, and subject to appropriate environmental and health standards
43	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 2: Climate policy	Adoption of methodological guidelines for developing local climate mitigation and adaptation plans	Ministry of Economy and Environment of Ukraine	Ukrainian municipalities receive official methodological guidelines for climate mitigation and adaptation planning, based on existing deliverables from the Sustainable Urban Net Zero Network for Ukraine initiative and the EU Covenant of Mayors for Climate and Energy
44	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Connected to: Spatial planning and green urban development	Introduction of a 'healthy city' approach to spatial planning, providing guidance and training for territorial communities	Ministry for Communities, Territories and Internally Displaced Persons of Ukraine, Ministry of Health of Ukraine	Territorial communities prepare 'healthy city' spatial strategies based on the Ro3kvit urban coalition's framework, which links people's physical and mental health with environmental goals. Planners and local officials are trained to use the approach.
45	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Connected to: Water and wastewater	Development and expansion of a groundwater monitoring system along with associated data	Ministry of Economy and Environment of Ukraine, State Service of Geology and Mineral Resources of Ukraine	The state groundwater monitoring network is expanded and modernised, with new observation wells established first in war-affected and water-scarce regions. Monitoring covers both water levels and quality, in line with Directive 2000/60/EC (Water Framework Directive) and Directive 2006/118/EC (Groundwater Directive). Data are collected in the state water monitoring system and published as open data.
46	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources	Adoption of a government resolution establishing the State Agency for Biodiversity and Protected Areas, including its regulation, structure and staff	Ministry of Economy and Environment of Ukraine	Establishment of the State Agency for Biodiversity and Protected Areas, including an approved regulation, budget and staff. This strengthens the state's ability to protect and restore nature, manage protected areas, and meet Ukraine's commitments under the EU accession process and the Kunming-Montreal Global Biodiversity Framework.

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47	Chapter 15: Green transition and environmental protection	Chapter 27: Environment and climate change	Reform 4: Restoration and conservation of natural resources	Approval and implementation of a programme to strengthen the Department of Environmental Assessment, including the provision of additional staff, training, and digital tools to carry out environmental impact assessment (EIA) and strategic environmental assessment (SEA) procedures	Ministry of Economy and Environment of Ukraine	The Department is provided with sufficient staff, expertise, and technical capacity to carry out EIA and SEA procedures effectively and consistently, in line with EU law. This helps ensure that environmental concerns are properly integrated into reconstruction planning.