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# ANTICORRUPTION LAW IMPLEMENTATION PROGRAMME (ACLIP)

Land Chapter 2.5:  
Construction, Land Relations & Infrastructure

**PROGRESS REVIEW AND FORWARD-LOOKING  
RECOMMENDATIONS FOR THE NEXT 5 YEARS**



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FORWARD-LOOKING RECOMMENDATIONS  
FOR THE NEXT 5 YEARS**

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# LIST OF ACRONYMS AND SPECIAL TERMS

<b>ACRONYM / TERM</b>	<b>FULL TITLE / MEANING</b>
ACLIP	Anticorruption Law Implementation Programme
API	Application Programming Interface
AS SLC	Automated System of the State Land Cadastre
Aarhus Convention	UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters
CAP	Common Agricultural Policy of the European Union
CMU	Cabinet of Ministers of Ukraine
EIA Directive	EU Environmental Impact Assessment Directive (2011/92/EU)
EU	European Union
GIS	Geographic Information System
HARP	Historical and Architectural Reference Plan
Hromada	A basic unit of administrative division in Ukraine
IFI	International Financial Institution
INSPIRE	Infrastructure for Spatial Information in Europe Directive (2007/2/EC)
IPA	Instrument for Pre-Accession Assistance
IPF	Investment Project Financing (World Bank lending instrument)
IDP	Internally Displaced Person
MAPF	Ministry of Agrarian Policy and Food of Ukraine
MinCult	Ministry of Culture and Strategic Communications of Ukraine
MinDevelopment	Ministry of Communities and Territories Development

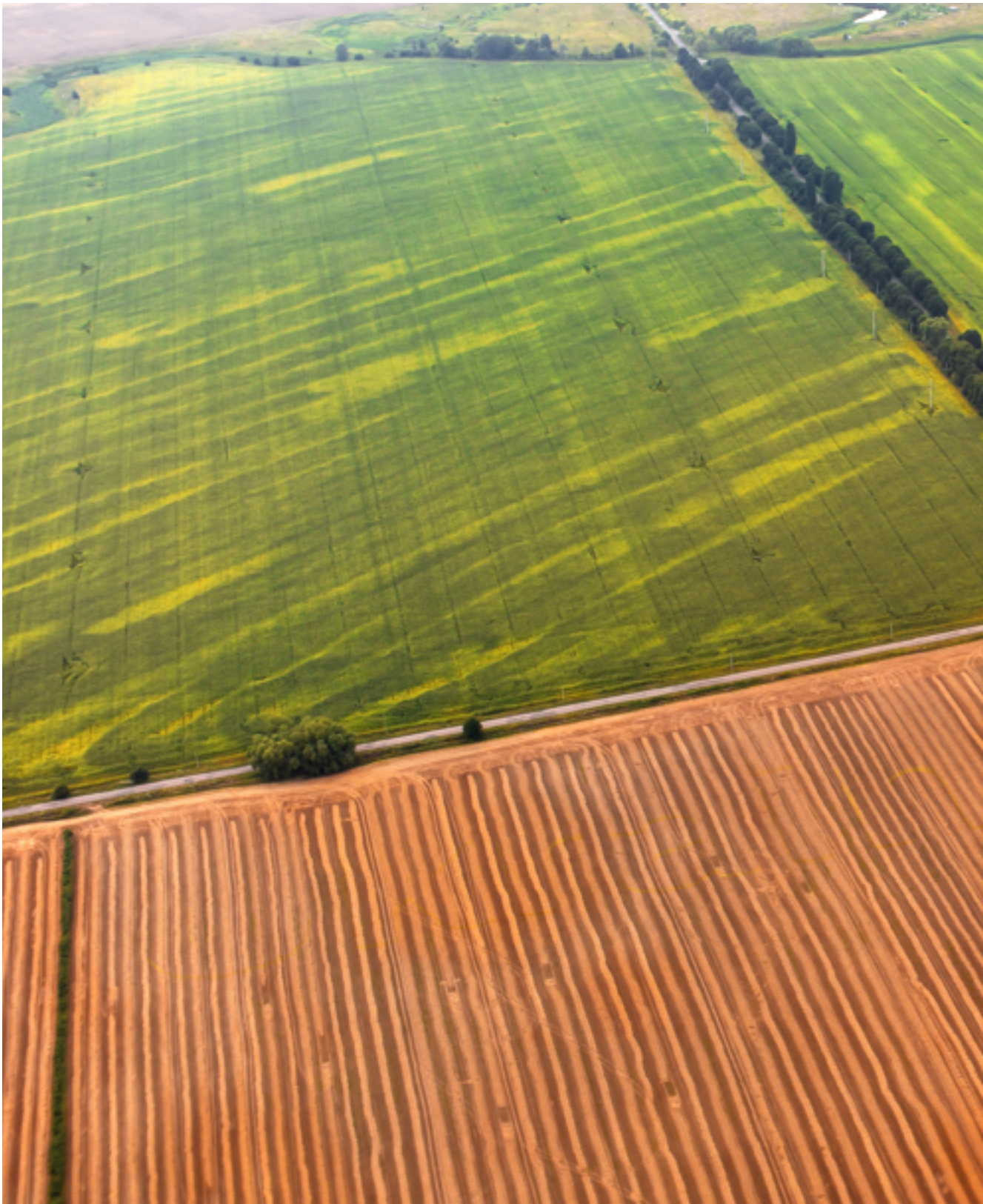
<b>ACRONYM / TERM</b>	<b>FULL TITLE / MEANING</b>
<b>NABU</b>	National Anticorruption Bureau of Ukraine
<b>NACP</b>	National Agency on Corruption Prevention
<b>NGO</b>	Non-Governmental Organisation
<b>NSDI</b>	National Spatial Data Infrastructure
<b>ProZorro.Sale</b>	Ukraine's electronic auction platform for public assets
<b>SAPO</b>	Specialised Anticorruption Prosecutor's Office
<b>SDM</b>	EU Single Digital Market
<b>SLC</b>	State Land Cadastre
<b>SOE</b>	State-Owned Enterprise
<b>SRO</b>	Self-Regulatory Organisation
<b>StateGeoCadastre</b>	State Service of Ukraine for Geodesy, Cartography and Cadastre
<b>TFEU</b>	Treaty on the Functioning of the European Union
<b>UPC</b>	Urban-Planning Cadastre (Unified State Urban-Planning Cadastre)
<b>UPCRs</b>	Urban-Planning Conditions and Restrictions
<b>USESCS</b>	Unified State Electronic System in the Construction Sphere
<b>Verkhovna Rada</b>	Parliament of Ukraine
<b>World Bank</b>	International Bank for Reconstruction and Development (IBRD) / International Development Association (IDA)

# EXECUTIVE SUMMARY

Implementation of the land-related measures of ACLIP 2023-2025 is lagging. None of the seventeen selected activities under Chapter 2.5 is on track for complete, timely delivery; six have not started at all. The delay weakens Ukraine's ability to address deep-seated corruption risks in land administration, hampers recovery-related investment, and risks slowing alignment with the EU acquis.

- **Overall achievement score** (weighted by NACP and expert assessments): 21.6 %.
- **Main achievements** – adoption of a legal framework and IT prototype for mass land valuation; conducting an independent IT Assessment (audit) of the National Cadastral System and development of a plan for re-engineering the National Cadastral System; partial delegation of professional accreditation to self-regulatory organisations; limited relaunch of the cadastral pilot permitting private engineers to enter data.
- **Significant gaps** – lack of enforceable anti-discretion tools in land-plot formation; stalled digitization of land-management workflows; no legislation making mandatory the use of a market-based approach to transactions with the state/municipal via Prozorro.Sales land e-auctions; postponement of free-privatisation reform; no financing for community urban planning and strategic documentation; limited launch of pilot projects on digitalisation of registers in the fields of urban planning and cultural heritage; no integration of urban planning documentation with automated service delivery tools; failure to launch automation of issuing Urban Planning Conditions and Restrictions (UPCRs); lack of effective data integration between the Urban Planning Cadastre and key state registries and cadastres, including State Land Cadastre; environmental and forest protection related issues not addressed by any of the ACLIP activities; lack of progress in implementing the cadastral system re-engineering plan based on the findings of the independent IT assessment.

**Priority recommendations** for the next ACLIP cycle (2026-2030) centre on (i) closing legislative gaps that enable discretion, (ii) completing the end-to-end digital transformation of the State Land Cadastre, Urban Planning Cadastre and related registers, (iii) embedding EU-compliant valuation, taxation and spatial-planning standards, and (iv) creating robust, transparent market mechanisms—such as mandatory e-auctions—for state-land allocation; (v) launching phased re-engineering of the cadastral system based on the findings of the independent IT Assessment (audit).



# 1. CONCLUSIONS AND IMPLICATIONS OF THE LAND-GOVERNANCE ASPECT



## 1.1 Land & Property Rights / Land Markets

### *Key legal fixes stalled; investors still face discretionary hurdles*

- **Score:** *Ongoing but unlikely to be achieved in full (4).*
- **Key findings:**
  - Draft Law No. 10095 (unified checklist) was rejected; the discretion of decision-making by cadastral registrars, therefore, remains intact.
  - Free-privatisation reform (Activity 2.5.8.1) has been deferred until nine months after martial law is lifted, which preserves a pathway for acquiring valuable public land without competitive procedures or market pricing.
  - No legislation mandates the use of e-auctions via Prozorro.Sale for all types of transactions—including sales, leases, emphyteusis, superficies, concessions—involving state or municipal land. In addition, there is no unified legal requirement that such e-auctions be applied consistently across all categories of land (e.g., agricultural, non-agricultural, industrial), except in narrowly defined cases such as land designated for national defence or martial purposes. (Activity 2.5.7.1), perpetuating opaque, off-market allocations.
- **Implications:** Persistent legal uncertainty deters long-term investors, sustains rent-seeking schemes (e.g., the well-documented «toilet» scam in Kyiv<sup>1</sup>), and will complicate the application of EU free-movement-of-capital rules that require transparent access to land markets.

## 1.2 Land-Use Management

### *Partial progress; funding gaps and legal ambiguities slow delivery*

- **Score:** *Partially achieved (2–3, depending on sub-activity).*
- **Key findings:**
  - Procedural simplification of parcel formation is incomplete; the pilot permitting certified private surveyors and engineers to register parcel boundaries via the State Land Cadastre was extended beyond its initial period and remains active. However, to institutionalise this as a stable mechanism for expanding cadastral capacity and reducing administrative discretion, a dedicated law must be adopted to grant private land surveyors permanent authority to carry out registration activities.

<sup>1</sup> The Ukrainian “toilet scam” is a land-grab tactic in which an individual quietly registers ownership of a tiny, often derelict structure—frequently an old privy—situated on a desirable piece of state or municipal land; invoking Article 120 of the Land Code, the “owner” then claims the right of first refusal to lease or buy not only the structure’s footprint but also an adjoining plot ostensibly “needed for its servicing,” thereby acquiring valuable real estate without an auction, demolishing the token building, and redeveloping the parcel for high-profit use.

- Comprehensive spatial-development planning is underway in barely one-third of hromadas, with most of those cases still stuck in the very early preparatory phase; the state subventions that financed such work were halted when the full-scale war began in 2022, and since then, land-use changes have increasingly been authorised through ad-hoc legal exemptions in the absence of approved plans.
- Because historical-and-architectural reference plans (HARPs) lack clear legal status and funding, many heritage zones remain unmapped; as a result, reconstruction decisions can overlook cultural-heritage constraints and expose officials to corruption pressure.
- **Implications:** Post-war reconstruction may proceed through piecemeal, non-transparent land conversion that threatens nature reserves, cultural-heritage objects, and strategic infrastructure corridors, thereby undermining EU environmental and heritage commitments.

## 1.3 Property Valuation & Taxation

### *Technical prototype ready; enabling laws and fiscal link are still missing*

- **Score:** *Partially achieved (2).*
- **Key findings:**
  - The GIS-based mass valuation prototype for agricultural land is live and publicly accessible 24/7. However, the GIS prototype for non-agricultural land remains under development. As a result, the pilot must be extended to finalize and operationalize the valuation system across all land categories.
  - Follow-up steps—full roll-out, evaluation report, and a law institutionalising mass valuation—have not begun.
  - Tax Code amendments to link rent and land tax to market value (Activity 2.5.5.2) await both the institutional law and complete system deployment.
- **Implications:** Without full legislative backing and integration with fiscal instruments, local budgets miss out on potential revenue, and land users face weak incentives for efficient, sustainable management.

## 1.4 Urban Development

### *Core digital reforms delayed; high corruption exposure remains*

- **Score:** Ongoing (partially 2) but unlikely to reach most targets; one key action has not started.
- **Key findings:**
  - The core corruption risk—manual issuance of Urban Planning Conditions and Re-

strictions —has not been addressed; automated/ electronic generation via the Urban Planning Cadastre is not implemented.

- The developed Urban Planning Cadastre functionality does not provide public access to documentation at the land parcel level, and no efforts have been made to add this functionality to the Software.
  - Urban Planning Cadastre is not integrated with essential state registers, cadastres, and registries with information on construction, environmental, and cultural heritage protection;
  - Most legacy planning documents remain paper-based, blocking digital processing and delaying permission workflows.
  - Socio-economic development programmes continue to be developed independently of spatial and urban planning documentation, leading to misaligned recovery priorities and misuse of funds.
- **Implications:** The lack of data interoperability, public access, and transparency fuels corruption, allows unlawful land-use changes, weakens landowners' rights protection, and obstructs compliance with EU spatial and heritage standards.
  - The failure to legislate and implement the Urban Planning Cadastre's core functions preserves systemic corruption risks, undermines digital governance in urban planning, and blocks progress on EU integration, sustainable spatial development, and land transparency.
  - The lack of alignment between socio-economic development programmes and strategic, spatial and urban planning documentation enables discretionary resource allocation, fuels project-level corruption, misaligns with restoration priorities, and results in land use that contradicts strategic planning goals — ultimately undermining legal certainty, delaying recovery efforts, and deterring investment.

## 1.5 Land-Related Corruption

### *Some safeguards introduced; systemic loopholes still wide*

- **Score:** *Mixed – some risk-mitigation tools introduced, but systemic gaps persist.*
- **Key findings:**
  - **Regulatory capture and delegation.** The draft law on the delegation of selected state functions to self-regulatory organisations (SROs)—registered as Draft Law No. 13163—represents a step toward reducing the monopoly of the StateGeoCadastre over the professional accreditation of land management and geodesy specialists. However, the proposed framework preserves the agency's dominant role in key decision-making processes, including final approval of certification decisions and the composition of examination commissions. Moreover, the criteria for recognising SROs as eligible to receive delegated powers remain undefined or overly broad, undermining transparency and leaving room for discretionary or inconsistent application.

- **Land-inventory gap.** Inventory of state/municipal land shows minimal progress (official NACP monitoring reports cite roughly 6 % completion) and is at risk from budget cuts.
- **Opacity in the management of cultural heritage objects:**
  - ◀ The State Register of Cultural Heritage Objects remains incomplete and unreliable, and its digitalisation has not been implemented.
  - ◀ The experimental digital register of Cultural Heritage Objects <sup>2</sup> lacks required ACLIP functionalities <sup>3, 4</sup> including public access to complete documentation, object status, and protection zones.
  - ◀ Gaps in legislation that create corruption risks remain unresolved, such as the indefinite legal status <sup>5</sup> of newly identified heritage objects and the ability of property owners to block their official registration by refusing to sign the documentation.
- **Historical and Architectural Reference Plan (HARPs)**
  - ◀ The contradiction in the regulations for the Historical and Architectural Reference Plan (HARPs) (as non-urban planning documentation but mandatory for planning) remains unresolved.
  - ◀ HARPs are not publicly accessible: only the List of adopted HARPs is published, while the HARP documentation itself remains undisclosed and not publicly accessible.
  - ◀ No legislative or policy mechanisms to incentivise HARP development were proposed or drafted, and no funding (budgetary, subvention-based) was allocated for HARPs development.
  - ◀ The legal uncertainty of HARPs (between cultural heritage and urban planning spheres) remains unresolved, contributing to interagency conflicts.
  - ◀ Local governments resist HARPs as these documents may be perceived as a lim-

<sup>2</sup> The State Register of Cultural Heritage Objects has not yet been officially implemented. Only an experimental version of the programme has been created – <https://e-pamiatka.gov.ua/> – which, however, is not formally established as an experimental project at the regulatory level (there are no legal documents recognising it as an experimental project or authorizing its operational use).

<sup>3</sup> Analysis by the National Agency on Corruption Prevention (NACP) regarding the functionality of ePamyatka <https://dap.nazk.gov.ua/en/zahid/477/>

<sup>4</sup> Public analysis (NGO «Together Against Corruption») of the ePamyatka functionality, posted on the NACP website concerning measure 2.5.2.1.14: <https://dap.nazk.gov.ua/uploads/Feedback/OsrZahid/477/1012-1951135739-662faa61656df.pdf>

<sup>5</sup> A newly identified object is a temporary status granted to an object that qualifies for inclusion in the State Register of Cultural Heritage Objects. According to current legislation, there is a three-year time limit during which documentation for the object must be developed and a decision must be made on whether or not to include the object in the State Register. However, in practice, a newly identified object may remain in this undefined status for 10 years or more. At the same time, there are no legislative mechanisms in place to prevent an object from remaining in the temporary status of a newly identified object beyond the three-year limit. Such a legislative framework allows for the manipulation of the legal status of any building by assigning it the status of a newly identified object, without the need to prepare documentation or include it in the State Register.

itation of local self-government bodies' authority in the area of spatial planning, land use, and development discretion.

- ◀ Existing legal gaps and broad discretionary powers of cultural heritage protection bodies contributing to the HARP enable uncontrolled approval processes and misuse of "silence-as-consent" in heritage-related permitting.
- **Implications:** Without a clear division of powers, a modernised cadastre, and mandatory, market-based e-auctions via Prozorro.Sale for all transactions involving all categories of state and municipal land, entrenched corruption schemes will persist, heritage assets will remain vulnerable, and Ukraine will fall short of EU transparency benchmarks.
- The absence of a unified, electronic, verifiable, and publicly accessible register of Cultural Heritage Objects leaves the status of heritage objects unclear and at risk, as this situation enables unlawful construction and land allocation, and creates high corruption risks.
- Restrictions tied to the outdated or unjustified List of historic settlements of Ukraine hinder lawful development and increase bureaucratic burdens on developers, landowners, and local communities.
- Without enforcement or incentives, local authorities have little motivation to develop HARPs, resulting in opaque decision-making on construction and permitting in sensitive heritage zones. This sustains legal chaos and opens avenues for arbitrary or corrupt actions in land management, urban planning, and loss of cultural heritage. Developers, communities, and investors cannot access reliable information on protection zones, increasing legal uncertainty, planning delays, and corruption risks.
- The absence of clearly defined powers and procedures in cultural heritage protection preserves regulatory opacity, prevents investor due diligence, and facilitates arbitrary decision-making. These gaps weaken land rights security, obstruct urban planning compliance, and diminish trust in state institutions—both domestically and internationally.

# 2. CONSEQUENCES OF NON-ACHIEVEMENT



Ukraine's failure to implement the land-governance and spatial-planning reforms outlined in the 2023–2025 ACLIP carries far-reaching and interrelated consequences. These consequences extend beyond the land sector, impacting fiscal stability, investor confidence, regional development equity, environmental resilience, and Ukraine's EU accession trajectory.

While the following analysis avoids speculative quantification, it draws on a growing body of documented cases, legislative gaps, expert assessments, and real-world trends. The risks are not abstract or hypothetical—they are already visible in governance bottlenecks, missed revenue opportunities, legal disputes, and uneven territorial development.

Crucially, the costs of non-achievement are not limited to delayed institutional reform; they represent a cumulative erosion of Ukraine's capacity to fund recovery, protect public assets, ensure equitable land access, and meet the benchmarks required for EU integration. The longer these gaps persist, the more deeply they embed dysfunctional practices, raising the eventual cost—financial, institutional, and political—of correction.

The subsections that follow identify five core risk clusters—fiscal, investment-related, territorial, accession-linked, and environmental/cultural—through which the impacts of inaction are already materialising (see [Annex II](#)). Each vector, in turn, reinforces the others, creating a compounding cycle of diminished state effectiveness and reform fatigue. Preventing that outcome requires timely and coordinated intervention.

## EU accession; international agreements

### Alignment gaps with the *acquis* for EU accession

Land-sector reforms touch at least four negotiation chapters—Agriculture, Taxation, Environment, and Digital Single Market. Incomplete cadastral modernisation, discretionary land pricing, and weak spatial planning will likely trigger critical observations in the European Commission's screening reports, slowing the pace of accession.

### Elevated cost of capital

International financial institutions increasingly condition disbursements on governance and transparency benchmarks. Slow progress on making market-based e-auctions mandatory for all transactions involving all categories of state and communal lands, and lack of progress in implementing the re-engineering and transformation plan for the National Cadastral System based on the findings of the independent IT audit could postpone loan tranches and elevate sovereign-risk perceptions, raising borrowing costs at a time when reconstruction financing needs are acute.

### Reputational risk

Ukraine has framed its anticorruption land agenda as emblematic of broader institutional modernisation. Persistent delays risk eroding donor confidence and diluting the narrative of irreversible reform—particularly if high-profile corruption schemes continue to surface.

## Fiscal deficit

### Structural revenue leakages

Modernised systems for valuation and collection of land-based revenues—based on market prices and grounded in robust systems for computerized mass valuation and collected through transparent, electronic systems—are among the quickest own-source revenues local governments can mobilise. By keeping the current mass-valuation platform in pilot mode, maintaining administratively set normative values, and delaying Tax Code amendments, Ukraine foregoes a sizeable pool of potential recurrent income for local governments. This undercuts the fiscal autonomy of the community, widens vertical imbalances, and sustains dependency on general transfers and external borrowing for investment in service delivery.

### Hidden quasi-fiscal subsidies

Below-market leases of state and municipal land function as off-budget concessions: rental rates are set administratively, never subjected to open parliamentary appropriation, and therefore bypass normal fiscal scrutiny. Because e-auctions are not yet mandatory—and because the law lacks objective size limits for both agricultural parcels and built-up plots offered outside auction—authorities can award large areas at heavily discounted rents. These foregone receipts erode the return on publicly owned assets and progressively shrink the fiscal space needed for reconstruction, social services, and debt servicing.

### Inefficient use of state-held land

Although a Land Bank Project under the State Property Fund has been initiated to address idle and underutilized land assets, it faces key shortcomings, including limited integration with the State Land Cadastre, a lack of transparent procedures for identifying land for transfer, and absence of fully operational governance, asset registration, and digital monitoring mechanisms aligned with international standards.

The State Anticorruption Programme did not envisage the creation of a State Land Bank, and the final text of Law 3272-IX—substantially altered from its initial draft—left unresolved the core bottleneck: state-owned enterprises, military units, universities and research institutes still hold large tracts under permanent-use titles yet lack a clear legal right to sub-lease portions of those lands through transparent e-auctions without first surrendering their tenure. Consequently, much of this acreage remains idle or is informally rented out under opaque, short-term deals that deter investment in modern machinery, soil enhancement, and downstream processing. The programme's original anticorruption remedy—granting all state land users the authority to lease surplus parcels via ProZorro-based auctions while retaining permanent-use rights—remains unmet and will require a dedicated bill; until such legislation is adopted, neither the nascent Land Bank nor the modified Law 3272-IX can unlock the productivity gains that orderly, competitive secondary leasing would deliver.

## Private investments/ investment risks

### Contingent liabilities

Weak data integrity across cadastres and registries and unresolved tenure disputes increase litigation risk. Investor-state disputes over land access have already resulted in significant arbitration costs; each additional case threatens to draw resources away from development spending. Also, court challenges to decisions made by authorized heritage and urban planning bodies—but often grounded in vague legislation and broad discretionary powers—are becoming increasingly common. These legal uncertainties further undermine confidence in administrative processes and delay critical investments. Without a comprehensive cadastral and registral overhaul, coherent plot-formation rules, and review of ambiguous provisions in regulations, new disputes—including those arising from reconstruction projects—are likely to proliferate.

### Investor uncertainty

In Ukraine today, no oblast—or even a single major city—can yet guarantee the whole trio of investment fundamentals that international surveys prioritise: secure land title, zoning stability, and transparent, competitive plot allocation. Discretionary practices in cadastral and planning approvals, the continued availability of «free-privatisation» pathways that allow private parties to claim public land without auction,<sup>6</sup> case-by-case spot rezonings, and incomplete digital information on heritage zones or other land-use constraints all lengthen due diligence reviews and raise legal opinion costs. Faced with those uncertainties, both domestic investors and foreign partners defer or downscale projects, delaying the replacement of war-damaged productive capacity.

## Spatial/ land use planning

### Spatial inequality

Funding cuts for comprehensive spatial-development plans and HARPs<sup>7</sup> have left most hromadas without a strategic land-use framework or the digital data needed to activate valuation-based own-source revenues. According to official information<sup>8</sup>, only two comprehensive spatial-development plans have been developed and approved across all of Ukraine: one in Khmelnytskyi Oblast and one in a township community in Kharkiv Oblast. The lack of comprehensive spatial plans hinders effective anticorruption efforts in the fields of land management and urban planning,

<sup>6</sup> E.g., Article 118 of the Land Code allows individuals to obtain up to two hectares for personal farming outside market procedures.

<sup>7</sup> According to current legislation, the HARP is an integral part of the comprehensive spatial-development plans and must be approved simultaneously.

<sup>8</sup> information provided by the Chair of the Verkhovna Rada Committee on the Organisation of State Power, Local Self-Government, Regional Development, and Urban Planning, as of April 24, 2025  
<https://interfax.com.ua/news/economic/1066307.html>

and prevents the establishment of transparent and high-quality regulations in these areas. Moreover, it creates obstacles for investors.

### **Urban sprawl and loss of ecosystem services**

Weak planning enforcement and a proliferation of «spot» rezonings accelerate uncoordinated conversion of peri-urban farmland, wetlands, and forest fringes. Fragmented landscapes disrupt biodiversity corridors, diminish carbon-sequestration capacity, and increase long-term infrastructure costs for roads, drainage, and utilities.

## **EU subsidies**

### **Missed opportunities in green finance**

A fully implemented mass-valuation system would make it technically feasible to incorporate measurable ecological attributes—such as carbon-sequestration potential, habitat connectivity, or flood-retention capacity—into the assessed value of a land parcel. Similar approaches are already being piloted in the EU under the Carbon Farming Initiative (COM (2021) 800) and the new eco-scheme payment models of the Common Agricultural Policy, where land managers receive unit-based payments that reflect the climate-mitigation or biodiversity services generated by their parcels.<sup>9</sup> Because Ukraine's valuation framework is still only at the prototype stage, it cannot yet attach monetary signals to those ecosystem services. As a result, the country risks falling behind EU mechanisms that will soon channel grant and private-sector funds into verified carbon farming and other nature-based solutions, forfeiting a potential source of low-cost finance for post-war restoration and climate-adaptation projects.

### **Erosion of cultural identity and missed opportunities in heritage-driven development.**

The absence of transparent and consistent management of cultural heritage leads to the gradual loss of historical character in towns and villages, undermining the distinctiveness of communities. This weakens their appeal for cultural tourism, reduces potential income from visitor spending, and diminishes opportunities for local economic diversification. Furthermore, legal ambiguity around the status and protection of heritage objects discourages private investment and complicates project planning. As a result, communities forfeit access to heritage-linked funding (e.g., EU cultural and regeneration programmes) and miss out on the long-term benefits of development strategies anchored in identity, history, and landscape.

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<sup>9</sup> European Commission, "Communication on Sustainable Carbon Cycles," COM (2021) 800 final and DG AGRI factsheets on CAP eco-schemes, 2024.

## Conclusion

The challenges outlined across fiscal, investment, spatial, environmental, and accession-related domains are not isolated—they reinforce each other through compounding feedback loops. Fiscal shortfalls constrain the capacity of local governments to enforce zoning regulations or uphold environmental and cultural protections. This weak enforcement, in turn, accelerates land degradation, unplanned development, and disaster vulnerability, which require even greater public outlays. At the same time, investor hesitation—driven by legal ambiguity, data fragmentation, and weak land governance—slows economic recovery, erodes the tax base, and deepens pressure on public budgets and institutional integrity.

Delays in land-sector reform not only preserve inefficiencies but also harden informal systems and vested interests. Over time, the cumulative cost of inaction rises: legacy arrangements become more entrenched, reform momentum diminishes, and the scale of future corrective efforts—technically, financially, and politically—increases.

However, the early phases of EU accession offer a unique window of opportunity. Reform leverage is high, donor alignment is strong, and public expectations remain mobilised. This moment should be used to lock in foundational land-governance changes—ensuring transparency, reducing discretion, embedding digital tools, and aligning with EU acquis.

Ultimately, the non-achievement of ACLIP 2023–2025 land targets would not just delay progress—it would weaken public finances, deter investment, exacerbate territorial inequalities, jeopardise Ukraine’s environmental and cultural assets, and slow the country’s European integration. By contrast, completing the outstanding measures is among the most strategic and cost-effective institutional investments Ukraine can make—both for post-war recovery and for long-term accession readiness.

### **3. RECOMMENDATIONS AND ACTION POINTS FOR ACLIP 2026-2030 (with EU-Accession Justification)**



The Anticorruption Law Implementation Plan (ACLIP) for 2026–2030 should continue to include a dedicated land chapter, anchored in a cohesive and forward-looking land-governance compact. This compact should rest on three foundational principles: complete digital transparency of land-related data and decisions; predictable, rules-based allocation and management of land resources; and systematic alignment with EU acquis, policies, and obligations relevant to accession.

The recommended measures build directly on the priorities established under Ukraine's land reform legislation, including the Land Code of Ukraine, the Law on the State Land Cadastre, the Law on Spatial Planning, and the Law on Cultural Heritage Protection, as well as key EU instruments. These include the EU Common Agricultural Policy (CAP), the INSPIRE Directive (2007/2/EC) on spatial data infrastructure, the Environmental Impact Assessment (EIA) Directive (2011/92/EU), the Strategic Environmental Assessment (SEA) Directive (2001/42/EC), and obligations under Chapter 23 (Judiciary and Fundamental Rights), Chapter 27 (Environment), and Chapter 16 (Taxation) of the EU acquis.

The implementation of land governance reforms in line with these frameworks is also vital to satisfying conditionalities under the European Commission's Ukraine Facility, maintaining eligibility for sectoral budget support, and fulfilling international commitments to good governance, environmental stewardship, and cultural heritage protection.

To translate these principles into actionable and monitorable reforms, six mutually reinforcing agendas are proposed. Each corresponds to key structural bottlenecks identified in the 2023–2025 cycle and has been designed to clarify legal mandates, reduce discretion, and create a digitally enabled, investment-ready, and citizen-focused land governance system that meets EU standards.

### 3.1 Clarify, Record, and Publicise All Land-Use Restrictions

- **Completed drafting and adoption of outstanding laws and CMU resolutions to close legal gaps:**

The next ACLIP cycle should begin by closing the information gaps that allow public-law land-use restrictions to be ignored, manipulated, or discovered only after an investment decision has been made. A coherent legislative package—anchored in primary law and completed by Cabinet of Ministers (CMU) resolutions—can achieve this without creating new administrative layers.

- Parliament should amend Chapter 18 of the Land Code of Ukraine and the corresponding provisions of the Law "On the State Land Cadastre" so that **every environmental, cultural-heritage, defence, or servitude restriction must be registered in the State Land Cadastre** as a condition of validity. The current wording ("may be entered") is only declarative; replacing it with a mandatory formulation, backed by administrative fines for non-registration, will remove discretion from implementing agencies. A follow-up CMU resolution should specify the electronic format and the automatic data-exchange protocol with the Register of Proprietary Rights.
- **Spatial-planning data need a single legal home.** Parliament should adopt a new Law on the Unified State Urban-Planning Cadastre (Urban-Planning Cadastre, UPC). The UPC would merge the presently fragmented municipal and regional cadastres into one interoperable national platform, recognised in law as the sole authoritative

repository for master plans, zoning plans, and detailed plans. The statute must oblige local authorities to upload plans in machine-readable form and block the issuance of Urban Planning Conditions and Restrictions when the underlying data are absent.

- **Heritage constraints must be brought into the same digital ecosystem.**

Either by amending the Law on Cultural Heritage Protection (No. 1805-III, 2000) or by enacting a standalone Law on the Unified Electronic Register of Cultural-Heritage Objects, the register should be placed on equal footing with the State Land Cadastre and Urban-Planning Cadastre. It must contain all data on cultural heritage objects, including newly identified objects, boundaries, and use regimes derived from Historical and Architectural Reference Plans, and should expose non-sensitive layers to the public in an INSPIRE-compliant open-data format.

- **The cultural-heritage package** should also remove long-standing legal conflicts that create entry points for rent seeking—most notably the undefined interim status of newly identified heritage objects; the silence-is-consent rule in permit issuance; elimination of the discretionary powers of cultural heritage protection authorities; and ambiguous procedures for the public buy-out of cultural heritage objects (especially the compulsory acquisition of land plots where archaeological objects have been discovered).
- The Land Code and the Law on Spatial Planning should be harmonised around a **single concept of functional zoning**. A statutory definition—mirroring the terminology in EU spatial-planning practice—would replace the parallel, sometimes conflicting, classifications now used in land and planning law. Transitional clauses should set out how existing land-use types will be mapped to functional zones, avoiding confusion during the shift to the harmonised regime.

Taken together, these measures will ensure that every public-law restriction is (i) legally obligatory, (ii) recorded in a uniform digital format, (iii) automatically shared across cadastral and planning systems, and (iv) accessible to citizens, investors and regulators alike—meeting both the transparency requirements of the INSPIRE Directive and the legal-certainty standards expected in the EU acquis.

- **Standardise and Share Spatial-Restriction Data:**

A cornerstone of the next ACLIP must be the creation of a single, authoritative description of every public-law land-use restriction—from ecological buffer zones to cultural-heritage protection areas. Achieving this requires three tightly linked actions:

- **Adopt a standard metadata template.** The tool: a Cabinet of Ministers (CMU) resolution that approves an INSPIRE-compliant XML/JSON schema for restrictions. The content: each record must hold the same four attributes—legal basis, mapped boundary, time-limit (if any), and issuing authority—so that entries in the State Land Cadastre, the Urban-Planning Cadastre, the future Register of Cultural Heritage Objects, and the Register of Proprietary Rights all “speak the same language.” Once approved, the schema becomes mandatory for any new or amended restriction.
- **Make machine-to-machine exchange the default.** A parallel CMU act should oblige the operators of the four registers to expose Web Feature Service (WFS) or API endpoints and to route them through the National Spatial Data Infrastructure (NSDI) geoportal. That resolution will cover data structure, minimum positional accuracy, update frequency (within 24 hours of a legal act), and quality-control rules.

- **Phase in a targeted data audit.** Before full roll-out, an 18-month inventory—led by the MinDevelopment with support from the MinCult and StateGeoCadastre and line ministries—will close the worst gaps. Priority layers are: (i) cultural-heritage objects and HARPs; (ii) environmental and forest cadastres; (iii) engineering-geology and flood-risk zones; (iv) utility-network corridors. Results feed directly into the new template and NSDI services.
- **Guarantee procedural transparency.** Amendments to the Law on Access to Public Information (No. 2939-VI) and the Law on Local Self-Government (No. 280/97-VR) should oblige local councils, regional administrations, and central executive bodies to publish any draft restriction order online for a minimum of 15-day consultation. Publication must be through the same NSDI interface, ensuring traceability and public comment.
- **Ensure public monitoring:** Amend the CMU Resolution on Public Land Monitoring No 474 from May 12, 2023, to add specific indicators that trace the progress of standardizing and sharing spatial data restrictions: i) how many hromadas publish draft spatial restriction orders and conduct consultations via the NSDI interface; ii) machine-to-machine exchange progress and quality control performance;
- **Automate cross-register alerts.** A short amendment to Article 34 of the Law “On the State Land Cadastre” can require that the creation of a new restriction in any linked register triggers an automatic update in the others via the NSDI API. This removes manual re-entry and closes the loophole for selective omissions.
- **Provide wartime transparency with safeguards.** A CMU wartime-disclosure regulation should define tiered access: public layers, authenticated-user layers, and restricted layers (e.g., critical infrastructure). Measures such as user login, audit logs, and geometric masking of sensitive points will balance national-security needs with the EU principle of maximum disclosure.

These steps directly operationalise the INSPIRE Directive 2007/2/EC (spatial data interoperability), the Open Data Directive 2019/1024/EU (high-value geodata sets), and the transparency requirements embedded in the Environmental Impact Assessment Directive 2011/92/EU. By embedding them in ACLIP II, Ukraine not only meets Chapter 27 (Environment) and Chapter 22 (Regional Policy and NSDI) benchmarks, but also delivers the digital evidence base that DG NEAR and international donors require for results-based funding during the reconstruction phase.

### 3.2 Complete Digital Integration of Cadastre and Related Registers

- **Achieve “interoperability by design” through a paired legal-and-technical package:**
  - Regulatory backbone – Adopt a Cabinet of Ministers resolution “On the Core Electronic Services of the National Spatial Data Infrastructure (NSDI)”. This act will
    - ◀ name the State Land Cadastre, the Urban-Planning Cadastre (including the Unified State Electronic System in the Construction Sphere), the Register of Proprietary Rights, and the forthcoming Electronic Register of Cultural-Heritage Objects as compulsory “base registers” under the NSDI law (2021);

- ◀ oblige each operator to expose a secure, real-time Web Feature Service (WFS/API) that fulfils INSPIRE technical guidance;
  - ◀ set a 24-hour deadline for propagating any update from one base register to all others.
- Establish a Register of Existing Planning Documentation: Amend current ACLIP point 2.5.1 to include digitization and mandatory upload of existing general plans, zoning plans, and detailed plans of territory. Provide conditioning issuance of UPCR's on data availability (only if urban planning documentation <sup>10</sup> in machine-readable format, is available in the UPC). Support municipalities via subventions or an international technical assistance project.
  - Ensure the adoption by the MinDevelopment, in cooperation with the State Judicial Administration of Ukraine, of a procedure for establishing electronic information interaction between the Unified State Electronic System in the Construction Sphere and the Unified State Register of Court Decisions.
  - Provide for amendments to the Law of Ukraine "On the State Land Cadastre" and the Cabinet of Ministers Resolution No. 483 of June 3, 2013, "On Approval of the Procedure for Information Interaction between the State Land Cadastre, Other Cadastres, and Information Systems," to introduce electronic information exchange between the State Land Cadastre and the Unified State Register of Court Decisions.
  - Launch a Public Verification Tool for Pre-2013 Land Ownership Acts: Activate access to the state land cadastre database of scanned land titles (17 million acts from 2012). This tool would allow owners to confirm document authenticity and prevent forged backdated titles.

A complementary joint order of the line ministries (MAPF, MinDevelopment, MinCult, MinEnvironment) will approve a harmonised data catalogue so that environmental, cultural heritage, forest, geological, infrastructure-capacity, and utility-network layers can be consumed automatically by the Urban-Planning Cadastre.

- **Build traceability into every transaction**

- Amend Article 14 of the Law "On the State Land Cadastre" and the relevant provisions of the Law on Spatial Planning and appropriate provisions to require a time-stamped, tamper-evident audit trail for every document upload or edit. Technical implementation will follow the model already used in the e-procurement system ProZorro, ensuring full accountability.

- **Guarantee open, citizen-friendly access**

- Through a MinDigital order, mandate that each base register expose:
  - ◀ a free, browser-based map viewer;
  - ◀ bulk download of non-restricted layers;
  - ◀ a log that records—and legally justifies—any temporary access limitation.

This satisfies the EU Open-Data Directive while allowing security masking where justified under martial-law rules.

<sup>10</sup> including HARPs, for settlements where legislation mandates its development as a component of urban planning documentation

- Close the paper backdoor
  - Parliament should insert a “digital-only” clause into the Law on Electronic Documents and Electronic Trust Services and cross-reference it in the Land Cadastre and Urban-Planning laws. After a one-year transition:
    - ◀ all land-management, cultural-heritage, and urban-planning documents must be drafted, signed, and archived exclusively in electronic form with a qualified e-signature;
    - ◀ urban-planning documentation uploaded to the Urban-Planning Cadastre must be machine-readable (GML/CityGML or GeoJSON) so that the system can auto-generate UPCRs without additional written requests;
    - ◀ the Urban Planning Cadastre platform will host an open “e-consultation” module where draft planning documents are displayed for public comment, ensuring transparency and early conflict detection.
- **Subject the whole ecosystem to independent cyber-audits**
  - A biennial security-and-integrity audit—carried out by an accredited external assessor and tabled in the Verkhovna Rada—will test penetration resistance, data integrity, and service availability, mirroring EU NIS-2 requirements.
- **Implement the plan for re-engineering and transforming the National Cadastral System**
  - Based on the independent IT assessment report and the technical specifications developed by international experts, launch the re-engineering of the National Cadastral system with the relevant funding secured from the state budget and international donors. This is critical to ensuring data integrity, cybersecurity, and a modern digital architecture aligned with EU standards.

Together, these measures demonstrate the digital-governance capacity expected under the Single Digital Market acquis and will be assessed in the Commission’s screenings for Chapter 22 (Regional Policy and NSDI) and Chapter 23 (Judiciary and Fundamental Rights).

### 3.3 Guard against Wartime- and Reconstruction-Phase Corruption

During martial law and the subsequent rebuilding period, land remains one of the most valuable—and vulnerable—public assets. Five safeguards should therefore be embedded in the next ACLIP:

- **Make e-auctions the universal rule.** Every allocation of state or communal land—whether by sale, lease, emphyteusis, or superficies—must be carried out on the ProZorro.Sale platform. A statutory ceiling of 20 hectares for agricultural parcels and 2 hectares for built-up plots will prevent bulk transfers under the guise of “urgent reconstruction.” Only narrowly defined national-security cases, approved by the Cabinet of Ministers and logged in the public audit trail, may be exempt.
- **Introduce specific safeguards for the newly created State Land Bank.** All sub-lease lots that the Bank tenders must be capped at 20 hectares to give small and medium-sized farms a fair chance to compete. In addition, any decision by the Cabi-

net of Ministers to withdraw agricultural land from universities or research institutes and transfer it to the Bank should be taken only after a published, multi-criteria impact assessment that weighs (i) the effect on research and teaching infrastructure, and (ii) the socio-economic implications for the host community.

- **Establish tools for transparency and accountability:** Update the Resolution on Public Land Monitoring No 474 from May 12, 2023, to include indicators that trace the dynamics and number of land auctions conducted by local governments—including differentiation between those conducted via Prozorro.Sales and those outside the platform—to ensure accountability and policy alignment with mandatory market-based e-auctions.
- **Insert sunset clauses into emergency land-use acts.** Any derogation adopted to speed reconstruction should expire automatically after two years unless it is reviewed and reissued under standard planning criteria.
- **Publish a live “reconstruction corridor” map.** The Ministry for Development of Communities and Territories of Ukraine should host an interactive map showing every publicly funded reconstruction project, the affected parcels, and hyperlinks to the related contracts, permits, and financiers.
- **Apply integrity pacts to large infrastructure.** For projects above a monetary threshold to be set by CMU, the contracting authority, all bidders, and an independent civil-society monitor sign a tripartite agreement granting real-time access to tender and implementation data.
- **Align recovery budgets with adopted plans.** All socio-economic development programmes—national, regional, and local—must certify consistency with the relevant spatial or urban plan before funds are committed. The spatial plan itself must be uploaded to the Urban-Planning Cadastre to allow public verification.

### 3.4 Dismantle Regulatory Barriers and Discriminatory Privileges

- **Phase out nationality-based limits that breach EU capital-movement rules.** A comprehensive review of the Land Code and sector-specific acts should identify and repeal ownership or long-lease restrictions that cannot be justified under Article 65 of the Treaty on the Functioning of the European Union (public security, land-use planning, or environmental grounds).
- **Convert open-ended give-aways into targeted social support.** Instead of automatic free-privatisation quotas, introduce means-tested land-grant or housing-voucher schemes for veterans, internally displaced persons, and other vulnerable groups, modelled on the social-rent arrangements already piloted by the Ministry of Veterans' Affairs.
- **Subject all preferential allocations to a public-benefit test.** Any legal exemption that allows land to be transferred outside competitive procedures must undergo a proportionality and necessity review by the Anti-Monopoly Committee and be published with a reasoned justification.
- **Modernise the List of Historic Settlements.** Replace the legacy list—many entries date back to the 1980s—with a transparent, criteria-based methodology

that balances conservation needs with legitimate development. Publication of GIS boundaries and protection regimes will remove the current ambiguity that investors and communities face.

- Removing these discriminatory or opaque provisions will align Ukraine with EU free-movement-of-capital obligations (Chapter 4) and State-aid disciplines (Chapter 8), while still preserving tailored support for groups most affected by the war.

### 3.5 Eliminate Discretion in Land-Use Change and State-Land Redistribution

- **Checklist-only approvals:** Re-table the unified-checklist bill, making checklist compliance the sole basis for approving land-management documentation and for changing designated land use.
- **Codify zoning hierarchy:** Enact a Spatial Planning and Building Code that requires any parcel-level decision to conform to a binding comprehensive urban plan and detailed urban plan.
- **Resolve structural issues in the architecture of planning documents:**
  - Address the lack of a clear hierarchy and interconnection between strategic documents, spatial and urban planning documentation, and recovery programmes and plans. This fragmentation leads to inconsistent decision-making and legal uncertainty in land use.
  - Resolve legislative conflicts regarding the legal status and approval procedures of historical and architectural reference plans (HARPs),
  - No legislative or policy mechanisms to incentivise HARP development were proposed or drafted, and no funding (budgetary, subvention-based) was allocated for HARPs development.
- **Remove barriers to the development of documentation related to State-Land Redistribution:**
  - Introduce legislative or policy mechanisms to incentivise the development of spatial and urban planning documentation and historical and architectural reference plans, ensuring they are developed in a timely and efficient manner.
  - Allocate funding (budget subventions) for the development of spatial and urban planning documentation and historical and architectural reference plans, guaranteeing the availability of resources for these essential planning tools.
- **Eliminate discretionary powers of cultural heritage protection authorities:** Develop and adopt a law that clearly defines the content and scope of powers of cultural heritage protection bodies, and limits the application of the “silence consent” principle in this area.
- **Transparent state-land Bank:** Legislation establishing the State Land Bank should: mandate an independent supervisory board with stakeholder representation; require open-data publication of every lease, sub-lease, or sale (parcel map, term, price, coun-

terparty); impose rigorous, IVS-aligned valuation before any transaction; oblige the Bank to run all allocations through ProZorro.Sales e-auctions. In parallel, state enterprises that hold land in permanent use should be given a direct legal right to lease out portions of their parcels via the same e-auction mechanism—without land withdrawal and without routing transactions through the Land Bank—so that idle public land can be mobilised transparently and competitively.

- **Parliamentary oversight:** Establish an annual report to the Verkhovna Rada on state-land transfers, including metrics on auction use, prices achieved, and post-transfer compliance.

These steps align with the Aarhus Convention on public participation and strengthen the rule-of-law benchmarks under Chapter 23.

### 3.6 Strengthen Economic Instruments: Valuation, Taxation, and Compensation

- **Institutionalise mass valuation:** Adopt a government resolution extending the mass valuation pilot to complete the development of the regression-based valuation model for non-agricultural land, ensuring the valuation system covers all land types comprehensively and equitably. Adopt a standalone law on the mass valuation and changes to the Tax Code that make mass valuation the official tax base, stipulate transparent model governance, and guarantee open access to valuation maps.

**Refresh valuation methodology:** Harmonise land-valuation standards with International Valuation Standards and EU best practice, ensuring that factors such as ecological services and climate risk are captured.

- **Transparent compensation framework:**
  - Codify a uniform method for calculating and disclosing compensation when land is expropriated for public-purpose projects or on grounds of public necessity, with independent review and an appeal pathway.
  - Codify a uniform method for calculating and disclosing compensation when land is expropriated by the state due to the presence (discovery) of an archaeological heritage object, with guidelines on how compensation is determined and communicated to landowners and affected parties..
- **Independent valuation oversight board:** Create a multi-stakeholder body that audits valuation models, hears complaints, and publishes annual findings.

A fair, transparent land-tax base and credible compensation mechanisms support the fiscal criteria evaluated under Chapter 16 (Taxation) and bolster legal certainty for investors under Chapter 33 (Financial and Budgetary Provisions).

#### Implementation Enablers

- **Time-bound milestones:** Sequence reforms over 2026–2030 with yearly legislative, institutional, and digital-platform deliverables.

- **Capacity-building package:** Combine EU Instrument for Pre-Accession assistance, World Bank technical support, and twinning arrangements with EU land-administration agencies.
- **Civil-society watchdog role:** Formalise participation of watchdog NGOs in monitoring land auctions, valuation roll-outs, and spatial urban plan adoption.
- **Adaptive review mechanism:** Incorporate a mid-term stock-take in 2028 to recalibrate targets and verify alignment with evolving EU screening feedback.

**Anchoring these measures in ACLIP 2026-2030 will transform current vulnerabilities into demonstrable progress on transparency, competitiveness, and sustainable land management—key credentials for successful EU accession and resilient, inclusive growth.**

**See Roadmap of Priority Actions for ACLIP 2026-2030 (linked to EU-accession chapters) in Annex III.**

## Annex I –

### Scoring of Selected ACLIP Activities (Five-point scale)



- 1 = Fully achieved;  
 2 = Partially achieved;  
 3 = Ongoing and likely achievable;  
 4 = Ongoing but unlikely;  
 5 = Not started.

### Land & Property Rights / Land Markets

Code	Brief descriptor	Score
2.5.7.1	Introduce mandatory e-auctions for sale/lease of state and communal land	5
2.5.8.1	Convert open-ended free-privatisation into targeted social-support schemes	5
2.5.9.1	Split StateGeoCadastre's managerial, control, and registry powers	2

### Land-Use Management

Код	Стислий опис	Оцінка
2.5.4.1	Simplify and de-bureaucratise the parcel-formation procedure	4
2.5.4.2	Create a fully electronic workflow for parcel formation	4
2.5.4.3	Deploy Software for e-based land-management and valuation docs	4
2.5.4.4	Complete inventory of state / municipal land and upload to Cadastre	4
2.5.6.1	Incentivise hromadas to prepare comprehensive spatial plans	4

### Property Valuation & Taxation

Код	Стислий опис	Оцінка
2.5.5.1	Pilot mass land-valuation system for tax purposes	2
2.5.5.2	Amend the Tax Code to peg rent & tax to market value	5

## Urban Development

Код	Стислий опис	Оцінка
2.5.1.1	Publish and digitise urban-planning documentation (general plans)	2
2.5.1.2	Ensure open access to zoning plans for permitting	4
2.5.1.5	Roll out the automated issue of Urban-Planning Conditions & Restrictions	5
2.5.2.1	Integrate cultural-heritage layers into the planning cadastre	2
2.5.2.2	Digital link between construction e-system and planning cadastre	4
2.5.2.3	Automate construction-permit checks against planning data	5
2.5.2.4	Create a single portal for public review of planning documents	5

## Контроль за корупцією у сфері земельних відносин

Код	Стислий опис	Оцінка
2.5.4.1 (subse)	Introduce a checklist to curb registrar discretion	4
2.5.6.1 (subse)	Monitor draft laws that weaken spatial-planning safeguards	4



## Annex II –

### Land-governance gaps in seven high-priority risks



#	Core risk	Probability*	Impact*	Evidence drawn only from ACLIP-Selected-Activities text
1	<b>Chronic revenue leakage</b> (local budgets lose land-tax potential)	High	High	Pilot mass-valuation system completed for agricultural lands, yet the model for non-agricultural lands must be finalized. The steps 2.5.5.1.6-1.8 (full roll-out, report, institutional law) also remain undone; the standalone mass valuation Law and the Tax-Code amendments for measure 2.5.5.2 have not even been initiated.
2	<b>Off-budget land concessions</b> (below-market leases/sales)	High	High	All six measures under 2.5.7.1 aimed to mandate mandatory market-based Prozorro.Sales e-auctions for state & communal land are “not started”. Because the State Land Bank’s operations were not contemplated when the ACLIP was drafted and approved, they fall outside the programme’s goals and measures and are therefore not assessed in this report.
3	<b>Rising investor litigation</b> linked to registry and planning uncertainties	Medium-High	High	2.5.4.1 notes continued registrar discretion after rejection of Draft Law 10095; 2.5.4.2 shows electronic-workflow bill only partial; such unresolved discretion “directly contradicts” the action’s goal—conditions that typically trigger disputes. <i>(No quantitative case count provided in ACLIP text.) The re-engineering of the National Cadastre System following the independent IT Assessment has not started.</i>
4	<b>Spatial inequality between hromadas</b>	High	Medium-High	Measure 2.5.6.1 records that state subventions for spatial plans stopped in 2022; only two hromadas have approved comprehensive spatial-development plans, while seven of eleven actions remain pending. No public tools for monitoring progress are available.
5	<b>EU accession delay risk</b>	High	High	The analysis sections for 2.5.4.* and 2.5.5.* highlight unresolved cadastral interoperability, discretionary approvals, and un-institutionalised mass valuation—issues flagged as prerequisites for alignment with EU acquis (Chapters 22, 27, 16).
6	<b>Missed green-finance channels</b>	Medium	Medium-High	Because mass valuation is still a pilot (2.5.5.1) and the follow-up law is missing, Ukraine lacks a statutory framework to extend valuation models to modern standards, including environmental attributes required under EU initiatives.

#	Core risk	Probability*	Impact*	Evidence drawn only from ACLIP-Selected-Activities text
7	<b>Heritage-driven project risk</b>	Medium	Medium	The State Register of Cultural Heritage Objects remains incomplete and unreliable, and its digitalisation has not been implemented. 2.5.6.1 notes that Historical-and-Architectural Reference Plans are unfunded and legally ambiguous; newly identified heritage objects lack clear registration, delaying or blocking development in historic areas. No public tools for monitoring progress are available.

\*Qualitative scale:

**High** = very likely / very significant;

**Medium-High** = likely / significant;

**Medium** = possible / moderate.



# Annex III —

## Roadmap of Priority Actions for ACLIP 2026-2030

(linked to EU accession chapters)



#	Recommended action (summarised)	Legal / regulatory path	Lead & co-responsible bodies*	Target milestone**	EU acquis relevance
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#### SHORT-TERM (2026)

1	Extend the Mass Valuation Pilot	CMU Resolution	CMU / MAPF /SGC	Q2-2026	Ch. 16 (Taxation)
2	Make changes to the CMU Resolution on Public Monitoring of Land Relations	Amendments to CMU Resolution No. 474 from May 12, 2023	CMU / MAPF /SGC	Q2-2026	Ch. 23 transparency benchmarks
3	Activate e-auction <b>default for every state / communal land transaction</b> (≤ 20 ha agri, ≤ 2 ha built-up)	CMU resolution under Art. 137 Land Code; update ProZorro.Sale rules	CMU / MAPF / MinDigital	Q2-2026	Public-procurement acquis, Ch. 5
4	<b>Register of Existing Planning Documentation</b> – mandatory upload of general, zoning & detailed plans; link issuance of UPCRs to data presence	Amend Art. 2.5.1 ACLIP + CMU subvention decree	MinDevelopment / MAPF / StateGeoCadastre	Q3-2026	INSPIRE & Open-Data Directives, Ch. 22
5	<b>Public verification tool for pre-2013 land acts</b> (open DZZK scans)	CMU order activating DZZK database API	StateGeoCadastre / MinDigital	Q4-2026	Ch. 23 transparency benchmarks
6	Common XML/JSON <b>metadata template for all public-law restrictions</b>	CMU resolution "On NSDI Core Schema"	MinDigital / MAPF / MinDevelopment / MinCult	Q4-2026	
7	Initiate re-engineering of the National Cadastral System	Law on the State Budget for 2027	StateGeoCadastre / MAPF/ MinDigital	Q4-2026	Ch. 23 transparency benchmarks Ch. 23 (legal certainty) INSPIRE, Ch. 27

#	Recommended action (summarised)	Legal / regulatory path	Lead & co-responsible bodies*	Target milestone**	EU acquis relevance
<b>MEDIUM-TERM (2027-2028)</b>					
8	New <b>Law on Unified State Urban-Planning Cadastre (UPC)</b> (single digital platform)	New parliamentary law	Verkhovna Rada / MinDevelopment	Q2-2027	Ch. 22 (NSDI)
9	Amend Land Code & Cadastre Law to make <b>restriction registration mandatory</b> + fines for non-entry	Amendments to Land Code Ch. 18 & Law No. 3613-VI	Verkhovna Rada / MAPF	Q2-2027	Ch. 23 (legal certainty)
10	<b>Unified Electronic Register of Cultural-Heritage Objects</b> with INSPIRE open layers	New law or amend Law No. 1805-III	Verkhovna Rada / MinCult	Q4-2027	Ch. 27 (culture & env.)
11	Standalone <b>Mass-Valuation Law</b> – makes values the tax base; sets an oversight board	New parliamentary law + Tax Code amendment	Verkhovna Rada / MAPF / MoF	Q4-2027	Ch. 16 (Taxation)
12	<b>Spatial-Planning &amp; Building Code</b> – codify zoning hierarchy; resolve HARP status	Consolidated code (amends Laws 3038-VI & 1805-III)	Verkhovna Rada / MinDevelopment / MinCult	Q2-2028	Ch. 23, Ch. 27
<b>PRE-ACCESSION (2029-2030)</b>					
13	Repeal nationality-based <b>ownership / long-lease limits</b> not justified under Art. 65 TFEU	Amend the Land Code & sector acts	Verkhovna Rada / MAPF	Q2-2029	Ch. 4 (Free movement of capital)
14	<b>Uniform compensation framework</b> for expropriation, incl. archaeological finds	New parliamentary law	Verkhovna Rada / MAPF / MinCult	Q4-2029	Ch. 16, Ch. 33
15	Statutory <b>digital-only clause</b> for all land & planning documents; e-signature mandatory	Amend Law on E-Docs & cross-ref. sector laws	Verkhovna Rada / MinDigital	Q4-2030	Single Digital Market acquis

