



Supporting Transparent Land Governance in Ukraine

Steering Committee
February 19, 2026



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Overall goals and main areas of work

Goal: Create preconditions for transparent functioning of land markets to ...

- ...enhance efficiency and sustainability of resource use
- ...provide a basis for rural investment and growth by small and medium farms & rural SMEs
- ...counter rural depopulation and impoverishment

Three broad areas of work

- Legal & regulatory framework for transparent land policy & EU CAP readiness
- Put in place infrastructure for CAP-type programs (small farmers) in ag. Sector (IACS incl LPIS)
- Provide analytical support to improve public & private decision-making

Implementation arrangements

Supported by EU via bank Executed Trust Fund (BETF)

- Phase 1 closed (2017-2023)
 - Phase II (2020-2028)
 - Phase III Top-up IACS & SAR: 2024-2028
 - Technical assistance only
- => Support to Studies, Piloting, Land governance Monitoring, Impact Evaluation

Implemented in close collaboration with:

- Ukrainian Govt.. (MEEA -incl SGC, MoJ incl NAIS & FLA):
- EU Joint Research Center – JRC; EU-supported projects
- FAO program: Upgrading SAR SW; GSA SW development; LPIS/IACS pilot
- IPRSA: Paying agency regulatory framework; IACS, SAR
- NGOs/Inst/Univ: KIIS, KPI, KSE and others

Coordination with other World Bank programs

DPOs - Budget support based on prior actions

- Land market opening
- Market based valuation & land governance monitoring
- ACL & ACLIP I (2023-2025)

PCGF capitalization via EU supported RETF - operations

- Banks use of SAR to facilitate access to finance small and medium sized farmers

ARISE Agricultural project

- Scaling up PSG program with further plans for expansion
- Collaboration with implementation CAP style state support via SAR

RETF - SAR sustainability & IACS support –WB Operational Department

- Upgrade SAR SW to Paying Agency requirements (2027)
- Government-led SAR data center establishment & SAR maintenance
- Support Roll out IACS/LPIS

Legal foundations

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Legal basis for land reform & EU accession

Land laws adopted 2020/21

- Anti-raider law (#340)
- Land turnover law (#552) – allow ag. land sales
- Decentralized/ Local Planning (#711)
- National Spatial Data Infrastructure (NSDI) (#554)
- Transparent state support (#985)
- State Geocadaster Reform (#1423)
- Mandatory e-auction of public land (#1444)
- Partial Credit Guarantee Facility (#3205)

Key Ukraine plan Indicators:

- 12.1: 80% agricultural SS via SAR
- 12.3: Comprehensive monitoring land governance
- 12.6: Land valuation
- 4.5: Adoption ACL 2026-30 & ACLIP II

Follow up legislation/regulation

- 2022: Land Reform strategy (based on 2020 white paper)
- 2023 Anti-corruption law # 2322-IX: ACLIP-I R.# 220
- 2024 Land relations monitoring law & CMU R. #474
- 2024 NBU liquidity ratio for land as collateral (CMU R #351)
- 2024: Land valuation pilot & mass valuation law
- 2024: SAR law #3980 & CMU R. #549
- 2025: Paying agency law # 13202-1 w. ref. to IACS and SAR law

Subsidiary regulation for the above laws

- 6-monthly monitoring of regulations of key laws

ACLIP 2023-25 land chapter of strategic importance

- ACLIP is key for implementation Land Reform strategy (2020 white paper)
- Project commissioned independent review ACLIP I as a basis for follow-up legislation; Public presentation held to disseminate ACLIP In chapter assessment (October 16, 2025)

Accomplishments

Legal basis for mass land valuation

- Pilot successfully completed
- Regression-based methodology for agric. land

IT assessment of cadastral system

- Assessment completed
- TOR for redevelopment approved

Partial delegation to professionals

- Private surveyor pilot continued on temporary basis

Challenges

- High discretion in land plot formation remains
- E-auction not mandatory for all transactions state land
- Free privatization reform postponed; instead revived
- Digitization of land management workflows stalled
- Manual issuance of planning documents continues
- Urban planning cadaster (UPC) partial & not linked to key state registries or digital workflows
- Spatial development planning only in few hromadas
- Environmental protection issues not addressed

ACLIP II 2026-30: key to plug these gaps

Clarify, record & publicize all land use restrictions

- Amend LC Ch 18: require cadastral registration of all land use restrictions
- Pass law on UPC merging municipal ones
- Adopt single concept of functional zoning in line w. EU practice
- Standardize & share spatial restriction data: common metadata template; data audit, procedural transparency, cross-registry alerts

Complete digital integration of cadaster & related registries

- Name cadaster, UPC, RoR, and heritage object register as base registers; establish registry of planning documentation; link to court register
- Ensure full traceability, open access & eliminate paper documents
- Establish independent cyber-audits of the whole system
- Implement the plan for re-engineering the cadastral system

Guard against corruption during wartime & reconstruction

- Make e-auctions the universal rule & establish tools for public monitoring
- Insert sunset clauses into emergency land use acts
- Publish a live reconstruction corridor map
- Put in place integrity pacts for large infrastructure
- Align recovery budgets with local spatial plans

Dismantle regulatory barriers & discriminatory privileges

- Phase out nationality-based limits that breach EU capital movement rules
- Convert open-ended giveaways into targeted social support
- Subject all preferential allocations to a public benefit test
- Modernize list of historic settlements

Eliminate discretion in land use change & state land dist.

- Checklist only approvals for approving land management documentation or changes of land use
- Codify zoning hierarchy & establish hierarchy of plans
- Eliminate discretionary power of cultural heritage protection bodies

Strengthen economic instruments

- Institutionalize mass valuation via stand-alone law & integrate w tax code
- Establish transparent compensation framework
- Create independent valuation oversight board

Key legal challenges

Anti-Corruption law 2026-2030 & Implementation Plan (ACLIP)

- Ukraine Plan Indicator 4.5 requires adoption & publication of ACL & ACLIP in Q2 2026
- Public consultation for draft ACL completed (Dec. 2025), need to set date for Parliament
- ACLIP II drafting can start once ACL passed at least first reading

Other critical legal issues

- CMU resolutions missing for SGC reform law (#1423)
- SLC re-engineering on hold due to lack of resources
- Bill 10027 - free land privatization for veterans (passed first reading) inconsistent w EU requirements
- Laws 11533 limits land price reporting (no EDRPOU or cadno)
- No agric. land mass valuation follow up (methodology, tax law) or extension to non-agricultural land

Using SAR to ensure Ukraine's readiness for CAP-type small farmer programs

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Elements of CAP-type program: Registry, IACS, Paying Agency

Farmer registry

- Unique ID - interoperable w. other registries via API
- Reporting systems (beneficiary lists)
- Tracing back to beneficial owner & households
- Can also serve a basis for EUDR-type traceability

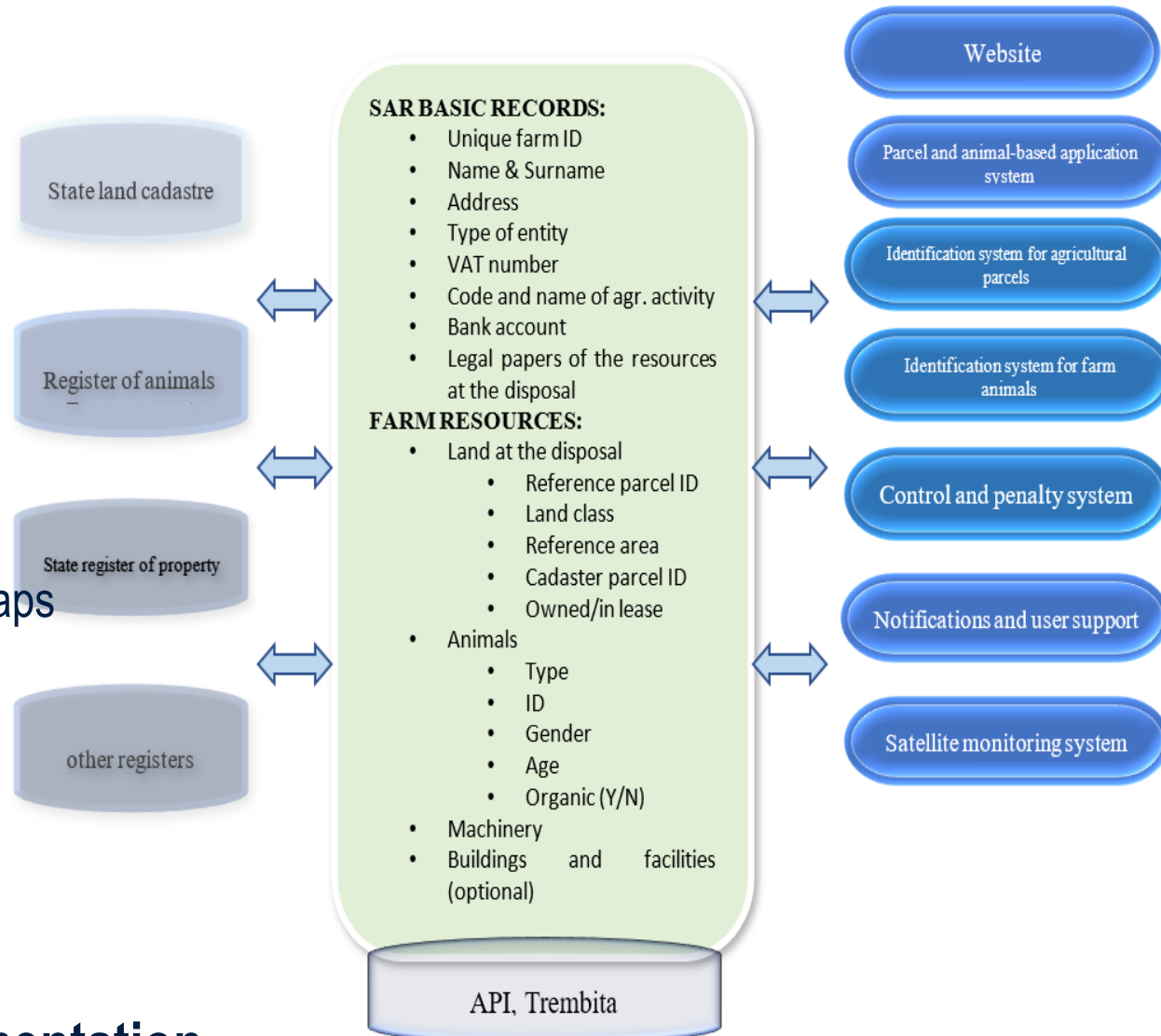
Integrated administration & controls (IACS)

- Geo-spatial application (GSA): Farmer selects parcels
- Automatic Risk-based on the spot control (OTSC) crop maps

Land Parcel information system (LPIS)

- Aerial imagery – 1:5,000 scale; < 3 years old
- Impossible to obtain under war conditions
- But piloting using alternatives key to improve readiness)

All of these require legal provisions & IT implementation



SAR Law (#3980) and resolution #549- 2024

Recognizes SAR as registry & establishes interoperability

- Establishes SAR as registry compliant with EU farm registry requirements
- Appoints technical administrator to maintain SAR SW & establish Data Centre
- Mandates registr. in cadaster & registry as precondition for area-linked support beneficiary eligibility

Expands types & sources of info/instruments in SAR system

- Establishes unique farmer ID; expands functionality & scope for error correction SLC/RoR/land use class
- Interoperability with additional registries (civil status, demographics, sanctions, normative land values; beneficial owners)
- Adds agrarian notes & crop statistics modules; updating frequency; modalities of 3rd party access

Allows use of satellite imagery to facilitate transition to CAP compliance

- Mandates creation of mechanisms for risk-based control & farmer feedback/error correction
- Provides basis for geo-spatial aid application (GSA) & risk-based on the spot controls
- Enables Land parcel information system (LPIS) development for IACS pilot

IACS & PA Legal Framework- Law #4619-IX (2025)

Paying Agency => Administrator Agricultural State Support

- Establishes Paying Agency & mechanisms for state support transfer
- List steps for Paying Agency accreditation

Establishes Integrated Administration and Control System (IACS)

- Defines IACS as state information system for monitoring, control and administration of support
- Establishes verification mechanism using cadaster, property register, other registries, crop maps
- Introduces risk-based monitoring and integrity checks and sanctions
- Mandates implementation of IACS functionalities via State Agrarian Registry (SAR) digital platform

Allows State Support alignment with EU CAP principles

- Defines “active farmer” and eligibility criteria like for area-based support and other activities
- Prioritizes small producers and veterans; excludes sanctioned & aggressor-linked entities, debtors
- Enables CAP-style payments and controls - basis for IPARD and future CAP financing cycles
- Detailed regulations needed by Q4, 2026

Progress on implementation

MEEA gained ample experience in managing state support via Farmer Fund

- Farmer self registration ($\approx 200,000$; 95% < 500 ha); 17 million ha agricultural land in SAR
- More than 100 mn USD disbursed via SAR in > 130 programs (PSG -> ARISE)
- Full rights to SAR software formally handed over Dec. 2025

Expansion of SW to accommodate full suite of IACS instruments underway

- TOR & oversight by project – implemented by FAO
- Contract to add GSA about to be signed
- Full real time interoperability with cadaster & RoR (daily updates) agreed; to be in place by March 2026

Challenge is now for MEEA to fully take over

- Complete HW establishment, data migration, licenses, call center, etc.
- Hire & train staff to maintain SW * establish procurement capacity to include resources in RETF as per procurement plan
- Gradually shift to funding from state budget & apply for EU IPARD funding
- Our project will provide TA & support to drafting TOR



Using satellite imagery and a farmer registry to assess agricultural support in conflict settings: The case of the producer support grant program in Ukraine

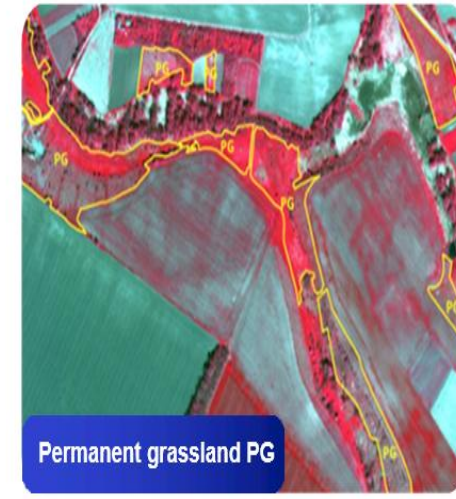
Klaus Deininger , Daniel Ayalew Ali 

The World Bank, 1818H Street NW, Washington, DC, USA

Basis for LPIS adapted to Ukraine (w. JRC)

Phase 1 (2024): Use of archive VHSI

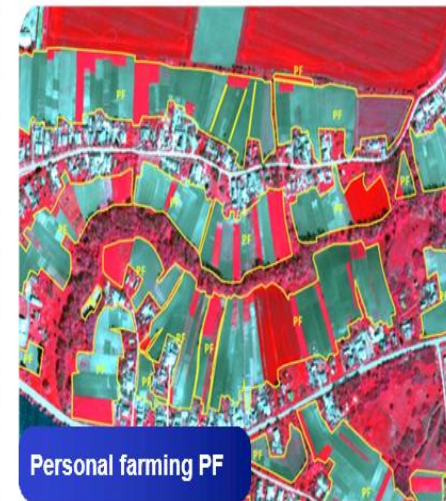
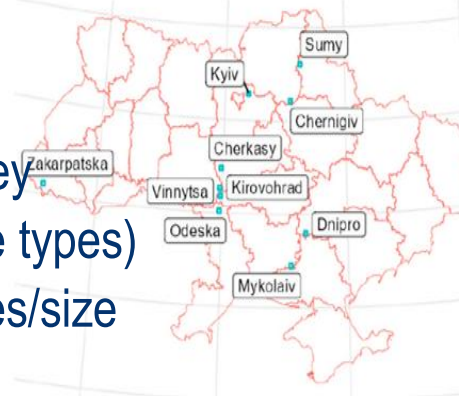
- Acquired VHSI for 10 blocks (1,000 km²)
- Delineated Reference Parcels (RPs) for jey categories
- Data used to identify land not meeting eligibility criteria



Phase 2 (2025): Tasking of satellite imagery

- 3 hromadas & manual delineation of RPs
- Big cost differences but still expensive
- JRC agreed to 'proto LPIS' to test GSA
- Farmer declaration based on crop stat. module

1st Stage LPIS Pilot Geography



GSA SW & actual program key for next steps

- SW to be contracted by FAO – deployment by July key
- Program criteria: Scale & coverage (oblasts, land use types)
- Suggestion: Use voucher program with adequate rules/size
- Importance: Essential for drafting of regulations

IACS/LPIS implementation roadmap

IACS in Paying Agency Law; Start Techn. Prep.

Achievements Dec. 2025

- MEEA presents IACS roadmap and results so far to DG Agri
- Payment Agency Law – w IACS adopted
- Upgraded SAR SW incl. IACS elements
- Approach LPIS VHR SI for IACS pilot agreed w. MEEA & DG Agri
- Land use classification model RP developed & agreed
- Technical specifications GSA developed and submitted to FAO

LPIS/IACS pilot completed

LPIS/IACS pilot –start July 2026

- Suitable FAO area-based support program available for pilot (EU \$)
- Functional GSA available (no later than July 15.)
- Upgraded SAR SW deployed; LPIS and proto LPIS available; Data base for proto- AMS ready
- Pilot application using GSA
- Grant approval–using IACS checks and controls completed by October 30 (3 months cycle)
- Lessons pilot for CMU resolution available (September 30)
- Baseline data for pilot evaluation collected

IACS CMU resolutions adopted

Adopt. resolution: Dec. 31, 2026

- Lessons learned from IACS/LPIS pilot used for updating draft CMU resolutions IACS (September)
- Public consultations completed (October)
- CMU resolutions for IACS adopted (December 2026)

Roadmap upscaling IACS

Upscale plan - 2027

- Impact evaluation IACS pilot completed
- Technical specifications nation-wide AMS and GSA agreed
- Tech specifications for nation-wide LPIS & cost estimate agreed
- Technical specifications for upgraded SAR SW w. full IACS & PA compliance ready; development via RETF
- Roadmap and strategy to institutionalize and roll out IACS agreed

Key milestones & issues for discussion

Nature, timing, total volume & rules of pilot program for FAO test of GSA to be agreed w. FAO

- Failure to implement in 2026 will render time plan impossible to achieve
- Need decision on rules & financing volumes
- Diversity across oblasts & minimum # of farmers not yet in SAR
- Checking of family/beneficial owners can be done but OTSC may need to be dropped

If GSA SW in place by July: Update regulations & SW TOR end 2026

- Guidelines for IACS & GSA implementation & SAR use as digital hub for farmers
- TOR for adjustments to SW – to be supported via RETF
- Will allow transition to full-scale LPIS

MEEA needs to demonstrate & maintain exclusive use of SAR for state support (Ukraine Plan)

- BDF will provide data by end March to allow reporting
- EU to indicate reporting template, type of access & protocol for and modality of verification (project can help if requested)
- Move towards consolidation & expansion - rumors of support via other channels to be corrected/clarified



**Analytical support to improve
public & private decision-making &
assess reform impacts**

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Land relations monitoring

Background & status of discussions

- Need for comprehensive hromada-level dashboard managed by DZK on prices/transaction, taxes, disputes, etc.
- Regulations adopted in 2024; pilot version for Ukraine Plan 2025 – refined KPIs & UI design based on feedback
- Data sharing agreements signed w. 8 providers (though not all have API access)

DZK/SGC Working group actively working on the topic

- Comprehensive revision of KPIs; methodology for simple indicators; calculation checks for prices, tax, disputes ongoing
- New UI almost finished, can be launched in Q2 2026
- Gradual expansion to other indicators & API connectivity

Discussion with urban cadaster, address & building registry, e-construction

- Agreement in principle on indicators reached – move to piloting technical implementation
- To be followed by regulatory adjustment
- Ideally to be combined with update of monitoring resolution to include ProZorro & spatial indicators

Crop statistics module: Use crop maps for analysis

Any administrative unit for any year in 2019-25 to get information on

- Area cultivated with different crops at hromada, rayon, oblast, parcel level
- Identify/display non-registered but cultivated parcels -> basis for risk-based land use control (needs legislation)
- Comparison over time (get figures/maps of newly cultivated or abandoned agricultural lands)

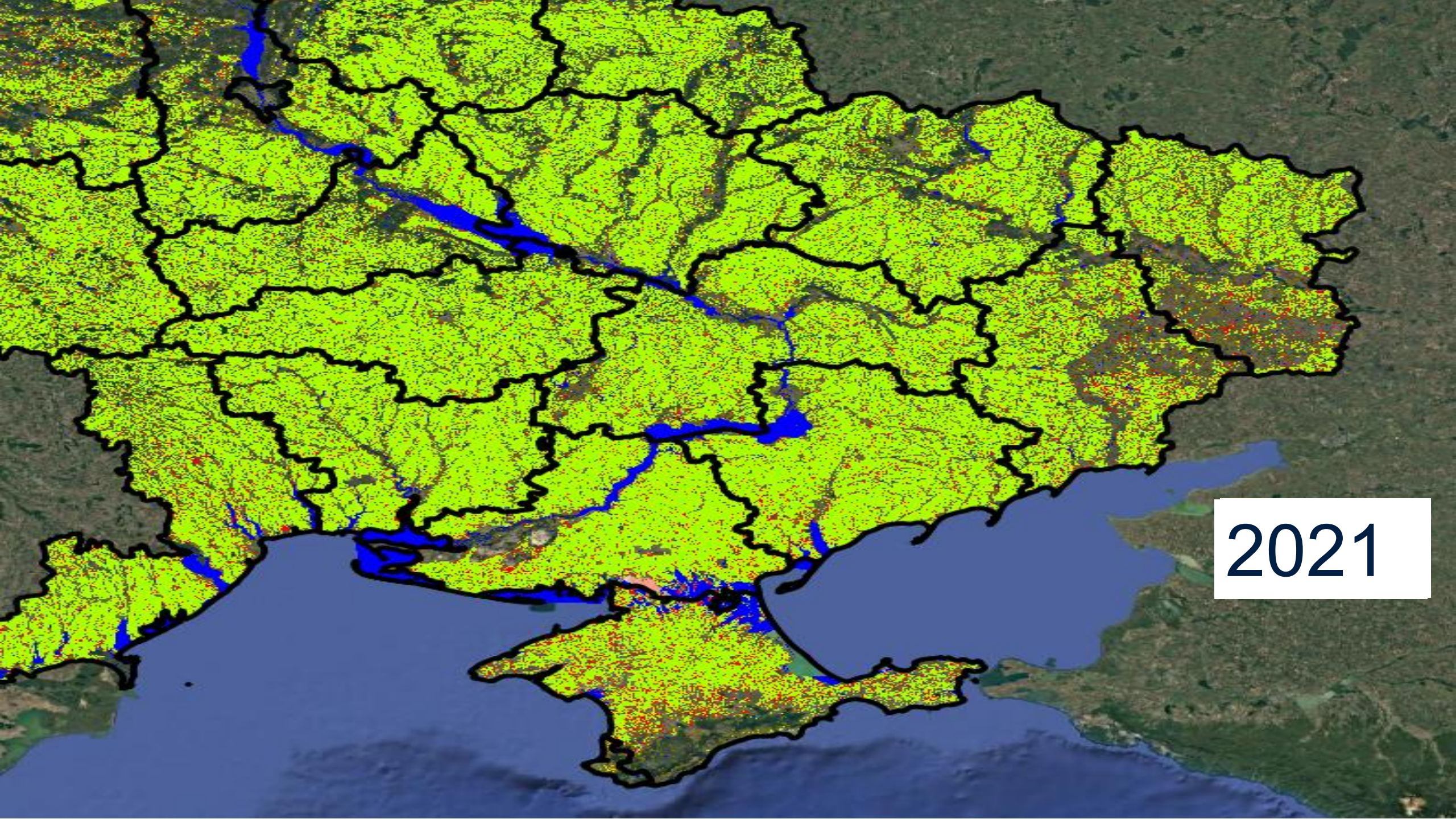
Search by EDRPOU important for programs

- Eligibility for programs that require current cultivation- key for proto-LPIS
- Traceability of produce (EUDR/organic, carbon credits etc.) if linked to digital receipts
- Advisories & credit/insurance based on real time crop monitoring
- All require real-time connection & updating with SLC & RoR – will be implemented shortly

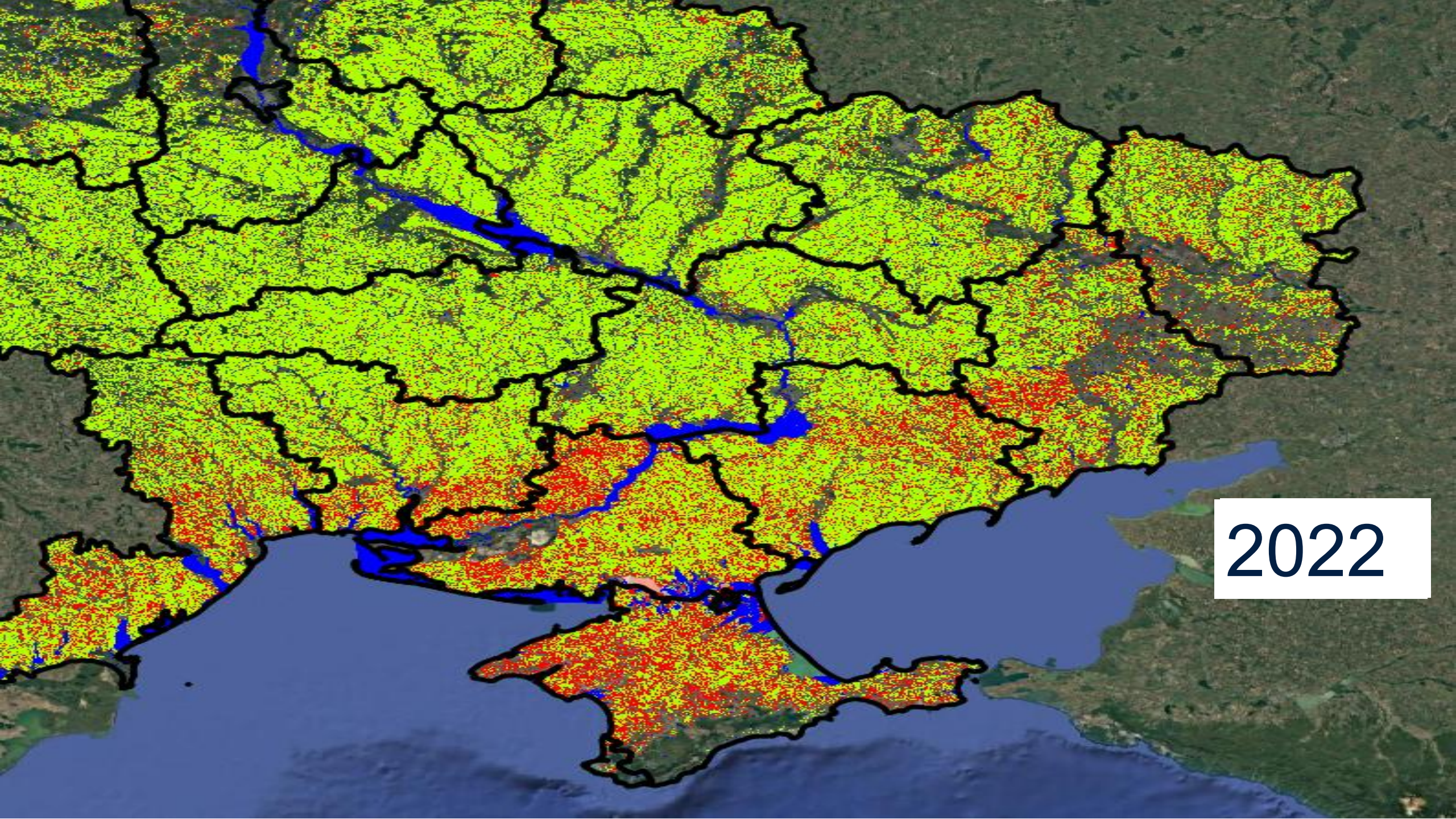
Improving quality & completeness of cadastral data

- Show discrepancies between cadastral boundaries and actual land use
- Identify fields with gaps/multiplicity of rights
- Initiate rectification to, among others, expand local revenue

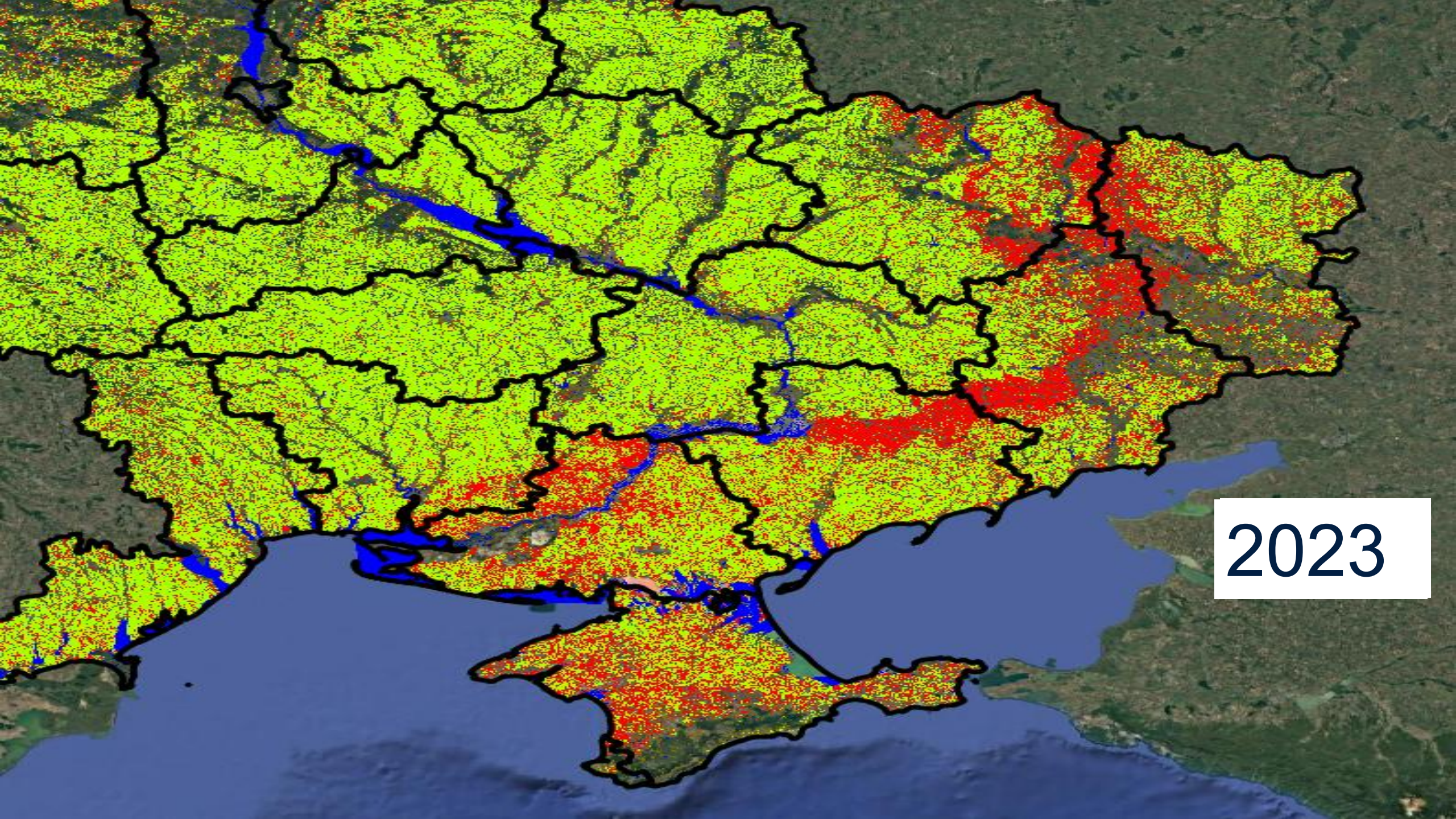
Demo conducted – production version to be delivered shortly



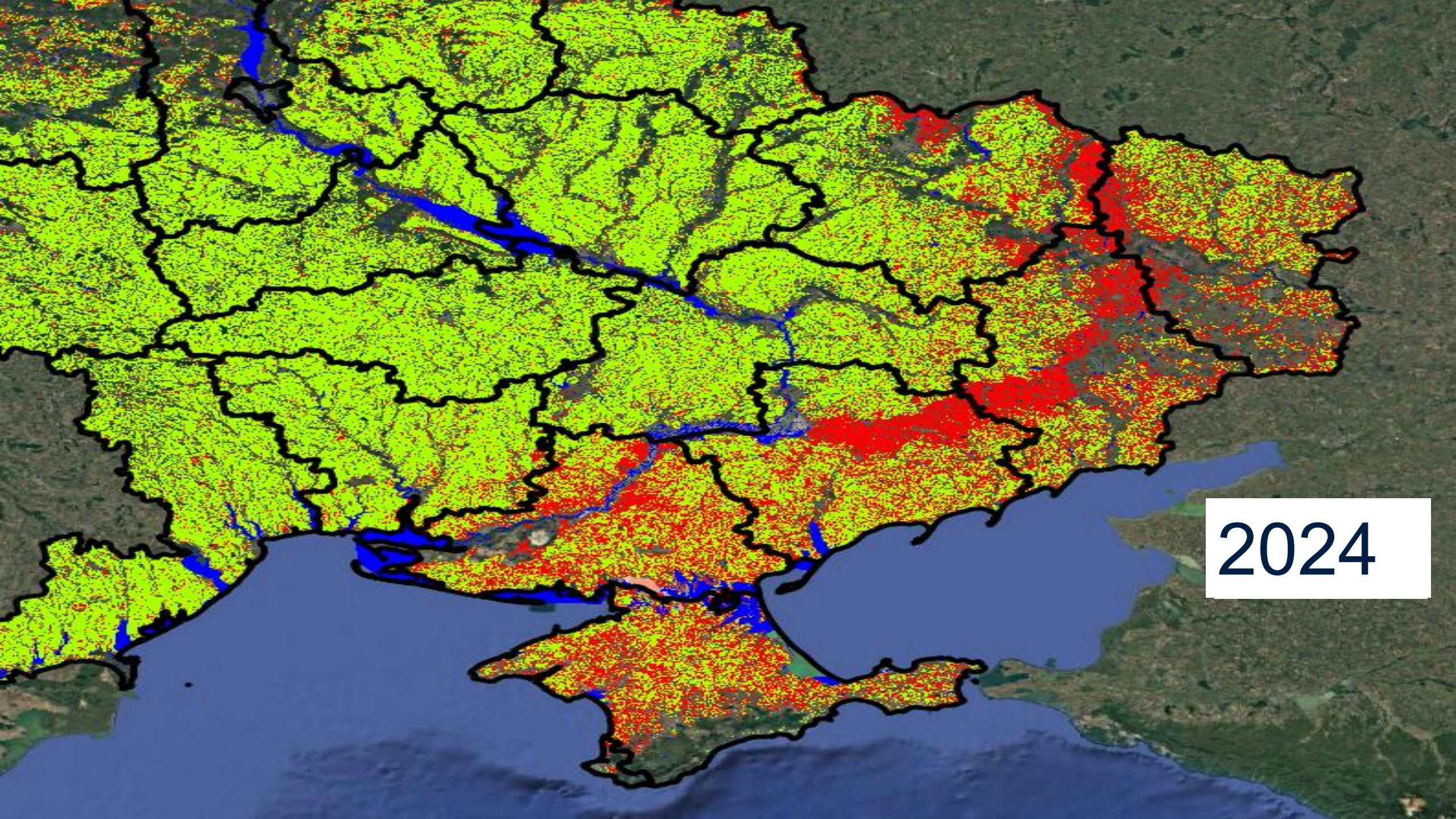
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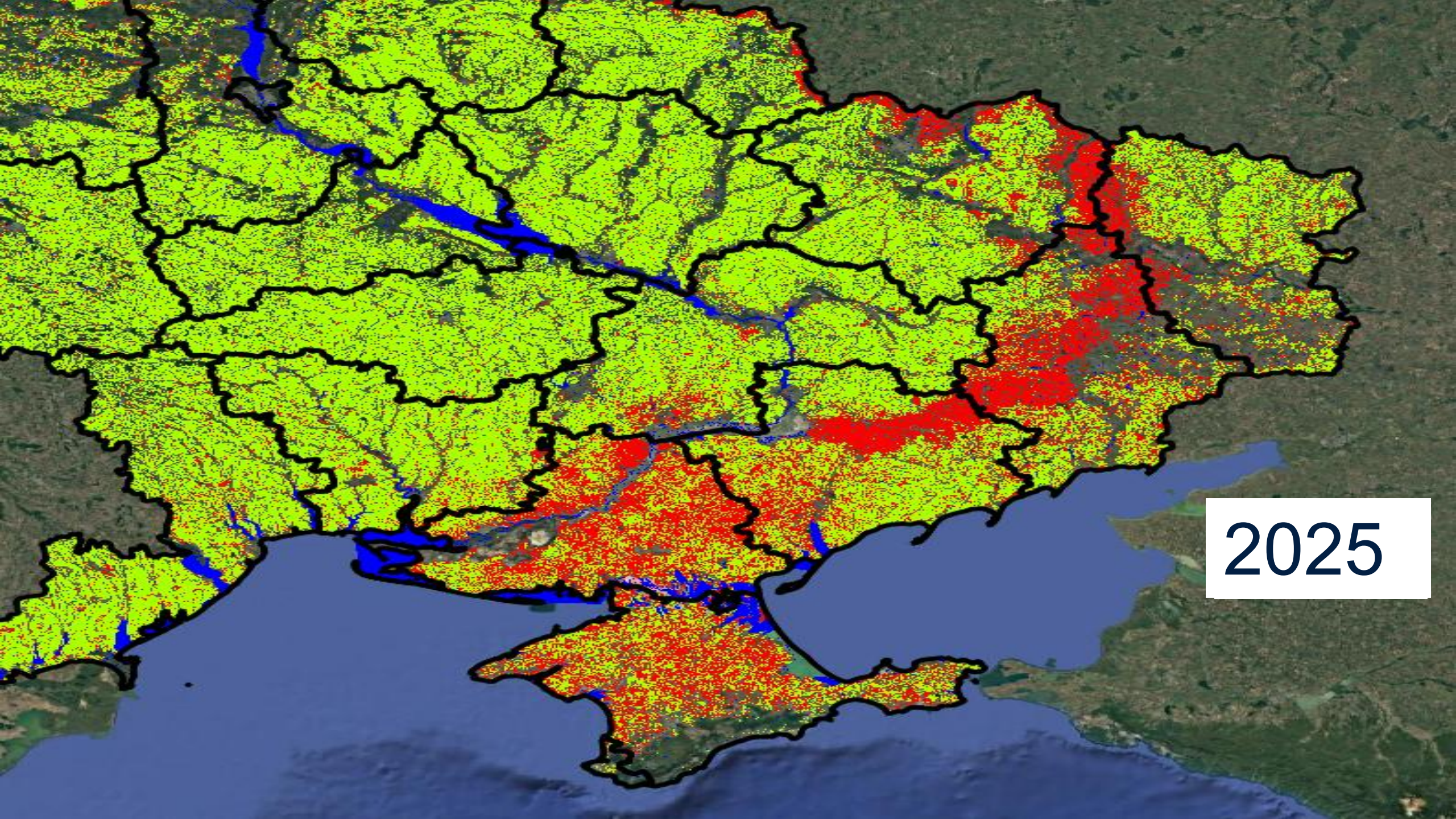
2022



2023



2024



2025

Cropped & uncult. area by conflict status (mn ha)

	2019	2020	2021	2022	2023	2024	2025
Total cultivable area							
Part or fully Russian-occupied	7.87	7.98	8.12	8.19	8.24	8.27	8.33
Oblasts bordering the front line	7.99	8.08	8.17	8.24	8.29	8.35	8.42
All other oblasts	15.37	15.75	16.26	16.58	16.82	16.97	17.38
Cropped area							
Part or fully Russian-occupied	7.18	6.98	7.27	5.37	4.84	4.17	4.50
Oblasts bordering the front line	7.55	7.44	7.69	6.75	6.84	7.12	7.27
All other oblasts	14.08	14.60	15.32	15.07	15.36	15.47	16.04
Uncultivated area							
Part or fully Russian-occupied	0.69	0.99	0.85	2.83	3.40	4.10	3.83
Oblasts bordering the front line	0.44	0.63	0.48	1.49	1.45	1.22	1.15
All other oblasts	1.28	1.16	0.94	1.51	1.46	1.49	1.33

Part or fully Russian-occupied oblasts: Crimea, Donetsk, Kherson, Luhansk, Sevastopol and Zaporizhia; oblasts bordering the front line: Dnipropetrovsk, Kharkiv, Mykolaiv, Odesa

Crop composition on Ukraine-controlled territory

	2019	2020	2021	2022	2023	2024	2025
Cropped area (mn. ha)	21.64	22.04	23.00	21.82	22.20	22.59	23.31
% cereal	35.7	30.3	32.4	31.3	27.9	26.1	27.8
% maize	24.7	25.1	25.2	21.2	21.2	21.1	22.0
% rapeseed	5.3	4.1	3.8	5.5	7.4	5.9	5.6
% sunflower	23.6	25.6	25.4	26.4	28.0	24.5	26.6
% soybeans	8.1	6.1	5.9	10.2	11.9	17.7	14.3
% other crops	2.6	8.8	7.3	5.4	3.5	4.8	3.7

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Regular Article

Using free remotely sensed data to assess war-induced damage to agricultural cultivation: Evidence from Ukraine

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Follow-up analytical work w. KPI/JRC/ESA

Parcel boundary delineation (using super-resolution Sentinel)

- Pilot for 10 hand-delineated blocks to test quality of model predictions
- If satisfactory, expansion to all of Ukraine in 2026 growing season

Generating training data for minor crops

- Building on tobacco case study
- Extend high quality crop map coverage to other crops of interest to Government -> List
- Can in future be self-perpetuating for crops where declarations are needed for public programs/traceability

To be discussed at ICAS in Krakow (July 8) & WB land conference (AgriConnect)

- Krakow: High level plenary w. DM, DG Ukrstats, DG Eurostats, WB Chief Statistician, & possibly JRC
- Technical session to highlight potential links between crop maps & statistics
- LC: Showcase versatility of farmer registries & Ukraine's digital prowess (ProZorro)

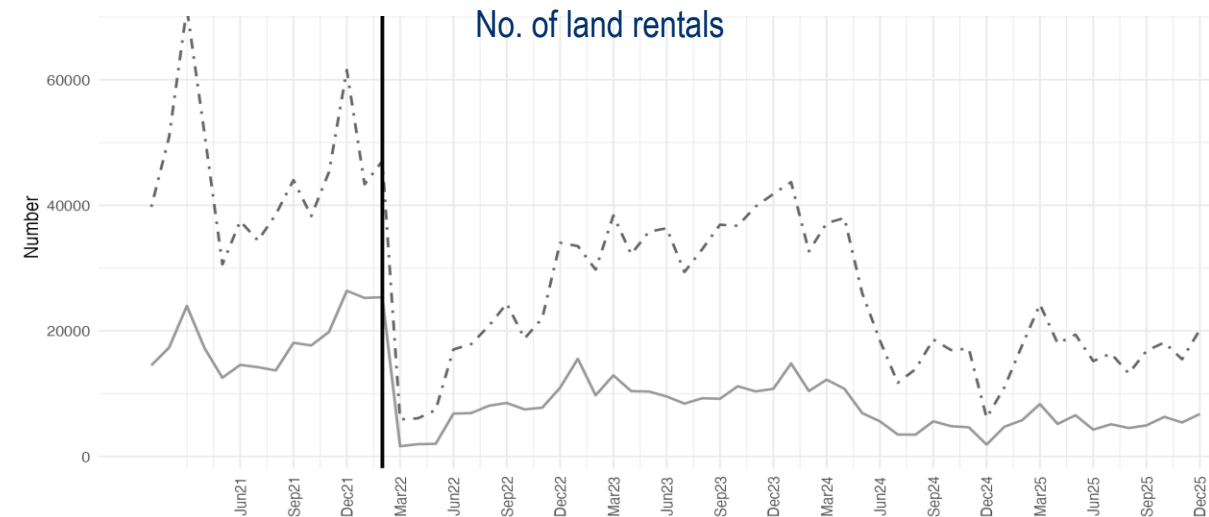
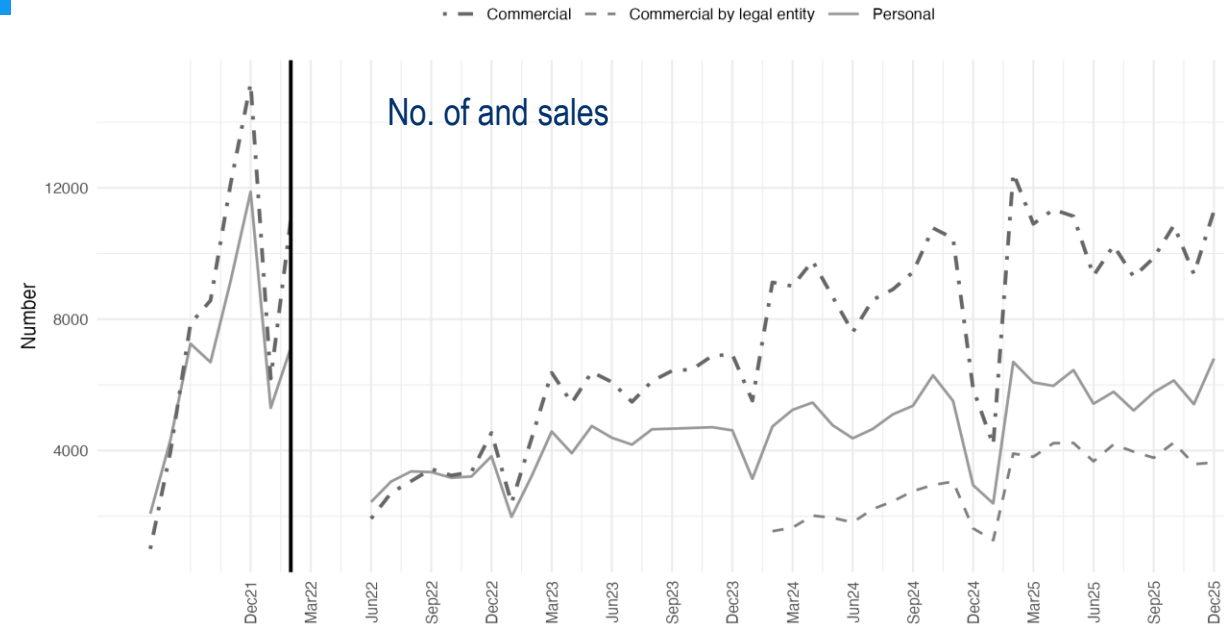
Land market monitoring – transaction volume

Land sales increasing – rentals dropping

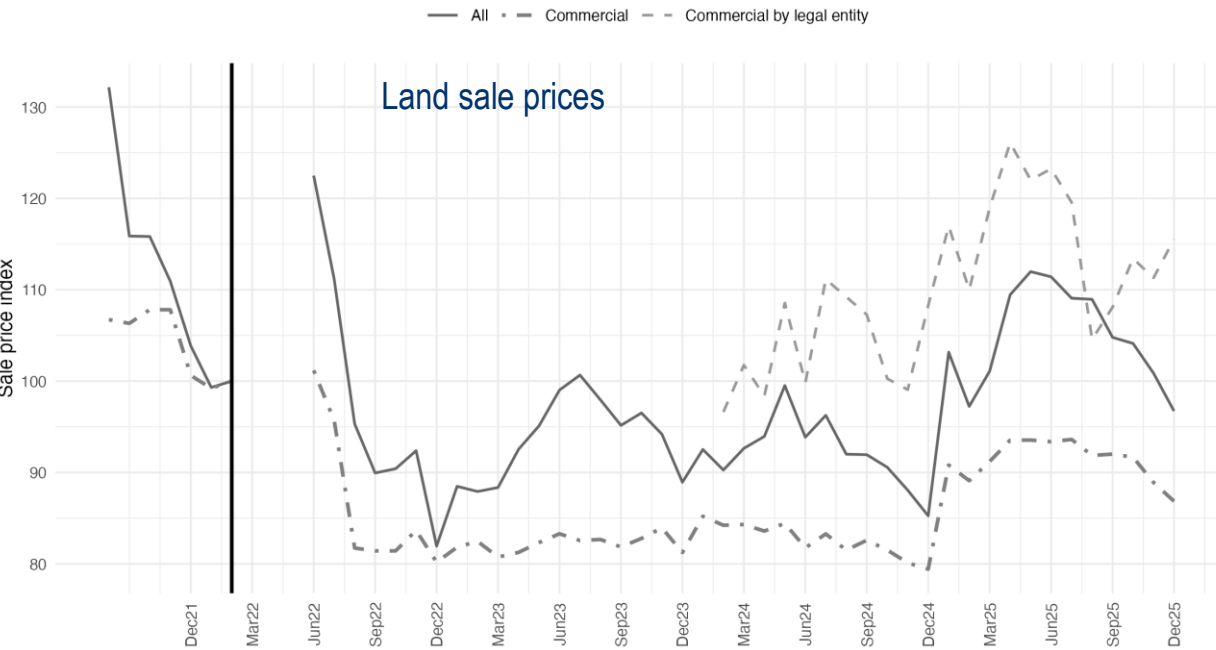
- > 10,000 sales/month in 2025 (double 2023 level)
- < 20,000 new leases/month (half 2023 level)

Need to analyze market power in sales market

- Earlier analysis showed market power in rental markets
- -> Need to extend to sales market: see if regulation justified
- Discontinuation of EDRPOU/cadno reporting for sales: concentration analysis & specific price analysis impossible



Land market monitoring – land values



Sales prices now above pre-war levels; leases about 80%

- Benefits landowners
- ‘Normative value’ no longer a good measure for taxation
- Project trained DZK staff in mass valuation for agric. land
- Need to extend pilot to non-agric. land & draft methodology
- ... precondition for changes in tax code
- Discussion with Agr. committee on next steps desirable

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Reforming land valuation and taxation in Ukraine: A path towards greater sustainability, fairness, and transparency

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Priority actions

Ensure legal issues (ACLIP, valuation, prices, privatization) are addressed

Build MEEA capacity to manage SAR, expand its use & routinely report on all support programs

Agree on timing, rules, and volume of GSA/LPIS piloting w. FAO

Analyze land sales market performance to assess need for regulation

Consolidate land relations monitoring, publicize dashboard, explore scope for expansion

Build on crop statistics module for GSA & analytics: parcel segmentation & small crops, statistics & private sector

Thank you!