



**The Invincible
LAND**



Land Market Review Ukraine

**ANALYTICAL REPORT
WAYS TO IMPROVE LAND LEGISLATION**

KEY CHANGES IN LAND LEGISLATION IN THE FIRST HALF OF 2025

Ukraine continues to implement land legislation reforms with the aim of creating an effective and transparent land resource management system.

During the first half of 2025, a number of regulatory acts were adopted aimed at strengthening control, transparency, and the optimization of procedures in the field of land relations.

Changes in the Procedure for Entering Restrictions into the State Land Cadastre

In January of this year, the government approved amendments to the Procedure for Maintaining the State Land Cadastre (SLC). **Resolution of the Cabinet of Ministers of Ukraine No.6 dated January 7, 2025, “On Amendments to the Procedure for Maintaining the State Land Cadastre”** aims to improve the accuracy, accessibility, and timeliness of entering data on land use restrictions.

In particular, it is now allowed to enter information into the State Land Cadastre regarding restrictions (e.g., related to defense facilities) based on an application — either with technical documentation or without it, if such documentation is not required by law.

The regulatory act also provides official access to cadastral data for law

enforcement and prosecution authorities. These changes aim to enhance control, transparency, and the speed of data updates in the cadastre — which is especially important under martial law for the effective use of land for national defense purposes.

Regulation of the transfer of land management documentation compiled before 2013 to the State Land Management Documentation Fund.

On April 8, 2025, the Cabinet of Ministers of Ukraine adopted **Resolution No. 394 “On Certain Issues of Protecting the Interests of Landowners and Applying the Administrative Procedure in the Field of Land Relations.”** The regulation entered into force on April 11, 2025, and, in particular, it regulates the transfer to the State Land Management Documentation Fund of land management documents prepared before 2013 without using an electronic digital signature (EDS).

Such transfer may be carried out not only by the authors of the documentation, but also by their heirs, land users, or local self-government authorities. The transfer is provided on a free-of-charge basis.

Due to martial law, public access to land parcel boundary coordinates in the cadastre has been temporarily restricted to prevent misuse and ensure the security of facilities.

This resolution also officially invalidated the outdated standard land management contracts from 2004, helping to avoid legal confusion.

The main objective of the act is to streamline the regulatory framework, ensure the preservation of valuable technical documentation, and protect data under wartime conditions.

Indexation of Normative Monetary Valuation of Land in 2025

The State Service of Ukraine for Geodesy, Cartography and Cadastre determined **the indexation coefficient**

for the normative monetary valuation of land in 2025. The indexation coefficient was set at 1.12, based on the consumer price index for the previous year, and was applied to all categories of land. Extracts from the normative monetary valuation of land were automatically updated with this coefficient as of January 16, 2025.

The maximum land tax rates were also clarified: for agricultural land – within the range of 0.3–1% of the normative valuation, for forest land – up to 0.1%, and for communal land – up to 1%.

These changes aim to reflect the current value of land resources in the tax base and ensure stable revenue for local budgets. They also create a basis for differentiating the tax burden according to the designated purpose and actual use of land parcels.

Key Changes in Land Legislation in the First Half of 2025

Changes to the Procedure for Entering Restrictions into the State Land Cadastre

Resolution of the Cabinet of Ministers of Ukraine No. 6 dated January 7, 2025, "On Amendments to the Procedure for Maintaining the State Land Cadastre"

- Possibility to enter information on land use restrictions into the State Land Cadastre based on an application — either with technical documentation or without it.
- Official access to cadastral data for law enforcement and prosecution authorities

Regulation of the transfer of land management documentation compiled before 2013 to the State Land Management Documentation Fund.

Resolution No. 394 dated April 8, 2025, "On Certain Issues of Protecting the Interests of Landowners and Applying the Administrative Procedure in the Field of Land Relations."

- The transfer of land management documentation compiled before 2013 to the State Land Management Documentation Fund without the use of an electronic signature may be carried out by the authors of the documentation, as well as by their heirs or local self-government bodies that are land users.
- The transfer is free of charge.
- Public access to land parcel boundary coordinates in the cadastre is restricted during the period of martial law.

Indexation of Normative Monetary Valuation of Land in 2025

Notification of the State Service of Ukraine for Geodesy, Cartography and Cadastre on the Indexation of the normative monetary valuation of land in 2025:

- The indexation coefficient was set at 1.12.
- The maximum land tax rates were clarified as follows: for agricultural land – within the range of 0.3–1% of the normative valuation, for forest land – up to 0.1%, and for communal land – up to 1%.

RECOMMENDATIONS FOR IMPROVING LAND LEGISLATION

Alongside the positive changes mentioned, a number of issues and gaps remain in land legislation that require resolution. These include excessive centralization of the functions related to the maintenance of the State Land Cadastre, insufficient control and accountability mechanisms, and the complexity of land auction procedures. To address these challenges, several important legislative initiatives have been developed.

- **Decentralization of the Powers of the State Land Cadastre**

The draft law “On Amendments to Certain Legislative Acts of Ukraine Regarding the Granting of Powers in the Field of Maintaining the State Land Cadastre to Local Self-Government Bodies and Certified Land Survey Engineers” (Reg. No. 12453 dated January 28, 2025) is aimed at addressing the systemic problem of overload and centralization in the functions of state land parcel registration.

Currently, the functions of state cadastral registrars are concentrated mainly within the State Service of Ukraine for Geodesy, Cartography and

Cadastre, which leads to delays, bureaucratic burden, and limited access to cadastral services for citizens and local self-government bodies.

The draft law was developed to implement the provisions of the Public Administration Reform Strategy and the State Anti-Corruption Program for 2023–2025. It proposes delegating part of the cadastral registrars’ powers to the local level — to local self-government bodies and certified land survey engineers.

The draft law provides for granting certified land survey engineers the status of state cadastral registrars with corresponding rights, duties, and responsibilities. It also delegates powers to officials of local self-government executive bodies. Decisions on entering data into the cadastre will be made automatically through software based on the principle of randomness, which minimizes corruption risks. The draft law also provides for mandatory training before such powers are granted and introduces a procedure for monitoring and appealing the actions of the respective entities.

The adoption of this draft law will significantly simplify the procedure for state registration of land parcels, improve its accessibility and speed, reduce the administrative burden on central government bodies, and enhance accountability and transparency in the management of the State Land Cadastre.

The decentralization of these functions will be particularly important in the context of post-war reconstruction, as communities will require effective tools for managing land resources.

The draft law of Ukraine “On Amending Article 536 of the Code of Ukraine on Administrative Offenses Regarding the Establishment of Liability for State Cadastral Registrars and Other Public Registrars of the State Land Cadastre” (Reg. No. 12454 dated January 28, 2025) was developed in connection with the planned expansion of the range of entities authorized to maintain the cadastre — in particular, certified land survey engineers and officials of local self-government bodies. This draft law is a logical continuation of legislative initiative No. 12453 on the decentralization of land parcel registration functions. Its goal is to provide an effective mechanism for holding new registrars administratively accountable in cases of violations when entering data into the

cadastre or in cases of unjustified refusal to do so.

The justification for developing this act lies in the need to establish a legal safeguard against misuse in cases where critically important powers are delegated beyond the central executive authority.

According to the current version of Article 536 of the Code of Ukraine on Administrative Offenses, administrative liability is provided exclusively for state cadastral registrars who are officials of the State Service of Ukraine for Geodesy, Cartography and Cadastre. However, the new decentralization format envisioned by the public administration reform strategies, the State Anti-Corruption Program, and the legislative work plan requires extending liability to other entities that will maintain the State Land Cadastre. Therefore, the draft law proposes amending Article 536 of the Code of Ukraine on Administrative Offenses to extend its provisions to include other public cadastral registrars as well.

The main change is that fines (ranging from 20 to 50 tax-free minimum incomes of citizens) for violations such as missing deadlines, demanding excessive documentation, or entering incorrect information will apply not only to state cadastral registrars, but also to certified land survey engineers and officials of local self-government

bodies, in cases where the respective functions are delegated to them.

Thus, the draft law ensures legal equality of responsibility for all entities involved in maintaining the cadastre and contributes to improving the quality of services and legal protection for landowners.

- **Involvement of Self-Regulatory Organizations in Professional Control in the Fields of Land Management and Geodesy**

The draft law “On Amendments to Certain Legislative Acts of Ukraine Regarding the Effective Exercise of Powers by Self-Regulatory Organizations in the Field of Land Management, Topographic, Geodetic and Cartographic Activities” (Reg. No. 13163 dated April 8, 2025) aims to introduce a new model of professional regulation through the delegation of certain state functions to self-regulatory organizations. In particular, it involves the transfer of powers related to professional certification, control, and revocation of qualification certificates of land surveyors and geodesists. The draft law was developed in accordance with the provisions of the State Anti-Corruption Program for 2023–2025 and the 2024 legislative work plan of the Verkhovna Rada.

The need to adopt this document is driven by the necessity to reduce state monopoly in matters of certification and control in the field of land and geodetic works, as well as to encourage the development of professional self-governance.

The draft law establishes the legal framework for the official delegation of relevant functions by the State Service of Ukraine for Geodesy, Cartography and Cadastre to self-regulatory organizations and provides for the introduction of state registers of certified professionals. It also defines the procedure for issuing and revoking qualification certificates, the requirements for professional training, and the mechanism for monitoring compliance with professional standards.

The draft law proposes amendments to the Laws of Ukraine “On Land Management,” “On Topographic, Geodetic and Cartographic Activity,” “On Land Valuation,” and “On the State Land Cadastre.” It envisages the creation of a mechanism for delegating powers in the area of specialist certification, defining the rights and responsibilities of self-regulatory organizations, and ensuring transparent control of the implementation of these functions. The draft law paves the way for deregulation, professionalization of the sector, and reduction of corruption risks through the distribution of

responsibilities between the state and professional communities.

- **Improvement of Mechanisms for the Use of State-Owned Agricultural Land**

The draft law of Ukraine “On Amendments to Certain Legislative Acts Regarding the Improvement of the Use of Agricultural Land Parcels” (Reg. No. 13203 dated April 21, 2025) aims to enhance the efficiency of managing state-owned agricultural land and reduce corruption risks in the process of allocating such land for use.

The adoption of draft law No. 13203 is outlined in the Government’s Priority Action Plan for 2025 and is linked to the need to ensure food security, promote rational land use, and simplify procedures for changing land use designation, land parcel division, rights registration, and conducting land auctions.

The draft law was developed in the context of implementing the provisions of Law No. 3272-IX, which introduced a new model for transferring rights to land previously held in permanent use by state enterprises — by transforming these enterprises into business entities, followed by leasing and the possibility of subleasing such land exclusively through auctions.

The draft law addresses the challenges related to the division of land parcels that contain assets remaining under state enterprises and those that will be put up for auction. It also provides for improvements to the auction procedure, including the establishment of clear deadlines for re-auctions, strengthening the guarantee liability of participants, increasing transparency requirements for eligible participants, and eliminating unjustified restrictions on subleasing.

The draft law specifically provides for an increase in the guarantee deposit to 100% of the starting rental price, along with a mechanism for transferring this deposit to the auction organizer in the event that the winner fails to fulfill the conditions. In addition, it clarifies the application of Article 130 of the Land Code of Ukraine regarding restrictions for individuals subject to sanctions or those who are not entitled to acquire ownership or use rights to agricultural land.

Thus, the draft law serves as a comprehensive tool to enhance the transparency of state-owned agricultural land transactions, ensure sustainable land management, and minimize the risks of manipulation in auctions and misuses in registration and land management procedures. Its implementation will help increase budget revenues, strengthen trust in land relations, and establish a new

legal foundation for the sustainable development of the agricultural sector.

The implementation of the above-mentioned legislative initiatives will enable a comprehensive improvement in land resource

management in Ukraine, enhance procedural transparency, and increase the efficiency of land use. This will have a positive impact on economic development — particularly in the agricultural sector — and will help ensure the country's food security.

Priority Steps for Improving Land Legislation in Ukraine

Legislative Initiative	Key Provisions
Decentralization of the Powers of the State Service of Ukraine for Geodesy, Cartography and Cadastre	
Draft Law No. 12453 “On Amendments to Certain Legislative Acts of Ukraine Regarding the Granting of Powers in the Field of Maintaining the State Land Cadastre to Local Self-Government Bodies and Certified Land Survey Engineers”	<p>Provides for the delegation of part of the cadastral registrar's powers to the local level:</p> <ul style="list-style-type: none"> · granting certified land survey engineers the status of state cadastral registrars with corresponding rights, duties, and responsibilities · delegation of powers to officials of local self-government executive bodies · automatic entry of data into the State Land Cadastre based on the principle of randomness · mandatory internship prior to obtaining powers

Draft Law of Ukraine No. 12454
“On Amending Article 536 of the Code of Ukraine on Administrative Offenses Regarding the Establishment of Liability for State Cadastral Registrars and Other Public Registrars of the State Land Cadastre”

Complements Draft Law No. 12453 by establishing a legal safeguard against misuse:

- Extends the scope of Article 536 of the Code of Ukraine on Administrative Offenses to include certified land survey engineers and officials of local self-government bodies in cases where cadastral registrar functions are delegated to them.

Involvement of Self-Regulatory Organizations in Professional Control in the Fields of Land Management and Geodesy

Draft Law No. 13163 “On Amendments to Certain Legislative Acts of Ukraine Regarding the Effective Exercise of Powers by Self-Regulatory Organizations in the Field of Land Management, Topographic, Geodetic, and Cartographic Activities”

Allows the delegation of state powers to self-regulatory organizations (professional associations) regarding:

- professional certification
- control and monitoring
- issuance and revocation of qualification certificates for land surveyors and geodesists.

Efficient Use of State-Owned Agricultural Land

Draft Law No. 13203 “On Amendments to Certain Legislative Acts Regarding the Improvement of the Use of Agricultural Land Parcels”

Defines a new model for leasing land held in permanent use by state enterprises:

- transformation of state enterprises into business entities
- formalization of state-owned land under lease, with the possibility of subleasing such land exclusively through auctions
- strengthening the guarantee liability of auction participants: increasing the guarantee deposit to 100% of the starting rental price and introducing a mechanism for transferring the deposit to the auction organizer in case the winner fails to meet the conditions.

Expansion of the Agricultural Credit Guarantee Fund's Capabilities

Expanding Access to Credit for Small and Medium-Sized Producers Under Guarantee Schemes

Lifting the Direct Ban on Participation of Legal Entities with Cross-Ownership, provided their total land holdings do not exceed the established threshold.

To support farmers who have relocated their operations from occupied territories, land currently under occupation at the time of the loan application should not be counted toward the 500-hectare limit.

Reforming Free Land Privatization

Abolition of Free Privatization of Agricultural Land

The elimination of the free land privatization mechanism, as it creates inequality, promotes inefficient resource use, generates serious corruption risks, and deprives local budgets of potential revenue from land leases or sales through auctions.

Implementation of Mass Land Valuation

There is a need to develop a law on mass land valuation, which would abolish the current normative monetary valuation and enable the establishment of realistic market-based land prices.

This would ensure objectivity in taxation, fair pricing in land sales, and more effective resolution of land disputes.

A market-based approach to determining the tax base for land and other mandatory payments.

Permission to Purchase State and Municipal Land Used for Orchards

Develop and adopt a law that allows the purchase of state and municipal land used for orchards.

Allow owners of perennial plantations to purchase state- or municipally-owned land plots where these plantations are located.

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