

Monitoring of Forestry Legislation in Ukraine and the EU

Period: July - December 2025

The series "Monitoring of Forest Legislation in Ukraine and EU" provides a brief overview of laws and draft laws of the Verkhovna Rada of Ukraine, adopted Resolutions of the Cabinet of Ministers of Ukraine, entered into force Orders of Ministries of Economy, Environment and Agriculture and of State Forest Resource Agency of Ukraine, that are important for the sustainable development of forestry.

Further this series includes an overview on recent regulations EU level related to forestry respectively forest land use with relevance for Ukraine.

The information and assessments provided here should not be considered as legal advice. The SFI-Project does not guarantee the accuracy of the statements. The information provided does not necessarily coincide with SFI's positions.

Monitoring of Ukrainian forestry legislation

Adopted regulatory acts:

Resolution of the Cabinet of Ministers of Ukraine dated 21.07.2025 No. 903 "Some issues of the Ministry of Economy, Environment and Agriculture".

In order to optimise the system of central executive authorities, the Ministry of Environmental Protection and Natural Resources and the Ministry of Agrarian Policy and Food were liquidated and their functions, tasks and powers were assigned to the Ministry of Economy, Environment and Agriculture.

In this regard, the activities of the State Forest Resources Agency of Ukraine are currently directed and coordinated by the Cabinet of Ministers of Ukraine through the Minister of Economy, Environment and Agriculture of Ukraine.

Resolution of the Cabinet of Ministers of Ukraine of 25.09.2025 No. 1212 "On Implementation of a Pilot Project on the Implementation of State Control Measures in the Field of Environmental Protection Aimed at Preventing Violations of the Legislation on Environmental Protection, Rational Use, Reproduction and Protection of Natural Resources".

Approved by this Resolution, the Procedure provides that the pilot project, which will be implemented for a period of up to six months within the framework of martial law, will have a positive impact on the forestry sector, in particular by contributing to the improvement of the efficiency of detection and prevention of illegal logging, damage to forest plantations and violations of forest protection regimes.

The introduction of systematic patrols, raids and round-the-clock response to reports of environmental offences, as well

as the mandatory use of the EcoThreat service, will ensure timely recording of damage to forest ecosystems and strengthen the preventive nature of state environmental control.

The introduced changes will help preserve forest resources, reduce environmental risks during martial law and create more effective mechanisms for protecting forests in the post-war period.

Resolution of the Cabinet of Ministers of Ukraine No. 1316 dated 23.10.2025 "On Amendments to the Procedure for Implementing a Pilot Project on Issuing a Special Permit for the Special Use of Forest Resources (Logging Ticket) in Electronic Form".

In order to clarify and streamline the rules for the operation of the electronic logging ticket system, the Resolution introduces amendments that define and detail the grounds for cancelling or terminating a logging ticket.

The amendments clarify the legal regulation in the event of termination of the forest user's activities. In particular, in case of complete liquidation of the company, the permit for special use of forest resources is terminated. At the same time, in case of reorganisation of the company, its activities are not considered terminated, and the issued logging permit may remain valid.

The amendments ensure the continuity of the rights to special use of forest resources in the event of reorganisation of enterprises, rather than their liquidation, and eliminate legal uncertainty that could arise in the practical activities of forest users.

As a result, the electronic system for issuing logging tickets will become clearer, more transparent and more consistent with the actual processes of forestry enterprises.

Resolution of the Cabinet of Ministers of Ukraine dated 31.10.2025 No. 1399 "On Amendments to Annex 1 to the Resolution of the Cabinet of Ministers of Ukraine dated 24 December 2024 No. 148 "On Approval of the Lists of Goods Subject to Licensing and Quotas for 2025".

Taking into account the difficult situation in the energy system of Ukraine, as well as the need to provide consumers with wood, ensure the proper functioning of life support systems for the population, and get through the heating season under martial law, the Resolution: Zero quotas have been introduced for the export of certain types of wood, which effectively means a ban on the export of such goods in 2025, in particular

- fuel wood in the form of logs, billets, knots, brushwood, branches or similar forms; wood chips or shavings;
- unprocessed timber, with or without removed bark or sapwood, or roughly timbered or untimbered, except for pine.

These restrictions were temporary in nature and were in force until 31 December 2025.

Resolution of the Cabinet of Ministers of Ukraine dated 28.11.2025 No. 1550 "On Amendments to the Resolution of the Cabinet of Ministers of Ukraine dated 7 September 2022 No. 1003".

The Resolution simplifies the procedure for transforming the state specialised economic enterprise "Forests of Ukraine" into a joint-stock company by transforming it and including it in the list of state property objects not subject to privatisation.

Implementation of the Resolution will allow completing the reform of the forestry sector, preserving state-owned land and transforming the enterprise into an efficient forest user with modern technologies and transparency, which is

part of Ukraine's commitments to the EU (Ukraine Facility).

The implementation of the Resolution provides:

- a guarantee of preservation of 100% state ownership of forestry lands that are in permanent use of the State Enterprise "Forests of Ukraine";
- Stability and continuity of forest management;
- eliminating the risks of hidden or phased privatisation of a strategically important enterprise;
- strengthening the role of the state in the sustainable use of forests.

Resolution of the Cabinet of Ministers of Ukraine dated 28.11.2025 No. 1551 "Some issues of forest management".

The Resolution amended the Procedure for forest management, in particular, clarified the validity of forest management materials depending on the status of the territories.

From now on, forest management materials are valid for the duration of the relevant order of the territorial body of the State Forest Resources Agency or until the end of the 15-year period from the date of their approval.

It has been established that forest management materials of permanent forest users and forest owners:

- forests that are not located in the territories of military operations or temporary occupation - remain valid until 01.01.2028;
- forests located in the territories of military operations or temporary occupation - remain in force for the period of martial law and two years from the date of its termination or cancellation. The Resolution updates the general rules for the validity of forest management documentation, taking into account the

restrictions related to the Russian armed aggression.

The adoption of the Resolution ensures legal stability and continuity of forestry in regions where new forestry works are difficult or impossible due to hostilities or temporary occupation, and also streamlines the general rules for the validity of forestry documentation.

Resolution of the Cabinet of Ministers of Ukraine dated 28.11.2025 No. 1552 "On Implementation of the Pilot Project on Implementation of the EU Law (EU acquis) on Prevention of Deforestation and Forest Degradation in relation to Information on Goods Made of Wood and Sold in the Customs Regime of Export".

The Resolution introduces a pilot project for a period of two years aimed at implementing the requirements of Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the placing on the Union market and export from the Union of certain goods and products relating to deforestation and forest degradation and repealing Regulation (EU) No. 995/2010 (hereinafter referred to as the EUDR Regulation).

The document improves the mechanisms for controlling the origin and legality of exported timber and timber products, and creates preconditions for further harmonisation of Ukraine's regulatory framework with EU law and expanding access of Ukrainian products to the EU market.

The Resolution, in particular

- approved the Procedure for the implementation of the pilot project;
- determined the list of commodity items of the Ukrainian Classification of Goods for Foreign Economic Activity subject to control;

- introduced the Electronic Exporter's Cabinet as part of the Unified State System of Electronic Timber Accounting to provide information on the origin of timber and supporting documents.

The implementation of the Procedure ensures

- access of Ukrainian timber and timber products to the EU market;
- full traceability of timber and timber products;
- reduction of illegal logging;
- promotion of forest conservation, prevention of forest ecosystem degradation and sustainable forestry development.

Order of the Cabinet of Ministers of Ukraine dated 28.11.2025 No. 1356-r "On Approval of the Operational Plan of Measures for the Implementation of the State Forest Management Strategy of Ukraine until 2035 in 2025-2027".

The purpose of approving the Operational Plan is to ensure the implementation of the State Forest Management Strategy of Ukraine until 2035, sustainable development of forestry, increase of forests' resilience to climate change, and formation of a transparent and efficient forest management system.

The Operational Plan defines tasks and measures to be implemented by ministries, other central executive authorities, regional and city state administrations, including

- development of regulatory acts on reforming the state forest protection, defining the rights and obligations of forest protection officials and other permanent forest users and forest owners;
- creation and development of a modern digital infrastructure for forest management;
- restoration of forests in the de-occupied territories;

- Increased forest cover on the territory of Ukraine;
- Increased the area of the national ecological network from existing territories and objects of the nature reserve fund;
- Increase the level of carbon absorption and retention through sustainable forest management (preparation of a draft law on stimulating forestry).

Resolution of the Cabinet of Ministers of Ukraine No. 1795 dated 31 December 2025 "On Approval of Lists of Goods Subject to Licensing for Export and Import, and Quotas for 2026".

The resolution approves the lists of goods whose export and import in 2026 is subject to obtaining the relevant licences and also establishes quantitative quotas for such operations. The document also regulates the procedure for licensing goods in accordance with Ukraine's international obligations.

It extends the zero-quota regime for the export of unprocessed timber and fuel wood, which was provided for by Resolution of the Cabinet of Ministers of Ukraine No. 1399 of 31 October 2025.

The extension of the zero-quota regime for the export of unprocessed timber is intended to:

- provide the domestic market with raw materials for woodworking and processing industries;
- support domestic production and employment;
- preserve forest resources and reduce the environmental burden.

Orders of central executive authorities and state-owned enterprises

Order of the Ministry of Economy, Environment and Agriculture dated 11

September 2025 No. 471, registered with the Ministry of Justice on 12 September 2025 under No. 1318/44724 "On Amendments to the Criteria for Determining Enterprises, Institutions and Organisations of Importance for Sectors of the National Economy and Invalidation of Certain Orders of the Ministry of Agrarian Policy and Food of Ukraine and the Ministry of Environmental Protection and Natural Resources of Ukraine".

The Order amended the Criteria for Determining Enterprises, Institutions and Organisations of Importance to Sectors of the National Economy, approved by Order No. 28003 dated 18.12.2024. The amendments update the previously established criteria and introduce separate criteria for environmental protection, forestry and hunting, which were transferred to the Ministry of Economy as a result of the reorganisation. The criteria for enterprises, institutions and organisations that are important for the national economy in the field of forestry and hunting during the special period have not changed compared to the criteria previously established by the Orders of the Ministry of Environment No. 60 dated 15.01.2025 and No. 1668 dated 16.12.2024, which became invalid due to the adoption of the new Order.

Order of the State Agency of Forest Resources of Ukraine dated 26.09.2025 No. 267 "On Transformation of the State Specialised Economic Enterprise "Forests of Ukraine" into a Joint Stock Company, 100 per cent of which is owned by the state, and the establishment of a commission for the transformation of the enterprise.

The Order provides for the reorganisation of the State Specialised Economic Enterprise "Forests of Ukraine" by

transforming it into a joint-stock company with 100 per cent state-owned shares.

Key conditions of the transformation:

- the state remains the owner of forestry lands in permanent use of the SE "Forests of Ukraine" (the joint-stock company is only a forest user);
- privatisation of forest resources is prohibited in accordance with the Law of Ukraine "On Privatisation of State and Communal Property";
- formation of the authorised capital of JSC "Forests of Ukraine" is carried out at the expense of the company's property (real estate, means of production, etc.);
- 100% of shares of JSC "Forests of Ukraine" belong to the state.

The advantages of corporatisation are as follows:

- Transition to an organisational and legal form that meets international corporate governance standards;
- expanding opportunities for cooperation with Ukrainian and international financial institutions;
- attracting investments in the company's development.

The corporatisation will create conditions for upgrading the material and technical base, introducing modern technologies, and improving production efficiency and financial performance of the enterprise.

Order of the State Specialised Economic Enterprise "Forests of Ukraine" dated 29.09.2025 No. 1585 "On Approval of the Strategy for Approximation to the Nature of Forestry of the Specialised State Economic Enterprise "Forests of Ukraine" for 2025-2030".

The order approves the Strategy of close-to-nature forestry (CNF) and the Plan for its implementation. The Strategy Implementation Plan stipulates that starting from 2030, the principles of close-to-nature

forestry will be applied to 20% of the forests of Ukraine used by the enterprise.

The main areas of implementation of the CNF Strategy:

- Adaptation of the forest management system to the natural and climatic conditions of Ukraine's regions;
- identification of forest areas where CNF will be applied;
- development of new rules that will define methods and measures for forest restoration and reforestation;
- introduction of plot-based forest management;
- Gradual abandonment of clear-cutting of the main use in favour of selective and gradual felling;
- restoration of the natural structure of forests;
- maintaining a balance between environmental, economic and social objectives of forest management;
- changing approaches to reforestation;
- strengthening scientific support and monitoring in forests using international FSC and PEFC standards;
- technological support of processes aimed at forming stands resistant to climate change.

Draft laws submitted to the Verkhovna Rada of Ukraine

Draft Law on Amendments to Certain Legislative Acts of Ukraine on Simplification of Conditions for Conducting Business (Reg. № 13554 dated 28.07.2025).

The draft law is aimed at creating more favourable conditions for business development and reducing the administrative burden on business entities by reviewing and cancelling inefficient and outdated mechanisms of state regulation of economic activity.

The draft law provides for changes in the field of forestry and hunting, including

- Simplification and decentralisation of the procedure for approving the estimated logging area;
- cancellation of the permit to cut down seed and plus trees;
- cancellation of the permit for hunting game animals for scientific purposes and relocation to new habitats.

Draft Law on the timber market (Reg. No. 13227-d of 10.09.2025).

A revised draft law on the timber market has been submitted to the Verkhovna Rada of Ukraine, which comprehensively defines the legal, economic and organisational principles of the timber market and is aimed at creating a transparent, competitive and predictable market that will promote its development and ensure a balance of interests of all participants.

The adoption of the draft law will help to:

- Ensuring transparency and openness of the timber market;
- improving the timber trade mechanism;
- development of competitive principles in the timber trade;
- regulation and improvement of the electronic timber accounting system;
- development of exports of high value-added products.

The draft law also provides for the extension of the moratorium on the export of unprocessed timber for the period of martial law and for ten years from the date of its termination or cancellation.

Monitoring of forestry legislation in the EU

Regulatory acts adopted

Commission Implementing Regulation (EU) 2025/1422 of 17.07.2025 amending Implementing Regulation (EU) 2016/1141

as regards updating the list of invasive alien species of concern to the Union.

The Regulation adopts new amendments that expand the list of invasive tree and plant species that can have a serious negative impact on forest ecosystems and biodiversity.

The amendments to this Regulation will reduce the negative impact of invasive species and contribute to the sustainable development of forestry in the European Union.

The list of invasive species has been updated based on new scientific research and risk assessments.

The addition of new invasive species to the list leads to the need to actively combat them, as these species can displace native plants and animals, leading to changes in the natural composition of forest ecosystems.

Forestry enterprises will have to adapt their forest management strategies to combat invasive species, take timely preventive measures and establish monitoring systems to assess the spread of such species.

REGULATION (EU) 2025/2650 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 2025/2650 of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders.

The amendments to the EUDR Regulation provide for the postponement of its practical implementation.

The EUDR Regulation introduces a due diligence obligation for operators and traders placing on, supplying to or exporting from the EU market certain goods and products. These products include cattle, cocoa, coffee, palm oil, rubber, soybeans and timber.

The postponement of the implementation of the EUDR Regulation for operators and

merchants is due to the complexity of implementing the new EU IT system required to ensure due diligence.

The new deadlines for the application of the Regulation are as follows:

- for large companies - 30.12.2026;
- for individuals, micro and small operators - 30.06.2027.

In addition, certain due diligence requirements for small operators have been simplified, and some products have been excluded from the scope of regulation, which is aimed at reducing the administrative burden on small businesses.

Decisions and notifications in the field of forestry in the EU

COUNCIL DECISION (EU) 2025/2437 of 20 November 2025 on the position to be taken on behalf of the European Union at the 20th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP20) (Samarkand, Uzbekistan, 24 November - 5 December 2025) 2025/1201.

The EU Council Decision approves the position presented on behalf of the European Union at the 20th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP20).

The main provisions of the EU Council Decision, which formed the position of the European Union, concerned, in particular

- amendments to the CITES Appendices, namely support or opposition to proposals for the inclusion, exclusion or change of status of certain species
- strengthening measures to protect endangered species of wild fauna and flora;

- Restrictions on international trade in endangered species, including living organisms, their parts and derivative products, including animals, tree species and plants;

- rules for trade in "Red Book" species;
- provisions on scientific, administrative and legal aspects of the implementation of the CITES Convention in EU legislation and practice.

Commission Communication on Regulation (EU) 2023/1115 on products without deforestation C/2025/4524 of 12.08.2025.

This Communication is an explanatory (guidance) document of the European Commission and is not legally binding. Its purpose is to provide clarification on certain aspects of the application of the EUDR Regulation, in particular practical issues of its implementation.

The document does not change the provisions of the Regulation itself, but details the procedure for its implementation in practice, in particular for the forestry and related industries, and explains how operators and traders should confirm that their products are not related to deforestation or forest degradation, which directly affects the conditions for access to the EU market for timber and timber products.

The purpose of the Commission Communication is to:

- to ensure a uniform and consistent interpretation of the provisions of the EUDR Regulation in all EU Member States;
- to clarify the obligations of operators and traders with regard to due diligence requirements;
- reduce the level of legal uncertainty for business entities;
- facilitate effective and timely implementation of requirements for products that do not cause deforestation.

Author, editorial team, contacts:

General monitoring of forest legislation:

Viktor Symonenko - short-term expert

Editorial board of the English version:

Volker Sasse - Project Leader

Editorial board of the Ukrainian version:

Vitaliy Storozhuk - National Project Coordinator

Tel: +38 (067) 964-77-02

info@sfi-ukraine.org.ua

www.sfi-ukraine.org.ua

