

Monitoring of Forestry Legislation in Ukraine and the EU

Period: January – June 2026

The series 'Monitoring of Ukrainian and EU Forestry Legislation' provides a brief overview of laws and draft laws of the Verkhovna Rada of Ukraine, resolutions adopted by the Cabinet of Ministers of Ukraine, and orders issued by the Ministry of Economy, Environment, and Agriculture of Ukraine and the State Forest Resources Agency of Ukraine, which have come into force and are important for the sustainable development of forestry.

This instalment of the series also provides an overview of the latest EU regulations concerning forestry and forest use that are relevant to Ukraine.

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Monitoring of Ukrainian forestry legislation

Adopted regulatory acts:

Resolution of the Cabinet of Ministers of Ukraine No. 438 of 1 April 2026 'On the Approval of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis)'.

This document sets out the provisions of the National Programme for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis), in particular regarding the negotiating chapters relevant to the forestry sector, forestry statistics, timber traceability, environmental accounting and preparation for EU requirements concerning products not linked to deforestation.

With regard to statistics, the document states that Ukraine conducts an annual statistical survey of forestry activities; however, Regulation (EU) No 691/2011 on European environmental-economic accounts, insofar as it relates to forestry accounts, has not yet been implemented. Provision is made for amendments to be made to the Methodological Provisions for the State Statistical Survey 'Forestry Activities' by December 2026, taking into account the European nomenclature of timber species, as well as for bringing forestry statistics and accounts into line with the EU acquis by December 2027.

The programme also highlights the low level of compliance with certain EU acts in the field of timber and forestry, in particular Regulation (EU) No 995/2010, Regulation (EU) 2023/1115 (EUDR) and Regulation (EU) No 2173/2005 (FLEGT). In this context, measures are envisaged to develop digital traceability of timber, utilise the Electronic Timber Accounting

System (ETAS), prepare operators and traders for EUDR requirements, and implement FLEGT mechanisms and supply chain controls.

Of particular importance are the tasks relating to the drafting and adoption of legislative amendments concerning the timber market, certification, the designation of competent authorities, the improvement of electronic registers, the monitoring of timber movements, and preparations for the lifting of the moratorium on the export of unprocessed timber as part of the gradual alignment with EU rules.

The practical significance of the Programme for the forestry sector lies in the fact that it sets out a medium-term roadmap for harmonisation with the EU acquis: from statistics and environmental-economic accounts to digital timber traceability, EUDR/FLEGT, LULUCF climate accounting, biodiversity and institutional coordination between the Ministry of Economy, the State Forest Resources Agency, the State Statistics Service, the State Customs Service, the State Geocadastre and other bodies.

Resolution of the Cabinet of Ministers of Ukraine No. 730 of 4 June 2026 'On the Approval of the Procedure for the Use of Funds Allocated in the State Budget to Finance Measures for Forest and Game Management, and the Conservation and Protection of Forests in the Forest Fund'.

The Resolution approves a new Procedure for the use of state budget funds under the budget programme 'Forest and Game Management, Conservation and Protection of Forests in the Forest Fund'. The document sets out the mechanism for allocating budget funds to measures for forest and game management, conservation and protection of forests in the Forest Fund.

The Ministry of Economy, Environment and Agriculture of Ukraine has been designated as the chief administrator of budget funds, whilst the State Forest Resources Agency of Ukraine acts as the lower-level administrator and the responsible implementing body for the budget programme. The recipients of the funds are business entities and their associations falling within the remit of the State Forest Resources Agency.

The funds are allocated, in particular, to partially compensate for the cost of forest restoration work in areas of hostilities or temporary occupation, the maintenance of the state forest cadastre, the conduct of the national forest inventory, the conservation and protection of forests, fire prevention measures, and forest regeneration by permanent forest users.

The adoption of this resolution is of great importance for the restoration of forests in affected regions, ensuring the continuation of the national forest inventory, the maintenance of the state forest cadastre, and the support of forest users who do not harvest timber under main-use felling schemes. The resolution comes into force on 1 August 2026.

Resolution of the Cabinet of Ministers of Ukraine No. 865 of 24 June 2026 'On amendments to certain resolutions of the Cabinet of Ministers of Ukraine regarding the regulation of timber harvesting'.

The resolution promotes the implementation of modern European approaches to forest management, the transition of the Ukrainian forestry sector towards nature-based forestry, and amends certain provisions of previously adopted documents.

The resolution introduces mechanisms for a practical transition to nature-based forestry, in particular: through selective felling in the Carpathians instead of clear-

cutting in commercial forests; the establishment of a system of technical corridors, which will reduce damage to soil and trees during forestry operations; establishing clear criteria for selecting trees for tending and felling, which will help to create more resilient and multi-aged forests. The consequences of hostilities are officially recognised as grounds for carrying out sanitary felling, which will make it possible to remedy war-related damage to forests more promptly. A new tool is being introduced – thinning of sparse stands – which will enable the restoration of low-productivity areas and the creation of new forests in their place. The resolution also stipulates that, during the period of martial law and for one year following its conclusion, timber obtained as a result of clear-cutting for sanitary purposes will not be counted towards the calculated felling quota. This will allow for an increase in timber harvesting to meet the country's urgent needs without altering the established principles of sustainable forest management.

Decree of the Cabinet of Ministers of Ukraine No. 561-r of 10 June 2026 'On the Approval of the Long-Term Strategy for Low-Carbon Development of Ukraine until 2050'.

The Strategy identifies the land use, land-use change and forestry (LULUCF) sector as one of the main natural tools for achieving climate neutrality. The Strategy notes that Ukraine's forests remain net sinks of greenhouse gases; however, their absorption capacity is declining due to an increase in timber harvesting, as well as losses caused by fires, pests, diseases, military operations and other adverse factors. According to the document's estimates, around 3 million hectares of forest were destroyed as a result of hostilities and fires, reducing the forests'

greenhouse gas absorption by approximately 1.7 million tonnes of CO₂-eq.

The strategy stipulates that, in order to achieve climate neutrality by 2050, the role of forests as carbon sinks must be significantly strengthened. Under the climate neutrality scenario, carbon sequestration in the forestry sector is set to increase to around 30 million tonnes of CO₂-eq. per year, in particular through the creation of around 1 million hectares of new forests, up to 50,000 hectares of new forest strips and the continued establishment of orchards. The document also emphasises the importance of agroforestry, field-protection afforestation, the restoration of degraded forest ecosystems, and the use of nature-based solutions to enhance carbon sequestration and protect soils, water resources and biodiversity.

The Strategy places particular emphasis on natural forests, which are regarded as an additional resource for increasing forest cover without significant expenditure on the artificial creation of plantations. At the same time, the document acknowledges the existence of barriers: a shortage of available land, low motivation among communities and landowners, the complexity of registering natural forests, the lack of effective financial incentives, and competition with other forms of land use. To realise the potential of the forestry sector, the Strategy highlights the need for legislative changes, financial mechanisms to incentivise afforestation, public and private funding, compensation mechanisms for landowners, and the integration of climate-oriented forestry into state forest management policy.

Resolution of the Cabinet of Ministers of Ukraine No. 562-r of 10 June 2026 'On the Approval of the National Energy and Climate Plan for the period up to 2030'.

For the forestry sector, the National Plan is significant primarily as a strategic climate document that enshrines the role of forests in achieving Ukraine's decarbonisation targets. The document provides for large-scale afforestation, including the creation of up to 1 million hectares of new forests in the long term, which will increase Ukraine's forest cover to 18 per cent, as well as demining and forest restoration following hostilities, the conservation of natural forests, and strengthening the role of forests as natural carbon sinks. These measures are directly linked to LULUCF and are intended to support the fulfilment of Ukraine's climate commitments.

The National Plan devotes particular attention to the implementation of climate-oriented forest management approaches. This involves enhancing the resilience of forests to climate change, fires, droughts, pests and diseases, as well as adapting forest management practices to new climatic conditions. Also important are the development of agroforestry, the creation and restoration of field-protection forest strips, the management of peatlands and the conservation of degraded land, which can contribute both to carbon sequestration and to the protection of soils and biodiversity.

Order of the Ministry of Economy, Environment and Agriculture of Ukraine No. 2813 of 19 February 2026 'On the approval of the forms of documents required for the implementation of a pilot project on the issuance of certain permits in the field of forestry in electronic form'; registered with the Ministry of Justice of Ukraine on 31 March 2026 under No. 429/45823.

The Order approves the forms of documents required for the implementation of a pilot project on the issuance of

a special permit for the special use of forest resources (a felling permit) and a certificate of origin for timber and sawn timber products made from it in electronic form.

The approved forms include, in particular, the logging permit form, the application for its issue, tree stand survey reports, the felling area allocation report, the felling area register, the felling area plan, field and inventory-assessment records, as well as forms of documents relating to the verification of timber origin for export operations.

The document represents a continuation of the digitisation of licensing procedures in forestry, initiated by Resolution No. 625 of the Cabinet of Ministers of Ukraine dated 30 May 2025. Its practical significance lies in the transition from paper documents to standardised electronic forms, enhancing the traceability of timber, integration with electronic accounting systems, and increasing the transparency of procedures for the special use of forest resources.

For forest users, the order means they must adapt their internal procedures, prepare data in digital format and maintain documentation properly for the electronic issuance of permits.

Order of the Ministry of Economy, Environment and Agriculture of Ukraine No. 4351 of 25 March 2026 'On the Approval of the Rules for the State Registration of Game Animals and the Volumes of Their Harvest'; registered with the Ministry of Justice of Ukraine on 23 April 2026 under No. 561/45955.

The Order approves the Rules for the State Registration of Game Animals and the Volumes of Their Harvest. The Rules set out requirements for the procedure for

conducting state registration of game animal populations, determining the volumes of their harvest, and recording dead game animals.

The document introduces a uniform approach for users of hunting grounds regarding recording methods, record card forms, recording reports, summary reporting forms, and requirements for the use and publication of the data obtained. The adoption of the Rules is significant for planning the conservation, use and restocking of game animals, monitoring population status, preserving biodiversity and preventing the spread of epizootic diseases among wild animals.

The Rules are also in line with the objectives of the Strategy for the Development of the Hunting Sector in Ukraine for the period up to 2035, which provides for the creation of a modern system for the recording and management of hunting resources.

Monitoring of forestry legislation in the EU

Adopted legislative acts

Regulation (EU) 2026/1392 of the European Parliament and of the Council of 20 May 2026 on the production and marketing of forest reproductive material (FRM Regulation), which amends Regulations (EU) 2016/2031 and (EU) 2017/625 and repeals Council Directive 1999/105/EC.

The Regulation establishes updated rules on the production, official control, certification, traceability and marketing of forest reproductive material in the EU. Such material includes seeds, parts of plants and planting stock used for reforestation, afforestation, the restoration of forest ecosystems, the conservation of genetic resources, adaptation to climate change, and the production of timber and biomaterials.

Key priorities for the forestry sector include improving the quality and availability of planting material, enhancing traceability from collection to sale, utilising digital tools, and taking into account resilience to climate change, pests and diseases. The Regulation also provides for alignment with EU plant health rules and official controls.

For Ukraine, this legislation is important in the context of aligning with the EU acquis, developing a certification system for forest seeds and planting material, preparing for participation in the EU internal market, and restoring forests damaged by war, fires, pests or other emergencies.

The Regulation was published in the Official Journal of the EU on 26 June 2026. Given the complexity of the transition from the previous Directive 1999/105/EC, the application of the new rules provides for a transitional period.

Commission Regulation (EU) 2026/1383 of 22 June 2026 amending Council Regulation (EU) No 338/97 to reflect the amendments to the CITES Convention adopted at the 20th Conference of the Parties, and other amendments agreed by the Scientific Review Group.

The Regulation updates the annexes to the EU's basic regulation on trade in endangered species of wild fauna and flora. The document implements the amendments adopted under CITES and is relevant to international trade in tree species, plants, their parts and derived products, provided such species are included in the relevant lists.

For the forestry sector, the impact lies in the need to verify the species composition of timber-based goods, licensing requirements, documents of origin and import/export rules for protected species. This is particularly important for businesses dealing in exotic or valuable timber

species, furniture, veneer, musical instruments or other timber products.

For Ukraine, the regulation is relevant in the context of aligning customs, licensing and environmental protection procedures with EU rules, as well as the control of international trade in species protected under CITES.

European Commission documents and implementation materials relevant to the forestry sector

Commission Report COM(2026) 191 final of 4 May 2026 on simplifying the application of Regulation (EU) 2023/1115 on deforestation-free products (EUDR).

The report was prepared in accordance with the mandate granted following the amendments to the EUDR in December 2025. The Commission assessed the impact of the simplifications already introduced on the administrative burden, in particular for micro and small operators, farmers and foresters, and outlined further measures for the practical launch of the EUDR at the end of 2026.

The Commission has not proposed reopening the basic text of the EUDR, but has focused on clarifications, refining the scope of application, updating the information system and trade facilitation tools. For timber and timber products, this means that preparations for due diligence on origin, geolocation data and confirmation of no link to deforestation remain relevant.

For Ukraine, the document is of practical significance, as Ukrainian exporters of timber and timber products must be prepared to provide EU operators with information on the legality of origin, traceability, the geolocation of harvesting sites and the compliance of products with EUDR rules.

The EUDR simplification package, published by the Commission on 4 May 2026: updated guidelines, FAQs, a draft delegated act on the list of goods and a draft updated implementing act on the information system.

The package aims to provide legal certainty for operators, EU Member States, third countries and suppliers. It provides further clarification on supply chains, the roles of operators and traders, geolocation, e-commerce and a simplified regime for micro and small primary operators.

Separately, technical amendments to the scope of the EUDR have been proposed: the possible exclusion of certain product categories and clarification of the list of goods subject to regulation. Pending the adoption of the relevant delegated act, these provisions should be regarded as draft provisions.

It is important for Ukraine's forestry sector to monitor the final version of Annex I to the EUDR, as it is this annex that specifies the specific product codes for which EU importers will require due diligence and proof of traceability.

Draft Commission Delegated Regulation amending Annex I to Regulation (EU) 2023/1115.

The draft aims to provide technical clarifications to the list of goods relevant to the EUDR, with a view to simplifying the application of the Regulation and avoiding uncertainty at the EU's customs border. It is not a final act and does not alter the basic list of relevant raw materials: cattle, cocoa, coffee, oil palm, rubber, soya and timber.

The practical implication for businesses is that they must check not only whether a product generally falls within the category of timber or timber products,

but also the specific Combined Nomenclature code and its status in Annex I to the EUDR.

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