

Legal Update

20.08.2025

UKRAINE'S NEW PPP LAW: KEY CHANGES FOR RECONSTRUCTION AND INVESTMENT

On 19 June 2025, Parliament adopted Law No. 4510-IX on Public-Private Partnerships (PPP), replacing the current framework and aiming to make PPPs central to post-war reconstruction. The law was published on 31 July 2025 and will become effective on 31 October 2025.

How has the scope changed?

The Law expands the possibilities for applying the PPP mechanism in existing sectors – such as healthcare and education. Furthermore, it significantly broadens PPP implementation in sectors including transport, digital infrastructure, energy, IT, and waste management, while also introducing entirely new areas such as housing (including modular), postal services, and support services for state institutions.

communal property, as well as property owned by public sector enterprises.

What is new in financing?

The law introduces grants as a recognised PPP funding tool – either via public bodies or directly to the private partner.

How are approvals changing?

Projects under €5.5 M use a single-stage process; recovery-focused projects get a fast-track route during martial law and for seven years after.

What protections are there for investors?

Expanded legislative stability on taxes



By opening new sectors, streamlining approvals, and empowering state enterprises as partners, the new PPP law creates a faster, more flexible path for Ukraine's reconstruction

Who can be public partners now?

In addition to state authorities, state and municipal enterprises (e.g., Ukrzaliznytsia, Ukrposhta) can act as full PPP partners.

What assets can be PPP objects?

Movable and immovable state and

and regulatory acts; contractual flexibility, including foreign law for ancillary agreements.

Are there sector-specific rules?

Yes – for housing, natural monopolies, and motorways (tolls allowed only if an alternative free route exists).

Legal Update

20.08.2025

UKRAINE'S NEW PPP LAW: KEY CHANGES FOR RECONSTRUCTION AND INVESTMENT

How will PPP projects be prepared?

The law sets three procedures:

■ **General** – two stages: concept note and full feasibility study (decision within 90 days).

■ **Below-threshold** – for projects under €5.5 M, only a concept note is required (decision within 45 days).

■ **Fast-track** – for recovery-focused projects on official lists, with simplified steps and shorter timelines, in effect during martial law + 7 years after.

Conclusion

The new PPP law is designed to make project preparation simpler, faster, and more adaptable – an essential move for Ukraine's reconstruction. Key innovations include single-stage approvals for smaller projects and a streamlined process for those on priority recovery lists, opening new opportunities for municipalities and other smaller public partners to work with business. Allowing state and municipal enterprises to act as public

partners should also make cooperation more practical and commercially minded. By closing gaps in the old framework, the law offers greater clarity and predictability for both sides. However, its



This law closes long-standing gaps in PPP regulation, aligning Ukraine's framework with modern global standards

success will hinge on the ability of public partners to plan and deliver quality projects, build genuine partnerships with the private sector, and on the timely adoption of secondary regulations to put the reforms into action.

[Find out more on our website](#)

The overview is authored by **INTEGRITES Real Estate and Construction team**



DR OLEKSIY FELIV
MANAGING PARTNER



ANNA POGREBNA
PARTNER



TETIANA STOROZHUK
COUNSEL