



Ukraine approves a civil aviation strategy and creates a coordination centre to prepare for the resumption of flights



Eventual resumption of flights across Ukraine

New moves by Ukraine's Cabinet of Ministers are readying the country for the eventual resumption of flights across Ukraine. Specifically, [Order No. 677-r](#) and [Resolution No. 888](#), issued on July 8, set out a vision for the eventual post-war reactivation of Ukrainian air traffic, along with a wider process of integration into the EU aviation system. Implementation comes via a formal Strategy for the Development of Civil Aviation and the establishment of an Interagency Coordination Centre and will comprise of two phases: the first covering 2026-2028, and the second spanning 2029-2030.

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- 1 **Regulation** (EU) 2018/1139 (the "**EASA Basic Regulation**") is due to be implemented by the end of 2026. It serves as the cornerstone of the European aviation regulatory framework and governs the certification and oversight of aircraft, operators, aerodromes, air navigation service providers, training organisations and personnel.
- 2 **Directive** 96/67/EC on groundhandling services (the "**Groundhandling Directive**") is due to be implemented by 2027. It requires the opening of airport groundhandling markets to independent providers and introduces rules designed to ensure non-discriminatory access to airport services.
- 3 **The Strategy** also places increased emphasis on aviation security and cybersecurity. It envisages implementing a cybersecurity framework consistent with International Civil Aviation Organization (ICAO) standards as well as the relevant Ukrainian and EU requirements, accompanied by increased investment in aviation safety and security technologies.
- 4 **Regulation** In terms of the **actual resumption of flights**, permits for Ukrainian and foreign air carriers to operate on international and domestic routes will be issued no sooner than **three months after the termination or lifting of martial law** (in place since 2022).

Air carriers



The principal regulatory change for air carriers concerns certification and regulatory oversight. Implementation of the EASA Basic Regulation will require alignment with the EU certification framework and associated EASA standards. Existing Ukrainian certificates and approvals are unlikely to suffice once the new framework is fully implemented and may need to be reviewed, amended or reissued under applicable EASA-based rules.



The reform process is expected to bring Ukrainian requirements closer to EASA standards in areas such as safety management, certification, continuing airworthiness and operational oversight. As Ukraine implements the Basic Regulation and related secondary legislation, airlines may face revised certification procedures and compliance requirements before commencing or resuming operations.



The implementation of the EASA Basic Regulation may also create new operational opportunities. The Directive grants carriers the right to self-handle at airports exceeding annual traffic thresholds of one million passengers or 25,000 tonnes of freight, introducing greater flexibility in the provision of ground services than has hitherto existed in Ukraine.



Airport operators will likewise be affected by the transition to the EU certification framework. Aerodrome certification requirements are expected to move closer to the standards established under the EASA Basic Regulation and the associated EASA regulatory system.



The more significant changes, however, are likely to arise from the liberalisation of groundhandling services. The transposition of the Groundhandling Directive will likewise require Ukrainian airports to amend existing service concession arrangements, as the current regulatory framework does not yet guarantee independent providers free access to the groundhandling market on the scale required by EU law. Airports handling more than two million passengers or 50,000 tonnes of freight annually will be required to open certain groundhandling services to independent providers, while self-handling rights apply at lower thresholds of one million passengers or 25,000 tonnes of freight.



Where limits on the number of service providers are permitted, at least two providers must be permitted to operate, including one provider independent of both the airport operator and any carrier accounting for more than 25 percent of airport traffic. Providers must be selected through a transparent tender procedure, and no selection may run for more than seven years. Airport operators may therefore need to review their existing groundhandling arrangements as Ukraine aligns its regulatory framework with EU requirements. Those that are exclusive, that run beyond seven years, or that were not competitively awarded are the most likely to require renegotiation or a new competitive selection.



The Directive also requires the separation of accounts where airport operators provide groundhandling services in-house.

Ground handlers



The Groundhandling Directive establishes a legal framework intended to ensure access to airport groundhandling markets for independent service providers. At airports exceeding the relevant traffic thresholds, providers will benefit from greater opportunities to compete for access to groundhandling services. Competitive tendering procedures are expected to become increasingly important for obtaining and maintaining access to airport groundhandling markets.



Independent providers that are not affiliated with airport operators or dominant air carriers may particularly benefit from provisions designed to preserve competitive market structures and ensure the presence of independent service suppliers.



While the reopening of Ukrainian airspace remains dependent on security conditions, the regulatory framework that will govern the market once operations resume is already beginning to take shape. The Strategy establishes a roadmap for the gradual alignment of Ukraine's aviation sector with the EU regulatory framework, with further details expected to emerge through secondary legislation adopted during 2026-2028.



We will continue to monitor the developments and to provide updates as the new framework evolves.
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