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New legal framework for explosives and ammunition in Ukraine

On 16 July 2025, the Government of Ukraine adopted Resolution No. 902, which establishes a procedure for the production, procurement, and supply of explosives and ammunition (the "**Procedure**"). The Procedure will remain in effect for the duration of martial law and for 12 months following its cancellation or termination.

Transition from previous regulation



Former framework:

Government Resolution No. 763 (pilot project, still formally in force).



New procedure:

Expands the criteria for obtaining manufacturer status, updates transportation and storage requirements, clarifies the process for obtaining necessary authorisations, and refines production requirements for explosives.

Continuity:

- Manufacturers registered under Resolution No. 763 will retain their existing status.
- Certificates for storing military explosives issued under Resolution No. 763 will remain valid as long as the Procedure is in effect.

Becoming a registered manufacturer



-  **Process:**
Submission of a declaration to the Ministry of Strategic Industries of Ukraine (liquidated; the Ministry of Defence of Ukraine is the successor)
-  **Result:**
Inclusion in the Register of Participants in the Selection Process and Executors of State Contracts



Timeline: 10 business days from submission

-  **Eligibility Criteria — at least one of the following must be met:**
 - Execution of a government contract within the past 12 months for the manufacture and delivery of explosives, ammunition, or related components;
 - Possession of developer rights for ammunition that has been approved for use or adopted for service;
 - Holding a valid permit from the National Police of Ukraine for storing industrial explosives, or a certificate from the State Labour Service for storing military explosives;
 - The legal right to use repurposed military infrastructure for ammunition storage; or
 - Cooperation with the Ministry of Defence of Ukraine on the development and/or production of explosives or ammunition.

Manufacturer status



Registered manufacturers are granted the right to:

-    Manufacture and supply explosives and ammunition for Ukraine's security and defence forces, and to other manufacturers;
-    Purchase explosives, detonating devices, and products or devices containing explosives;
-    Develop, produce, store, transport, purchase, sell, import into Ukraine, and use certain precursor chemicals;
-    Store and process, as well as transport for further storage and processing, waste from inorganic chemical processes;
-    Recover (recycle or regenerate) such waste received from other manufacturers; and
-    Produce and store methyl alcohol and fuel, and store ethyl alcohol.

Facility requirements



Manufacturers must have ownership or other real rights to facilities used for the production and storage of explosives and ammunition.



The facilities must meet the requirements set out in the Procedure.



Manufacturers obtain a certificate from the State Labour Service for the storage of military explosives (simplified procedure).

Transportation of explosives



Manufacturers are exempt from standard rules for transporting dangerous goods by road, provided they comply with the specific requirements set out in the Procedure.



Permission from the National Police of Ukraine is not required for the transportation of military explosives.

Purchase and import: simplified procedures



The Procedure introduces streamlined processes for obtaining the following authorizations and registrations:



Permits from the National Police of Ukraine to purchase industrial explosives



Registration with the State Service for Export Control of Ukraine ("SSECU")



Import permits from the SSECU



International import certificates issued by the SSECU

Development and supply of ammunition



Production and testing of explosive substances



Separate rules apply to the production and testing of explosive substances.



New process:

Statement from the Ministry of Defence affirming that the given testing procedures are sufficient to verify the declared characteristics of the given explosive sample.

Conclusion

The establishment of clear rules for the production of explosives and ammunition is expected to stimulate the development of Ukraine's defence industry and encourage the entry of new players into the market.



For more information, please contact:



Anastasiya Bolkhovitina

Partner, Head of Corporate and M&A,
Head of Defence and Security, Ukraine

anastasiya.bolkhovitina@kinstellar.com



Maïia Savelieva

Associate, Corporate and M&A

maïia.savelieva@kinstellar.com

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