INSIGHTS

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# Critical Importance Status and Employee Reservation: Recent Changes in Ukraine

On 2 June 2026, Resolution No. 692 of the Cabinet of Ministers of Ukraine dated 30 May 2026, "Certain Issues of Reservation of Persons Liable for Military Service During Mobilisation and Martial Law" (the "**Resolution**") entered into force. The Resolution introduces important changes to the procedure for recognising enterprises, institutions and organisations (the "**entities**") as critically important, and also updates the procedure for reserving employees liable for military service.

## The Resolution introduces important changes, including:

- Limitation of the validity period of the current critically important status
- Higher average salary requirements
- Clarification of the criticality criterion for Diia City residents
- Loss of critically important status in the event of exceeding the reservation quota
- Changes to the calculation of the reservation quota
- Higher minimum salary requirements for reserved employees

## Limitation of the Validity Period of the Current Critically Important Status

Decisions recognising entities as critically important for the functioning of the economy and ensuring the livelihood of the population during a special period remain valid for the period for which they were adopted, but no later than 1 September 2026.

This rule does not apply to entities that may lose their critically important status before 1 July 2026 if they are found not to comply with the updated sector-specific criticality criteria. For further details, see Other Key Dates for Critically Important Entities.

## Higher Average Salary Requirements

The accrued average salary of employees for the purposes of obtaining critically important status must be no less than three times the minimum statutory salary.

*As of June 2026, this amount cannot be lower than UAH 25,941 (approximately EUR 500).*

For entities that actually operate in areas of active hostilities, possible hostilities or temporarily occupied territories (the "**Entities Located in Areas of Hostilities and Temporary Occupation**"), the average salary criterion remains unchanged and must be no less than 2.5 times the minimum statutory salary.

*As of June 2026, this amount cannot be lower than UAH 21,617.50 (approximately EUR 420).*

## Clarification of the Criterion for Diia City Residents

To obtain critically important status, Diia City residents must demonstrate that the average monthly remuneration accrued to employees and gig specialists amounted to at least EUR 1,200 during the preceding six calendar months.

## Loss of Critically Important Status in the Event of Exceeding the Reservation Quota

If the permitted number of reserved employees liable for military service is exceeded, the head of the entity must, within 10 business days of such excess arising, submit an application through the Diia portal to cancel the relevant reservations.

Failure to bring the number of reserved employees into compliance with the established limits constitutes grounds for revoking an entity's critically important status.

## Changes to the calculation of the reservation quota

Employees who have an exemption from mobilisation under Article 23 of the Law of Ukraine "On Mobilisation Preparation and Mobilisation", as well as employees working under secondary employment arrangements with another employer, shall be counted towards the total number of employees liable for military service at only one place of employment.

## Higher Minimum Salary Requirements for Reserved Employees

Reserved employees liable for military service employed by critically important entities must be paid a monthly salary of no less than three times the minimum statutory salary.

*As of June 2026, this amount cannot be lower than UAH 25,941 (approximately EUR 500).*

For Entities Located in Areas of Hostilities and Temporary Occupation, the monthly salary requirements remain unchanged.

## Key Dates for Critically Important Entities

**By 10 June 2026**

Ministries, military administrations and other central executive authorities must review their sector-specific criteria used to identify entities that are important for a particular sector of the national economy or for meeting the needs of a territorial community. The review is intended to ensure that such criteria are objective, justified and applied exclusively to entities whose activities are critical for the functioning of the economy, ensuring the livelihood of the population or meeting the defence needs of the state.

**By 1 July 2026**

Ministries must assess whether entities recognised as critically important for the functioning of the economy and ensuring the livelihood of the population during a special period comply with the updated criteria.

*Critically important status will be revoked if the criterion on the basis of which the entity was previously recognised as critically important is removed.*

**By 1 September 2026**

All decisions recognising entities as critically important for the functioning of the economy and ensuring the livelihood of the population during a special period must be reviewed, except for entities whose critically important status is revoked before 1 July 2026.

For further information regarding the changes to the procedure for recognising entities as critically important and the employee reservation framework, please contact:




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