**ANALYSIS**
**of the Draft Law of Ukraine "On the Principles of the State Policy of Transition Period"**

On 9 August the Verkhovna Rada of Ukraine registered the Draft Law "On the Principles of the State Policy of Transition Period" (Reg. 5844)[1] (hereinafter - the Draft Law), which was initiated by the Cabinet of Ministers of Ukraine. According to the explanatory note, the Draft Law is designed to properly regulate the state policy of transition period, a set of measures to counter the armed aggression of the Russian Federation against Ukraine, restore the territorial integrity of Ukraine within the internationally recognized state border and ensure state sovereignty of Ukraine, restore the operations of central and local government authorities in the temporarily occupied territories, eliminate the consequences of the armed aggression of the Russian Federation against Ukraine, reintegrate the temporarily occupied (deoccupied) territories and their residents, build sustainable peace, and prevent the recurrence of the occupation.

As this Draft Law was initiated by the Government of Ukraine, there is every reason to believe that it expresses the Government's position on resolving issues related to eliminating the negative consequences of the armed conflict.

The coalition of organizations concerned with the protection of the rights of victims of the armed conflict submitted comments at all stages of public consultations on the text of the Draft Law organized by its legal drafter, the Ministry of Reintegration of the Temporarily Occupied Territories of Ukraine. These comments were partially taken into account during the preparation of the Draft Law. At the same time, the Draft Law contains a number of provisions that can create dangers and gaps in the existing legislation, and therefore it needs significant revision. Adoption of the Draft Law may lead to negative consequences, in particular, the emergence of legislative conflicts, inconsistency with the Constitution of Ukraine and international obligations, as well as to contradictory interpretation and, consequently, to different ways of law enforcement and violation of the principle of legal certainty. The Draft Law has the character of a political declaration rather than of a normative

[1] On 31 August, two alternative draft laws were registered in the Verkhovna Rada of Ukraine, the draft law on Principles of Reintegration of Temporarily Uncontrolled Territories of Ukraine (Reg. 5844-1) and the draft law on the Principles of the State Policy of Transition Period" (Reg. 5844-2).

legal act with clear norms of legal regulation, which calls into question the possibility of fulfilling its provisions in case of adoption.

Below is a detailed analysis of the main comments to the text of the Draft Law.

**1. Some proposals for the introduction of new terms in the legislation need to be revised and substantially refined in order not to violate the principle of legal certainty and to prevent misinterpretation and incorrect law enforcement.**

Article 1 of the Draft Law contains a number of definitions that are novel for Ukrainian legislation (in particular, "transition period", "conflict period", "post-conflict period", "temporary occupation", "convalidation", "contact line", "territorial communities on the contact line", "deoccupied territories", etc.). However, some of these novelties are incorrectly defined, which leads to contradictions with the norms of international law, as well as with the provisions of national law. In addition, the scope of some concepts, which are presented quite broadly in the definitions, is significantly narrowed in the text of the Draft Law.

Thus, it is doubtful whether it is reasonable to distinguish the concepts of "transition period", "conflict period", "post-conflict period". Analyzing the definition of these concepts, it should be noted that the terms "conflict period" and "post-conflict period" are in fact components of the term "transition period". The latter shall mean "*the period of time during which the State implements its policy to counter the armed aggression of the Russian Federation against Ukraine, restore the territorial integrity of Ukraine within its internationally recognized borders, and ensure the state sovereignty of Ukraine, restore the operations of central and local government authorities in the temporarily occupied territories as well as eliminate the consequences of the Russian aggression against Ukraine, reintegrate the temporarily occupied (deoccupied) territories and their residents, build sustainable peace, and prevent further occupation*." The definition of "conflict" and "post-conflict" periods is characterized by the fact that the first covers the time when active hostilities are carried out to restore territorial integrity, and the second covers the time when the reintegration of deoccupied territories and the restoration of constitutional order there take place. Although the general concept of the state policy of transition period and the text of this Draft Law is built on this division of the transition period into "conflict" and "post-conflict", it is impractical to separate two fundamentally similar terms.

In addition, it should be noted that Article 1 of the Law of Ukraine "On Mobilization Training and Mobilization" defines a "special period" that begins *"from the moment the mobilization decision is announced (except for the target one) or entrusted to the implementing entities regarding covert mobilization or from the moment the martial law is introduced in Ukraine or in some of its localities and covers the time of mobilization, wartime and the partial reconstruction period after the end of hostilities."* Thus, as can be seen, the definition of the "conflict" and "post-conflict" periods already partially coincides with the definition of the "special period", which may cause misinterpretation of the relevant legislation and incorrect law enforcement.

The Draft Law contains the concept of "transitional justice", which is defined as *"a set of measures specified in this Law and other laws to eliminate the consequences of violations of the rule of law, human and civil rights and freedoms caused by the armed aggression of the*

*Russian Federation against Ukraine, including measures to restore the rights and freedoms, compensate for damages, ensure justice and reconciliation, and prevent further occupation."*
Firstly, the challenge lies in the fact that the concept of "transitional justice" is translated into Ukrainian in two different ways: "*perekhidna yustytsiia*" and "*perekhidne pravosuddia*". The first is used solely in this Darft Law and the second is a stable expression which is already contained in the Ukrainian legislation. In particular, this concept is found in a number of strategic documents, namely Strategy of Deoccupation and Reintegration of the Temporarily Occupied Territory of the Autonomous Republic of Crimea and the City of Sevastopol, approved by the Decree of the President of Ukraine № 117/2021 of 24 March 2021, National Human Rights Strategy approved by the Decree of the President of Ukraine № 119/2021 of 24 March 2021 and others). Thus, the authors of the Draft Law actually propose to introduce a new concept that will exist in the legislation of Ukraine simultaneously with another concept that is identical in content. Secondly, in Section II of the Draft Law "Certain Aspects of Transitional Justice", which discloses the content of the relevant parts of transitional justice, its content is significantly narrowed compared to the definition contained in Article 1 of the Draft Law. Although the authors of the Draft Law note that this is a description of its separate aspects, it is unclear where all the aspects of transitional justice are described and what is the relationship between transitional justice and the transition period (conflict and post-conflict periods). For example, according to the definition contained in Article 1 of the Draft Law, the issue of compensation for damage caused by the armed conflict is part of transitional justice. At the same time, the issue of compensation for the damage caused by the conflict is mainly disclosed in Article 3 "Aggressor State, Occupying Power" (this article is not included to the Section on Transitional Justice). Furthermore, building a succession pool, by definition, is a measure within one of the four elements of transitional justice, namely "non-recurrence of the armed conflict." At the same time, the authors of the Draft Law consider building a succession pool for service in the deoccupied territories to be a measure of the conflict period.

The appropriateness of introducing such concepts as "contact line" and "territorial communities on the contact line" (paragraphs 10, 11 of Part 1 of Article 1 of the Draft Law) also raises significant doubts. This proposal contains several components. First, a new term "contact line" is introduced. Today, Ukrainian legislation uses the following terminology: "demarcation line", "settlements on the line of contact", "administrative border with the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol", "border of the temporarily occupied territories". At the same time, the term "contact line" used in this Draft Law is a translation loan word from the English "**contact line"** or "**line of contact**" and it is not found in Ukrainian legislation. Given this, in the event of the adoption of this Draft Law, it will be necessary to completely replace the terminology of bylaws in order to comply with its provisions. Secondly, the very proposal to create a definition of territorial communities on the contact line is wrong, because the status of territorial communities on the line of demarcation does not change their status as territorial communities. They remain territorial communities, and their list can be created by a separate legal act and this process does not require a legal definition of this concept.

Instead, some important definitions are missing in the Draft Law (for example, there is no definition of “national dialogue”, “dialogue processes”, “victims of the armed aggression”, etc.).

**2. The Draft Law provides for the expansion of the powers of the President of Ukraine in an unconstitutional manner.**

A number of articles of the Draft Law establish specific powers of the President of Ukraine, namely:

- authorization of members of the Parliament of Ukraine, local councilors, local government authorities, and their officials to make contacts and interact with the Russian Federation, its central and local government authorities, occupying forces and occupation administrations, and their officials regarding the elimination of the consequences of the armed aggression of the Russian Federation against Ukraine (Part 8 of Article 5 of the Draft Law);

- setting a date marking the restoration of the territorial integrity of Ukraine (Part 6 of Article 6).

It should be noted that the exhaustive list of the powers of the President of Ukraine is contained in the Constitution of Ukraine, as indicated in paragraph 31 of Part 1 of Article 106. In turn, this Article does not contain any of the above-mentioned powers of the President of Ukraine. The Constitution of Ukraine has the highest legal force according to its Article 8, and the laws of Ukraine must comply with it. Therefore, the powers of the President of Ukraine cannot be extended by laws, i.e. the acts of lower legal force compared to the Constitution of Ukraine.

In the field of national security and defence, Article 106 of the Constitution of Ukraine defines the President of Ukraine as the one who ensures the independence of the State and national security (Article 106 Part 1 para. 1) and the Supreme Commander-in-Chief of the Armed Forces of Ukraine (Article 106 Part 1 para. 17). Acting in this capacity, the President of Ukraine exercises the following powers:

- submits the proposal to the Verkhovna Rada of Ukraine regarding the appointment of the Minister of Defence of Ukraine (Article 106 Part 1 para. 10);
- appoints and dismisses the high command of the Armed Forces of Ukraine and other military formations; administers the national security and defence of the State (Article 106 Part 1 para. 17);
- is the Head of the National Security and Defence Council of Ukraine (Article 106 Part 1 para. 18);
- submits to the Verkhovna Rada of Ukraine a declaration of a state of war and in the event of armed aggression against Ukraine adopts a decision on the use of the Armed Forces of Ukraine and other military formations established in compliance with laws of Ukraine (Article 106 Part 1 para. 19);
- adopts, in accordance with the law, a decision on general or partial mobilization and the introduction of martial law in Ukraine or in its particular territories, in the event of a threat of aggression, or danger to the independence of Ukraine (Article 106 Part 1 para. 20).

As can be seen from this list, the powers of the President of Ukraine are to appoint and dismiss officials, as well as to declare a state of war, martial law, mobilization. The powers proposed in the text of this Draft Law go beyond the exhaustive list of powers established by Article 106 of the Constitution of Ukraine, and therefore there is a risk of recognizing such provisions of the Draft Law, if adopted as law, unconstitutional. It should be noted that the text of the Draft Law in this regard does not differ significantly from its previous version. Controversial norms of the previous version, which were available for public discussion, were left unchanged or incorporated into other articles of the Draft Law. The example is the powers of the President of Ukraine to determine the contact line and the list of temporarily occupied areas, territories of territorial communities and their parts, the list of territorial communities on the contact line, which was transferred from Article 1 of the previous version to Article 4 of the registered Draft Law.

In addition, some of the provisions proposed by the Draft Law on the powers of the President of Ukraine clearly indicate the sphere of the administrative-territorial organization (Articles 4 and 6 of the Draft Law), which may contradict Article 106 of the Constitution of Ukraine. Because whatever is connected with this sphere does not belong to the powers of the President of Ukraine. Instead, the sphere of the administrative-territorial organization is administered by the Verkhovna Rada of Ukraine and the Cabinet of Ministers of Ukraine. Thus, proposals to grant the President of Ukraine certain powers in the sphere of the administrative-territorial organization are not inherent to the presidency in accordance with the Constitution of Ukraine.

Another innovation is Part 8 of Article 5 of the Draft Law which states that "*members of the Parliament of Ukraine, local councilors, local government authorities, and their officials may not make contacts and interact with the Russian Federation, its central and local government authorities, occupying forces and occupation administrations, and their officials regarding the elimination of the consequences of the armed aggression of the Russian Federation against Ukraine unless authorized by the President of Ukraine.*" The wording of this norm clearly indicates the range of issues for the solution of which it is allowed to make contacts with the Russian Federation only with the authorization of the President of Ukraine. These are issues related to the elimination of the consequences of armed aggression. It should be noted that such a right of the President, on the one hand, may follow from his authority as the head of the State to represent the State in international relations, administer the foreign political activity of the State, conduct negotiations and conclude international treaties (Article 106 Part 1 para. 3). In this case, it makes no sense to record this power separately in the law, as the norms of the Constitution of Ukraine are the norms of direct action. On the other hand, based on the nature of the armed conflict (and the Draft Law is aimed at eliminating the consequences of the latter) and the logic of things, such a right should provide for the empowerment of certain persons to represent the State exclusively in the peace negotiation process for the purpose of concluding a peace treaty. However, as already mentioned, this is part of the understanding of the powers of the President of Ukraine as the head of the State, provided for in paragraph 3 of Part 1 of Article 106 of the Constitution of Ukraine. Nevertheless, Part 8 of Article 5 of the Draft Law contains a very broad wording without its detailing and without instructions in particular on the peace negotiation process. It should be noted that the issues related to the elimination of

the consequences of the armed aggression of the Russian Federation against Ukraine are much broader and the peace process is only a component of them. Therefore, it is worth clarifying this norm.

**3. The components of transitional justice are described in fragments and do not constitute a holistic system**

The Draft Law contains Section II, devoted to certain elements of transitional justice (Articles 9-14 of the Draft Law). Based on the wording of the provisions of these articles, the elements that will receive their legislative regulation are the prosecution of persons guilty of gross violations of international human rights law and international humanitarian law; the search for the truth and the safeguarding the right to the truth. At the same time, other elements of transitional justice, in particular compensation and reparation, building a succession pool, are contained in other sections of this Draft Law, which already indicates a breach of the internal structure of this text and some internal inconsistency.

It is necessary to point out the fragmentary approaches to the elements of transitional justice. The issue of liability in this context can generally be divided into two areas: criminal liability for crimes against humanity and war crimes and restrictions on holding offices, including elected ones (lustration). The Draft Law covers both topics. However, Article 9, which provides for the prosecution of perpetrators of war crimes and crimes against humanity, deals only with amnesty and the principles of exemption from criminal liability, although the transitional justice component itself is much broader and covers more than just these issues. Similarly, Article 10 of the Draft Law, which de facto concerns lustration, defines only certain principles. In addition, the same methodological error was made in the text of this Draft Law as in previous editions, i.e. nothing is said about the current Law of Ukraine "On Purification of Power", which also establishes the principles of lustration and appropriate mechanisms. Part 2 of Article 10 of the Draft Law only states that the grounds and procedure for applying restrictions on holding offices are determined by law, however, without mentioning the existing law. In addition, the Final and Transitional Provisions again do not indicate whether the Law of Ukraine "On Purification of Power" will be amended or adopted in the new version. Given this, there is a risk that in the event of the adoption of a special law on restrictions on the right to hold office, in Ukraine there may be two laws concerning lustration.

Another element of transitional justice mentioned in the Draft Law is the search for the truth and safeguarding the right to the truth, as stated in Article 12 of the Draft Law. However, a more detailed analysis of this provision suggests that it is not about the right to the truth in the sense of transitional justice, but about the right to information, which is much narrower in content and can only be one of the components of the right to the truth. This element of transitional justice is closely linked to prosecution, and the right to the truth includes the right of victims of the armed conflict and society to know, inter alia, the progress of a criminal investigation. In addition, this component of transitional justice involves the establishment of non-judicial truth-seeking mechanisms that complement the national judicial system to better investigate cases of gross human rights violations.[2] However, the Draft Law is limited in this respect and contains only one article, Article 12, which is general and

[2] A/HRC/RES/12/12 - https://undocs.org/A/HRC/RES/12/12

essentially substitutes concepts, i.e. the right to the truth is replaced by the right to information that does not correspond to the content of this element of transitional justice.

Given that, this Section requires careful study and meticulous analysis in terms of compliance with international instruments on transitional justice, which set out in detail the main purpose of transitional justice, its principles and objectives, and possibly refinement in terms of proper implementation of the elements of transitional justice. It should be noted that in accordance with the Resolution of the Human Rights Council of the UN General Assembly (A/HRC/RES/12/11/2009), States are encouraged to take into account the specifics of the context when developing public transition policies in order to prevent the recurrence of human rights violations and to ensure social cohesion, public education, process control and openness at the national and local levels. In addition, all necessary mechanisms, both judicial and extrajudicial, including prosecution, reparations, truth-seeking, institutional reforms, oversight of officials, or a combination of these tools, need to be put in place.[3]

**4. The issues of convalidation are very limited, and there is no even minimal description of how convalidation will take place, what are its general principles and mechanisms.**

The Draft Law defines the term "convalidation". However, apart from mentioning that the procedure for convalidation of transactions in the temporarily occupied territories will be defined in a separate law, there is no general understanding of the framework and principles of convalidation in this Daft Law. Therefore, parliamentarians are invited to support the very introduction of the convalidation procedure in the future without providing an explanation of how and by whom this procedure can be conducted.

At the same time, the section on convalidation is devoted to the state registration of civil status acts and the recognition of acquired qualifications, results and periods of study in the temporarily occupied territories. The issue of using information from documents issued in the temporarily occupied territories has been the subject of discussion for more than a year. Thus, there is still no administrative extrajudicial procedure for registering births and deaths in such territories, despite a direct indication in the Law[4] on the need to develop such a procedure. And although the Draft Law mentions this problem, no solutions are offered.

In addition, attention should be paid to the threat posed in Part 3 of Article 13 of the Draft Law. Thus, academic certificates issued in the temporarily occupied territories shall not be recognized. To obtain documents on basic secondary and complete general secondary education, certification of recognition of learning outcomes and periods of study in the temporarily occupied territories is carried out in the manner prescribed by the central executive body in the field of education and science. At the same time, the Draft Law does not mention the procedure for certification for the recognition of qualifications, results and periods of study in the higher education system obtained in the temporarily occupied territories. It follows from the logic of the Article that documents on higher education in the occupied territories are not recognized. However, currently, there is a well-established

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[3] A/HRC/RES/12/11 - https://documents-dds-ny.un.org/doc/RESOLUTION/GEN/G09/165/92/PDF/G0916592.pdf?OpenElement

[4] Law of Ukraine "On Peculiarities of State Policy to Ensure State Sovereignty of Ukraine in the Temporarily Occupied Territories in Donetsk and Luhansk Oblasts"

practice, according to which the certification of recognition of results and periods of study in higher educational institutions is carried out in accordance with the Order of the Ministry of Education and Science of Ukraine №537 dated 19.05.2016 "On approval of the Procedure for certification to determine qualifications and periods of study in the higher education system obtained in the temporarily occupied territory of Ukraine after February 20, 2014, registered with the Ministry of Justice of Ukraine on May 30, 2016, under № 793/28923." Thus, the Draft Law proposes to stop this practice without giving any reasons for such a decision.

One of the main components of transitional justice, among other things, is the establishment of relations with the residents of the occupied territories and their reintegration. During the seven years of occupation in these territories, a large number of educational documents have been obtained, and former graduates continue to work and live in these territories. The requirement to validate school knowledge and the lack of mechanisms to validate qualifications in university education will lead to significant difficulties in employing young people in the occupied territories and, as a result, to enormous unemployment and even greater economic decline. Such a position of the Government of Ukraine on the future of the residents of the occupied territories may lead to an increase in the number of entrants to Russian higher education institutions.[5]

Thus, the certification requirement should be limited and applied to certain subjects and disciplines studied in the occupied territories. In addition, it should be possible to obtain knowledge and skills, access to which is currently limited or absent (for example, refresher courses with optional disciplines in Ukrainian language and literature, history of Ukraine, etc.).

In addition, it should be noted that the provisions of Article 13 of the Draft Law for some reason cover only the issues of convalidation of transactions, state registration of civil status acts and the issue of non-recognition of educational documents. At the same time, many other documents have been issued in the temporarily occupied territories that are not included exclusively in these groups of documents (for example, medical documents, court decisions, etc.).

**5. The reference in the text of the Draft Law to laws that do not yet exist violates the principle of legal certainty.**

The text of the Draft Law contains many references to laws that should establish separate procedures provided by this Draft Law. For example, Article 9 states that the specifics of amnesty and exemption from criminal liability of persons who have committed criminal offences in connection with the temporary occupation are determined by law. Article 10 states that the grounds and procedure for applying restrictions on the right to be elected in local elections and to hold office are determined by law. Article 36 of the Draft Law mentions the Law of Ukraine "On the Legal Consequences of Activities Related to the Temporary Occupation", which is also referred to in the Final and Transitional Provisions as one to be adopted.

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[5] This issue is acute due to the practices of imposing Russian citizenship in the occupied territories and significant restrictions on freedom of movement across the line of demarcation and the administrative border with Crimea, which occurs from 2020.

Moreover, paragraph 3 of Section VII of the Final and Transitional Provisions contains the requirement to recognize as invalid the Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine in Connection with the Adoption of the Law of Ukraine "On the Principles of the State Policy of Transition Period", "a number of laws of Ukraine, in particular, the relevant Law, which regulates the implementation of the rights and freedoms of residents of the occupied territory of Crimea (Law of Ukraine" On Ensuring the Rights and Freedoms of Citizens and the Legal Regime in the Temporarily Occupied Territory of Ukraine"). At the same time, the Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine in Connection with the Adoption of the Law of Ukraine "On the Principles of the State Policy of Transition Period" does not yet exist, its draft has not been developed.

Despite the mentions of these laws, they have not yet been adopted or at least developed and submitted to the Verkhovna Rada of Ukraine. However, it seems that according to the logic of the drafters, together with the Draft Law 5844, all these non-existent legislative initiatives should form a system and create a certain area of Ukrainian legislation on the policy of transition period. Indeed, the Draft Law "On the Principles of the State Policy of Transition Period" is rather a political declaration and proposes certain very general directions of the actions of the State in the context of the armed conflict and in the elimination of its consequences. In essence, it is a general law, and other laws are special and should be aimed at implementing its provisions. In this case, they must be adopted simultaneously or one after the other in an extremely short time. However, it currently appears that only one Draft Law (5844) has been drafted. However, the adoption of this Draft Law alone without the adoption of other laws aimed at developing its norms and creating full-fledged mechanisms for its implementation will turn this Draft Law into a purely declarative one, and its norms will not be able to be implemented in practice.

**6. The Draft Law contains imperative prescriptions for phenomena and processes on which there should be a wide public discussion and dialogues, in particular, with the residents of the currently occupied territories of Ukraine.**

Thus, Article 22 of the Draft Law contains the main elements of commemorating the victims of the armed aggression of the Russian Federation against Ukraine. In addition to the fact that, as noted above, the Draft Law does not specify who can be considered victims of the armed conflict, this article defines the forms of commemoration (museum of resistance to Russian aggression against Ukraine, memorial site to commemorate victims of the armed aggression against Ukraine) and places of the establishment of museums and memorial sites (Kyiv, as well as Donetsk, Luhansk, Sevastopol and Simferopol after their deoccupation). It is not clear how the places and forms of commemoration were determined, given that these issues are very sensitive in a polarized society in a state of an ongoing armed conflict, and a broad discussion of such commemorations of the victims of the armed conflict is crucial to peace-building.

**7. Revoking of normative legal acts regulating the legal status of the Autonomous Republic of Crimea and the city of Sevastopol.**

The Draft Law defines the Autonomous Republic of Crimea and the city of Sevastopol as a temporarily occupied territory, which is an integral part of the territory of

Ukraine, to which the Constitution and laws of Ukraine apply. At the same time, Section VII of the Final and Transitional Provisions revokes a number of Laws of Ukraine and Resolutions of the Verkhovna Rada of Ukraine on the legal status of the Autonomous Republic of Crimea and the city of Sevastopol.

Crimea as an administrative-territorial unit has a special status of autonomy with its historical aspects and difficulties. The causal link between the status of Crimea as a part of Ukraine and the chain of establishment and activity of the authorities in Crimea has been traced by the Resolutions of the Verkhovna Rada since 1991. Therefore, the justification of the need to revoke a number of regulations, which in fact reflect the history of the Autonomous Republic of Crimea and the city of Sevastopol as full-fledged administrative-territorial units of Ukraine, is not clear.

It is important to note that the normative legal acts proposed to be revoked in the Draft Law regulate the order of activity of authorities, citizenship, the status of the Autonomous Republic of Crimea and the city of Sevastopol, etc. All these are only outlined in the Constitution of Ukraine and the Constitution of the Autonomous Republic of Crimea.

**Conclusion:** The development of the Draft Law "On the Principles of the State Policy of Transition Period" is an important step to continue the broad public debate on issues related to eliminating the consequences of the aggression of the Russian Federation against Ukraine, deoccupation and reintegration of the temporarily occupied territories of Ukraine.

At the same time, the Draft Law contains rather controversial provisions, some of which may worsen the situation with the realization of the rights and freedoms of victims of the conflict, compared to the current situation. Such issues include the proposal of the authors of the Draft Law to recognize as invalid a number of legislative acts relating to the status of the Autonomous Republic of Crimea and the city of Sevastopol. In addition, the new concepts introduced by the Draft Law need to be clarified, revised and substantially refined in order not to violate the principle of legal certainty and prevent misinterpretation and incorrect law enforcement.

**Thus, the Draft Law "On the Principles of the State Police of Transition Period" needs refinement with the involvement of experts from national and international organizations, as well as relevant public authorities.**

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The Analysis was prepared by the experts of non-governmental human rights and charitable organizations:

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