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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the Transport, Telecommunications and Energy Council on 6 June 2025 : Roaming with Ukraine and Moldova - state of play - Information from the Commission

Ukraine

Under the framework of the EU-Ukraine Association Agreement (the ‘EU-UA AA’), the EU and Ukraine may grant mutual internal market treatment in various sector areas, including roaming. This is subject to transposition and implementation of the EU roaming *acquis* by Ukraine.

On 7 November 2024, Ukraine notified the transposition of the EU roaming *acquis* and requested mutual internal market treatment for roaming, i.e. to access the EU Roam Like at Home (the ‘EU RLAH’) area. Ukraine also committed to supplement its initial notification at a later stage, with the adoption and official publication into law of a registered bill to the Parliament of Ukraine containing some remaining transposition measures.

On 15 April 2025, the Parliament of Ukraine adopted the remaining bill. Following the notification to the Commission of the official publication into law of that bill, which the Commission hopes to receive soon, the Commission will be in the position to present for the Council approval:

- An assessment of Ukraine’s notified legislation and implementation capacity of the EU roaming *acquis*;
- A proposal for a Council decision, within the meaning of Article 218(9) of the TFEU, authorising the Commission to take the position on behalf of the Union in the Association Committee in Trade Configuration (the ‘ACTC’) in favour of a decision of the Trade Committee by which the EU and Ukraine mutually grant each other internal market treatment for roaming.

Subject to the Council approval and the ACTC’s formal decision, Ukraine could join the EU RLAH area. A transition period until 1 January 2026 is granted to both EU and Ukraine-based operators, for technical implementation of the RLAH requirements.

The voluntary agreement to ensure affordable connectivity for Ukrainian refugees, signed by 22 EU and 7 Ukrainian telecom operators, expires on 9 July 2025. Discussions are ongoing for a final prolongation, until the full implementation of the RLAH requirements (10 July – 31 December 2025).

Moldova

Under the framework of the EU-Moldova Association Agreement (the ‘EU-MD AA’), the EU and Moldova may agree on further market opening, including with respect to roaming. In practical terms, the market opening as foreseen by the EU-MD AA may lead to Moldova accessing the EU RLAH area. This is subject to transposition and implementation of the EU roaming *acquis* by Moldova.

On 9 May 2025, Moldova notified the national laws that are meant to align its legislation with the EU roaming *acquis*. At the same time, Moldova committed to supplement its initial notification in the beginning of June, after a swift adoption of the secondary legislation covering certain outstanding transposition and implementation measures.

The Commission services have already started the informal assessment of the legislation notified by Moldova. Subject to a positive conclusion of the assessment and depending on Moldova’s pace with its supplementary notification, the Commission could present a proposal for a Council decision, within the meaning of Article 218(9) of the TFEU, authorising the Commission to take the position on behalf of the Union in favour of a decision in the Association Council on the reciprocal market opening with respect to the sector of roaming on public mobile communications networks between the Union and Moldova at the end of June/beginning of July for proceedings in the Council during July.