HHRF
HUNGARIAN HUMAN RIGHTS FOUNDATION

The Current Legal Status of the Hungarian Minority in Transcarpathia, Ukraine

Key developments in 2026 to date, the legislation shaping them, and unresolved issues

September 30, 2026

The first nine months of 2026 brought a turning point in the legal situation of the Hungarian community in Transcarpathia

- *Hungary and Ukraine reached an agreement on expanding minority rights, announced on June 3*
- *the first cluster of accession negotiations between the European Union and Ukraine was opened on June 15*
- *the Ukrainian authorities subsequently adopted measures that have produced an uneven legal landscape whose implications remain unclear*

The overview below presents the events in chronological order and sets out their legislative background.

The first public turning point of the year came on May 19, 2026, when László Brenzovics and László Zubánics, the presidents of the Cultural Alliance of Hungarians in Subcarpathia (KMKSZ) and the Democratic Union of Hungarians in Ukraine (UMDSZ), respectively, issued a joint statement.

The joint statement set out four requirements for resolving the minority rights situation:

1. Predictable conditions for Hungarian-language education;

2. Ensure school-leaving examinations in minority languages;

3. Guaranteed parliamentary representation and electoral district boundaries reflecting the ethnic composition of the population; and

4. Cultural self-government and clear rules on the use of national symbols.

The statement explicitly stressed that, in setting out these requirements, the organizations are not seeking new privileges but rather the restoration of rights that minorities had freely exercised under laws previously in force.

The item about parliamentary representation stems from the fact that there has been no ethnic Hungarian member of the Verkhovna Rada of Ukraine since 2019. As part of Ukraine's 2020 administrative reform, Hungarian-majority settlements were incorporated into districts with significantly lower proportions of Hungarians.

On June 3, Hungarian Prime Minister Péter Magyar announced that Hungary and Ukraine had reached an expert-level agreement on expanding the linguistic, educational, cultural and, in part, political rights of the Hungarian minority. On June 12, he reported that the agreement had received political approval from both governments and stated that the Ukrainian government had incorporated the pledged measures into the minority-rights action plan linked to the EU accession process. Accordingly, the implementation of this plan would also be monitored by the European Commission and the Council of the European Union. As a result of Ukraine's pledge, Hungary lifted the veto that had until then prevented the opening of the first cluster of accession negotiations.

According to press reports, the expert-level bilateral agreement announced on June 3 is approximately 20 pages long and contains the following main elements: the introduction of "minority school" as a distinct legal status; free use of the minority language in communications between students and teachers; bilingual institutional signs; appointment of school leaders who can speak the given minority language; certificates translated into the given minority language upon request; limiting the subjects that must be taught exclusively in Ukrainian to four; the right (in perpetuity) to Hungarian-language high school exit exams; and bilingualism in local public administration where the ethnic Hungarian population exceeds 10 per cent.

However, neither side has made public the full official text of the agreement — a fact also noted by the Ukrainian press. The points listed above are known only from secondary sources, and their precise legal wording cannot be verified. Hungarian and Ukrainian analysts differ on one point: according to the Hungarian analysis of the agreement, only one subject (Ukrainian language) of the secondary school-leaving exams cannot be translated to the minority language. In contrast, the Ukrainian analysis lists a second subject in this category (History of Ukraine). In current practice, the History of Ukraine subject test can be translated into Hungarian.

The direct precursor to the agreement was the eleven-point list of demands presented by Hungarian diplomats in Uzhhorod/Ungvár on January 29-30, 2024, which is substantively close to the bilaterial agreement announced in June 2026.

On June 5, Ukrainian Deputy Prime Minister Taras Kachka said that the bilateral agreement essentially amounted to implementing, "with minor amendments," the minority-rights action plan already adopted as part of the EU accession process. He noted that education-related issues could be resolved by the end of 2026 and the remaining issues in 2027. Consistent with this, **on June 12, the Cabinet of Ministers of Ukraine amended the action plan** by Order No. 570-p. However, the text of this Order is not available in the official legislative database, so its content cannot be confirmed.

The EU Framework

The incorporation into the EU accession process of the Hungarian-Ukrainian agreement announced June 3, 2026, began two years earlier. Point 40 of the European Union's negotiating framework of **June 21, 2024** (AD 9/24, CONF-UA 2/24) required Ukraine, through an inclusive process, to adopt an action plan to protect the rights of persons belonging to national minorities, including non-discrimination; measures to combat hate

speech; and the use of minority languages and minority-language education. The action plan also had to include effective implementation measures, reporting mechanisms, and responsible institutions. Point 40 concludes with the expectation that Ukraine "implement in good faith relevant bilateral agreements with EU Member States."

Consequently, the Cabinet of Ministers of Ukraine adopted Order No. 475-p of **May 14, 2025**, an action plan for the protection of the rights of national minorities, containing 122 numbered measures under nine strategic objectives. Implementation is monitored by the State Service of Ukraine for Ethnopolitics and Freedom of Conscience (DESS), which publishes a public progress report every six months; the report for the second half of 2025 was published in February 2026.

On June 15, 2026, at the second meeting of the Accession Conference, the European Union and Ukraine opened the first negotiating cluster, "Fundamentals". The cluster brings together five chapters: Judiciary and Fundamental Rights (23), Justice, Freedom and Security (24), Public Procurement (5), Statistics (18), and Financial Control (32). The protection of the rights of national minorities falls within Chapter 23.

According to the Council of the European Union's press release, the EU set interim benchmarks both at the horizontal level of the cluster and separately for the rule-of-law chapters, which must be met before the negotiations can be closed. The press release also notes that the "Fundamentals" cluster is the first to open and the last to close; progress in this cluster determines the pace of the accession process as a whole. The process is merit-based: further progress depends on legislative alignment and its effective implementation.

> **By way of background:** Ukraine was granted candidate status in June 2022; the European Council decided to open accession negotiations in December 2023; and the first EU intergovernmental conference took place on June 25, 2024. In its Conclusions document of June 18, 2026, the European Council welcomed the opening of the cluster; however, the text does not mention the issue of national minorities. On July 14, 2026, the Member States also opened the sixth cluster, External Relations.

Legal background

The Ukrainian legal framework behind the events of 2026 has developed in several stages since 2017. The core of the dispute between Hungary and Ukraine lies in the indeterminate wording used by Article 53 of the Constitution of Ukraine. In this text, citizens belonging to national minorities are guaranteed "the right to receive education in their native language *or* to study their native language." [italics added] The Law on Education of 2017 opted for the latter (weaker) of these two alternatives. The Law's amendments package of December 8, 2023, included some provisions that supported the first alternative (education in the native language).

Relevant Legal Documents

Ukrainian Legal Instrument	Adoption/entry into force	Main provision affecting minorities
Constitution of Ukraine, Articles 10 and 53	1996	Ukrainian is the state language; minorities are guaranteed "the right to receive education in their native language or to study their native language"
Law No. 2145-VIII on Education, Article 7	Sept. 5, 2017	Originally: native-language education only at preschool and primary level; paragraph 4 allows subjects to be taught in an official EU language
Law No. 2704-VIII on the State Language	April 25, 2019 July 16, 2019	Primacy of the state language; Article 21 (education), Article 26 (50% quotas in book publishing), Article 30 (customer service, with another language permitted on request); establishes the office of the Commissioner for the Protection of the State Language
Law No. 463-IX on Secondary Education, Article 5	2020	Grades 5-9: instruction may be in the minority language, except the subjects of Ukrainian language, Ukrainian literature, and History of Ukraine. In Grades 10-12: the subject "Defense of Ukraine" is also to be taught in Ukrainian
Law No. 2827-IX on National Minorities	Dec. 13, 2022 July 1, 2023	Article 10: language rights; "traditionally inhabited" = 100 years + 10%; "significant proportion" = above 15%; preferential language provisions apply to minorities whose languages are official languages of the EU[1]

[1] These thresholds are legally significant because several forms of public minority-language use are conditional on them. A locality qualifies as "traditionally inhabited" by a minority only where that community has been continuously present for at least 100 years and constitutes at least 10% of the population; a "significant proportion" means more than 15%. Communities falling below these thresholds may therefore be unable to benefit from certain language-use rights in public administration, signage and other areas. The thresholds can particularly disadvantage smaller, dispersed or demographically declining minority communities.

Ukrainian Legal Instrument	Adoption/entry into force	Main provision affecting minorities
Law No. 3504-IX amending several laws	Dec. 8, 2023 Dec. 10, 2023	Amends seven laws; removes the fixed end date for minority-language secondary education in EU languages; reduces the media quota to 30%; exempts these minorities from book-publishing quotas
Cabinet of Ministers Order No. 475-p	May 14, 2025	Minority-rights action plan containing 122 measures
Cabinet of Ministers Resolution No. 1587	Dec. 3, 2025	Funding dependent on enrolment thresholds (45/55/60 pupils) for small schools, beginning Sept. 1, 2026.[2]
Cabinet of Ministers Order No. 570-p	June 12, 2026	Amendment of the action plan of 2025 (content not public)
Cabinet of Ministers Resolution No. 929	July 15, 2026 July 16, 2026	Exemption from the enrolment threshold for schools operating minority-language classes in an official EU language

The most important row in the table is Law No. 3504-IX, which amended seven laws at once on December 8, 2023. Three elements are particularly significant:

> **First,** Article 7 of the Law on Education and Article 21 of the State Language Law both had the same new sentence: *in classes taught in the language of a minority whose language is an official language of the EU, the use of the minority language in the educational process is guaranteed alongside the state language*.

[2] According to this resolution: as of September 1, 2026, state education subsidies would be subject to different minimum enrolment thresholds depending on the school structure: 60 pupils for schools covering grades 1–12, 55 for grades 1–11, and 45 for schools covering only certain stages of primary and secondary education. These thresholds may disproportionately affect small rural and minority-language schools, which often have lower enrolment; falling below the applicable threshold may jeopardize state funding and increase pressure for consolidation or closure, thereby reducing access to native-language education.

Second, pupils who began their secondary education before September 1, 2018, in the language of a minority whose language is an official EU language could now continue receiving minority-language instruction under the pre-reform rules until they completed their secondary education. (Earlier, there was a fixed cutoff date after which the new language-of-instruction rules would apply.) For minorities speaking non-EU languages, this grace period expired on September 1, 2020.

Third, the law allowed private higher-education institutions to choose an official EU language as the language of instruction. For example, the Ferenc Rákóczi II Transcarpathian Hungarian College in Berehove/Beregszász, a private institution which received university status in 2025, enrols approximately 1500-1600 students.

The trajectory of international assessments broadly follows these developments. In Opinion CDL-AD(2017)030, adopted on 8-9 December 2017 concerning the 2017 Law on Education, the **Venice Commission** stated that the Law could amount to "disproportionate interference" with the existing rights of minorities. Opinion CDL-AD(2019)032 on the 2019 State Language Law criticized differentiation between minority languages without objective justification. Opinion CDL-AD(2023)021 on the minorities law (June 2023) recommended a further postponement of the restructuring of the minority-language school system, while follow-up Opinion CDL-AD(2023)028 (October 2023) acknowledged improvement on twelve points but found on eight points that several key recommendations had not been implemented, or had not been fully implemented.

In its country report of October 30, 2024 (SWD(2024) 699), the **European Commission** wrote of the December 2023 package (Law No. 3504-IX)**,** that "the Commission considers that Ukraine has taken all the necessary measures", while also noting that the Venice Commission itself had not issued an assessment of the steps taken in response to its recommendations. The country report of November 4, 2025 (SWD(2025) 759) **emphasized the conditions for implementation of the action plan: close consultation with representatives of minorities, the administrative capacity of the implementing bodies, and the further development of the Council of National Minorities.**

Ukraine ratified the Framework Convention for the Protection of National Minorities on December 9, 1997, and the European Charter for Regional or Minority Languages by Law No. 802-IV of May 15, 2003.

On December 3, 2025, with Law No. 4699-IX, Ukraine amended its implementation legislation of the European Charter for Regional or Minority Languages: according to this amendment, Russian was removed from the list of protected languages, while Hungarian remained on the list.

Summer 2026: the first months of implementation

In the weeks following the announcement of the new Hungarian-Ukrainian agreement, Ukrainian state bodies took a number of apparently contradictory measures:

On June 23, following a letter from the Commissioner for the Protection of the State Language, the education department of the Transcarpathian Regional State

Administration issued “guidance” to educational institutions. This “guidance” requires the use of the Ukrainian language during extracurricular activities, including clubs, sports activities, and school events.

The Commissioner is an independent official established by the 2019 State Language Law to enforce the law. The office’s powers do not depend on the Cabinet of Ministers’ minority-policy decisions. **On July 19,** MEP Viktória Ferenc approached the European Commission over the “guidance”.

On July 13, Ukrainian Human Rights Commissioner Dmytro Lubinets and his Hungarian counterpart agreed on joint “mirror-visit” monitoring in schools and kindergartens in Transcarpathia. Lubinets also provided the latest official education figures: 12,975 pupils study in Hungarian in 91 educational institutions in Transcarpathia, while a further 2,550 study Hungarian as a subject. According to the Commissioner, his office had received no complaints from the Hungarian minority during 2026.

On July 15, Cabinet of Ministers Resolution No. 929 exempted institutions operating minority-language classes in an official EU language from the enrolment thresholds for education funding. The measure corrected the effect of Resolution No. 1587 of December 3, 2025, which from September 1, 2026, would have withdrawn state education subsidies from schools whose enrolments did not reach the applicable minimum enrolment threshold (of 45, 55 or 60 pupils, depending on the school structure). That resolution would have affected several small Hungarian schools in Transcarpathia, including those in Mezőgecse/Hecha, Sárosoroszi/Orosiyevo, and Palágykomoróc/Palad-Komarivtsi. Hungarian Foreign Minister Anita Orbán described this correction as “the first significant step” since the June agreement between Hungary and Ukraine.

On July 21-22, the relevant committee of the Hungarian National Assembly held a hearing on the situation of Hungarians in Transcarpathia. Anita Orbán stated that the first official monitoring exercise was expected in October-November 2026. László Brenzovics said that not a single Hungarian-language class or school had closed, but that enforcing the Ukrainian commitments “will not be easy.” He estimated that **around 500 Hungarians from Transcarpathia were serving at the front and around 120 had been killed** — these figures are estimates in the absence of an official register and are not confirmed by an independent source. László Zubánics called for continuous monitoring. István Csernicskó, rector of the Rákóczi University in Berehove, **identified the lack of legal continuity as the main problem: the law on higher education has been amended 69 times since 2014**.

On August 11, Olena Ivanovska, Commissioner for the Protection of the State Language, issued practical guidance stating that parents should communicate in Ukrainian in school-related communication forums (such as school-initiated class chat groups for parents), because education is part of the public sphere. The statement itself does not mention Transcarpathia or minority languages; the Hungarian press interpreted it as a tightening of the rules in Transcarpathia. On the same day, regional sources indicated that in the Transcarpathia region, 566 secondary-education institutions and 583 kindergartens were preparing for the 2026/27 school year, in addition to 1,149 designated shelter sites: civil-

protection facilities that students and staff of educational institutions can use during an air-raid alert or other emergency.

In September, Ukraine's EU accession process stalled during meetings of the Working Party on Enlargement and Countries Negotiating Accession to the EU (COELA). During the meetings held on September 1 and 8, Hungary did not consent to the approval of the screening results for the second and third negotiating clusters. According to the Hungarian position, the political agreement reached in June must first be followed by concrete Ukrainian legislative measures. As of September 22, therefore, only the first ("Fundamentals") and sixth ("External Relations") clusters remained open.

At the center of the dispute is a Ukrainian draft law still under preparation. Contrary to the June agreement, this draft law would not automatically grant minority-school status to institutions operating minority-language classes but would make that status dependent on a decision by each school's operating authority.

A further difference is that the June agreement would require that either the school principal or deputy principal be able to speak the minority language, whereas the draft law would treat this only as an option, not a requirement. Since neither the bilateral agreement nor the full text of the bill is public, these details should for the time being be treated as press reports.

Under the timetable for the commitments, the education-related amendments should be enacted by December 31, 2026, and the remaining measures during 2027.

The Hungarian community in numbers

Ukraine's last official census, conducted in 2001, recorded 151,516 ethnic Hungarians in Transcarpathia, representing 12.1 percent of the region's population. The 2017 SUMMA demographic survey — based on a sample of around 22,000 people and therefore a representative estimate rather than a census — put the size of the community at approximately 131,000. No new scientific survey has been conducted since 2017; post-war estimates put the population at 80,000-90,000.

Education figures reflect these demographics. In the 2019/2020 school year, nearly 16,000 children studied in Hungarian in 97 institutions; the official figure for July 2026 was 12,975 pupils in 91 institutions. The number of institutions has therefore changed little, while pupil numbers have fallen by about 19 percent -- according to KMKSZ, without any school closures. In the 2025/26 school year, 1,001 Hungarian first-graders began their studies. Since 2024, six subject tests in Ukraine's national entrance examination (NMT) — mathematics, History of Ukraine, biology, geography, physics and chemistry — have been available in Hungarian translation; Ukrainian language and foreign languages cannot be translated.

What remains to be done

During the remainder of the year 2026, three expected developments could resolve the outstanding issues.

1. The first official monitoring of the commitments is expected in October-November. Monitoring take place both bilaterally and at EU level, with the participation of an inter-institutional working group and the Hungarian-Ukrainian Joint Committee on National Minorities.
2. The European Commission's 2026 enlargement package is also expected in the autumn.
3. Finally, under the timetable indicated by the Ukrainian side and the Hungarian position stated in September, all education-related issues should be resolved by legislation by December 31, 2026.

By September 11, press reports had already emerged about a Ukrainian bill under preparation, but its full official text and parliamentary status were not publicly verifiable when this overview was finalized on September 22, 2026.

References and online sources

1. Constitution of Ukraine (Articles 10 and 53)

2. Law No. 2145-VIII on Education

3. Law No. 2704-VIII on Ensuring the Functioning of Ukrainian as the State Language

4. Law No. 463-IX on Complete General Secondary Education

5. Law No. 2827-IX on National Minorities (Communities)

6. Law No. 3504-IX amending several laws (2023.12.08.)

7. Cabinet of Ministers Order No. 475-p — minority-rights action plan (2025.05.14.)

8. Cabinet of Ministers Resolution No. 1587 — enrolment thresholds for education subsidies (2025.12.03.)

9. Cabinet of Ministers Order No. 570-p — amendment of the action plan (2026.06.12.)

10. Cabinet of Ministers Resolution No. 929 — exemption for schools operating minority-language classes (2026.07.15.)

11. Law No. 4699-IX amending legislation (2025.12.03.)

12. Law No. 802-IV — ratification of the European Charter for Regional or Minority Languages

13. EU-Ukraine Negotiating Framework, AD 9/24, CONF-UA 2/24 (2024.06.21.)

14. Council of the EU: opening of Cluster 1 ("Fundamentals") (2026.06.15.)

15. Council of the EU: opening of Cluster 6 ("External Relations") (2026.07.14.)

16. Venice Commission, CDL-AD(2017)030

17. Venice Commission, CDL-AD(2019)032

18. Venice Commission, CDL-AD(2023)021

19. Venice Commission, CDL-AD(2023)028

20. European Commission: Ukraine 2024 Report, SWD(2024) 699

21. European Commission: Ukraine 2025 Report, SWD(2025) 759

22. Council of Europe: Ukraine — Framework Convention for the Protection of National Minorities

23. Council of Europe: Ukraine's declarations concerning the European Charter for Regional or Minority Languages

24. Telex: Talks with Ukraine on the rights of Hungarians in Transcarpathia may indeed have produced a breakthrough (2026.06.04.)

25. Kárpátalja: Eleven-point agreement or not — another language "guidance" issued to educational institutions in Transcarpathia (2026.06.23.)

26. European Pravda / Ukrainska Pravda: Hungary again blocks opening of clusters 2 and 3 for Ukraine (2026.09.01.)

27. European Pravda / Ukrainska Pravda: Hungary again blocks opening of EU accession clusters 2 and 3 for Ukraine (2026.09.08.)

28. Telex: Péter Magyar — Ukraine must take concrete steps… (2026.09.10.)

29. Telex: Amended Ukrainian draft law after a flawed letter may be behind the Hungarian veto… (2026.09.11.)