



RD4U-Board-CLD(2026)19

**REGISTER OF DAMAGE  
CAUSED BY THE AGGRESSION OF THE RUSSIAN FEDERATION  
AGAINST UKRAINE**

**Board Decision**

**Category A3.2 – Damage or destruction of non-residential immovable property**

**Group G-A3.2-000002**

**(Bakhmut claims)**

29 April 2026

The Hague

[www.RD4U.claims](http://www.RD4U.claims)

TECHNICAL SUMMARY .....	2
I. INTRODUCTION .....	3
II. METHODOLOGY.....	3
III. ASSESSMENT .....	4
IV. DECISION .....	6

### TECHNICAL SUMMARY

<b>1. RCMS Group ID</b>	<b>G-A3.2-000002</b>
2. Date of submission to the Board	17 April 2026
3. Claims category	A3.2
4. Description	Claims concerning properties in Bakhmut damaged or destroyed on or after 1 May 2022
<b>5. Number of Claims</b>	<b>33</b>
6. Submitted by Claimants on their own behalf	33
7. Submitted by Representatives using the issued Digital Authority	0
8. Submitted by a parent or guardian	0
9. Submitted through CPAS	0
10. Data from integrated registers or databases	<ul style="list-style-type: none"> <li>• Demographic Register</li> <li>• Property Register</li> </ul>
11. External data	No
12. Use of mass claims processing methods and techniques	Grouping
13. Use of AI in processing	No
14. Executive Director's recommendation	To record the Claims in the Register

## **I. INTRODUCTION**

1. This group comprises 33 claims (Claims) in category A3.2 – Damage or destruction of non-residential immovable property (Group).
2. The Claims have been reviewed by the Secretariat in accordance with Article 19 of the Rules Governing the Submission, Processing and Recording of Claims (Claims Rules).

## **II. METHODOLOGY**

3. The Group was formed by the Secretariat according to the following criteria:
  - a. the Claims were filed by natural persons who are Ukrainian nationals;
  - b. the Claims were filed by adult Claimants on their own behalf;
  - c. the Claims concern properties included in Ukraine's Register of Property Rights to Immovable Property (Property Register);
  - d. the Claims concern properties that are not included in Ukraine's Register of Damaged and Destroyed Property (RDDP);
  - e. as per the Claimants' submissions, the Claims concern damage to or destruction of non-residential immovable properties;
  - f. the Claims concern properties located in the city of Bakhmut, Donetsk Oblast, Ukraine;
  - g. as per the Claimants' submissions, the events causing the damage or destruction occurred on or after 1 May 2022;
  - h. as per the Claimants' submissions, the damage or destruction: was caused by (i) aerial attacks, (ii) artillery shelling, (iii) combat in frontal or prefrontal areas; or was sustained (iv) while under occupation; and
  - i. the Claims fulfil the general requirements set out in Articles 10 and 13 of the Claims Rules, as well as the technical requirements prescribed by Article 17 of the Claims Rules.
4. The Board has reviewed the criteria and the methodology applied by the Secretariat to identify and select the Claims in the Reparations Claims Management System (RCMS) for inclusion in the Group. Moreover, the Board has assessed the verification conducted by the Secretariat to ensure that the Claims meet the eligibility criteria.

5. The Board recalls its previous determination that, in accordance with Article 19(3) of the Claims Rules, it is appropriate for the Secretariat to rely on external data such as satellite imagery, in addition to the evidence contained in the relevant claims.<sup>1</sup>

### III. ASSESSMENT

6. Article 6.5(c) of the Statute of the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine (Statute) provides that the Board has the “ultimate authority in determining the eligibility of claims to be recorded in the Register, based on the recommendation of the Executive Director”. In accordance with Article 2.1 of the Statute, the Register’s role is to assess and determine the “eligibility of claims for inclusion in the Register” and to record eligible claims “for the purposes of their future examination and adjudication”. The Register does not have any adjudicative functions with respect to such claims, including a determination of responsibility and an allocation of any payments or compensation.
7. On this basis, the Board considers that in the performance of its functions under the Statute, its role is limited to ascertaining whether the criteria for the eligibility of claims submitted, as laid down in Article 2.2 of the Statute and Article 18 of the Claims Rules, have been met. This determination is made applying a *prima facie* standard of review of the evidence and the information provided in the recommendation of the Executive Director.
8. Pursuant to Article 18 of the Claims Rules, claims shall be eligible for recording if they meet the following criteria:
  - a. the claims are submitted by or on behalf of an eligible Claimant;
  - b. the claims are for damage, loss, or injury that occurred on or after 24 February 2022;
  - c. the claims are for damage, loss, or injury that occurred in the territory of Ukraine within its internationally recognised borders, extending to its territorial waters; and
  - d. the claims are for damage, loss, or injury that was caused by the Russian Federation’s internationally wrongful acts in or against Ukraine.
9. Claims cannot be recorded in the Register if they are manifestly unfounded.
10. The Claimants in the Group are natural persons of Ukrainian nationality who have submitted Claims on their own behalf. The Claims concern damage to or destruction of non-residential immovable properties in the city of Bakhmut, Donetsk Oblast, which is located within the internationally recognised territory of Ukraine. The damage or

---

<sup>1</sup> See e.g. Board Decision on Group G-A3.1-000002 (12 December 2024, corrigendum 16 March 2025) RD4U-Board-Sec-CLD(2024)02-corr [5].

destruction occurred on or after 1 May 2022 based on the event date indicated by the Claimants.

11. The Claims concern non-residential properties that are included in the Property Register and relate to damage or destruction that, based on the Claimants' submissions: was caused by (i) aerial attacks, (ii) artillery shelling, (iii) combat in frontal or prefrontal areas; or was sustained (iv) while under occupation.
12. As noted in previous decisions, the Board considers that the inclusion of a property in the Property Register constitutes proof of ownership by the Claimant.<sup>2</sup>
13. The Board recalls its previous determinations that residential properties in the city of Bakhmut were almost entirely destroyed on or after 1 May 2022, as a result of the internationally wrongful acts of the Russian Federation, either during the period of intense combat operations in Bakhmut or during the city's subsequent occupation. Therefore, damage to or destruction of residential properties in the city of Bakhmut could be presumed for the purpose of recording a claim, and could be presumed to have been caused by the internationally wrongful acts of the Russian Federation.<sup>3</sup>
14. Accordingly, the Board now determines that, also for non-residential properties in the city of Bakhmut, the existence of damage or destruction on or after 1 May 2022 can be presumed and such damage or destruction can be presumed to have been caused by the internationally wrongful acts of the Russian Federation.
15. The Board therefore determines that the eligibility criteria in Article 18 of the Claims Rules for recording the Claims in the Register are met.

---

<sup>2</sup> See e.g. Board Decision on Group G-A3.1-000001 (12 December 2024, corrigendum 16 March 2025) RD4U-Board-Sec-CLD(2024)01-corr [12].

<sup>3</sup> Board Decision on Group G-A3.1-000002 (n 1) [10], [13]-[15] (concerning damage or destruction that occurred between 1 May 2022 and 20 May 2023); Board Decision on Group G-A3.1-000010 (21 October 2025) RD4U-Board-CLD(2025)20 [13]-[14] (concerning damage or destruction that occurred on or after 21 May 2023).

#### IV. DECISION

16. Pursuant to Articles 2.2 and 6.5(c) of the Statute and Articles 21(7) and (8) of the Claims Rules, the Claims in Group **G-A3.2-000002**, as listed in RCMS, shall be recorded in the Register.



Robert Spano

Chair of the Board of the Register of Damage for Ukraine

\* \* \*