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NOTARIAL SYSTEMS IN COUNTRIES BELONGING TO THE ROMAN-GERMANIC LEGAL FAMILY

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Abstract. The article examines notarial systems in the countries of the Romano-Germanic legal family within the context of the development of the Latin notarial model. The research is based on comparative legal, historical-legal, and systemic methods, allowing a comprehensive analysis of notarial organization in France, Germany, and Italy. It is established that notaries in continental European states perform preventive justice functions, ensure legal certainty in civil circulation, and are characterized by a high level of professional responsibility. Current trends in the digitalization of notarial activity and harmonization of European legal standards are identified. The study concludes that the Latin notarial model is effective and that foreign experience should be used to improve the notarial system of Ukraine.

Key words: notariat, Romano-Germanic legal family, Latin notariat, notary, comparative law, digitalization.

Introduction. The notarial system is one of the key elements of the legal systems of countries belonging to the Romano-Germanic legal family, as it ensures the stability of civil transactions, provides preventive protection of the rights and legitimate interests of individuals and legal entities, and promotes the principle of legal certainty. In the current context of the development of private international law, European integration, and the digitization of legal procedures, research into models of notarial organization in countries with a civil law system and their impact on the effectiveness of legal regulation of social relations is of particular importance.

The issues surrounding the functioning of the notarial system in countries of the Romano-Germanic legal family are the subject of research by both Ukrainian and foreign scholars. Significant contributions to the study of the legal nature of the notarial system, its functions, and its role in the mechanism for protecting civil rights have been made by M. Dolynska (2018), V. Komarov and V. Barankova (2020), and S. Fursa and E. Fursa (2023). In their works, the notarial system is viewed as a special legal institution of preventive justice, whose activities are aimed at ensuring the legal security of transactions and minimizing litigation.

In foreign legal doctrine, significant attention is devoted to the analysis of the Latin model of the notarial system, which is characteristic of most countries in continental Europe. In particular, R. David and John E. C. Brierley (1985), K. Zweigert and H. Kötz (1987) examined the characteristics of the Romano-Germanic legal tradition and the role of the notary as a state-authorized official who performs public-law functions in the sphere of civil transactions. The scholars emphasize that the notarial profession in the states of this legal family performs not only certifying but also advisory and preventive functions.

Specific aspects of the organization of notarial systems in France, Germany, Italy, and Spain were highlighted in works devoted to comparative law and European private law (Myrza & Serednytska, 2021). The researchers emphasize that the Latin notarial system is characterized by a high level of professional responsibility on the part of the notary, a special procedure for entering the profession, and a combination of state oversight and professional self-regulation.

At the same time, contemporary academic literature has not sufficiently explored the issue of the transformation of notarial systems under the influence of digitalization, electronic document

management, and the harmonization of European legislation. The issues of adapting foreign experience to the Ukrainian notarial system in the context of reforming the state's legal system and Ukraine's integration into the European legal space require further scholarly analysis.

In the legal doctrine of countries belonging to the Romano-Germanic legal family, the notarial system is traditionally viewed as an institution of preventive justice, whose activities are aimed at ensuring the stability of civil transactions and preventing the emergence of legal conflicts. Unlike the Anglo-Saxon legal system, where notarial functions are limited in scope, in the continental legal tradition, the notary is vested with broad public powers regarding the certification of legal transactions, the establishment of legal facts, and the assurance of the evidentiary value of documents.

One of the most common approaches in modern legal scholarship defines the notarial system as an independent legal institution that combines elements of state activity and independent professional practice. In particular, scholars emphasize that in countries with a civil law notarial system, the notary acts as a representative of the state, since they act on its behalf and certify legally significant acts, yet simultaneously carry out their professional activities on the principles of self-governance and independence (Lyla-Barska, 2023).

A functional approach to understanding the legal nature of the notarial profession is also common in the academic literature. Its essence lies in defining notarial activity through the set of functions performed by a notary within the legal regulatory framework. Researchers classify the main functions of the notarial system as law enforcement, preventive, certification, advisory, and evidentiary functions. Particular importance is attached to the preventive function, as the notary, by verifying the legality of transactions and explaining their legal consequences to the parties, helps prevent the emergence of legal disputes (Gusarov et al., 2024).

Significant attention in scholarly works is also devoted to the relationship between the notarial profession and the judiciary. Some researchers view the notarial profession as a supporting element of the justice system that ensures the implementation of the principle of legal certainty in civil legal relations. Other scholars emphasize the autonomous nature of notarial activity and stress that the notarial profession is a separate institution within the legal system that performs special functions in the sphere of protecting the rights and legitimate interests of citizens (Herych & Herych, 2025).

In the current context of the development of legal systems in states of the Romano-Germanic legal family, the concept of the notarial profession is undergoing significant changes under the influence of digitalization and European integration. This necessitates a rethinking of traditional approaches to defining the legal nature of the notarial profession and its role in ensuring the effective functioning of civil transactions. At the same time, the primary purpose of the notarial system remains unchanged – ensuring legal certainty, legality, and stability in private law relations.

Main text. The relevance of studying notarial systems in countries of the Romano-Germanic legal family stems from contemporary processes of reforming national legal systems, the development of private international law, and the need to ensure an effective mechanism for protecting the civil rights and legitimate interests of parties to legal relationships. In the context of globalization and Ukraine's integration into the European legal space, the study of foreign experience in organizing notarial activities takes on particular significance, as it can be used to improve the national notarial system.

The modern notarial system in countries of the Romano-Germanic legal family is an important element of the mechanism for the legal regulation of private law relations. Its activities are aimed at ensuring legal certainty in civil transactions, confirming indisputable rights and facts, and preventing the emergence of legal conflicts. In this regard, a study of the notarial systems of France, Germany, Italy, Spain, and other countries of continental Europe allows for the identification of the most effective mechanisms for the legal regulation of notarial activities and outlines the prospects for their implementation in Ukrainian legislation.

This issue is particularly relevant in the context of the digitization of legal procedures and the introduction of electronic notarial services. In most countries of the Romano-Germanic legal family, electronic registries, digital means of document certification, and remote forms of notarial proceedings are being actively introduced. Such changes require a comprehensive scientific analysis, as they affect the traditional foundations of the notarial system's operation and transform its legal nature.

The purpose of this article is to conduct a comprehensive comparative legal analysis of notarial systems in countries of the Romano-Germanic legal family, to identify their characteristic features, organizational and operational specifics, and to explore the prospects for utilizing foreign experience in the process of improving Ukraine's notarial system.

To achieve this objective, the article aims to address the following research questions:

- to define the concept and key characteristics of the notarial system in countries of the Romano-Germanic legal family;
- to examine the historical background of the development of the Latin model of the notarial system;
- analyze the characteristics of the organization of notarial practice in France, Germany, Italy, and other countries of continental Europe;
- describe the legal status of a notary and the procedure for entering the profession;
- to examine current trends in the digitization of notarial practice;
- to identify opportunities for adapting foreign experience to the notarial system of Ukraine.

The practical significance of the study lies in the possibility of using its results to improve Ukraine's legislation on the notarial system, reform the system of notarial practice, and harmonize national legal regulation with European standards.

The Romano-Germanic legal family is one of the most widespread legal systems in the world, formed on the basis of the reception of Roman law and the subsequent development of the continental legal tradition. The states belonging to this legal family include France, Germany, Italy, Spain, Poland, and most other countries of continental Europe. The main characteristics of the Romano-Germanic legal family are the primacy of statutory law as a source of law, the codified nature of legislation, the division of law into public and private law, and the significant role of legal doctrine in the process of lawmaking and law enforcement (Syta & Chornobai, 2009).

An important component of the Romano-Germanic legal tradition is the notarial institution, which serves to ensure legal certainty in civil transactions and to protect the rights of parties to private law relationships. Unlike the Anglo-Saxon legal system, where notarial functions are predominantly technical in nature, in civil law countries the notary acts as a special entity endowed by the state with public powers to certify legal transactions and legal facts.

One of the key features of the notarial system in countries of the Romano-Germanic legal family is its public-law nature. The notary acts on behalf of the state, and notarial acts possess heightened evidentiary and enforceable force. This ensures a high level of trust in notarial documents and contributes to the stability of civil legal relations.

Another important feature is the preventive nature of notarial activities. In the Latin notarial system, the notary's primary task is not only to authenticate legal transactions but also to prevent potential legal conflicts by verifying the legality of agreements, ascertaining the parties' true intent, and providing them with necessary legal explanations (Mirza et al., 2024). Thanks to this, the notarial system serves as a unique mechanism for the pre-litigation protection of the rights of citizens and legal entities.

The Roman-Germanic legal family is also characterized by a high level of professional training for notaries and strict requirements for entry into the profession. In most countries of continental Europe, a person may be appointed as a notary only after obtaining a legal education, completing a specialized internship, and passing qualifying exams (Lyla-Barska, 2022). This approach ensures a high level of professional competence among notaries and the effective performance of their public-law functions.

Furthermore, the notarial profession in countries of the Romano-Germanic legal family operates on the basis of a combination of state oversight and professional self-regulation. The state defines the legal framework for notarial activities, monitors their legality, and establishes the procedure for entering the profession, while professional notarial organizations ensure compliance with ethical standards, the professional development of notaries, and the protection of their professional rights.

In countries belonging to the Romano-Germanic legal family, the notarial profession is a vital component of the legal regulatory framework, combining the characteristics of a public institution with those of an independent professional practice. Its function is to ensure the rule of law, the stability of civil transactions, and the effective protection of the rights of parties to private law relationships.

The formation of the Latin model of the notarial profession is inextricably linked to the historical development of the Romano-Germanic legal family and the reception of Roman law in the countries of continental Europe. The first elements of notarial activity emerged as early as in Ancient Rome, where the functions of drafting and certifying documents were performed by tabellions and notaries. It was they who recorded legally significant facts and formalized legal transactions, which became the basis for the further development of notarial activity in European states (Orzikh, 2017).

During the Middle Ages, the notarial profession actively developed in Italian city-states, particularly in Bologna, Venice, and Genoa, where a professional notarial guild was established. The Bologna School of Law had a significant influence on the development of the Latin notarial system; its representatives conducted research on Roman law and promoted the spread of the practice of officially certifying legal acts. During this period, the notary began to be viewed not merely as a person who drafts documents, but as a representative of public authority, endowed by the state with special powers (Orzikh, 2017).

The further development of the notarial system in the countries of continental Europe took place under the influence of the centralization of state power and the codification of legislation. France played a particularly significant role in shaping the modern Latin model of the notarial system, where, following the adoption of the Napoleonic Code, the status of the notary as a public official was enshrined in law. The French model of the notarial system became the basis for the development of notarial systems in many states of the Romano-Germanic legal family, as it combined the principles of state control, professional independence, and preventive protection of civil rights (David & Brierley, 1985).

In Germany, the formation of the notarial system took into account the peculiarities of the state's federal structure and the historical traditions of individual states. The German notarial system was characterized by a high level of professional training for notaries and a strong focus on ensuring the legality of civil transactions (Lyla-Barska, 2022). In the course of the development of the German legal system, the notary became an important actor in law enforcement, ensuring the legal validity of transactions and the protection of the rights of parties to civil relations.

In Italy and Spain, the notarial profession also developed as an institution of public law, performing the functions of certifying transactions and ensuring the legal security of civil transactions. A distinctive feature of these countries was the formation of powerful professional notarial organizations that actively participated in regulating notarial activities and maintaining professional standards (Myrza & Serebnytska, 2021).

In the 19th and 20th centuries, the Latin notarial system spread internationally and became the foundation for the operation of notarial systems in most countries of continental Europe and Latin America. An important stage in the development of international cooperation in the field of notarial practice was the creation of the International Union of Latin Notaries, whose activities are aimed at the unification of notarial practice, the exchange of professional experience, and the development of legal standards for notarial activities (Myrza et al., 2024).

The historical development of the Latin model of notarial practice attests to its close connection with the processes of the formation of the continental legal tradition. It was the historical features

of the formation of the Romano-Germanic legal family that determined the modern status of the notary as an independent professional who simultaneously performs public-law functions and ensures the stability of civil transactions.

The notarial systems in France, Germany, and Italy belong to the classical Latin model of notarial practice, which took shape within the Roman-Germanic legal family and is characterized by the notary's public-law status, a high level of professional responsibility, and the preventive nature of notarial activities. At the same time, the organization of notarial systems in these countries has its own distinctive features, determined by historical, political, and legal factors.

The French notarial system is traditionally considered one of the most developed models of the Latin notarial system. In France, a notary is a public official appointed by the state and acting on its behalf. The primary function of a French notary is to authenticate legal transactions, confer authenticity upon them, and ensure the legal validity of documents (Orzikh, 2017). Notarial acts in France have heightened probative value and may be directly enforced without recourse to the courts, which significantly enhances the effectiveness of civil rights protection.

A distinctive feature of the French notarial system is the combination of state oversight and professional autonomy. The French Ministry of Justice oversees the activities of notaries, determines the requirements for entering the profession, and sets the number of notary offices in specific regions. At the same time, notarial chambers play a significant role in regulating professional activities, ensuring compliance with professional ethics and organizing continuing education for notaries.

The German notarial system is more differentiated in nature. In Germany, there are several models for organizing notarial activities depending on the federal state. The most common are the "pure notary" model, under which a notary engages exclusively in notarial activities, and the "lawyer-notary" model, under which a person simultaneously practices as both a lawyer and a notary (Lyla-Barska, 2022).

Despite organizational differences, the German notarial profession is characterized by a high level of professional training and strict requirements for candidates for the position of notary. A person must have a higher legal education, significant practical experience, and undergo a complex professional selection process. The primary purpose of a notary's work in Germany is to ensure the legality of transactions and protect the interests of all parties involved in civil legal relationships.

The Italian notarial system also belongs to the civil law tradition and is characterized by a high level of legal regulation of notarial activities. Notaries in Italy are independent professionals who perform public functions and authenticate civil law acts, inheritance matters, corporate documents, and other legally significant acts. A key feature of the Italian notarial system is the significant level of digitization of notarial activities and the active use of electronic registries (Myrza et al., 2024).

The organization of Italy's notarial system involves strict control over the number of notaries and high qualification requirements for candidates. Access to the profession is granted through a rigorous state examination, which ensures a high level of professional training for notaries. Additionally, notarial organizations in Italy play a significant role in ensuring professional discipline and monitoring compliance with ethical standards (Myrza & Serednytska, 2021).

A comparative analysis of the notarial systems of France, Germany, and Italy reveals common features characteristic of the Latin model of notarial practice. These include the public-law status of the notary, the preventive nature of notarial activities, high requirements for professional training, and the combination of state oversight with professional self-regulation. At the same time, each state has developed its own model for organizing the notarial system, reflecting the peculiarities of its historical and legal development.

The legal status of a notary in countries of the Romano-Germanic legal family is defined by a unique combination of the characteristics of a public official and an independent professional. The notary is vested by the state with special powers to authenticate legal transactions, certify legal facts, and

ensure the legal validity of documents; however, in the performance of professional activities, he acts independently and is guided exclusively by the law. This approach is aimed at ensuring the objectivity of notarial activities and protecting the rights of all participants in civil legal relations.

In most countries with a civil law notarial system, a notary holds the status of a public official. This means that documents certified by them have heightened probative value and are presumed authentic until their invalidity is established in court. This is precisely why individuals seeking to hold the office of notary are subject to heightened requirements regarding professional qualifications, moral character, and legal experience (Myrza et al., 2024).

The process for entering the notary profession in countries of the Romano-Germanic legal tradition is complex and multi-tiered. A general requirement is a law degree and significant practical experience in the legal field. For example, in France, a candidate for the position of notary must complete specialized professional training and an internship at a notary's office, after which they take a qualifying exam and obtain the right to practice as a notary (Orzikh, 2017).

In Germany, the procedure for entering the profession is even more rigorous. A candidate must successfully pass two state bar exams, complete a lengthy internship, and demonstrate a high level of professional competence. In some federal states, only individuals with significant experience in legal practice may become notaries. This approach ensures a high level of professionalism among notaries and the effective performance of their public-law functions (Lyla-Barska, 2022).

In Italy, access to the notary profession is granted through a state competitive examination, which is considered one of the most difficult legal qualification exams. Candidates must demonstrate in-depth knowledge of civil, inheritance, corporate, and private international law. The high level of competition is due to the limited number of notary positions and the significant level of responsibility placed on the notary (Myrza et al., 2024).

One of the most important components of a notary's legal status is professional liability. In countries of the Romano-Germanic legal family, notaries bear disciplinary, civil, administrative, and, in certain cases, criminal liability for the improper performance of their professional duties. Disciplinary liability applies for violations of professional ethics or the rules governing notarial practice and is enforced through notarial self-governing bodies or state oversight.

A notary's civil liability arises in cases where harm is caused to individuals or legal entities as a result of unlawful or negligent actions. In most countries of the Latin notarial tradition, professional liability insurance for notaries is mandatory, ensuring compensation for damages to individuals whose rights have been violated as a result of the notary's wrongful actions.

In countries of the Romano-Germanic legal family, particular attention is paid to the notary's adherence to professional ethics. The fundamental principles of notarial practice are independence, impartiality, confidentiality, legality, and professional competence. Compliance with ethical standards is monitored by notary chambers and other professional self-regulatory bodies, which have the authority to impose disciplinary measures on notaries in the event of a breach of professional duties.

The legal status of a notary in countries of the Romano-Germanic legal family is characterized by a high level of public trust, a complex procedure for entering the profession, and a significant degree of professional responsibility. This model ensures the effective functioning of the notarial system as an institution for the preventive protection of civil rights and a guarantor of the stability of civil transactions.

The current stage of development of the notarial system in countries of the Romano-Germanic legal family is characterized by the active introduction of digital technologies into the sphere of notarial activity. Digitalization processes encompass electronic document management, the creation of electronic registries, the use of digital signatures, remote certification of certain legal transactions, and the integration of notarial systems with state information resources. These changes are aimed at improving the efficiency of notarial activities, simplifying citizens' access to notarial services, and ensuring an adequate level of legal certainty (Myrza et al., 2024).

One of the countries most actively implementing digital technologies in the notarial sector is France (Myrza et al., 2024). French notaries use electronic document exchange systems, electronic archives, and digital means of certifying legal transactions. An important area of reform has been the creation of centralized electronic registries, which provide prompt access to information on real estate, inheritance rights, and other legally significant data.

In Germany, the digitization of notarial services is carried out in accordance with high standards of personal data protection and information security. Significant attention is paid to the electronic exchange of information between notaries, courts, and government agencies. In addition, German law provides for the use of electronic documents in corporate legal relations and certain types of registration procedures (Myrza et al., 2024).

In Italy, the digitization of notarial activities has become a key element of the modernization of the public administration system. Italian notaries actively use electronic registries and digital platforms to execute transactions related to real estate and corporate rights. The implementation of modern information technologies has significantly reduced document processing times and improved the efficiency of notarial proceedings (Myrza et al., 2024).

At the same time, the process of digitizing the notarial profession is accompanied by a number of legal and organizational challenges. One of the main ones is the need to ensure an adequate level of protection for personal data and confidential information. In countries of the Romano-Germanic legal family, the notary traditionally serves as a guarantor of legal certainty; therefore, the introduction of electronic technologies requires the creation of effective cybersecurity mechanisms and protection of information against unauthorized access.

Another important trend in the development of the notarial profession is the harmonization of legislation among European Union member states in the field of notarial activities. European integration promotes the unification of approaches to the authentication of legal transactions, the mutual recognition of notarial acts, and the simplification of cross-border civil transactions. European Union regulations in the areas of inheritance law, electronic identification, and digital services have a significant impact on the development of notarial systems (Myrza & Serednytska, 2021).

In the current context of notarial reform, the issue of combining the traditional principles of the Latin notarial system with the latest digital technologies takes on particular significance. Despite the active implementation of electronic services, the fundamental principles of a notary's practice remain legality, independence, professional competence, and ensuring legal certainty in civil legal relations.

For Ukraine, the experience of digitizing notarial activities in countries of the Romano-Germanic legal family holds significant practical importance. Studying European models of electronic notarial practice allows for identifying promising directions for modernizing the national notarial system, improving electronic registries, and enhancing the protection of the rights of participants in civil transactions.

A comparative legal analysis of notarial systems in the Roman-Germanic legal family reveals common conceptual foundations for the organization of notarial practice, which have evolved within the framework of the Latin model of notarial practice. The main common features include the public-law status of the notary, the performance of activities on behalf of the state, the preventive nature of notarial activities, high qualification requirements for entry into the profession, and the combination of state control with elements of professional self-governance.

Despite the commonality of basic principles, the notarial systems of individual states have significant differences, due to the peculiarities of national legislation, historical development, and state structure. For example, in France, the notarial system operates as a centralized system with a high level of state regulation and a clearly defined number of notarial positions. A French notary acts as a public official, and notarial acts are enforceable without the need to go to court.

In Germany, the notarial system is characterized by greater flexibility and a wider variety of organizational models. The existence of the "lawyer-notary" system in certain federal states reflects

the combination of notarial and legal practice, which is a distinctive feature of the German notarial system. At the same time, the primary priority remains ensuring the legality of transactions and protecting the interests of parties to civil legal relationships.

The Italian notarial system is distinguished by a high level of professional competition and significant attention to the digitization of notarial activities. Italian notaries actively use electronic means of executing legal transactions and integrated information systems, which ensures the efficiency and legal reliability of notarial proceedings.

A common trend for most countries in the Romano-Germanic legal family is the gradual introduction of electronic notarial services and the development of international cooperation in the field of notarial practice. Within the European Union, legislation is being harmonized regarding electronic identification, digital document management, and the mutual recognition of notarial acts. This contributes to the simplification of cross-border legal relations and the establishment of uniform standards for notarial practice.

For Ukraine, the experience of countries in the Romano-Germanic legal family is of great importance in the context of reforming the national notarial system and adapting legislation to European standards. First and foremost, the adoption of mechanisms for the digitization of notarial activities, the improvement of electronic registries, and the integration of notarial information systems with state databases are promising areas. Another important direction for reform is raising professional requirements for notaries and strengthening the role of professional self-governance.

Particular attention must be paid to ensuring a balance between state control and the independence of notarial activities. European experience shows that the effective functioning of the notarial system is possible only when a high level of professional autonomy for notaries is combined with effective mechanisms of state oversight and disciplinary accountability.

Furthermore, the development of the concept of the notarial system as an institution for the preventive protection of civil rights holds promise for Ukraine. In countries of the Romano-Germanic legal family, notaries perform not only a certification function but also provide legal support for transactions, explain the legal consequences of their actions to the parties, and help prevent litigation. The introduction of such approaches into the national legal system could help increase legal certainty and public trust in the notarial institution.

A comparative legal analysis of notarial systems in countries of the Romano-Germanic legal family leads to the conclusion that the Latin model of notarial practice is effective as a mechanism for ensuring the stability of civil transactions and protecting the rights of parties to private law relationships. The use of positive foreign experience can become an important factor in improving Ukraine's notarial system and its further integration into the European legal space.

Conclusions. The study found that the notarial systems of countries in the Romano-Germanic legal family were formed on the basis of the Latin model of notarial practice, which is characterized by the public-law status of the notary, the preventive nature of notarial activities, and a high level of professional responsibility. The notarial system in countries of the civil law tradition performs the important function of ensuring legal certainty in civil transactions, protecting the rights and legitimate interests of individuals and legal entities, and preventing the emergence of legal conflicts.

The study revealed that in France, Germany, and Italy, the notary serves as a public official who acts on behalf of the state and is vested with special powers to authenticate legal transactions and legal facts. Common features of the notarial systems in these countries include high qualification requirements for entry into the profession, a combination of state oversight with professional self-regulation, and a high level of professional responsibility for notaries.

The analysis has shown that the current development of the notarial system in countries belonging to the Romano-Germanic legal family is characterized by the active implementation of digital technologies and electronic forms of notarial proceedings. The digitization of notarial activities

contributes to improving the efficiency of notarial services, ensuring the promptness of document flow, and enhancing mechanisms for the legal protection of participants in civil legal relations. At the same time, such processes require proper legal regulation and effective mechanisms for the protection of personal data and confidential information.

A comparative legal analysis of notarial systems in countries of the Romano-Germanic legal family has identified promising directions for improving Ukraine's notarial system. In particular, it is advisable to adopt European experience in the field of digitizing notarial activities, improving electronic registries, strengthening the professional training of notaries, and developing mechanisms for professional self-governance. The development of the concept of the notarial system as an institution for the preventive protection of civil rights is also of great importance, as it will contribute to enhancing the level of legal certainty and stability of civil transactions in Ukraine.

Thus, the notarial systems of countries in the Romano-Germanic legal family demonstrate the effectiveness of the Latin model of notarial practice as a key element of the legal framework governing private law relations. The use of positive foreign experience and the adaptation of European standards to national legislation can become important factors in the further reform and modernization of Ukraine's notarial system.

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