POLICY BRIEF

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Integrating Ukraine's agrifood sector into the EU: Challenges, sensitivities and policy priorities

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INTRODUCTION

The opening of four negotiating clusters in 2026 has marked significant progress on Ukraine's path towards EU membership. Following Cluster 1 "Fundamentals" and Cluster 6 "External Relations", Ukraine and the EU opened two economic clusters on 13 October[1]: Cluster 2 "Internal Market" and Cluster 3 "Competitiveness and Inclusive Growth". Ukraine aims to open the remaining two clusters by the end of 2026. Among those, Cluster 5 "Resources, Agriculture and Cohesion" is considered one of the most challenging for Ukraine and the EU due to the size of the sector, the scale of reforms needed and the challenges posed by Russia's ongoing war. Currently, agricultural reforms and legal approximation are taking place under wartime conditions, with severe risks and limited financing for local farmers and daily attacks by Russia that disrupt their activities across the country. To manage this politically sensitive sector and its potential impact on the EU's Common Agricultural Policy (CAP), various accession models, such as gradual integration, are being discussed to ensure a mutually beneficial process.

Agricultural reforms and legal approximation are taking place under wartime conditions.

Agriculture is a vital part of Ukraine's economy, both domestically and internationally. In 2025, agriculture generated 7.6% of Ukraine's GDP[2] and accounted for about 60% of the country's exports, heavily dominated by crops such as grains and oilseeds. Socially, farming provides essential employment opportunities for about 14% of Ukraine's[3] total employment and stabilises rural livelihoods. Before Russia's full-scale invasion, Ukraine was already working on its regulatory alignment with EU standards under the EU-Ukraine Deep and Comprehensive Free Trade Agreement (DCFTA). In the context of Ukraine's EU candidacy, further approximation has been underway.

This policy brief examines the current state of Ukraine's agricultural integration into the EU and proposes ways to address the concerns and challenges surrounding accession. It aims to move beyond a rigid, "all-or-nothing" approach and focuses instead on possible pathways towards a gradual integration model and its possible application to the agri-food sector. This approach is supported by the European Commission and several Member States, which are developing proposals to offer candidate countries a more credible pathway to membership. In particular, the "associated membership" proposed by Germany[4] envisages Ukraine's gradual integration through non-voting participation in core EU institutions and progressive access to EU programmes and funding, as an interim step with full membership as the ultimate objective.

The European Commission's *Preparing for a wider Union* pre-enlargement policy review,[5] adopted on 6 October 2026, also proposed structured gradual integration through earlier participation in selected EU policies, subject to merit-based, conditional and reversible arrangements. Building on this approach, the European Commission plans to present indicative accession roadmaps for Montenegro, Albania, Moldova and Ukraine as part of the 2026 Enlargement Package, provided they maintain reform momentum.[6] The review also suggests that Ukraine's agricultural sector would require special targeted arrangements, including transitional measures and periods governing financial support and market access for sensitive agricultural products. The final terms of Ukraine's accession will be determined during negotiations.

The policy brief first provides background on the ongoing reform of Ukraine's agricultural sector in the context of EU accession, the EU-Ukraine Association Agreement and its DCFTA provisions. It will then outline the key challenges related to the implementation of reforms, the specifics of Ukraine's case and recommendations on how the EU and Ukraine could move forward.

BACKGROUND: PROGRESS UNDER THE ASSOCIATION AGREEMENT

As part of the EU accession process under Cluster 5, Ukraine must align with and effectively implement the *acquis* across three key agricultural chapters, including Chapter 11 "Agriculture and rural development", Chapter 12 "Food safety, veterinary and phytosanitary policy" and Chapter 13 "Fisheries and aquaculture". These chapters are among the most complex in the accession negotiations, with Chapter 12 alone covering more than 2,000 EU legal acts,[7] according to the Ukrainian Government.

However, Ukraine had already begun the approximation process over a decade ago under the EU-Ukraine Association Agreement and its DCFTA provisions, which provides for reciprocal trade liberalisation with gradual approximation of policies and legislation to the EU *acquis* as a pathway towards closer integration into the EU market. Under the DCFTA, a significant part of the EU–Ukraine agri-food trade has been liberalised, while restrictions have remained for sensitive agri-food products on both sides, including tariff rate quotas (TRQs), and the entry-price system.[8]

In the field of food safety, veterinary and phytosanitary policy, Ukraine adopted framework legislation on food and feed safety, animal health and by-products, veterinary medicine, plant health, animal identification and consumer information, introducing key EU principles such as risk-based controls, farm-to-fork traceability, operator responsibility and procedures based on Hazard Analysis and Critical Control Points. It also established the State Service of Ukraine on Food Safety and Consumer Protection as the competent authority for controls across the agri-food chain and developed a network of accredited laboratories, although laboratory capacity requires further strengthening.

Progress in agriculture and rural development has been more limited. For example, Ukraine introduced EU-oriented marketing standards for selected products and legislation on geographical indications and organic production, certification and labelling, while advancing land reform.

This regulatory approximation has brought Ukraine's food-safety system closer to the EU model and supported access to the EU market and bilateral trade (Figure 1). A growing number of Ukrainian operators have achieved compliance of their production and control systems with the EU requirements and have been authorised to export to the EU.[9]

Russia's full-scale invasion in 2022 and the subsequent granting of EU candidate status to Ukraine significantly changed the context and pace of Ukraine's EU integration, considerably accelerating this process while prompting exceptional EU measures to sustain Ukrainian trade and economic resilience. Amid wartime logistics disruption, the EU established alternative trade corridors via EU–Ukraine Solidarity Lanes[10] and introduced temporary Autonomous Trade Measures (ATMs) from June 2022 to June 2025; these were annual measures that were extended each year. The ATMs temporarily suspended remaining import duties and all TRQs[11] on Ukrainian agri-food products, with additional safeguards introduced in later extensions. Products subject to TRQs represented about 40% of Ukraine's agri-food exports to the EU,[12] or about €5.4 billion in 2024.

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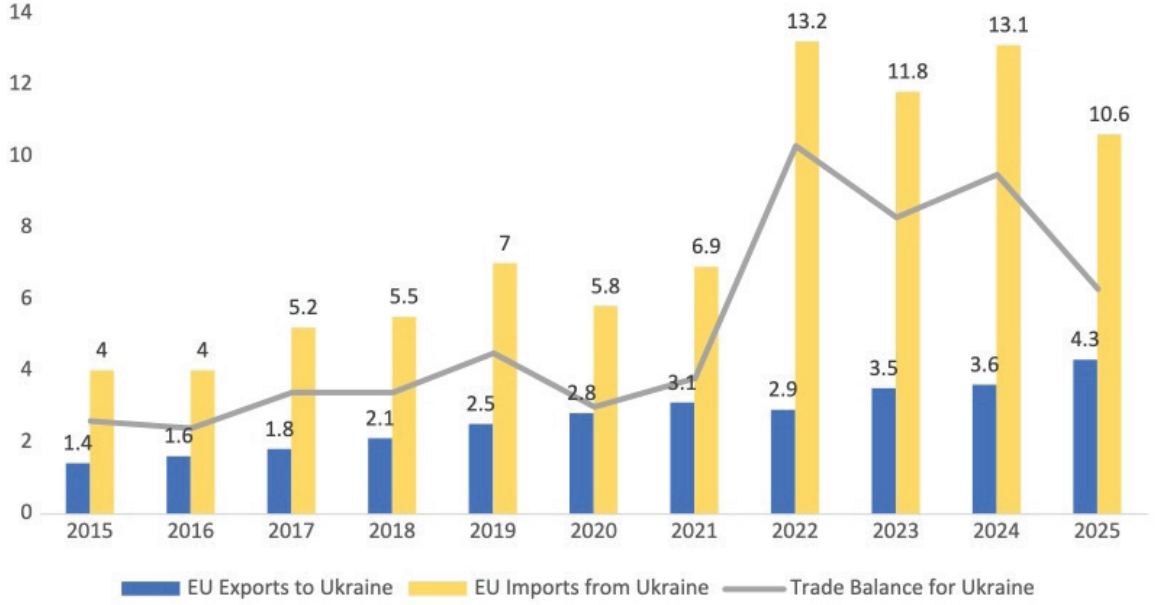
These trade support measures contributed to the further expansion of bilateral agri-food trade.[13] The EU has become Ukraine's largest agri-food trading partner, accounting for about half of Ukraine's agri-food exports. Ukraine is also one of the EU's largest sources of agri-food imports, reaching 8% of the EU's agri-food imports in 2024, then declining to about 6% in 2025, following the expiry of the ATMs. For certain EU agri-food imports, Ukraine's role is especially significant: in 2025, Ukraine's share in EU imports of sunflower oil reached 93%, maize 41%, eggs 67%, sunflower meal 53% and soft wheat 36%. Ukraine also ranks among the EU's top suppliers of organic products, particularly of cereals and oilseeds.[14]

Figure 1

EU–UKRAINE AGRI-FOOD TRADE, 2015–2025, € BILLION



Source: European Commission, Monitoring EU agri-food trade[15] and EU–Ukraine agri-food trade statistical factsheet.[16]

FROM TRADE-DRIVEN APPROXIMATION TO ACCESSION PREPARATION

EU candidacy has significantly expanded the scope of Ukraine's agri-food alignment. The EU screening process identified 16 benchmarks relating to three agricultural chapters of Cluster 5.[17] Accession preparations encompass legislative alignment, administrative capacity and effective implementation across agriculture and rural development, food safety, veterinary and phytosanitary policy, and fisheries and aquaculture, including the development of management, payment and control systems required for CAP participation.

In its 2025 Ukraine Report, the European Commission assessed Ukraine as being moderately prepared[1] under Chapter 12 (Food safety, veterinary and phytosanitary policy), and having some level of preparation under Chapter 13[18] (Fisheries and aquaculture). At the same time, Chapter 11 (Agriculture and rural development) started from a much lower level of preparedness,[19] as the CAP's management, payment and control architecture was largely outside the Association Agreement. Since 2022, however, reforms have accelerated under all chapters, with the European Commission's 2025 Ukraine Report recording good progress under Chapter 11 and upgrading Ukraine's preparedness to "between an early stage and some level of preparation".[20]

Under Chapter 11, Ukraine adopted the Agriculture and Rural Development Strategy to 2030 and its 2025–2027 operational plan[21] as a framework for agricultural reforms and preparation for future CAP participation, including a future National Strategic Plan required to participate in the CAP. Ukraine is developing the administrative and digital infrastructure needed to manage EU agricultural support transparently in line with CAP requirements, including the State Agrarian Register (SAR), a paying agency, the Integrated Administration and Control System (IACS), Land Parcel Identification System (LPIS), and Farm Sustainability Data Network (FSDN). The SAR already serves as a nationwide digital platform for agricultural support, while IACS will support eligibility checks, land-use monitoring and payment controls and is planned to become operational from 2027.[22]

The Ukrainian State Farm Support Fund (Ukrderzhfond)[23] has been designated to perform paying agency functions but still requires further institutional development and accreditation. Ukraine is also developing agricultural advisory and knowledge services for farmers through the launched Unified State Platform for Agricultural Knowledge and Innovation (AKIS).[24] In the area of agricultural markets, Ukraine continues aligning agricultural marketing standards and rules on organic production and labelling.

Under Chapter 12, Ukraine has advanced alignment through new framework legislation on veterinary medicine and animal welfare, genetically modified organisms (GMOs) and plant health and plant protection. The veterinary medicine law, the GMO law, and animal-welfare requirements for farm animals came into force in 2026,[25] while the new plant health framework law[26]

[1] The EC uses an ordinal scale to assess the level of readiness: early stage; some level of preparation; moderately prepared; good level of preparation; and well advanced.

will apply from 2028 and still requires substantial secondary legislation. Ukraine has also strengthened its integration with EU control systems, including the use of the EU's TRACES NT for sanitary and phytosanitary (SPS)certification, connection to the global International Plant Protection Convention (IPPC) ePhyto system, and launching a national food and feed rapid-alert system modelled on the EU's Rapid Alert System for Food and Feed (RASFF).[27]

Under Chapter 13, Ukraine has advanced digital fisheries management by introducing the e-Fish system and a one-stop shop for fishing permits, while also adopting measures on fishing gear, sensitive habitats and remote vessel monitoring. In 2025, it joined the Port State Measures Agreement and became a full member of the General Fisheries Commission for the Mediterranean.[28] However, Ukraine still needs to establish an effective fisheries-control system to combat illegal, unreported and unregulated fishing, further develop e-Fish and align rules on data collection, traceability, market measures and sustainable aquaculture with the EU *acquis*.[29]

Overall, legislative approximation has accelerated since 2022, driven by accession momentum and the EU screening process and reinforced by Ukraine Facility support for agri-food reforms.[30] While legislative approximation must continue, greater emphasis is now needed on effective implementation and enforcement. This will require stronger administrative capacity, functioning control systems and sustained investment so that legal alignment results in practical compliance.

Public sector capacity remains one of the major constraints due to long-term underinvestment in agricultural public services, control systems, digital infrastructure, research and advisory services, laboratory modernisation, wartime fiscal pressures, and staff shortages.[31] Closing the capacity gap will require sustained investment in competent authorities, digital systems, public infrastructure, staffing and professional training, and full restoration of some inspection, reporting and monitoring capacities that have been constrained by wartime conditions and martial law related restrictions.[32]

PREPARING UKRAINE'S AGRICULTURE FOR EU ACCESSION: A DISTINCT ENLARGEMENT CHALLENGE

Agriculture has traditionally been among the most politically sensitive areas of EU enlargement because accession affects market competition, distribution of CAP expenditure and extensive regulatory compliance. Previous enlargements raised concerns over budgetary pressures and competition from new agricultural producers, including during the 2004 'big bang' enlargement, when fears focused on an influx of lower-cost agricultural products from Central and Eastern Europe.[33]

Previous enlargements addressed these pressures through country- and sector-specific accession arrangements. Following Spain's accession in 1986, a temporary Supplementary Trade Mechanism[34] applied to selected fresh fruit and vegetables from 1990 to 1995, combining trade monitoring with measures to manage risks of market disruption. For the states joining in 2004, CAP direct payments were phased in between 2004 and 2013,[35] beginning at 25% of the applicable EU level, with the possibility of complementary national direct payments. Transitional arrangements also allowed several countries to retain temporary restrictions on the acquisition of agricultural land, subject to specified exceptions (12 years in Poland).[36] In the food-safety sector, accession arrangements granted individually listed processing establishments time-limited derogations from specified EU requirements for upgrading their facilities, while core food hygiene and food-safety requirements continued to apply, and their products required special marking and could not be marketed in other Member States.[37] For Croatia's accession in 2013, transitional arrangements[38] allowed specified meat, milk, fish and animal-by-product establishments until the end of 2015 to meet EU structural standards, and permitted existing laying-hen production cycles in non-compliant cages to continue for up to 12 months, subject to domestic-market restrictions and special marking.

The EU's agricultural legislation and policies have evolved since previous enlargements, including through the abolition of milk production quotas in 2015 and sugar production quotas in 2017.[39] Nevertheless, the earlier accession arrangements could offer useful lessons for shaping the future terms of Ukraine's agricultural integration into the EU.

Ukraine's situation also differs substantially because accession preparations are taking place during Russia's ongoing war, forcing regulatory convergence, economic integration and reconstruction to proceed simultaneously under substantial security threats. By end 2025, direct agricultural damage was estimated at about $12 billion, cumulative losses at $78 billion, and recovery and reconstruction needs exceeded $55 billion for 2026–2035.[40] Occupation, mines, damaged irrigation, storage and transport infrastructure, attacks on ports and labour shortages have weakened production, disrupted exports, raised costs and constrained investment.

Furthermore, Ukraine's agricultural sector is highly diverse and productive, encompassing millions of household producers, tens of thousands of small and medium-sized commercial farms and large agricultural enterprises, including vertically integrated and export-oriented agroholdings.[41] The European Commission's 2026 pre-enlargement assessment states that farms operating more than 1,000 hectares collectively cover more than 15 million hectares.[42] Across the sector, farms vary widely in size, production systems, market orientation and access to finance and infrastructure, meaning that producers face different adjustment costs and capacities to comply with EU requirements.

Ukraine's large agroholdings operate tens or sometimes hundreds of thousands of hectares. Among the largest are Kernel, MHP, Ukrlandfarming, Agroprosperis and Astarta. MHP, a major producer of poultry, grain, animal feed, oil and milk, illustrates this business model, combining large-scale primary production with processing and exports while operating according to a range of international standards.[43]

Smaller farms face greater constraints in accessing finance, technology and advice, while large commercial producers generally have greater investment capacity for regulatory compliance and taking advantage of deeper integration into the EU Single Market. Producers in frontline and formerly occupied regions face additional burdens of damaged assets, land contamination and disrupted logistics. Different parts of the sector will therefore require different forms and levels of adjustment support.

Ukraine is also already closely integrated with the EU agri-food supply chains and remains a major supplier of cereals, oilseeds and vegetable oils to global markets. Accession preparations must therefore combine deeper EU integration with continued access to third-country markets and to sustain Ukraine's wider role in global food security.

MAJOR SENSITIVITIES AND CHALLENGES DURING ACCESSION

Addressing sensitivities on both sides will be essential for conducting negotiations under Cluster 5 and designing an effective model for Ukraine's agricultural integration. The sequencing and aligning of market opening, regulatory implementation, access to CAP support and pre-accession assistance will therefore be central to the agricultural negotiations.

Ukraine needs sufficient time, financing and institutional capacity to complete regulatory alignment and to modernise and rebuild its agricultural sector. The EU requires assurance of effective food-safety controls, enforcement of the *acquis*, fair competition and protection of the Single Market's integrity.

Market access. Ukrainian and EU agri-food producers share an interest in predictable, balanced and transparent conditions for Ukraine's integration and market access. Ukrainian farmers need a credible accession perspective, a predictable regulatory environment, long-term certainty over market access and stronger incentives for large-scale private investment and participation in European value chains.[44] EU farmers need confidence that integration will ensure a level playing field through comparable standards and effective enforcement, while managing increased competitive pressures and avoiding sudden market or budgetary disruption.

Although the ATMs between 2022 and 2025 were temporary emergency measures adopted in exceptional circumstances, their implementation has demonstrated that agricultural trade and integration with Ukraine has become politically sensitive in some Member States.[45] These sensitivities vary across Member States, sectors and electoral contexts. Neighbouring countries such as Poland, Hungary, Slovakia, Romania and Bulgaria have faced particular trade and logistics pressures since 2022, as the diversion of Ukrainian exports through EU land routes increased pressure on local markets, storage capacity and transport infrastructure. Hungary, Poland and Slovakia continue to maintain unilateral import bans on selected Ukrainian agricultural products, despite the European Commission's calls to lift such unilateral restrictions.[46]

Beyond these countries, Ukraine's agricultural integration raises broader questions about the long-term implications for competition, farm incomes, food-safety assurance, differences in production standards and the future distribution of CAP resources. Cereals, sugar, poultry and eggs[47] are likely to remain particularly politically sensitive, because Ukraine's scale, fertile land and lower production costs in some sectors could intensify competitive pressure on some EU producers. These sensitivities could easily be amplified during upcoming election campaigns, especially when concerns over imports, prices, standards and CAP funding may be politicised, as well as through disinformation portraying Ukraine's integration as, a food safety risk or a drain on EU taxpayers.

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In response to these concerns, the ATMs were replaced by the upgraded DCFTA,[48] which entered into force in October 2025, establishing a longer-term framework for bilateral trade. It provides additional reciprocal tariff liberalisation, including expanded tariff-rate quotas and tariff reductions for agricultural products, while offering more limited market access than under the ATMs. The new regime also introduces a product-specific safeguard mechanism that may be activated if imports cause or threaten serious difficulties, including in one or several Member States. Additional market access under the upgraded DCFTA is also conditional on Ukraine progressively aligning with specified EU agri-food production standards by the end of 2028, including those concerning animal welfare, plant-protection products and pesticides, veterinary medicines and GMOs, and failure to meet these commitments may lead to the suspension of the received additional trade preferences.

These provisions seek to balance Ukraine's integration into the EU market with protection against disruptive effects in sensitive sectors and concerns about differences in production standards, helping shape

political support for further liberalisation and eventually for Ukraine's accession.

Regulatory alignment will raise standards across Ukraine's agri-food sector, further strengthening food safety, environmental protection and animal and plant health while facilitating deeper integration into the EU Single Market. At the same time, compliance will require substantial public and private investment and may increase production costs,[49] potentially affecting the competitiveness of Ukrainian products. However, the impact is likely to vary considerably across products and farm sizes and will also depend on the design of future CAP support and Ukraine's capacity to implement and enforce the EU requirements. The burden may be particularly heavy for smaller farms serving domestic and local markets, which often have more limited access to finance, technology and advisory services.[50]

Upon accession, full participation in the Single Market will require Ukraine to apply and effectively enforce the relevant EU *acquis* throughout its domestic market, although specific, time-limited transitional arrangements may be negotiated in clearly defined cases. Ukrainian agricultural associations identify requirements concerning plant-protection products, feed additives, manure and nitrogen fertiliser management, animal by-products and Natura 2000, alongside CAP standards on good agricultural and environmental condition, as particularly demanding.[51] The negotiations should therefore carefully sequence costly regulatory obligations and link them to adequate financing, technical assistance and adjustment support, while safeguarding the integrity of the Single Market.

Alignment on plant-protection products will be particularly challenging for Ukrainian farmers. Ukraine has adopted a Law on state regulation in plant protection,[52] which advances alignment with the EU *acquis* and whose principal provisions are scheduled to enter into force in January 2028. Implementation of the law and further alignment with EU plant-protection rules will require significant changes in farming practices, including the replacement of active substances not approved in the EU, more sustainable use of pesticides, investment in alternative products and technologies, and stronger training and record-keeping. Industry representatives estimate that more than 100 active substances[53] (around 40% of those currently permitted) could cease to be authorised, with adjustment particularly challenging for crops such as sunflower, peas and rapeseed,[54] where substitutes may be limited. Ukrainian agricultural producers have therefore called for a longer transition period for implementing some EU plant-protection requirements.[55]

Livestock producers and processors will need significant investment in animal welfare, biosecurity, manure management, traceability and compliant facilities. Ukraine has already adopted legislation on veterinary medicine, animal welfare, slaughter and animal by-products, but effective implementation remains the main challenge, requiring further secondary legislation, enforcement capacity and investment in farms, slaughterhouses and animal-by-product processing facilities. Targeted adjustment support will be especially important for smaller producers with limited capacity to finance these changes. Personnel responsible for keeping, handling, transporting or slaughtering animals must also meet applicable training and certification requirements concerning animal welfare.[56]

Under the European Commission's proposal, CAP funding would be incorporated into broader National and Regional Partnership Plans, with greater national flexibility and reserved funding for farm income and crisis support.

Access to the CAP. The budgetary impact of extending the CAP to Ukraine is another concern, as this could require an increase in the overall EU budget and affect the distribution of CAP resources among existing Member States. Estimates based on current CAP rules[57] indicate a potentially substantial increase in CAP expenditure (€8–€14 billion, described as about 20%), but should not be treated as forecasts of Ukraine's eventual allocation. Ukraine's farm structure also raises distributional concerns, as unrestricted area-based payments could direct substantial sums to its largest agricultural enterprises.[58] Proposals to address these concerns include capping and progressively reducing payments to larger farms, as envisaged in the European Commission's post-2027 proposal,[59] while directing greater support towards small and medium-sized producers, as well as towards investment in EU compliance, rural development and sustainable agricultural practices, all of which would be particularly important for Ukraine's agricultural integration.

The 2028–2034 MFF and post-2027 CAP reform provide an opportunity to prepare agricultural support for enlargement. Under the European Commission's proposal, CAP funding would be incorporated into broader National and Regional Partnership Plans, with greater national flexibility and reserved funding for farm income and crisis support. The final rules and financial allocations remain under negotiation. Ukraine's accession preparations should take account of this evolving CAP framework, including more targeted income support, digital monitoring and control systems, agri-environmental and climate actions and risk-management tools.

Under this proposed structure, Ukraine's large agricultural area (41.3 million hectares in 2021 and 32.7 million hectares estimated to be available for agricultural use in 2024)[60] would remain relevant to its future allocation of CAP funding but would not

determine it alone. The actual budgetary impact of Ukraine's accession would also depend on the CAP rules and EU budget applicable at that time, the agricultural area and beneficiaries eligible for support, and negotiated allocations, payment ceilings and phasing-in arrangements[61] (such as the ten-year phase-in of direct payments applied during the 2004 enlargement). The scale and composition of support should also reflect Ukraine's farm structure, administrative and absorptive capacity, reconstruction needs and accession conditions. Ukraine will need to identify the investment priorities and financing needs for agricultural adjustment, including farm support, regulatory compliance, rural infrastructure and reconstruction.

CAP integration will also require substantial institutional investment. A functioning paying agency, IACS, LPIS and related audit, databases and control systems must be established and financed. The Ukrainian Government estimates that launching the paying agency and integrated monitoring system will require 250–400 qualified specialists and sustained state budget financing.[62] Establishing these systems and meeting the relevant accreditation requirements will be demanding under wartime financial, technical and staffing constraints.

The 2028–2034 MFF will be especially important for supporting Ukraine's gradual agricultural integration and adjustment before accession. The EU should provide dedicated pre-accession support for Ukraine's regulatory compliance, SPS and veterinary infrastructure, environmental adaptation, reconstruction and administrative preparation for CAP participation, with particular attention to small and medium-sized producers.

LEVERAGING THE ACCESSION AND DCFTA PROCESSES FOR GRADUAL INTEGRATION INTO THE EU SINGLE MARKET

As Ukraine is already a candidate country, DCFTA implementation and future revisions should be closely and systematically linked to accession preparations, using the EU–Ukraine Association Agreement, including its DCFTA provisions, as a legal framework for gradual integration into relevant EU policies and specific areas of the EU Single Market. Stronger coordination would make the two processes mutually reinforcing, since DCFTA commitments can advance accession reforms, while verified implementation of relevant EU rules should provide the basis for further negotiated market opening.

The upgraded DCFTA[63] already moves in this direction. It provides additional agricultural tariff liberalisation conditional on Ukraine progressively aligning with selected EU production standards, which also form part of the accession *acquis*, particularly under Chapter 12, "Food safety, veterinary and phytosanitary policy". The review of trade liberalisation under the DCFTA provided for in 2028[64] should build on this link, with further liberalisation guided by Ukraine's progress towards membership and designed to prepare both sides for Ukraine's participation in the Single Market.

Beyond tariff liberalisation, the DCFTA provides mechanisms for reducing non-tariff barriers and advancing gradual integration, including recognition of equivalence for specified SPS measures. The 2025–2026 Priority Action Plan for enhanced DCFTA implementation[65] builds on these opportunities to advance gradual integration and reduce trade barriers, including through practical measures concerning seed equivalence, animal-welfare alignment, recognition of animal-disease regionalisation and market access for selected animal products.

Future DCFTA Action Plans could establish a more systematic "alignment-for-access" approach in the agri-food sector, setting out specific regulatory milestones, the assessments needed for further market access, and the technical and financial assistance required for implementation. This could translate accession reforms into tangible economic integration before membership while allowing both Ukraine and the EU to manage adjustment gradually.

RECOMMENDATIONS

As the European Commission prepares country-specific indicative accession roadmaps[66] and develops a more coherent approach to gradual integration, agriculture will be a central and particularly challenging component of Ukraine's accession preparations. Ukraine has made substantial progress in aligning its agricultural legislation with the EU *acquis*, but implementation and enforcement remain major challenges. Given the scale and diversity of its agricultural sector, the costs of regulatory adjustment, wartime reconstruction needs and the political sensitivity of agricultural integration within the EU, the EU and Ukraine need a tailored accession model for Ukraine's agri-food sector combining regulatory implementation, gradual and safeguarded market opening, pre-accession support and preparation for CAP participation. This model should maintain accession momentum while managing adjustment costs and market sensitivities on both sides, and at the same time build on Ukraine's contribution to EU food security, and the resilience and competitiveness of EU agri-food value chains.

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Ukraine has signalled readiness to discuss transitional arrangements, including a phased introduction of CAP direct payments after accession, transitional market access conditions and safeguards for sensitive products,[67]

drawing on previous enlargement experience with market monitoring and procedures for responding to disruption. Ukraine's emphasis is on predictable conditions that allow producers on both sides to adapt and give Ukrainian farmers a clear basis for long-term investment.

The following recommendations identify priorities for Ukraine's accession preparations and EU support, requiring coordinated action on regulatory implementation, institutional capacity, gradual integration and financing:

- **Advance legislative alignment and implementation across the food-safety, veterinary and phytosanitary *acquis*.** Ukraine should continue aligning its legislation, with an emphasis on implementation, supported by sectoral implementation plans for the most demanding EU requirements that assign institutional responsibilities, identify financing and capacity needs, sequence reforms and establish measurable implementation targets. Priorities should include upgrading food, feed and animal-by-product establishments to comply with EU safety and hygiene requirements, strengthening official controls, laboratories, border control posts and traceability systems, and implementing requirements concerning animal welfare, plant health, seeds and GMOs.[68] Particularly important for Ukraine will be the gradual alignment of permitted active substances with those approved in the EU, and implementation of rules on the sustainable use of plant-protection products.

- **Build sustainable administrative and enforcement capacity.** Ensuring that competent authorities have clear mandates, sufficient specialised staff and predictable financing is a key priority in meeting the administrative capacity requirements for accession. Given wartime fiscal constraints, priority should be given to establishing the IACS infrastructure required for administering CAP payments, as well as strengthening the food-safety and veterinary-control system. EU assistance should support staff recruitment and retention, training, interoperable databases, laboratory capacity, equipment and risk-based inspection systems, together with provision for their continued operation and maintenance.

- **Advance gradual integration into the EU Single Market through verified regulatory alignment.** As gradual integration is now an integral part of the accession process, the DCFTA provides an instrument for advancing it. The EU and Ukraine should link DCFTA implementation more systematically with the accession track to reinforce and stimulate progress towards membership. The immediate priority is to help Ukraine meet its end-2028 alignment commitments and retain the additional market access linked to them. Verified implementation and enforcement of EU standards should provide the basis for negotiating further market opening, including through reductions in non-tariff barriers, additional product and establishment authorisations, and the recognition of equivalence. A successor to the 2025–2026 DCFTA Priority Action Plan[69] should build on existing commitments and set out concrete steps, timelines and measurable targets for regulatory implementation and further market integration, including in the agri-food sector.

- **Address sensitivities in Ukraine and EU Member States.** For the future agricultural accession model to be politically acceptable, it will need to address sensitivities on both the Ukrainian and EU sides. The sectoral and regional effects of Ukraine's integration, particularly for cereals, oilseeds, sugar, poultry and eggs, should therefore be taken into account in accession preparations and reflected in market-access and adjustment arrangements. Monitoring should bring together evidence on trade flows, prices, storage capacity and regional market conditions to identify emerging pressures. Where evidence shows serious disruption, temporary and proportionate safeguards or crisis support should be available under clear, transparent and predictable procedures. Safeguards should have clearly defined triggers, duration and review procedures. EU investment should also further strengthen Solidarity Lanes, including border, rail, storage and transhipment infrastructure, enabling Ukrainian exports intended for third countries to transit efficiently without accumulating in neighbouring markets.

- **Use targeted transitional arrangements based on demonstrated adjustment needs.** Transitional arrangements should be time-limited and based on assessments of compliance gaps, investment costs and realistic implementation timelines. Drawing on previous enlargement experience, they could cover specified structural requirements, environmental obligations and the phased introduction of CAP support after accession. The Commission's October 2026 assessment also envisages targeted arrangements governing market access for sensitive agricultural products, alongside safeguard mechanisms. Transitional arrangements should reflect Ukraine's administrative capacity, farm structure and financing needs, with clearly defined scope, implementation steps and deadlines, backed by financing and technical assistance.

- **Prepare a Ukraine-specific pathway into the future CAP.** Ukraine should prioritise establishing a fully operational, adequately staffed and sustainably financed paying agency and meeting the relevant accreditation requirements, alongside the IACS, LPIS, beneficiary registers and related audit and financial-control systems. CAP support could be phased in after accession, as in previous enlargements, subject to negotiated terms and demonstrated administrative readiness. The settlement should reflect Ukraine's agricultural structure, absorptive capacity and reconstruction needs, as well as the CAP and EU budget in force at accession.[70] Support could combine area-based income payments subject to ceilings or degressivity with redistributive support for smaller farms and targeted assistance for young farmers, alongside investment and environmental measures adapted to regional needs.[71] Ukraine's preparations could identify the appropriate mix of support and financing needs to inform its negotiating position.

- **Differentiate adjustment support according to producer needs.** Small and medium-sized farms need better access to finance, advisory services, producer organisations and investment grants. Livestock producers and processors require capital-intensive upgrades, while farms in frontline and formerly occupied regions need demining, reconstruction and risk-sharing support. Assistance should therefore be differentiated by farm size, subsector, region and compliance costs. Simplified procedures, advisory services and training will be essential to ensure effective access for smaller farms.

- **Provide dedicated pre-accession agricultural support and pilot CAP-like measures.** The EU should use the 2028–2034 MFF and other pre-accession and reconstruction instruments to help Ukraine meet EU standards and prepare for CAP participation. Pilot schemes could test beneficiary registration, eligibility checks, environmental incentives, payments, monitoring and audits before accession using pre-accession funding. These pilots should initially focus on regions where registers and control systems can operate reliably and expand as administrative capacity improves.

- **Link reconstruction with agricultural modernisation and stronger EU–Ukraine agri-food value chains.** Public and private investment in irrigation, storage, processing, energy, logistics and demining should restore productive capacity while improving resilience and compliance with EU requirements. Accession and reconstruction financing should also support domestic processing, diversification and cooperation with EU businesses. According to the Ukraine Investment Framework,[72] potential areas for investment include oilseed crushing and refining, grain milling, protein extraction, and biogas and biomethane production. Cooperation on protein crops and processing[73] could help diversify EU food and feed supplies while increasing value added in Ukraine. Joint ventures, technology partnerships and long-term supply agreements could connect Ukrainian producers and processors more closely with EU markets, creating jobs and supporting rural recovery.

- **Maintain and diversify access to third-country markets.** EU integration should support Ukraine's role as a global food supplier. Reconstruction and accession support should help Ukrainian exporters maintain and diversify their markets through reliable Black Sea, Danube and land routes, investment in export logistics and assistance with certification and destination-market requirements.

- **Strengthen EU–Ukraine agricultural dialogue and partnerships at national, regional and local levels.** Structured dialogue among Ukrainian and EU farmers, processors, business associations and authorities should address market developments, regulatory adjustment, safeguard use and support needs. Business partnerships[74] and cooperation between local and regional authorities could complement this dialogue through joint projects, knowledge exchange and rural-development initiatives. These exchanges could help identify shared interests, resolve concerns early and counter disinformation about Ukraine's agricultural integration.

- **Open Cluster 5 and begin substantive agricultural negotiations.** The Council should open Cluster 5, "Resources, Agriculture and Cohesion", as soon as the conditions in the negotiating framework are met. Because opening a cluster requires unanimous agreement among Member States, this step may face political hurdles arising from wider accession politics and concerns about agricultural competition, market disruption and CAP financing. These sensitivities should be addressed through formal negotiations, structured dialogue and credible safeguards. Opening the cluster would allow financing needs, institutional reforms, CAP arrangements and possible transition periods to be addressed formally, while giving Ukrainian farmers a credible accession perspective.

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