

Joint Position of Agricultural Associations on the EU Integration Process

Agricultural associations representing the overwhelming majority of Ukraine's agricultural producers – the Ukrainian Agri Council (UAC), the Ukrainian Agribusiness Club (UCAB), Association of Milk Producers, Association of Ukrainian Pig Breeders, the Poultry Union of Ukraine, and National Association of Sugar Producers of Ukraine – consider it appropriate to formalise in the negotiations with the European Union on the European integration of the agricultural sector the following minimum conditions. Compliance with these conditions is essential to ensure a predictable, balanced and economically sustainable integration of Ukraine's agricultural sector into the EU.

- 1. Transition period.** The transition period during which Ukrainian standards and production requirements must be fully harmonised with EU norms should be at least 10 years. This applies to:
 - The list of permitted active substances in plant protection products (PPPs);
 - Feed additives;
 - Requirements for the application of manure and nitrogen fertilisers, including in nitrate-vulnerable zones;
 - Establishment of the legal regime for Natura 2000 network areas, land-use restrictions and seasonal/technological limitations;
 - Implementation of GAEC standards: buffer strips, anti-erosion requirements, minimum soil cover, crop rotation, non-productive areas;
 - Handling of animal by-products.
- 2. Counting from the date of accession.** The transition period must begin at the moment of Ukraine's accession to the EU and cannot be linked to any date prior to membership.
- 3. Access to CAP support.** Ukrainian farmers must have access to the support instruments of the CAP from the beginning of the transition period — in accordance with the CAP rules in force at the time of accession, taking into account the agreed transitional provisions on the phased introduction or ramp-up of payments. By the end of the transition period, the level of support should be aligned with that granted to farmers in EU Member States.
- 4. Capping of support.** Limitations (“capping”) on the amount of support per farm should not be applied to Ukrainian farmers in a way that effectively deprives a significant share of producers of support. Such approaches make it impossible to compensate for additional costs related to the transition to EU standards and would create structural disproportions for producers who bear the main burden of adaptation.
- 5. Access to structural funds.** The transition of Ukrainian farmers to European standards and production requirements will require substantial investment that is unaffordable for many enterprises. Therefore, it is critically important that Ukraine's agricultural sector, following the example of Poland and other countries of past enlargements, gains access to European financing for the necessary restructuring from EU structural funds.
- 6. Access to the EU market.** Ukrainian products that fully comply with EU SPS and production standards and are placed on the markets of EU Member States in accordance with EU requirements on labelling, traceability and certification should receive fully liberalised access to the EU market. Products exported to third countries will be produced in accordance with Ukraine's national requirements, fully traceable, and labelled as “non-EU compliant products”.

Ukraine's agricultural community also considers it necessary to draw attention to the potential systemic consequences of setting excessively short timelines for implementing EU requirements in Ukraine's agricultural sector. Introducing the full set of EU regulatory, production, and environmental standards within a short period, without appropriate transitional mechanisms and financial instruments to support adaptation, may lead to reduced production, the closure of some agricultural enterprises, and job losses in rural areas.

In the long term, such scenarios may undermine Ukraine's production potential, weaken its role as a reliable food supplier, and reduce Ukraine's contribution to global food security. This, in turn, would limit the joint soft power of Ukraine and the EU globally, particularly in regions where food stability is a key factor for political and social security.

Therefore, as Ukraine accedes to the EU, Ukraine's agricultural community advocates a special approach: a political decision on accession should come first, followed by a gradual fulfilment of the necessary minimum requirements, including the technical readiness to comply with EU standards and requirements for agricultural production.