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Integrating Ukraine into the EU Single Food Market: Navigating the Common Market Organization Framework

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About the project "German-Ukrainian Agricultural Policy Dialogue" (APD)

The project "German-Ukrainian Agricultural Policy Dialogue (APD)" has been implemented with the support of the Federal Ministry of Agriculture, Food and Regional Identity (BMLEH) since 2006 and is currently being implemented until 2025 at its request through the executor of GFA Consulting Group LLC, as well as a consortium consisting of IAK Agrar Consulting, Leibniz Institute for Agricultural Development in Transition Economies and GOPA AFC GmbH.

The recipient of the project is the National Association of Agricultural Advisory Services of Ukraine "Dorada". The beneficiary of the project is the Ministry of Economy, Environment and Agriculture of Ukraine.

The project should support Ukraine in the areas of sustainable agriculture, efficient processing industry and international competitiveness in accordance with the principles of market and regulatory policies taking into account the development potential that arises under the Association Agreement between the EU and Ukraine. To meet this goal, the Project should provide information on German experience, as well as international European experience in development of agrarian and forestry policy framework, as well as on the organization of relevant agrarian and political institutions.

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Contents

1. Introduction

Despite being almost four years into the Russia's full-scale military aggression against Ukraine, and more than ten years after Russia's occupation of Crimea and parts of Donbass, Ukraine continues to advance its European ambitions. These efforts gained momentum after the Revolution of Dignity in late 2013, which erupted due to the abrupt decision of Ukraine's leadership to refuse signing the Association Agreement with the EU, signaling instead a turn toward Russia.

Formally Ukraine's path to the EU began with the introduction of the visa-free regime and with the Association Agreement and Deep and Comprehensive Free Trade Area (DCFTA) in 2017. Shortly after Russia's full-scale invasion, Ukraine applied for EU membership and obtained candidate status in June 2022. After diligently fulfilling several conditions, the European Council decided in December 2023 to open accession negotiations. These were formally launched at the first EU–Ukraine Intergovernmental Conference in June 2024.

Since then, Ukraine has been undergoing the legislative screening process with the European Commission according to six thematic negotiation clusters, which group together corresponding chapters or policy fields of the EU acquis that Ukraine must align with. By September 2025, Ukraine had completed the screening process. The Commission then presents its screening reports to the EU Member States (MS) along with recommendations to open negotiations in the relevant policy fields. If all MS agree, the negotiation chapters and clusters can be opened. Accession talks always begin and conclude with the "Fundamentals" cluster, which covers the rule of law, fundamental rights, and the functioning of democratic institutions. So far, however, Hungary has vetoed the opening of the first cluster, effectively stalling the entire negotiation process. A solution to this obstacle remains unclear.

Screening reports on various negotiation chapters are expected later this year and will outline the full range of laws, institutions, and policies that Ukraine must adopt and enforce to comply with the EU acquis. This will entail a gradual—or possibly rapid—transformation of Ukraine's economy in line with EU requirements, posing significant challenges for both the public and private sectors.

In this paper, we focus on the agri-food sector as one of the key drivers of Ukraine's economy. Agriculture alone accounted for about 14% of GDP in 2024, while the entire agri-food complex—including upstream industries (e.g., agricultural machinery) and downstream sectors (e.g., food processing)—contributed more than 20% of Ukraine's GDP. Agri-food exports made up nearly 60% of Ukraine's total exports. Roughly the same share—around 60%—of Ukraine's exports now goes to the EU, largely dominated by agri-food products.

Beyond its economic importance, agriculture has recently become the most contentious area in Ukraine–EU relations. A sharp increase in agri-food imports from Ukraine to the EU—resulting from the introduction of the European Solidarity Lanes and Autonomous Trade Measures (ATMs) to counter Russia's blockade of Ukrainian seaports—triggered protests by farmers and associations in EU Member States bordering Ukraine. In some cases, these protests escalated into temporary blockades and successfully pressured

the European Commission to restrict agricultural imports and revise the trade regime with Ukraine. As a result, the ATMs expired in June 2025, pre-war DCFTA terms were reinstated, and a new trade deal (DCFTA 2.0) was negogiated and adopted in October 2025. Nonetheless, political pressure within the EU to curb agricultural imports from Ukraine remains strong and will likely continue to shape the tone and direction of future negotiations between Ukraine and the EU.

As far as the agriculture and food sectors are concerned, by the time of accession Ukraine must be capable of implementing the administratively complex and financially demanding EU Common Agricultural Policy (CAP)—a policy framework that itself continues to evolve. Furthermore, Ukraine will need to adopt and enforce the extensive EU agricultural acquis, which, together with the CAP, encompasses market regulations and standards in areas such as farming practices, animal and plant health, food safety, environmental protection, and animal welfare. Collectively, these elements define the functioning of the EU Single Agri-Food Market.

From a formal perspective, Article 38 of the Treaty on the Functioning of the European Union (TFEU) extends the common market to agricultural products and grants the EU the authority and responsibility to regulate competition along the agricultural value chain as well as the trade policy of the Member States (MS). Article 38 TFEU establishes the Common Agricultural Policy (CAP) for the internal market in agricultural products with the following objectives:

(a) to increase agricultural productivity by promoting technical progress and the optimal use of production factors;
(b) to ensure a fair standard of living for the agricultural community;
(c) to stabilize markets;
(d) to guarantee the availability of supplies; and
(e) to ensure that supplies reach consumers at reasonable prices.

Although the current CAP has expanded these original goals to ten, its core mission—to balance productivity, fairness, stability, and consumer welfare within a unified agricultural market—remains central[2].

The CAP itself is highly complex and has evolved substantially since its inception (Tangermann and von Cramon-Taubadel, 2013; Nivievskyi, 2024b). Broadly, it encompasses measures that can be grouped into four principal components: market measures (or the common organisation of agricultural markets), direct income support, rural development, and horizontal measures[3].

In what follows, we limit our focus to the common organisation of agricultural markets (CMO), which underpins the establishment of a single market for agricultural products. The analysis examines the specific features of the CMO, its implications for Ukraine's prospective EU membership, and strategies to mitigate potential challenges.

While income support measures have historically attracted the most public attention and debate in the context of Ukraine's integration into the EU (see Emerson, 2022; Matthews, 2024; Nivievskyi, 2024b), the CMO dimension has so far received comparatively

[2] https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-glance_en
[3] https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-glance_en

little consideration. This paper therefore seeks to help fill this gap in public discussion and policy analysis.

2. Overview of the Common Market Organisation (CMO)

The Common Organization of Agricultural Markets (CMO)[4], established by Regulation (EU) No 1308/2013 and subsequently amended by Regulation (EU) 2021/2117, constitutes a central component of the CAP. It provides a unified legal and institutional framework for managing markets in agricultural products within the EU, ensuring market stability, fair competition, and income support for producers. The CMO applies to nearly all agricultural products listed in Annex I of the TFEU, excluding fisheries.

2.1 Internal Market

The internal market framework is designed to stabilize agricultural markets, enhance competitiveness, and ensure transparency across all EU Member States. It is structured around the following key parts:

Market Intervention

The CMO provides a system of market safety nets designed to stabilize agricultural markets during periods of crisis. These include:

- Public intervention, under which authorities purchase and store products when market prices fall below a predefined threshold, thereby helping to stabilize markets and support producer incomes.
- Private storage aid, which compensates private operators who temporarily withdraw products from the market to reduce excess supply and prevent further price declines.

These instruments apply to specific sectors such as cereals, dairy, beef and veal, sugar, and wine.

In addition, the CMO encompasses a range of aid schemes aimed at supporting particular sectors and social objectives. Notably, the EU School Fruit, Vegetables and Milk Scheme promotes healthy diets among children, while targeted support is also provided for the olive oil, apiculture, fruit and vegetable, wine, and hops sectors. Under the reformed CAP, these sectoral programs are now integrated into national CAP Strategic Plans, allowing Member States greater flexibility in tailoring support to their specific needs and market conditions.

Marketing standards and producer organizations

Marketing standards ensure consistent product quality, classification, labelling, and presentation across key sectors such as eggs, wine, fruit and vegetables, olive oil, poultry and bovine meat, and bananas. The CMO also supports EU quality schemes, including:

- Protected Designations of Origin (PDO) and Protected Geographical Indications (PGI),
- Traditional Specialities Guaranteed (TSG) and optional quality terms.

Regulation (EU) 2024/1143 consolidates geographical indication (GI) protection for wine, spirits, and agricultural products, introducing simplified registration procedures,

[4] See https://eur-lex.europa.eu/eli/reg/2013/1308/oj/eng or https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legissum:0302_1 for the summary of the legal document

enhanced online protection, and new administrative oversight by the EU Intellectual Property Office (EUIPO).

EU marketing standards, established in the early years of the CAP, were originally based on existing national and international norms and have since evolved across specific product groups. The first standards were adopted for fruit and vegetables in 1966, followed by dairy in 1968 and poultry in 1975. Today, they are codified in three principal legal frameworks: the CMO Regulation, its secondary legislation, and the so-called "breakfast directives."

The overarching objectives of EU marketing standards are to:

- improve the economic conditions for agricultural production and trade,
- ensure and signal high product quality,
- provide consumers with transparent and reliable information, and
- maintain a consistent supply of standardised, safe, and satisfactory products across the EU.

To achieve these aims, the rules define technical characteristics and quality grades, such as product classifications, minimum standards, and protected terms like *"free-range"* or *"extra virgin."* In essence, EU marketing standards create a level playing field within the Single Market by ensuring uniform product definitions, facilitating intra-EU trade, and strengthening both producer competitiveness and consumer trust.

In addition, detailed provisions are set out for specific sectors such as sugar, wine, and milk. The CMO also recognises and regulates Producer Organisations (POs), Associations of POs, and Interbranch Organisations (IBOs) as key instruments for improving market coordination and the bargaining position of primary producers.

Market Transparency and Monitoring

Member States and the European Commission are required to regularly exchange market data and report on agricultural conditions, intervention measures, and related expenditures. To support this process, the EU has established a network of market observatories[5] and an Agri-Food Data Portal[6] that collect and disseminate statistical information on production, stocks, prices, costs, and profit margins at all stages of the agri-food supply chain, as well as on imports, exports, and the utilization of tariff quotas in selected agricultural sectors.

These observatories monitor and analyze market trends, publish short- and medium-term forecasts, and provide early warnings of potential market disturbances. By improving the transparency and accessibility of market information, they enable evidence-based policymaking and facilitate timely and coordinated responses to emerging challenges within the EU's agricultural markets.

[5] https://agriculture.ec.europa.eu/data-and-analysis/markets/overviews/market-observatories_en

[6] https://agridata.ec.europa.eu/extensions/DataPortal/home.html

2.2 Trade with Non-EU Countries

The CMO also establishes a comprehensive framework for the external trade of agricultural products, aiming to strike a balance between open trade and market protection. Its key instruments include:

- Import and export licences, tariff quotas, and safeguard measures, which regulate market access and help prevent serious market disruptions.
- Export refunds and import duties for selected sectors such as cereals, sugar, and dairy, designed to stabilise internal prices and protect producers from excessive volatility.
- Delegated and implementing acts, which define detailed procedures for tariff quota management, calculation of import duties, and the administration of export licences.

These mechanisms align the CMO with the EU's Common Customs Tariff and the European Union's commitments under the World Trade Organization (WTO), while at the same time protecting EU producers from unfair competition stemming from imports that do not meet equivalent production, environmental, or safety standards.

2.3 Competition Rules

The CMO ensures that Articles 101 and 102 of the TFEU on competition are applicable to the agricultural sector, while providing targeted exemptions that reflect its distinctive structure and socio-economic role.

- Collective actions undertaken by farmers and recognised organisations with the aim of achieving the objectives of the CAP are exempt from standard competition rules.
- Interbranch organisations (IBOs) may carry out certain coordinated activities—such as market analysis, quality promotion, and crisis management—without infringing competition law.
- State aid in the agricultural sector remains subject to EU competition rules but can be authorised when it serves specific CAP objectives, such as promoting sustainability, environmental protection, or rural development.

These provisions are designed to balance fair competition with the need for collective producer action, thereby strengthening farmers' position within the agri-food value chain while maintaining the integrity of the EU's internal market.

2.4 General Rules

The general provisions of the CMO establish crisis and governance mechanisms:

Exceptional Measures

The European Commission may adopt temporary exceptional measures in response to serious market disturbances caused by price or trade shocks, animal or plant diseases, or trade embargoes. It may also intervene in cases of loss of consumer confidence arising from public health risks—for instance, in the beef and veal, milk and dairy, sheep and goat meat, eggs, and poultry meat sectors.

Agricultural Reserves

A crisis reserve is set to finance rapid market interventions such as emergency buying or private storage aid.

3. Implications and Impact on Ukraine's EU Membership

3.1 Theoretical framework

A detailed discussion and comprehensive quantification of the implications of EU membership for Ukraine, and of the CMO in particular, represent a multi-layered and complex undertaking that goes well beyond the scope of this policy study. To simplify the analysis and provide a helicopter view, this paper conducts a high-level assessment of the potential impact of aligning Ukraine's agricultural legislation with the EU's CMO framework on the competitiveness of the agricultural sector.

The rationale behind this approach is straightforward: as Ukraine progressively aligns its regulatory and institutional framework with the CMO, agricultural production structures, market behavior, and trade dynamics are expected to evolve in parallel with broader changes in agricultural competitiveness.

From a theoretical perspective, (international) competitiveness[7] is determined by a wide range of interrelated factors and their complex interactions. However, changes in a firm's or a country's international competitiveness between two periods can generally be decomposed into several key components (Nivievskyi et al., 2010):

$$\%\Delta\text{Competitiveness} = \%\Delta\text{Productivity} + \%\Delta\alpha * P_{output} - \%\Delta\beta * P_{input} \quad (1)$$

where %Δ refers to 'percentage change'. P_{output} and P_{input} are undistorted output and input prices, and α and β are revenue and cost shares so that the last two terms on the right-hand side of equation (1) refer to weighted average output and input price changes, respectively.

The intuition behind equation (1) is straightforward. First, a firm's competitiveness over time depends on changes in its productivity. Second, it is influenced by changes in output and input prices: if output prices rise (holding input prices constant), competitiveness improves; if input prices rise, competitiveness declines.

However, input and output prices are often distorted by government interventions—mainly through trade policies (such as import or export restrictions and non-tariff measures) or domestic policies (such as price supports, minimum or maximum prices, subsidised inputs, or other forms of aid). As a result, a firm that is uncompetitive at undistorted world market prices may appear competitive under policy-distorted domestic prices, and vice versa. Similarly, when a trading partner imposes tariffs or non-tariff barriers, it effectively reduces the exporting country's competitiveness in its destination markets.

As noted above, a firm's competitiveness is largely shaped by changes in productivity, which remains one of the key goals of agricultural policy worldwide. Governments pursue productivity growth through various measures, including direct subsidies, tax incentives, and other forms of support. Trade and domestic policies also influence productivity indirectly, thereby affecting overall competitiveness.

[7] International competitiveness means that a farm or company can sell its products on the world market at prices that cover all production costs and still make a reasonable profit. For major traded agricultural goods—such as grains, oilseeds, meat, and dairy—world market prices are the main reference point. For example, a wheat farm is internationally competitive if it can sell its wheat at the going world price and still earn enough to cover the cost of all inputs used in production.

In the following sections, we discuss these policy measures and other factors that may influence Ukraine's agricultural competitiveness.

3.2 Economic impact

Tariff barriers

Considering the current structure of Ukraine's agricultural trade, its trade regime is largely determined by its WTO commitments and the Deep and Comprehensive Free Trade Area (DCFTA) with the EU. As shown in the figures below, over the past decade the EU has become Ukraine's largest trading partner, accounting for over 60% of total exports (Figure 5) and more than 50% of total imports in 2024 (Figure 6). By contrast, in 2024 Ukraine accounted for only 1.2% of the EU's total trade in goods. Before the full-scale invasion, exports to the EU represented about 40% of Ukraine's total exports.

This sharp increase in the EU share mainly reflects the effects of the Autonomous Trade Measures (ATMs) and the European Solidarity Lanes, which were introduced to counter Russia's blockade of Ukrainian seaports. The ATMs temporarily removed remaining EU trade barriers, including tariff-rate quotas (TRQs) for around 40 agricultural products that had previously been limited under the DCFTA framework. In 2021, TRQ-covered goods represented about 35% of Ukraine's agricultural exports to the EU. Much of the subsequent export growth was concentrated in neighboring EU Member States, which became critical logistics and transit hubs. However, this surge in imports also triggered farmer protests and blockades in several EU countries. Coupled with effective lobbying efforts in Brussels (Nivievskyi, 2024a), these pressures ultimately led to the termination of the ATM regime and a return to the pre-war DCFTA terms as of June 2025. At the same time, the European Commission proposed a new trade arrangement —DCFTA 2.0 (Taran, 2025) - which was adopted by the EU Council and was launched in October 2025.

DCFTA 2.0 represents a more liberalized version of the original DCFTA. Quotas for the most sensitive products (e.g., eggs, sugar, wheat, maize, poultry, honey, and apple juice) will be larger than under the initial DCFTA but lower than those allowed under the ATMs. Quotas for less sensitive products will be expanded closer to the ATM levels. The agreement will also include safeguard mechanisms and conditionalities related to the gradual alignment of Ukrainian legislation with the EU CMO, as well as rules on food safety, animal welfare, and pesticide use (Taran, 2025).

Upon Ukraine's accession to the EU Single Market, tariff barriers will be eliminated, effectively liberalizing trade to the level of the ATM regime. Although final trade statistics for 2025 are not yet available, agricultural trade volumes are expected to decline relative to 2024 due to the more restrictive framework reintroduced in mid-2025. Movchan and Giucci (2025) confirm this expectation in their study, projecting that under the DCFTA 2.0 scenario Ukraine's exports to the EU could fall by about USD 1.45 billion compared to the ATM period, mainly because of the drop of wheat exports by USD 894 mln (Table 3). However, Ukraine can partly reorient its exports to non-EU markets, thereby moderating the overall impact of the new TRQs imposed by the EU; as a result, the total effect on exports is estimated at USD 253 million, or about 0.6% of total exports in 2024 (Movchan and Giucci, 2025).

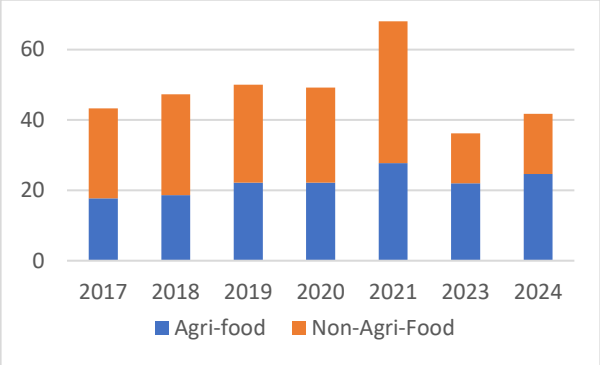
From the perspective of the theoretical framework outlined in equation (1), deeper integration into the EU Single Market should enhance Ukraine's agricultural

competitiveness, as the removal of tariff barriers will lower the cost of agricultural inputs sourced from EU Member States (e.g., machinery, fertilizers, seeds, and agrochemicals).

Within the Single Market, however, Ukraine's imports from non-EU countries will be subject to the EU's Common External Tariff. To assess the likely impact, Tables 1 and 2 compare current WTO-reported tariff structures for the EU and Ukraine. As seen in Table 1, average bound tariffs for both agricultural and non-agricultural products are relatively similar—11% vs. 10.9% for agriculture, 3.9% vs. 4.9% for non-agriculture, and 4.1% vs. 3.6% overall. This suggests that, on average, no major shift in trade protection is expected.

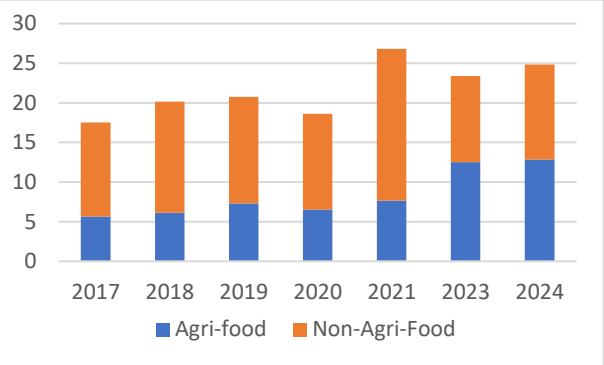
More disaggregated data (Table 2) confirm this for agricultural inputs, although some product categories—notably dairy products (27% protection in the EU vs. 9.4% in Ukraine) and beverages and tobacco—are more protected under the EU regime. On aggregate, however, the differences are modest, which implies that Ukraine's agricultural competitiveness, from the perspective of the theoretical framework outlined in equation (1), would not be significantly undermined by the transition to the EU tariff framework; in fact, it could be strengthened by improved market access and lower input costs within the Single Market.

Figure 1 Total exports from Ukraine, bn USD



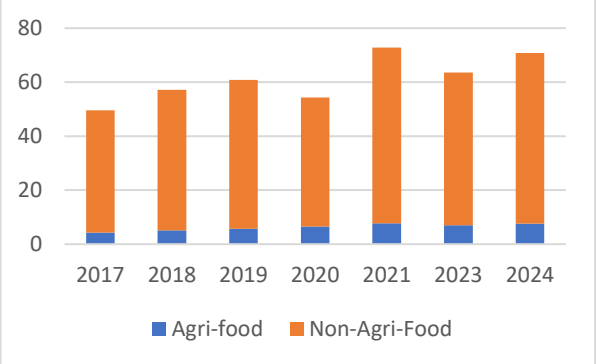
source: own presentation using Ukrstat data

Figure 2 Exports from Ukraine to the EU, bn USD



source: own presentation using Ukrstat data

Figure 3 Total imports to Ukraine, bn USD



source: own presentation using Ukrstat data

Figure 4 Total imports to Ukraine from the EU, bn USD

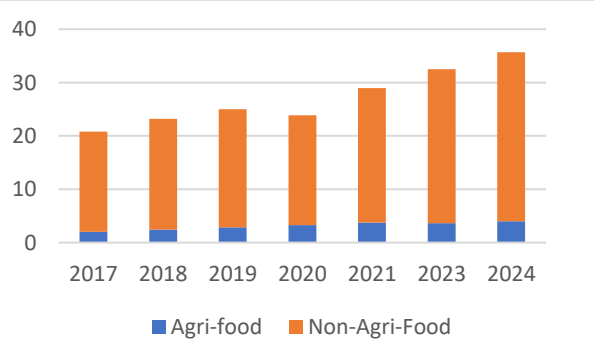


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Figure 5 Exports from Ukraine to the EU, % of total

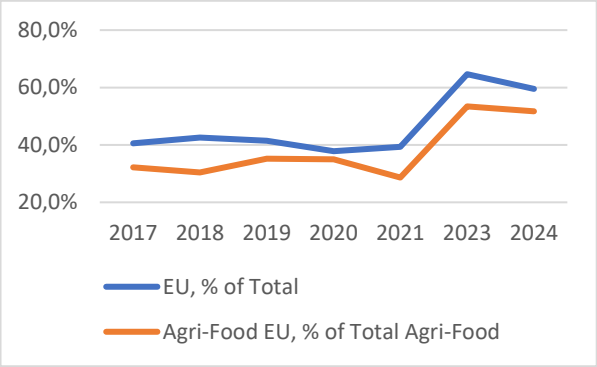

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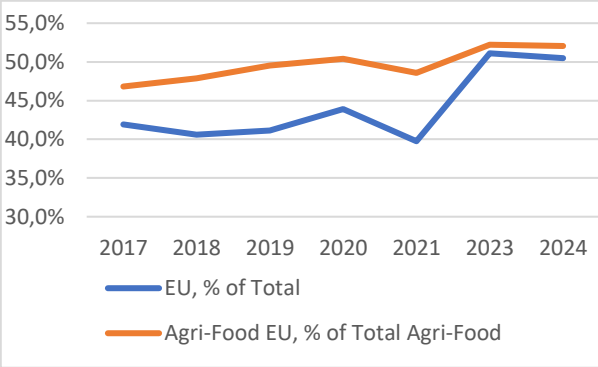
Figure 6 Imports from the EU to Ukraine, % of total



source: own presentation using Ukrstat data

Table 1 Tariffs and imports: summary

Indicator	EU	Ukraine
Simple average final bound (Total)	5	5.8
Simple average final bound (Ag)	11	10.9
Simple average final bound (Non-Ag)	3.9	4.9
MFN applied simple average 2024 (Total)	5	4.3
MFN applied simple average 2024 (Ag)	10.5	9.1
MFN applied simple average 2024 (Non-Ag)	4.1	3.6
Trade weighted average 2024 (Total)	2.8	3.5
Trade weighted average 2024 (Ag)	8.7	6.2
Trade weighted average 2024 (Non-Ag)	2.4	3.2
Imports in billion US$ 2023 (Total)	2483.7	58.6
Imports in billion US$ 2023 (Ag)	164.7	6.1
Imports in billion US$ 2023 (Non-Ag)	2319	52.6
Ag: tariff quotas (in %)	13.5	0.3
Ag: Special safeguards (in %)	23	0

source: own presentation using WTO data; https://www.wto.org/english/res_e/statis_e/daily_update_e/tariff_profiles/ua_e.pdf and https://www.wto.org/english/res_e/statis_e/daily_update_e/tariff_profiles/CE_e.pdf

Table 2 Tariffs and imports by product groups

Product group	EU Final bound avg %	EU MFN applied %	Ukraine Final bound avg %	Ukraine MFN applied %
Live animals and meat	15.8	15.4	13	10.5
Dairy products	29.2	27.1	9.4	9.4
Fruit and vegetables	13.1	11.4	12.4	11
Coffee, tea, cocoa and spices	3.8	3.5	6.7	2.6
Cereals and food preparations	14.5	7.2	12.5	12.4
Oilseeds, fats and oils	6.7	7.2	10.3	8.2
Sugar and confectionery	17.5	18.1	19.4	19.4
Beverages and tobacco	18.2	18.3	6.9	6.7
Cotton, silk and wool	0	0	0.7	0
Other Ag products	4.4	4.1	11.2	7.8
Petroleum	3.1	2.5	1.8	0.8
Chemicals	4.5	4.6	5.1	3.2
Mechanical machinery	1.6	1.7	4	2
Electrical machinery	2.5	2.0	5.4	3.7
Transport equipment	4	5.1	7.5	5.6

source: own presentation using WTO data; https://www.wto.org/english/res_e/statis_e/daily_update_e/tariff_profiles/ua_e.pdf and https://www.wto.org/english/res_e/statis_e/daily_update_e/tariff_profiles/CE_e.pdf

Non-tariff measures

In addition to tariffs, countries also apply non-tariff measures (NTMs) in trade, which are essentially regulatory instruments affecting the cross-border flow of goods and services. These typically include technical barriers to trade (TBTs)—such as product standards and certification requirements for manufactured goods—and sanitary and phytosanitary (SPS) measures, which relate to food safety and animal or plant health. NTMs also cover domestic regulations in services, as well as licensing requirements, quotas, inspections, and financial restrictions. Although SPS measures are not formally part of the CMO framework, their economic effects are closely intertwined with other NTMs, making it difficult to isolate their individual impacts for quantification purposes. NTMs set the quality and safety standards that imported inputs must meet, and thus have a direct influence on producers' international competitiveness.

NTMs serve legitimate public policy objectives—such as protecting consumer health, ensuring product quality, and reducing trade costs through standardisation. However, they can also be used for protectionist purposes, and in many cases are now considered more trade-restrictive than tariffs.

For example, Adilbish et al. (2025) estimate the ad valorem equivalent (AVE) of NTMs within intra-EU trade at an average of 44%, and as high as 140% for agricultural products, despite the absence of internal tariffs within the EU Single Market. Other scholars argue that these estimates are overstated: Head and Mayer (2021), for instance, place the AVE of NTMs closer to 10%, and others question their empirical justification[8]. Arita et al. (2015) estimate the AVEs of EU NTMs on U.S. poultry, pork, and corn at 102%, 81%, and 79%, respectively, while EU NTMs on U.S. beef, vegetables, and fruits were also found to be significant. These findings also cast doubt on the results of Adilbish et al. (2025), as it is unclear why NTMs within intra-EU trade would be higher than those applied to extra-EU trade. Conversely, U.S. NTMs on EU exports are estimated to range from 37% to 45%. So the results of Head and Mayer (2021)—who estimate intra-EU NTMs at around 10%—are likely closer to reality.

Overall, the impact of non-tariff measures (NTMs) on trade is ambiguous. On the one hand, standards and regulations can benefit consumers by improving product quality and safety, thereby reducing information asymmetry in the market. Under such conditions, sellers of higher-quality products can expect stronger demand. On the other hand, NTMs can protect domestic producers, limit product variety available to consumers, and increase costs related to testing, compliance, and monitoring (Gardner, 2003). Most empirical studies find that NTMs tend to have a negative impact on trade volumes, but predominantly for exports from developing countries. However, in the case of developed countries, SPS measures are often associated with positive effects on exports, as they enhance product reputation and market access.

[8] https://iep.unibocconi.eu/europes-internal-tariffs-why-imfs-44-estimate-doesnt-hold

The quality dimension also matters: higher quality can yield premium prices and larger market shares, while stricter NTMs may stimulate quality upgrading (see Movchan et al., 2019). In their study focused on Ukraine's food sector, Movchan et al. (2019) find that SPS regulations are linked to higher prices and quality of exported food products, whereas outdated, quasi–Soviet-type technical regulations continue to limit access to modern technologies for Ukrainian producers. From this point of view, Ukraine's accession to the EU is expected to further enhance its international competitiveness, as alignment with EU standards and regulations tends to improve product quality, credibility, and market access. Similarly, Hamaniuk et al. (2018) show that the harmonisation of Ukraine's legislation with the EU acquis under the DCFTA has led to a reduction in NTMs, which in turn positively affected trade between Ukraine and the EU.

CMO product and marketing standards

Information on the benefits and costs of EU marketing standards remains limited. Arguably, the most recent and comprehensive assessment is provided by Russo et al. (2022). EU marketing standards are designed to ensure a stable market supply of products with standardised and satisfactory quality. These standards cover a broad range of aspects, including technical definitions, product classification, presentation, marking and labelling, packaging, production methods, conservation, storage, transport, related administrative documentation, certification, time limits, and restrictions on use or disposal.

Based on a survey of 123 business associations, Russo et al. (2022) find that EU firms generally view marketing standards positively: more than 80% of respondents considered EU marketing standards to be reasonable and to add value compared with both international and private standards.

The main benefits of EU marketing standards for firms, as identified in Russo et al. (2022), include:

- Reducing transaction costs and information asymmetries, thereby increasing market transparency.
- Facilitating trade, improving market access, and ensuring a level playing field among producers.
- Supporting product differentiation strategies and encouraging the supply of high-quality products.

The study also finds that certification and control costs for EU firms are modest relative to total production costs—for example, amounting to less than 0.5% of the final product price in the case of hops. Both survey participants and workshop stakeholders agreed that the benefits of marketing standards outweigh their costs.

At a broader level, compliance costs extend beyond marketing standards to encompass the entire EU agricultural acquis, which—together with the CAP—regulates markets and standards in areas such as farming practices, animal and plant health, food safety, environmental protection, and animal welfare. Although no recent comprehensive studies are available, earlier research by the European Commission (2014) found that regulatory compliance costs are not the primary determinant of competitiveness; rather, other cost components such as labour and land rents play a more significant role. The same study estimated that EU farmers face, on average, up to a 10% increase in

production costs (varying across sectors) due to EU regulations, which are generally more stringent than those in Ukraine.

EU marketing standards also generate benefits for consumers, notably by:

- Ensuring that food products meet minimum levels of quality and safety, thereby raising the average quality of food available on the market.
- Facilitating consumer assessment of food quality, reducing uncertainty, limiting misleading claims, and protecting against safety risks and food fraud.

Similar to the discussion of NTMs above, no clear consensus exists in the academic literature regarding the net trade effects of marketing standards. While standardisation and transparency may lower transaction costs and thus promote trade, the additional costs of compliance and monitoring may discourage it. The overall effect ultimately remains an empirical question.

Status of alignment of Ukraine's legislation in the field of CMO to the EU Aquis and administrative capacity of public institutions

Table 4 shows that Ukraine's alignment with the EU CMO acquis remains highly fragmented, uneven across sectors, and selective. None of the areas have yet achieved full alignment with EU legislation; in the vast majority of cases, Ukraine's legal framework is only partially aligned or not aligned at all. Full alignment has been observed only in a few isolated instances.

In particular, state aid in agriculture remains unharmonised with the EU's complex framework, which are essential for ensuring transparency and preventing market distortions within the internal market. Similarly, two sectors of major economic importance—milk and dairy products and fruit and vegetables—show no alignment with the CMO framework. By contrast, several other product areas demonstrate more advanced levels of approximation, indicating that Ukraine possesses at least a basic administrative capacity to transpose complex EU norms.

However, the systemic alignment deficit underscores that substantial legislative and institutional work remains before Ukraine can achieve full integration into the EU's Single Market mechanisms governing agricultural products. Moreover, effective implementation and enforcement of these norms constitute an equally pressing challenge.

As Nivievskyi (2024b) argues, Ukraine will require significant additional public investment in competent authorities, administrative capacity, and public infrastructure to implement and enforce the EU agricultural acquis effectively. Addressing this institutional capacity gap is crucial for enhancing agricultural productivity and competitiveness—potentially even more so than direct forms of support such as subsidies or tax privileges.

Trade Development of the New EU Member States since their Accession into the EU

A simple analysis of the evolution of total, intra-EU, and extra-EU trade for twelve new EU Member States (NMS)—compared with the EU average and old Member States (OMS)—before and after accession provides valuable insights for Ukraine. Figure 7 reveals a consistent pattern across the NMS: EU membership introduced a structural break in trade patterns, significantly reorienting trade flows toward the internal market, deepening integration within the Single Market, and reducing dependence on external partners. This

trend is absent among the OMS (Figure 8). Moreover, the trade growth of the NMS clearly outpaces that of the OMS.

For all Central European countries—Poland, Hungary, Czechia, and Slovakia—EU accession (indicated by the dashed vertical line in 2004) was followed by a sharp and sustained rise in both exports and imports, with intra-EU trade shares exceeding 75–85% of total trade. This reflects the rapid integration of their production and supply chains into the EU's industrial core. The Baltic States (Estonia, Latvia, and Lithuania) display a similar trajectory, though with somewhat lower and more volatile intra-EU shares, reflecting their stronger historical ties to non-EU markets.

In Romania and Bulgaria, which joined in 2007, accession also accelerated trade growth and prompted a gradual shift toward intra-EU dominance, albeit with short-term fluctuations caused by transitional adjustments and differing industrial structures. Croatia, joining in 2013, exhibits a delayed but clear convergence toward EU trade patterns, with intra-EU trade approaching 70% within a few years. Meanwhile, the early and stable integration of Slovenia and Hungary illustrates the benefits of pre-accession policy alignment.

Across all NMS, the data demonstrate that EU accession served as a powerful catalyst for trade expansion and internal market integration. Intra-EU trade shares eventually stabilised at high levels, while extra-EU trade either remained limited or declined as a share of total trade. This shows that membership not only boosted trade volumes, but also anchored these economies more firmly within the EU's regional value chains and common market structures.

Drawing on the experience of the NMS and the trade dynamics between the EU and Ukraine during the ATMs regime (May 2022–June 2025) (Figure 9), one can reasonably assume that Ukraine's intra-EU trade share could eventually surpass the current EU average of 70%, accompanied by a reduced reliance on non-EU markets.

4. Conclusions and Strategies to Cope with Potential Problems

The Common Market Organisation (CMO) is a cornerstone of the EU's Common Agricultural Policy (CAP). It provides the legal and institutional framework for regulating agricultural markets, managing crises, and ensuring standardization, product quality, and fair competition across Member States. The CMO's strength lies in maintaining market stability and a level playing field; however, its complexity and administrative demands require significant institutional capacity, effective implementation, and continuous monitoring.

Currently, Ukraine's agricultural legislation remains far from aligned with the EU's CMO framework. Yet, successful integration would unlock substantial long-term benefits that clearly outweigh the transitional costs. Alignment would allow Ukrainian producers to operate under uniform market rules, gain predictable access to the EU's Single Market, and integrate into transparent, competitive, and high-quality value chains.

Evidence from Central and Eastern European Member States demonstrates that EU accession triggered a structural reorientation of trade toward the internal market,

accompanied by productivity gains, higher investment, and export growth. If Ukraine follows a similar trajectory, it can expect deeper trade integration, enhanced competitiveness, and greater resilience to market shocks.

To achieve this, Ukraine might follow a strategic, phased approach focused on three core priorities:

1. Policy and Legislative Alignment – Gradually align agricultural legislation with the EU acquis, ensuring consistency across all market and product sectors.
    a) Gradual harmonization with the EU acquis: National legislation must be progressively aligned with EU CMO and CAP and other agriculture related EU acquis provisions across all agricultural sectors. The current Government 2030 timeline is quite demanding but not unfeasible.
    b) Sector-specific alignment: Priority should be given to areas with high trade and economic significance—such as grains, oilcrops, poultry, dairy, fruit and vegetables, and state aid.
    c) Transition planning: A clear, time-bound roadmap should guide both producers and regulatory bodies, outlining sequencing, milestones, and interim compliance targets.
2. Institutional and Administrative Capacity Building – Reinforce public authorities and modernise market surveillance, data, and IT systems to meet EU transparency and governance standards.
    a) Address the capacity gap: As highlighted by Nivievskyi (2024b), Ukraine's current administrative capacity lags far behind of what is required by the EU membership and strengthening public authorities is essential as effective and service-driven competent authorities will mitigate the burden of additional EU legal framework requirements and even leverage private investments (Nivievskyi and Bogonos, 2024).
    b) Reinforce competent authorities: Enhance or where it is needed create agencies responsible for market regulation, state aid, competition oversight, and implementation of CMO measures. For example, create and make operational Paying Agency[9] or/and Market organization body (BLE in Germany)[10] and support/strengthen corresponding existing sectoral directorates/units in the Ministry
    c) Invest in human capital and digital infrastructure: Continuous staff training, data-driven decision-making systems, and modern IT tools for market observation and reporting are critical for aligning with EU transparency and accountability standards.
3. Producer capacity-building – Provide training, advisory support, and transitional financial assistance, particularly to small farms, to facilitate compliance and adaptation.
    a) Revise current agricultural support in Ukraine and realigned it with the EU accession challenges. Introduce training, advisory, and extension programmes

[9] A corresponding draft law was adopted in October 2025 (draft law #13202-1 as of 07.05.2025). This draft law initiates creation of the Paying Agency, IACS (Integrated Administrative Control System) and of FADN

[10] E.g. BLE (Federal Office for Agriculture and Food) in Germany https://www.ble.de/EN/BLE/ble_node.html

to help farmers and agri-businesses understand and adapt to the new regulatory environment. Ukraine's fiscal space is extremely limited compared to the challenges of reconstruction and recovery and of the EU integration process (World Bank, 2024). This means currently there is no space for mainly wasteful and not pro-growth oriented agricultural state support programs in Ukraine (coupled subsidies, input purchase compensation programs etc). Agricultural support landscape should be redesigned to enable sustainable transformation and growth in Ukraine's agricultural sector, and it could include three priorities:

i) prioritize a mobilization of private finance, the provision of core agricultural services, and the support of small-sized farms to address their specific challenges, using OECD agricultural support language we mean here so-called General Support Services (or public services), but not in the direct transfers to farmers;

ii) public spending should be bolstered by a broad-based rather than product specific agricultural support and by free trade policy (e.g. avoid taxing exports of agricultural commodities to subsidize food processing);

iii) investments are necessary to enhance the capabilities of competent authorities, ensuring compliance with EU standards and facilitating Ukraine's EU accession process, as it was mentioned already in 2a above (World Bank, 2024).

b) Financial assistance for transition: Provide temporary, targeted support—especially to small farms—through transitional technical aid to offset compliance and modernization costs.

4. Cooperation and Knowledge Development and Exchange – Strengthen collaboration with EU institutions and Member State agencies through twinning, joint research, and expert exchanges, enabling Ukraine to leverage best practices, accelerate learning, and build long-term institutional resilience.
   a) Institutional partnerships and joint capacity-building initiatives: Strengthen collaboration with EU institutions and Member State agencies to draw on shared experience and best practices. Engage in EU-funded programs, twinning projects, and expert exchanges to accelerate policy learning and implementation. Such cooperation will help Ukraine build institutional resilience, improve governance, and fast-track integration into the EU's agricultural market system.
   b) Knowledge and information development: Establish Ukraine's own knowledge and information system to underpin evidence-based policymaking and improve transparency in the agri-food sector. This should include the creation of sector-specific market observatories and a unified agricultural data portal, modelled on EU best practices.

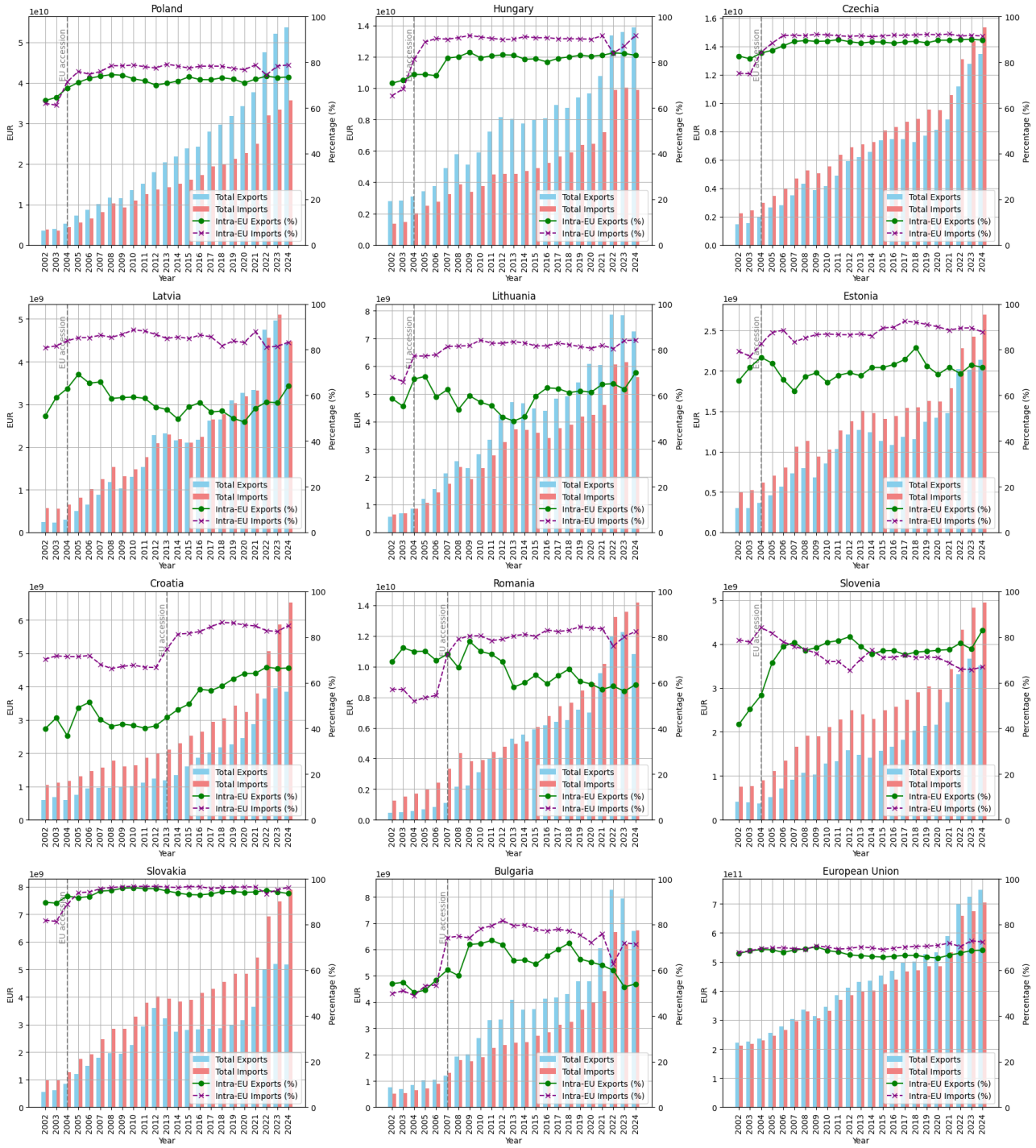
The observatories would systematically collect, analyse, and publish data on production, prices, trade, input costs, stocks, and margins across the supply chain, while the data portal would integrate information from various public and private sources into a single, user-friendly platform accessible to policymakers, researchers, and stakeholders.

Development of these systems should be undertaken in close collaboration with domestic research institutions, universities, and analytical centres, as the current capacity

of public agencies to generate, manage, and disseminate policy-relevant data remains limited. Over time, this knowledge infrastructure would strengthen Ukraine's ability to monitor markets, anticipate crises, evaluate policy impacts, and align with the EU's transparency and reporting standards under the CMO.

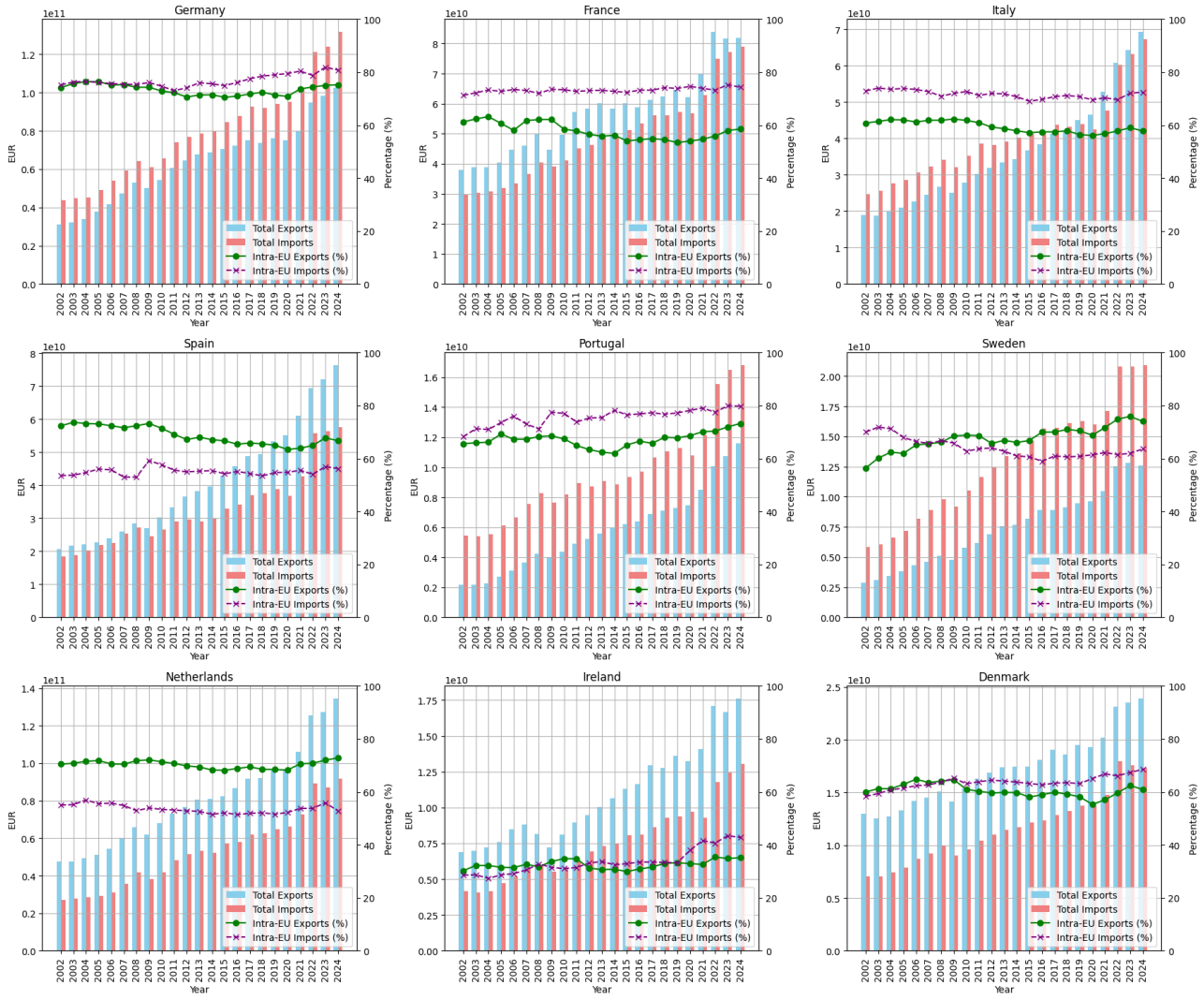
Ultimately, aligning with the CMO is not merely a legal obligation but a structural reform—one that can transform Ukraine into even more competitive and trusted agricultural actor within the EU and for the rest of the world. This alignment will also enhance food security, attract investment, and contribute to Ukraine's long-term economic recovery and EU integration. But successful integration into the EU CMO framework will depend not only on legal transposition but also on institutional readiness, producer adaptation, and sustained cooperation with EU partners. A sequenced, well-resourced, and transparent reform strategy will be key to strengthening Ukraine's agricultural competitiveness and ensuring full participation in the EU Single Market.

Figure 7 New EU members: trade volumes and share of agricultural intra-EU trade in total agricultural trade volumes



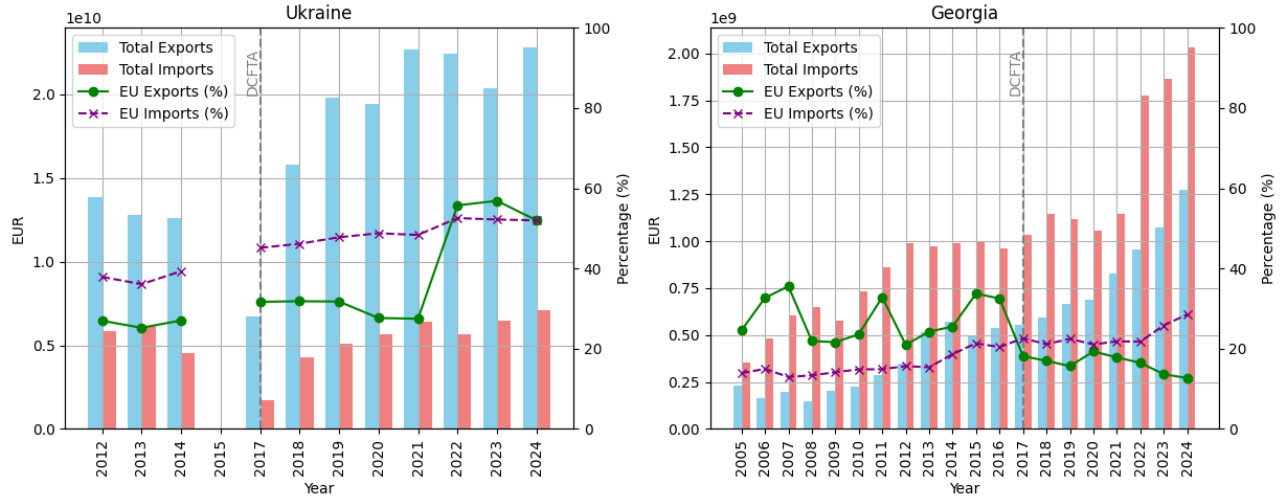
source: own presentation using Eurostat data

Figure 8 Old EU members: trade volumes and share of agricultural intra-EU trade in total agricultural trade volumes



source: own presentation using Eurostat data

Figure 9 Ukraine and Georgia: trade volumes and share of agricultural intra-EU trade in total agricultural trade volumes



source: own presentation using Eurostat data

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Annex

Table 3 The effect of new TRQs vs ATMs: effect on Ukraine's exports to the EU

№	Description	Exports to EU, 2024, tt (ATMs)	NEW TRQ, tt	Estimated exports to EU, tt (new TRQs)	Exports to EU, 2024, USD m (ATMs)	Estimated exports to EU, USD m (new TRQs)	Effect, USD m	Effect, %
1	Beef meat	0	12	0	0	0	0	0%
2	Pork meat	0	40	0	0	0	0	0%
3	Sheep meat	0	2	0	0	0	0	0%
4	Poultry meat	137	120	122	408	363	-45	-11%
5	Milk, cream	3	15	3	8	8	0	0%
6	Milk powder	15	15	15	36	36	0	0%
7	Butter, spreads	1	7	1	10	10	0	0%
8	Eggs and albumins	60	18	53	78	70	-8	-11%
9	Honey	54	35	51	104	98	-6	-6%
10	Garlic	0	0.75	0	1	1	0	0%
11	Sugars	320	100	100	199	62	-137	-69%
12	Other sugars	12	30	12	10	10	0	0%
13	Sugar syrups	0						
14	Wheat, flour, pellets	6352	1300	1300	1 124	230	-894	-80%
15	Barley, flour, pellets	632	450	450	103	74	-30	-29%
16	Oats	8	8	8	2	2	0	0%
17	Maize, flour, pellets	13757	1000	13757	2 394	2 394	0	0%
18	Barley groats; other cereal grains	26	33	26	16	16	0	0%
19	Malt and wheat gluten	15	18	15	7	7	0	0%
20	Starches	17	24	17	11	11	0	0%
21	Starch processed	5	8	5	4	4	0	0%
22	Bran, shaps, residues	48	85	48	7	7	0	0%
23	Mushrooms	0	2		0	0	0	0%
24	Processed tomatoes	25	25	25	40	40	0	0%
25	Grape and Apple juice	78	30	66	164	140	-24	-15%
26	Processed milk products	0	4		0	0	0	
27	Processed oil products	0	0.375	0	0	0	0	0%
28	Sweetcorn	1	2	1	2	2	0	0%
29	Sugar processed products	5	8	5	12	12	0	0%
30	Cereal processed products	1	3	1	1	1	0	0%
31	Milk-cream processed products	0	1		0	0	0	
32	Food preparations	0	4		0	0	0	
33	Ethanol	80	125	80	369	369	0	0%
34	Cigars and cigarettes	0	3	0	0	0	0	0%
35	Mannitol-sorbitol	0	0		0	0	0	0%
36	Malt-starch processed products	0						
37	Flour	27	30	27	9	9	0	0%
	Total		**0**		**5 120**	**3 976**	**-1 144**	**-22%**

source: Movchan and Giucci (2025).

Table 4 Ukraine's Legal Framework Alignment with the EU CMO

Item	EU Acquis	Status Full/partially/not aligned
State aide in agriculture	Council Regulation (EU) 2015/1589 of 13 July 2015 laying down detailed rules for the application of Article 108 of the Treaty on the Functioning of the European Union (codification) (Text with EEA relevance) Commission Regulation (EC) No 794/2004 of 21 April 2004 implementing Council Regulation (EC)No 659/1999 laying down detailed rules for the application of Article 93 of the EC Treaty Commission Regulation (EU) 2023/2831 of 13 December 2023 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid Commission Regulation (EU) 2023/2832 of 13 December 2023 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid granted to undertakings providing services of general economic interest	Not aligned

	Commission Regulation (EU) No 1408/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid in the agriculture sector Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty Text with EEA relevance Commission Regulation (EU) 2022/2472 of 14 December 2022 declaring certain categories of aid in the agricultural and forestry sectors and in rural areas compatible with the internal market in application of Articles 107 and 108 of the Treaty on the Functioning of the European Union Communication from the Commission Guidelines for State aid in the agricultural and forestry sectors and in rural areas 2022/C 485/01	
Milk and dairy products	**Council Directive 2001/114/EC** dated 20.12.2001 relating to certain partly or wholly dehydrated preserved milk for human consumption	Partially aligned
	Commission Delegated Regulation (EU) No 880/2012 dated 28.06.2012 supplementing Council Regulation (EC) No 1234/2007 as regards transnational cooperation and contractual negotiations of producer organisations in the milk and milk products sector Commission Implementing Regulation (EU) No 511/2012 dated 15.06.2012 on notifications concerning producer and interbranch organisations and contractual negotiations and relations provided for in Council Regulation (EC) No 1234/2007 in the milk and milk products sector Commission Implementing Regulation (EU) 2018/150 dated 30.01.2018 amending Implementing Regulation (EU) 2016/1240 as regards methods for the analysis and quality evaluation of milk and milk products eligible for public intervention and aid for private storage Commission Regulation (EC) No 445/2007 dated 23.04.2007 laying down certain detailed rules for the application of Council Regulation (EC) No 2991/94 laying down standards for spreadable fats and of Council Regulation (EEC) No 1898/87 on the protection of designations used in the marketing of milk and milk products 2010/791/EU: Commission Decision dated 20.12.2010 listing the products referred to in the second subparagraph of point III(1) of Annex XII to Council Regulation (EC) No 1234/2007 (recast) (notified under document C(2010) 8434) Regulation (EU) No 1308/2013 of the European Parliament and of the Council dated 17.12.2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (with regard to the requirements for milk and dairy products)	Not aligned
Beef	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97 Commission Regulation (EC) No 566/2008 of 18 June 2008 laying down detailed rules for the application of Council Regulation (EC) No 1234/2007 as regards the marketing of the meat of bovine animals aged 12 months or less	Fully aligned
	Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products Commission Delegated Regulation (EU) 2017/1182 of 20 April 2017 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the Union scales for the classification of beef, pig and sheep carcasses and as regards the reporting of market prices of certain categories of carcasses and live animals Commission Implementing Regulation (EU) 2017/1184 of 20 April 2017 laying down rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the Union scales for the classification of beef, pig and sheep carcasses and as regards the reporting of market prices of certain categories of carcasses and live animals	Partially aligned
Pigmeat	Commission Regulation (EC) No 2004/2002 of 8 November 2002 relating to the procedure for determining the meat and fat content of certain pigmeat products; Commission Regulation (EEC) No 226/89 of 26 January 1989 on the procedure for determining the meat content of products falling within CN codes 1602 49 11, 1602 49 13, 1602 49 15, 1602 49 19, 1602 49 30 and 1602 49 50; Commission Delegated Regulation (EU) 2017/1182 of 20 April 2017 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the Union scales for the classification of beef, pig and sheep carcasses and as regards the reporting of market prices of certain categories of carcasses and live animals; Commission Implementing Regulation (EU) 2017/1184 of 20 April 2017 laying down rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the Union scales for the classification of beef, pig and sheep carcasses and as regards the reporting of market prices of certain categories of carcasses and live animals.	Partially aligned
Poultry and eggs	Commission Delegated Regulation (EU) 2023/2464 dated 17.08.2023 amending Regulation (EU) No 1308/2013 of the European Parliament and of the Council, as regards marketing standards for eggs	Fully aligned

	Commission Regulation (EC) No 543/2008 dated 16.06.2008 laying down detailed rules for the application of Council Regulation (EC) No 1234/2007 as regards the marketing standards for poultry meat Commission Regulation (EC) No 617/2008 dated 27.06.2008 laying down detailed rules for implementing Regulation (EC) No 1234/2007 as regards marketing standards for eggs for hatching and farmyard poultry chicks Commission Delegated Regulation (EU) 2023/2465 dated 17.08.2023 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for eggs, and repealing Commission Regulation (EC) No 589/2008 Commission Implementing Regulation (EU) 2023/2466 dated 17.08.2023 laying down rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for eggs	Partially aligned
Honey	Council Directive 2001/110/EC of 20 December 2001 relating to honey Directive (EU) 2024/1438 of the European Parliament and of the Council of 14 May 2024 amending Council Directives 2001/110/EC relating to honey, 2001/112/EC relating to fruit juices and certain similar products intended for human consumption, 2001/113/EC relating to fruit jams, jellies and marmalades and sweetened chestnut purée intended for human consumption, and 2001/114/EC relating to certain partly or wholly dehydrated preserved milk for human consumption	Partially aligned
Sheep and goats	Commission Regulation (EC) No 874/96 of 14 May 1996 on imports of pure-bred breeding animals of the ovine and caprine species from third countries Commission Delegated Regulation (EU) 2017/1182 of 20 April 2017 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the Union scales for the classification of beef, pig and sheep carcasses and as regards the reporting of market prices of certain categories of carcasses and live animals; Commission Implementing Regulation (EU) 2017/1184 of 20 April 2017 laying down rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the Union scales for the classification of beef, pig and sheep carcasses and as regards the reporting of market prices of certain categories of carcasses and live animals	Partially aligned
Olive oil	Commission Delegated Regulation (EU) 2022/2104 dated 29.07.2022 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for olive oil, and repealing Commission Regulation (EEC) No 2568/91 and Commission Implementing Regulation (EU) No 29/2012	Fully aligned
	Commission Implementing Regulation (EU) 2022/2105 dated 29.07.2022 laying down rules on conformity checks of marketing standards for olive oil and methods of analysis of the characteristics of olive oil	Partially aligned
Hops and hop products	Regulation (ЕС) № 1308/2013; Commission Implementing Regulation (EU) 2024/601; Commission Delegated Regulation (EU) 2024/602; Commission Implementing Regulation (EU) 2023/2834; Commission Delegated Regulation (EU) 2023/2835; Commission Regulation (EC) 1299/2007.	Partially aligned
Processed Products	Regulation (EC) No. 900/2008	Partially aligned
	Regulation (EU) No 510/2014; Implementing Regulation (EU) No. 514/2011; Regulation (EC) No. 1488/2001; Regulation (EU) No. 578/2010; Regulation (EC) No. 284/2005; Regulation (EC) No. 88/2007	Not aligned
Fruits	Regulation (EU) No 1308/2013 of the European Parliament and of the Council dated 17.12.2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (with regard to the requirements for fruit and vegetables) Commission Delegated Regulation (EU) 2017/891 dated 13.03.2017; Commission implementing Regulation (EU) 2017/892 dated 13.03.2017; Commission Delegated Regulation (EU) 2023/2429 dated 17.08.2023	Not aligned
Wine	Commission Delegated Regulation (EU) 2017/670 of 31 January 2017 supplementing Regulation (EU) No 251/2014 of the European Parliament and of the Council as regards the authorised production processes for obtaining aromatised wine products	Fully aligned
	Commission Delegated Regulation (EU) 2018/273; Commission Implementing Regulation (EU) 2018/274; Commission Delegated Regulation (EU) 2019/934; Commission Implementing; Regulation (EU) 2019/935; Commission Delegated Regulation (EU) 2019/33; Commission Implementing Regulation (EU) 2019/34; Commission Delegated Regulation (EU) 2023/1606; Regulation (EU) No 251/2014; Commission Delegated Regulation (EU) 2017/670; Commission Delegated Regulation (EU) 2024/585	Partially aligned
Tobacco	Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007	Partially aligned
Organic farming	Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labeling of organic products and repealing Council Regulation (EC) No 834/2007	Partially aligned

	Commission Implementing Regulation (EU) 2020/464 of 26 March 2020 laying down detailed rules for the application of Regulation (EU) 2018/848 of the European Parliament and of the Council as regards documents necessary for retroactive recognition of conversion periods, organic production, and the information to be provided by Member States Commission Implementing Regulation (EU) 2021/1165 of July 15, 2021, authorizing certain products and substances for use in organic production and establishing their lists Commission Regulation 2020/2146 dated 24.09.2020	
	Commission Regulation 2021/1189 dated 07.05.2021; Commission Regulation 2021/771 dated 21.01.2021; Commission Regulation 2021/2119 dated 01.12.2021; Commission Regulation 2021/279 dated 22.02.2021; Commission Regulation 2021/2304 dated 18.10.2021; Commission Regulation 2019/723 dated 02.05.2019; Commission Regulation 2023/1195 dated 20.06.2023; Regulation 2023/2419 of the European Parliament and of the Council dated 18.10.2023; Commission Regulation 2021/2305 dated 21.10.2021; Commission Regulation 2021/2306 dated 21.10.2021; Commission Regulation 2021/2307 dated 21.10.2021 Commission Delegated Regulation (EU) 2022/1450 dated 27.06.2022 supplementing Regulation (EU) 2018/848 of the European Parliament and of the Council as regards the use of non-organic protein feed for the production of organic livestock due to Russia's invasion of Ukraine	Not aligned
Spirit drinks	Regulation (EU) 2019/787 of the European Parliament and of the Council of 17 April 2019 on the definition, description, presentation and labelling of spirit drinks, the use of the names of spirit drinks in the presentation and labelling of other foodstuffs, the protection of geographical indications for spirit drinks, the use of ethyl alcohol and distillates of agricultural origin in alcoholic beverages, and repealing Regulation (EC) No 110/2008	Partially aligned
	Regulation (EC) No 2870/2000 of 19 December 2000 laying down Community reference methods for the analysis of spirits drinks	Not aligned
Promotion of agricultural products	**Regulation (EU) No 1144/2014** of the European Parliament and of the Council of 22 October 2014 on information provision and promotion measures concerning agricultural products implemented in the internal market and in third countries and repealing Council Regulation (EC) No 3/2008 **Commission Delegated Regulation (EU) 2015/1829 of 23 April 2015** supplementing Regulation (EU) No 1144/2014 of the European Parliament and of the Council on information provision and promotion measures concerning agricultural products implemented in the internal market and in third countries **Commission Implementing Regulation (EU) 2015/1831 of 7 October 2015** laying down rules for application of Regulation (EU) No 1144/2014 of the European Parliament and of the Council on information provision and promotion measures concerning agricultural products implemented in the internal market and in the third countries	Not aligned

source: own presentation based on the screening materials of Ukraine's government