In cooperation with IER

German Economic Team

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POLICY STUDY UKRAINE

New EU tariff rate quotas for Ukrainian products: effect on exports

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Summary

- At the end of Jun-25, the EU and UKR completed negotiations on new tariff rate quotas (TRQs) for UKR products; if approved, the new TRQs are likely to come into force this year in the autumn
- The new TRQs can be compared with the old TRQs, which were in place until Jun-22 and after Jun-25, or with the autonomous trade measures (ATMs), which prevailed in the period Jun-22 to Jun-25; thus, two comparisons are necessary

New vs old TRQs (first comparison)

- 4 TRQs were abolished and 26 were enlarged; the most substantial expansion was for honey, sugar, barley groats, and bran
- Potential expansion of duty-free exports: **USD 630 m** per year or 35% increase
- UKR exporters could save up to **USD 165 m** per year related to EU's import duties
- **New TRQs imply a substantial trade liberalisation when compared to old TRQs**

New TRQs vs ATMs (2024, second comparison)

- UKR exports to the EU to drop by **USD 1,144 m** per year when compared to ATMs (2024)
- Main reason: exports of wheat to drop by **USD 894 m** per year
- However, UKR can reorient its exports to non-EU markets; thus, the effect on total exports amounts to **USD 253 m** or 0.6% of total exports in 2024
- **Moderate negative effect of new TRQs on UKR exports when compared to ATMs (2024)**

Structure

1. Motivation
2. New vs. old TRQs (first comparison)
   i. Changes
   ii. Implications
3. New TRQs vs. ATMs (second comparison)
   - Estimation of effect on UKR exports to the EU
4. First vs second comparison
   - Illustration
   - Product-level

5. Estimation of reorientation of exports

Annex: Methodology

1. Motivation

- In Jun-25, after three years of autonomous trade measures (ATMs), the EU reinstated the old TRQs on imports from UKR, as specified in the DCFTA
- The prevalence of the old TRQs most likely applies only for a few months, as the EU and UKR immediately launched talks on revising the TRQs under the mandate of Article 29 of the Association Agreement
- The negotiations were completed at the end of June. The agreed-upon revision is still pending approval by the EU Council and the Association Committee in Trade Configuration to come into force, expected in the autumn
- This Policy Study aims to:
  - Analyse the changes (“new vs. old TRQs”, first comparison), and
  - Assess the effect of the new TRQs on UKR exports in comparison to 2024 (“new TRQs vs. ATMs”, second comparison)

Note: The composition and amounts of the new TRQs are based on the European Commission Proposal for the EU Council Decision (2025/0248(NLE))

New vs. old TRQs (first comparison): i. changes

- **Complete abolishment** of 4 TRQs and withdrawal of products from 6 TRQs:
  - Yoghurts, buttermilk, whole milk powder, mushrooms, grape juice, protein concentrates, and several other products are now fully duty-free
- **Expansion** of 26 TRQs
  - Most substantial: honey, sugar, barley groats, and bran
- **No changes** to TRQs for some products
  - Beef, pork and lamb; reason: no exports due to food safety restrictions
  - Cigars and cigarettes
- **Reshuffling of products between TRQs** to reduce crowding out within TRQs:
  - A new TRQ on flour was established by moving this product from “grain” TRQs on wheat, barley and maize
  - Other sugars (HS 1702) moved from different TRQs into one
  - Sugar syrups merged with sugar processed products, and processed starches with malt-starch processed products
- **Substantial changes in TRQs**
- Below, we present the changes at the product level

New vs. old TRQs: product-level changes (1/2)

No	Description	Old TRQs, tt	New TRQs, tt	Change, tt	Change, %	TRQ quantity	TRQ coverage	Comment
1	Beef meat	12	12	0	0%	=	=	
2	Pork meat	40	40	0	0%	=	=	
3	Sheep meat	2.25	2.25	0	0%	=	=	
4	Poultry meat	90	120	30	33%	↑	=	
5	Milk, cream	10	15	5	50%	↑	↓	**Duty-free**: yoghurt, buttermilk **Moved to other TRQ**: yoghurt with sugar content ≥ 70%
6	Milk powder	5	15.4	10.4	**208%**	↑	↓	**Duty-free**: milk powder with fat content >1.5%; buttermilk in solid form
7	Butter, spreads	3	7	4	**133%**	↑	=	
8	Eggs and albumins	6	18	12	**200%**	↑	=	
9	Honey	6	35	29	**483%**	↑	=	
10	Garlic	0.5	0.75	0.25	50%	↑	=	
11	Sugars	20.07	100	79.93	**398%**	↑	↓	**Moved to other TRQ**: maltodextrine, other HS 1702
12	Other sugars	20	30	10	50%	↑	↑	**Added**: HS 1702 from other TRQs
13	Sugar syrups	2						**Moved to other TRQ**: sugar syrups **Duty-free:** protein concentrates
14	Wheat	1,000	1,300	300	30%	↑	↓	**Moved to other TRQ**: flour
15	Barley	350	450	100	29%	↑	↓	**Moved to other TRQ**: flour, groats
16	Oats	4	7.7	3.7	93%	↑	=	
17	Maize	650	1,000	350	54%	↑	↓	**Moved to other TRQ**: flour
18	Barley groats; other cereal grains	7.8	33.2	25.4	**326%**	↑	↑	**Added**: groats and meal of rye, barley, cereals; cereal pellets
19	Malt and wheat gluten	7	17.5	10.5	**150%**	↑	=	

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, and Eurostat

New vs. old TRQs: product-level changes (2/2)

No	Description	Old TRQs, tt	New TRQs, tt	Change, tt	Change, %	TRQ quantity	TRQ coverage	Comment
20	Starches	10	24.4	14.4	**144%**	↑	=	
21	Starch processed	2	8	6	**300%**	↑	↑	**Added**: malt-starch processed products
22	Bran, shaps, residues	21	85	64	**305%**	↑	↓	**Duty-free**: more expensive kinds
23	Mushrooms	1				∞	=	**Duty-free**
24	Processed tomatoes	10	25	15	**150%**	↑	=	
25	Grape and apple juice	20	30	10	50%	↑	↓	**Duty-free**: grape juice
26	Processed milk products	2				∞	=	**Duty-free**
27	Processed oil products	0.25	0.375	0.125	50%	↑	=	
28	Sweetcorn	1.5	2.25	0.75	50%	↑	=	
29	Sugar processed products	3	7.5	4.5	**150%**	↑	↑↓	**Moved to other TRQ**: fructose **Duty-free**: food preparations of flour, groats, etc. with sugar content ≥ 70% **Added**: sugar syrups; yoghurt with sugar content ≥ 70%
30	Cereal processed products	2	3	1	50%	↑	=	
31	Milk-cream processed products	0.5				∞	=	**Duty-free**
32	Food preparations	2				∞	=	**Duty-free**
33	Ethanol	100	125	25	**25%**	↑	=	
34	Cigars and cigarettes	2.5	2.5	0	0%	=	=	
35	Mannitol-sorbitol	0.1	0.15	0.5	50%	↑	=	
36	Malt-starch processed products	2						**Moved to other TRQ**
37	Flour		30			new		**New TRQ**

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, and Eurostat.

New vs. old TRQs: ii. implications

Short-term implications

- The potential expansion of duty-free exports, if all TRQs are fully utilised, amounts to USD 630 m per year; 35% increase at the aggregate level
- UKR exporters could save up to USD 165 m per year related to EU's import duties

Long-term implications

- The new TRQs are permanent and constitute a **long-term basis** for exporters
- As such, they do not only influence the short-term orientation of exports, but also long-term investment decisions; this is the key difference from ATMs, which apply only in the **short term**
- Thus: potential implications on investment, not just on the orientation of exports
- However, a quantification of long-term implications is beyond the scope of this analysis

- Below, we present the implications on the product level

New vs. old TRQs: product-level implications (1/2)

No	Description	Old TRQs: Max duty-free exports within TRQ, USD m	New TRQs: Max duty-free exports within TRQ, USD m	Max change, USD m	Max change, %	Max import duty saving, USD m
1	Beef meat	90	90	0	0%	0.0
2	Pork meat	207	207	0	0%	0.0
3	Sheep meat	17	17	0	0%	0.0
4	Poultry meat	269	358	90	33%	32.0
5	Milk, cream	22	34	12	54%	3.4
6	Milk powder	13	38	25	196%	8.5
7	Butter, spreads	21	50	29	133%	12.0
8	Eggs and albumins	8	24	16	200%	1.6
9	Honey	12	68	56	483%	9.7
10	Garlic	2	2	1	50%	0.6
11	Sugars	13	62	49	375%	22.5
12	Other sugars	18	25	7	38%	2.3
13	Sugar syrups	6	merged			
14	Wheat	178	230	52	29%	20.8
15	Barley	58	74	16	27%	6.6
16	Oats	1	3	1	93%	0.2
17	Maize	113	174	61	54%	0.0
18	Barley groats; other cereal grains	5	20	15	324%	1.4
19	Malt and wheat gluten	3	8	5	150%	1.7

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, WITS and Eurostat. See Annex for methodology

New vs. old TRQs: product-level implications (2/2)

No	Description	Old TRQs: Max duty-free exports within TRQ, USD m	New TRQs: Max duty-free exports within TRQ, USD m	Max change, USD m	Max change, %	Max import duty saving, USD m
20	Starches	7	16	9	144%	1.4
21	Starch processed	2	6	5	300%	0.6
22	Bran, shaps, residues	3	13	10	369%	4.9
23	Mushrooms	5	11	5	100%	0.0
24	Processed tomatoes	16	41	24	150%	3.5
25	Grape and Apple juice	42	63	21	50%	6.9
26	Processed milk products	3	6	3	100%	0.0
27	Processed oil products	2	3	1	50%	0.1
28	Sweetcorn	2	3	1	50%	0.1
29	Sugar processed products	7	20	13	189%	0.0
30	Cereal processed products	2	2	1	50%	0.3
31	Milk-cream processed products	1	1	1	100%	0.0
32	Food preparations	6	12	6	100%	0.0
33	Ethanol	463	579	116	25%	22.0
34	Cigars and cigarettes	161	161	0	0%	0.0
35	Mannitol-sorbitol	0	0	0		0.0
36	Malt-starch processed products	0	merged			
37	Flour		10	10		2.0
	Total	**1,775**	**2,399**	**630**	**35%**	**165.3**

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, WITS and Eurostat. See Annex for methodology

3. New TRQs vs ATMs (second comparison)

- Next, we assess the effect of the new TRQs on exports to the EU in comparison with 2024, when the ATMs were applied
- The switch to new TRQs entails a change in the market access regime compared to duty-free ATMs, as regular import duties apply for exports exceeding the new TRQs
- Step 1: comparison of new TRQs and the actual exports to the EU in 2024
  - If the new TRQ is above the actual exports, no import duties apply, and thus the estimated exports to the EU are equal to the actual exports → **no effect**
  - If the new TRQ is below the actual exports, the EU import duty applies for exports over the TRQ, and we proceed with the estimates of the effect
- Step 2: a partial equilibrium model is used to estimate the effect of the new TRQs vs ATMs on UKR exports to the EU (see methodological details in Annex)

Effect on UKR exports to EU (1/2)

No	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	2.25	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	15.4	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	*Merged with TRQ "Sugar processed products"*						
14	Wheat	6,352	1,300	1,300	1,124	230	-894	-80%
15	Barley	632	450	450	103	74	-30	-29%
16	Oats	8	7.7	8	2	2	0	0%
17	Maize	13,757	1,000	13,757	2,394	2,394	0	0%
18	Barley groats; other cereal grains	26	33.2	26	16	16	0	0%
19	Malt and wheat gluten	15	17.5	15	7	7	0	0%

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, WITS and Eurostat. Note: estimates are conducted for tariff lines included in new TRQs

Effect on UKR exports to EU (2/2)

No	Description	Exports to EU, 2024, tt (ATMs)	New TRQs, 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, %
20	Starches	17	24.4	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		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		0	0	0	0	0%
27	Processed oil products	0	0.375	0	0	0	0	0%
28	Sweetcorn	1	2.25	1	2	2	0	0%
29	Sugar processed products	5	7.5	5	12	12	0	0%
30	Cereal processed products	1	3	1	1	1	0	0%
31	Milk-cream processed products	0		0	0	0	0	0%
32	Food preparations	0		0	1	1	0	0%
33	Ethanol	80	125	80	369	369	0	0%
34	Cigars and cigarettes	0	2.5	0	0	0	0	0%
35	Mannitol-sorbitol	0	0.15	0	0	0	0	
36	Malt-starch processed products	*Merged with TRQ "Starch processed"*						
37	Flour	27	30	27	9	9	0	
	Total				**5,120**	**3,976**	**-1,144**	**-22%**

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, WITS and Eurostat. Note: estimates are conducted for tariff lines included in new TRQs

Summary of the effect on UKR exports to the EU

- Although the new TRQs offer a considerable expansion compared to the old TRQs, for several products, they stay well below actual UKR exports in 2024 under ATMs
- The estimated reduction in UKR exports to the EU amounts to **USD 1,144 m** per year
- Seven TRQs bear the losses: wheat, barley, poultry, eggs, sugar, apple juice, and honey
- For wheat, sugar and barley, the new TRQs are binding, i.e. exports are estimated to stop after the new TRQ level is reached
- The exports of wheat will drop by USD 894 m per year, accounting for four-fifths of the total reduction in exports to the EU
- Other noticeable reduction in exports to the EU is expected for sugar, poultry, barley and apple juice
- Below, we estimate the potential for reorientation of exports to third markets

4. First vs second comparison: illustration

- The first comparison (new vs old TRQs) and the second comparison (new TRQs vs ATMs) deliver partly very different results
- This can be illustrated using sugar as an example

	Old TRQ	New TRQ	ATMs (2024)
tt	20	100	320
USD m	13	62	199

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, Eurostat for volume and UKR export unit value in 2024 for estimates of nominal values

First comparison (new vs old TRQ)

- Expansion from 20 to 100 tt; 5-fold increase
- Very positive

Second comparison (new TRQ vs ATMs)

- Strong reduction from 320 to 100 tt; almost 70% drop
- Very negative

➢ **Illustration shows that both comparisons need to be conducted; only one comparison would deliver the wrong picture**

First vs second comparison: product-level

Description	Units	Old TRQ	New TRQ	First comparison	ATMs (2024)	Second comparison
Poultry	tt	90	120	**+30**	137	**-17**
	USD m	269	358		408	
Eggs	tt	6	18	**+12**	60	**-42**
	USD m	8	24		78	
Honey	tt	6	35	**+29**	54	**-19**
	USD m	12	68		104	
Sugar	tt	20	100	**+80**	320	**-220**
	USD m	13	62		199	
Wheat	tt	1,000	1,300	**+300**	6,352	**-5,052**
	USD m	178	230		1,124	
Barley	tt	350	450	**+100**	632	**-182**
	USD m	58	74		103	
Apple juice	tt	20	30	**+10**	78	**-48**
	USD m	42	63		164	

Sources: own display based on the EU-UKR Association Agreement, the EC Proposal for the EU Council Decision, Eurostat for volume and UKR export unit value in 2024 for estimates of nominal values. Note: The table includes seven products, for which the results of the first and second comparisons are opposite. Maize is not included as the EU duty outside the TRQ is zero, and thus there is no effect on exports to the EU

5. Estimation of reorientation of exports

- As shown, for some products, exports to the EU will suffer under the new TRQs
- This applies to wheat, barley, poultry, eggs, sugar, apple juice, and honey
- For these seven products: reorientation to non-EU markets will take place
- Key question: What are the financial losses involved with the reorientation of exports? To what extent will exports (in USD) decline?
- Own estimation based on two components:
  - Price wedge, i.e. the difference between the unit value of UKR exports to the EU and non-EU markets
  - Transport costs, i.e. the difference between the expenses required for shipping one ton to the leading destination in the EU and the leading destination outside the EU
  - In both cases, we focus exclusively on potential losses, so we use zero when there are no losses associated with price and/or transportation costs
- For all seven products, given that these products are commodities and feature a considerable share of exports to non-EU destinations already in 2024, we assume their complete reorientation, i.e. that the difference in quantity between exports to the EU in 2024 and under the new TRQ could be exported to non-EU markets in full

Example: estimation of wheat exports' reorientation

- UKR exports to the EU in 2024: 6.4 mt
- New TRQ: 1.3 mt
- Custom rate beyond TRQ: 40% ad valorem equivalent
- Estimated exports to the EU (new TRQs): 1.3 mt (i.e. TRQ is binding)
- Amount for the reorientation: 5.1 mt
- **Price wedge:**
  - As shown by data on unit values of UKR exports, prices in non-EU markets are not lower than in the EU
  - Thus, no losses to be expected due to a price wedge
- **Transport costs:**
  - The difference between the expenses required for shipping one ton to the leading destination outside the EU (in the case of wheat: Indonesia) and the leading destination in the EU (Spain): + USD 40.2 per ton
  - USD 40.2 per ton x 5.1 mt = **USD 203.3** m of the losses due to higher transport costs
- **The reduction in total exports of wheat: USD 203.3 m**

Estimation of reorientation of exports

No	Description	Reorientation volume, tt	Reduction in EU exports, USD m	Reoriented exports, USD m	Reduction in total exports, USD m	...due to price wedge	...due to transport costs
4	Poultry	15	45	28	-17	-17	0
8	Eggs	6	8	8	-1	-1	0
9	Honey	3	6	4	-2	0	-2
11	Sugars	220	137	113	-23	-23	0
14	Wheat	5,052	894	690	-203	0	-203
15	Barley	182	30	27	-3	0	-3
25	Apple juice	11	24	20	-4	-3	-1
	Total		**1,144**	**891**	**-253**	**-44**	**-209**

Sources: own display based on WITS, SeaRates by DP World and own estimates. See Annex for methodology.

- The estimated yearly reduction of USD 1,144 m in exports to the EU will be partially offset by reoriented exports at **USD 891 m** to other destinations
- Thus, the estimated yearly reduction in total exports amounts to **USD 253 m**, which is equivalent to 0.6% of the total exports in 2024
- Higher transport costs for shipping wheat outside the EU explain most of the reduction in total exports
- However, lower prices on alternative markets play the key role in the reduction of total exports for poultry, sugar, and apple juice

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About the German Economic Team

Financed by the Federal Ministry for Economic Affairs and Climate Action, the German Economic Team (GET) advises the governments of Ukraine, Belarus*, Moldova, Kosovo, Armenia, Georgia* and Uzbekistan on economic policy matters. Berlin Economics has been commissioned with the implementation of the consultancy.

**Within the framework of project activities in Georgia, we are in contact solely with reform-oriented partners for the time being; in Belarus advisory activities are suspended.*

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Annex: Methodology (1/3)

Estimate of baseline data:

- In the analysis, we rely on the constructed estimate of UKR exports to the EU subject to DCFTA-TRQs.
- While the information on prices (unit values) is sourced from UKR (exporter), the volume information is sourced from the EU (importer).
- That allows for avoiding mirror statistics biases caused by, e.g., discrepancies between the country of contract and the country of destination in UKR export data, differences in the date of the product leaving the UKR customs territory and entering the EU customs territory, as well as any misreporting or mistakes

Estimate of the maximum duty-free exports within the TRQ

- Maximum duty-free exports within the TRQ are a hypothetical value, describing the maximum value of exports shipped duty-free, assuming that the TRQ is fully utilised
- Maximum duty-free exports within TRQ are estimated as:
  - TRQ volume
  - Unit value of UKR exports in 2024
- For TRQs that were fully liberalised, the maximum duty-free exports are assumed doubled

Annex: Methodology (2/3)

Impact on UKR exports to the EU:

» To estimate the effect related to the new TRQs, we used a partial equilibrium model, thereby assuming the reinstatement of TRQs, although at the new levels, would increase UKR product prices on the EU market, and EU buyers would respond by adjusting their demand

» That should be considered an upper-bound estimate, as UKR exporters could instead forgo their profits to maintain their market share. Also, we do not consider the possibility of using the non-preferential EU TRQs, open to all third countries

» The steps of the analysis:

- Estimate of over-TRQ exports
- Estimate the change in exports in the case of applying the new TRQs, using estimated exports over the TRQ in 2024, MFN import duties applied by the EU outside the TRQ amount, and the import demand elasticity of the EU, with a ceiling of -5. The reduction in exports resulting from the reintroduction of the TRQs cannot exceed the total over-TRQ exports

Data sources: WITS and EUROSTAT for trade data, WITS for elasticities, Market Access Map for EU MFN duties, Association Agreement and the EC Proposal for the EU Council Decision for the level of TRQs

Annex: Methodology (3/3)

Reorientation potential:

- The losses associated with the reorientation are estimated as a sum of two components:
  - The difference between the unit value of UKR exports to the EU and non-EU markets
  - The difference in the transport costs per ton for shipments to the leading destination in the EU and the largest destination outside the EU
- We focus on potential losses associated with the reorientation of exports to non-EU destinations only. We put zero for situations when there are no losses
- No gains due to positive price wedge or cheaper transport costs are considered, as these factors would imply natural market adjustments rather than the reorientation driven by policy changes
- Data sources: WITS, SeaRates by DP World

- The estimate of the transport costs difference is based on inquiries about the price for shipments to the main port or capital of the partner country:
  - For wheat and barley: 500 tons bulk (sea)
  - For poultry, eggs and honey: 20’ refrigerated (sea or road)
  - For juice: 20’ tank (sea or road)
  - For sugar: 20’ standard (sea)