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POLICY BRIEFING UKRAINE

DCFTA revision: changes in EU TRQs for UKR products and effect on the EU

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Summary

- On 29 October 2025, the revised trade provisions under the EU-UKR deep and comprehensive free trade area (DCFTA) entered into force
- In this policy briefing, we estimate the effect on the EU of the new EU tariff rate quotas (TRQs) for UKR products; this research is part of a broader analysis on the effect of DCFTA revision, see Annex 4
- The new EU TRQs imply a drop in EU imports from UKR for seven products: wheat, barley, poultry, eggs, honey, sugar, and apple juice
- EU imports from UKR drop by USD 1,428 m p.a., mainly due to wheat (- USD 1,146 m)
- The effect of the import reduction **on the EU market** depends on the size of the drop compared to the EU market

	Poultry	Eggs	Honey	Sugar	Wheat	Barley	Apple juice
% import decline to market supply	0.1%	0.1%	0.7%	1.4%	5.6%	0.3%	0.7%

- **Wheat**. Import reduction accounts for 5.6% of the EU market; lower imports from UKR result in less extra-EU exports, and its reorientation towards the EU internal market
- **Sugar**. Import decline is equivalent to 1.4% of the EU market; lower imports from UKR benefit EU producers, while pushing internal prices up
- **Honey**. Import reduction (0.7% of EU market) benefits other countries, primarily China

➢ **New EU TRQs have a considerable impact on the EU wheat market; the effect on the EU markets for sugar, honey and apple juice is also noticeable**

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Structure

1. Motivation
2. Changes in EU TRQs for UKR products
3. The effect on EU imports from UKR
4. Relative importance of imports from UKR
5. The EU internal market reaction

Annex:

1. Methodology
2. Product-level changes in the EU TRQs
3. The effect on the EU welfare
4. Overview of the DCFTA revision
5. Combined effect of the DCFTA revision

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1. Motivation

- **DCFTA revision**. On 29 October 2025, the revised trade provisions under the EU-UKR deep and comprehensive free trade area (DCFTA) entered into force, effectively replacing the recently expired EU autonomous trade measures (ATMs)
- These changes were negotiated under the mandate of Article 29 of the Association Agreement in Jun-25
- Unlike ATMs, the revised DCFTA provisions envisage improved market access for both parties
- GET has prepared complementary papers, analysing the four distinct impacts of the DCFTA revision after the ATMs expiration: the impact of changes in the EU market access on UKR and the EU, and the impact of changes in the UKR market access on UKR and the EU (see Annex 5 for the combined results)
- This policy brief is one of these papers, aiming to:
  - Analyse the effect of new EU TRQs for UKR products on EU imports from UKR after the ATMs expiration
  - Analyse the EU internal market reaction

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2. Changes in EU TRQs for UKR products

New TRQs vs EU imports in 2024	Number of new TRQs	Effect on EU imports	EU market reaction
New TRQ > EU imports from UKR in 2024	23 out of 31	No effect	No reaction
New TRQ < EU imports from UKR in 2024	7 out of 31: wheat, barley, poultry, eggs, honey, sugar, and apple juice	Subject of the policy briefing	Subject of the policy briefing
	Special case: maize	No effect as out-of-quota import duty is zero	No reaction

Sources: own display based on GET UKR PS/03/2025

- For seven products (excl. maize), the DCFTA revision does not provide UKR with the same level of market access to the EU market that the country enjoyed under the ATMs
- Thus: EU imports from UKR for these seven products will drop; our further analysis focuses on these seven products
- Annex 2 contains the product-level EU imports from UKR under all new TRQs

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3. The effect on EU imports from UKR

The effect of the EU's new TRQs on imports from UKR

	EU imports from UKR, 2024, tt	New TRQs, tt	Estimated EU imports from UKR, tt	EU imports from UKR, 2024, USD m	Estimated EU imports from UKR, USD m	Effect, USD m	Effect, %
Poultry meat & preparations	137	120	122	413	368	-46	-11%
Eggs & albumins	59	18	53	107	98	-9	-9%
Honey	54	35	51	103	97	-6	-6%
Sugars	325	100	100	230	71	-159	-69%
Common wheat	6,343	1,300	1,300	1,442	296	-1,146	-80%
Barley	632	450	450	138	100	-38	-28%
Apple juice	78	30	66	156	133	-23	-15%
Total				2,589	1,161	-1,428	-55%

Sources: own display and estimates based on GET UKR PS/03/2025 and Eurostat retrieved on November 23, 2025; see annex 1 for methodology

- The EU imports of seven products from UKR, for which new TRQs are below the EU imports in 2024 under ATMs, will drop by USD 1,428 m or 55% compared to the baseline
- The steepest drop is registered for wheat, for which imports will decline by USD 1,146 m or 80%, explaining most of the overall EU import reduction
- Sugars are the second most affected category, featuring a decline by USD 159 m or 69%
- In nominal terms, ESP will be affected the most, with its imports dropping by USD 889 (-74%), followed by IRL with USD 142 m
- In relative terms, the highest reduction will be for ITA and PRT imports, by 79% each; while DNK and BEL will be the least affected, with 7% and 8% decline, respectively

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Breakdown of import reduction by member states

USD m	Poultry meat & preparations	Eggs & albumins	Honey	Sugars	Common wheat	Barley	Apple juice	Total USD m	%
Austria	7	0	0	5	0	0	4	16	-16%
Belgium	0	0	0	0	0	0	0	1	-8%
Bulgaria	0	1	0	41	0	0	0	42	-59%
Croatia	0	1	0	7	0	0	0	8	-40%
Cyprus	0	0	0	0	3	8	0	11	-33%
Czechia	0	1	0	13	2	0	0	17	-43%
Denmark	0	0	0	0	0	0	0	0	-7%
Estonia	0	0	0	0	0	0	0	0	-12%
Finland	0	0	0	0	0	0	0	0	-68%
France	0	0	1	1	0	0	1	3	-14%
Germany	0	0	2	3	18	0	6	30	-29%
Greece	1	0	0	4	39	1	0	45	-63%
Hungary	0	0	0	39	0	0	0	40	-64%
Italy	0	0	0	0	16	0	0	16	-79%
Ireland	0	0	0	24	118	0	0	142	-65%
Latvia	0	2	0	1	2	0	0	5	-22%
Lithuania	1	0	0	4	0	0	0	6	-35%
Luxembourg	-	-	-	-	-	-	-	-	-
Malta	0	0	0	0	0	0	0	0	-69%
Netherlands	26	2	0	0	30	1	1	60	-20%
Poland	0	1	1	5	0	2	8	18	-18%
Portugal	0	0	0	1	50	0	0	50	-79%
Romania	2	0	0	1	0	3	0	7	-18%
Slovakia	7	0	0	0	0	0	0	7	-11%
Slovenia	0	0	0	4	11	0	0	15	-76%
Spain	1	0	1	5	857	24	2	889	-74%
Sweden	0	0	0	0	0	0	0	1	-17%
EU total	**46**	**9**	**6**	**159**	**1,146**	**38**	**23**	**1,428**	**-55%**

Sources: own display and estimates based on GET UKR PS/03/2025, Eurostat

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4. Relative importance of imports from UKR

	Poultry	Eggs	Honey	Sugar	Wheat	Barley	Apple juice
2024							
Imports from UKR, tt	137	59	54	325	6,343	632	78
EU market supply, tt	12,998	6,529	437	15,550	90,611	43,917	1,784
% in market supply	**1.1%**	**0.9%**	**12.4%**	**2.1%**	**7.0%**	**1.4%**	**4.4%**
New TRQs							
Estimated imports, tt	122	53	51	100	1,300	450	66
Decline in imports, tt	15	6	3	225	5,043	182	11
% import decline to market supply	**0.1%**	**0.1%**	**0.7%**	**1.4%**	**5.6%**	**0.3%**	**0.7%**
% estimated imports to market supply	**1.0%**	**0.8%**	**11.7%**	**0.7%**	**1.4%**	**1.1%**	**3.7%**

Sources: own estimates and display based on Eurostat, EU and GET UKR PS/03/2025, estimated imports is the EU imports from UKR after the new TRQs are enforced; see annex 1 for methodology

- The importance of UKR imports for the EU market varies among products
- As of 2024, honey had the highest share of EU market supply (12.4%), followed by wheat (7%), apple juice (4.4%) and sugar (2.1%)
- However, the effect of DCFTA revision doesn't depend on these shares, but on the size of the **import decline** compared to the EU market supply
- After ATMs' expiration and DCFTA revision, the import decline for wheat amounts to 5.6% of EU supply, by far the largest share, followed by sugar (1.4%), honey and apple juice (each 0.7%); for poultry, eggs and barley, the import decline is rather small
- Below, we take a look at the implications for the EU market for each product

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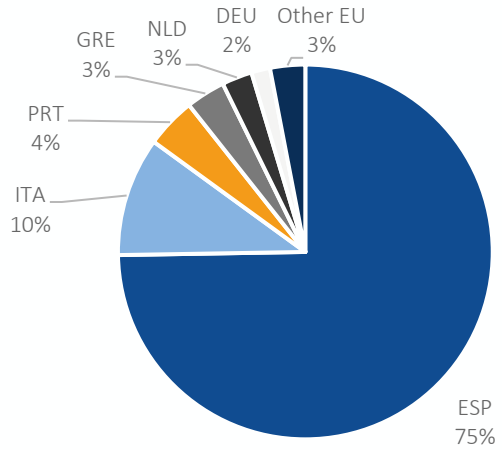
5.1. The EU internal market reaction: wheat

EU market balance of common wheat, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	111,585	100%	
Intra-EU trade*	21,825	20%	239
Exports outside EU	30,003	27%	241
Imports outside EU	9,029	8%	243
including			
UKR	6,343	6%	227
Others	2,686	2%	279
Internal market supply	90,611	81%	

Sources: own display based on Eurostat, intra-EU trade based on export data

EU imports of common wheat from UKR, 2024



Sources: own display based on Eurostat, value of imports

- 2024: imports from UKR played a large role in the EU wheat market
  - 6% of the EU production
  - 70% of imports from outside the EU
  - Key importers: ESP (75%), ITA (10%)
- New TRQ: As out-of-quota duty is prohibitively high at EUR 95 per ton (ad valorem equivalent: 45%), estimated imports from UKR drop by 5,043 tt to the new TRQ level of 1,300 tt
- That change concerns **5.6% of the EU internal market supply** (see slide 8)
- As non-UKR imports from outside the EU are expensive, demand for EU wheat increases
- That, coupled with increased competition with UKR in external markets, stimulates EU wheat exporters to reorient from extra-EU exports to the EU market
- But a higher internal price dampens demand and fosters the replacement of wheat in feed with other cereals, including maize from UKR

➢ **Lower imports from UKR result in less extra-EU exports and its reorientation towards the EU internal market, benefitting EU producers**

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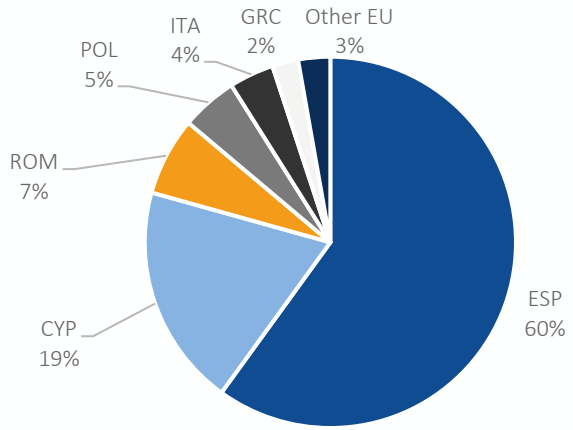
5.2. The EU internal market reaction: barley

EU market balance of barley, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	48,985	100%	
Intra-EU trade*	8,882	18%	235
Exports outside EU	6,520	13%	206
Imports outside EU	1,452	3%	243
including			
UKR	632	1%	219
Others	820	2%	261
Internal market supply	43,917	90%	

Sources: own display based on Eurostat, intra-EU trade based on export data

EU imports of barley from UKR, 2024



Sources: own display based on Eurostat, value of imports

- 2024: Imports from UKR were of minor relevance for the EU barley market:
  - 1% of the EU production
  - 44% of imports from outside the EU
  - Key importers: ESP (60%), CYP (19%)
- New TRQ: As out-of-quota duty is prohibitively high at EUR 93 per ton (ad valorem equivalent: 46%), estimated imports from UKR reduce by 182 tt to the new TRQ level of 450 tt
- That change concerns **0.3% of the EU internal market supply** (see slide 8)
- Internal demand for EU barley will grow, as imports from non-UKR destinations outside the EU are more expensive
- EU producers will supply more to the internal market, benefiting from higher intra-EU prices compared to extra-EU exports
- But given the scope of the EU market supply change, the effect on the internal market and prices will be small
- **Lower imports from UKR benefit EU producers, but the effect is limited**

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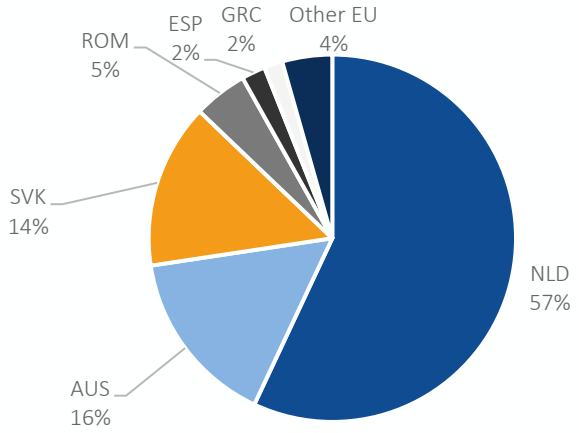
5.3. The EU internal market reaction: poultry

EU market balance of poultry, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	14,093	100%	
Intra-EU trade*	4,657	33%	3,413
Exports outside EU	1,752	12%	2,661
Imports outside EU	657	5%	3,108
including			
UKR	137	1%	3,021
Others	520	4%	3,130
Internal market supply	12,998	92%	

Sources: own display based on Eurostat, intra-EU trade based on export data

EU imports of poultry from UKR, 2024



Sources: own display based on Eurostat, value of imports

- **2024**: Imports from UKR played a minor role in the EU poultry market:
  - 1% of the EU production
  - 21% of imports from outside the EU
  - Key importers: NLD (57%), AUS (16%)
- **New TRQ**: The ad valorem equivalent of out-of-quota duty is high at 36%, and estimated imports from UKR will reduce by 15 tt to 122 tt, a bit above the new TRQ level of 120 tt
- The change in imports concerns less than **0.1% of the EU market supply** (see slide 8)
- Imports from UKR will be replaced mainly by imports from other destinations, in particular Brazil, the UK, Thailand and China
- Imports from these destinations have already increased in 7M2025
- The impact on the EU producers and the EU internal prices is expected to be small
- **Lower imports from UKR benefit mostly importers from other destinations**

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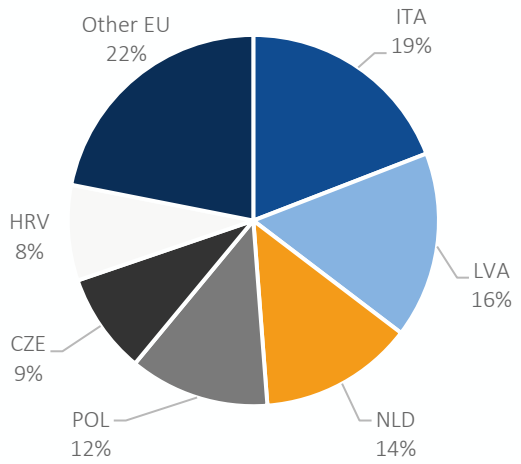
5.4. The EU internal market reaction: eggs

EU market balance of eggs, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	6,664	100%	
Intra-EU trade*	2,033	31%	1,986
Exports outside EU	259	4%	4,992
Imports outside EU	124	2%	2,913
including			
UKR	59	1%	1,803
Others	64	1%	3,939
Internal market supply	6,529	98%	

Sources: own display based on Eurostat, intra-EU trade based on export data

EU imports of eggs from UKR, 2024



Sources: own display based on Eurostat, value of imports

- 2024: Imports from UKR played a small role in the EU eggs market:
  - 1% of the EU production
  - 48% of imports from outside the EU
  - Key importers: ITA (19%), LVA (16%)
- New TRQ: The out-of-quota duty for eggs is moderate, 10%, and estimated imports from UKR will reduce by 6 tt to 53 tt, staying well above the new TRQ level of 18 tt
- The change in imports concerns less than **0.1% of the EU market supply** (see slide 8)
- With prices for non-UKR imports being extremely high, the drop in imports from UKR will stimulate demand for EU eggs
- The internal price for eggs will increase, but not significantly
- **Lower imports from UKR benefit primarily domestic producers, although the impact will be small**

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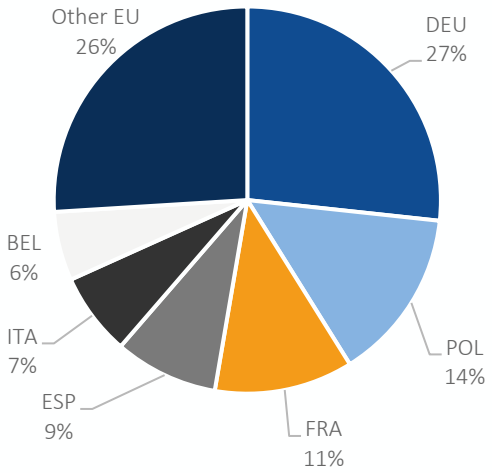
5.5. The EU internal market reaction: honey

EU market balance of honey, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	286	100%	
Intra-EU trade*	155	54%	3,511
Exports outside EU	20	7%	6,026
Imports outside EU	170	59%	2,104
including			
UKR	54	19%	1,905
Others	116	41%	2,197
Internal market supply	437	153%	

Sources: own display based on Eurostat, intra-EU trade based on export data; production is for 2022

EU imports of honey from UKR, 2024



Sources: own display based on Eurostat, value of imports

- 2024: Imports from UKR played a considerable role in the EU honey market:
  - 19% of the EU production
  - 32% of imports from outside the EU
  - Key importers: DEU (27%), POL (14%)
- New TRQ: The out-of-quota duty for honey is moderate, 17%, and estimated imports from UKR will reduce by 3 tt or to 51 tt, staying above the new TRQ level of 35 tt
- The change in imports concerns about **0.7% of the EU market supply** (see slide 8)
- With prices for non-UKR imports being much lower than prices for the EU honey, the drop in imports from UKR will result in higher imports from other destinations, primarily China
- The internal price for honey will increase
- **Lower imports from UKR benefit other exporting countries, primarily China**

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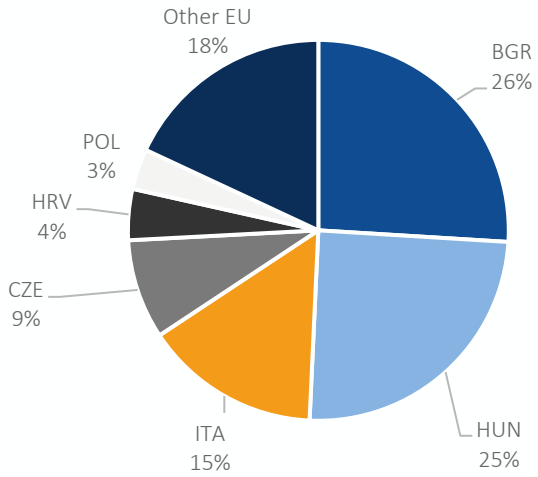
5.6. The EU internal market reaction: sugar

EU market balance of sugar, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	16,600	100%	
Intra-EU trade*	5,423	33%	828
Exports outside EU	1,778	11%	697
Imports outside EU	728	4%	818
including			
UKR	325	2%	708
Others	404	2%	907
Internal market supply	15,550	94%	

Sources: own display based on Eurostat, intra-EU trade based on export data

EU imports of sugar from UKR, 2024



Sources: own display based on Eurostat, value of imports

- 2024: Imports from UKR played a moderate role in the EU sugar market in 2024:
  - 2% of the EU production
  - 45% of imports from outside the EU
  - Key importers: BGR (26%), HUN (25%)
- New TRQ: The out-of-quota duty for sugar is prohibitively high at 46%, and estimated imports from UKR will reduce by 225 tt to the new TRQ level of 100 tt
- The change in EU imports concerns **1.4% of the EU market supply** (see slide 8)
- As imports from other destinations outside the EU are more expensive than intra-EU trade, internal demand for EU sugar grows
- EU producers will supply more to the internal market, benefiting from higher intra-EU prices compared to extra-EU exports
- The internal prices for sugar will increase
- **Lower imports from UKR benefit the EU producers, while pushing internal prices up**

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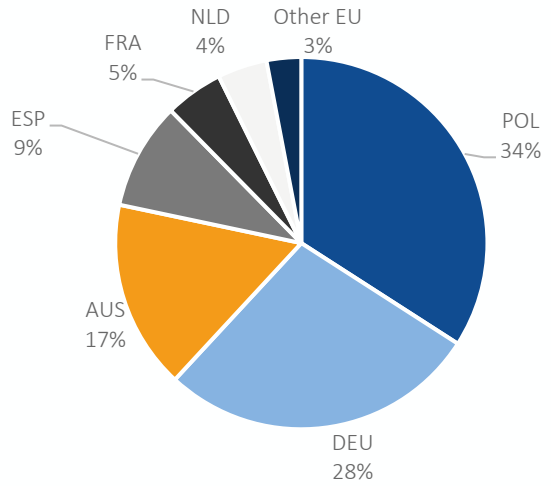
5.7. The EU internal market reaction: apple juice

EU market balance of apple juice, 2024

	Volume, tt	% of the EU production	Unit value, USD/t
Production	1,920	100%	
Intra-EU trade*	983	51%	1,096
Exports outside EU	326	17%	1,301
Imports outside EU	190	10%	1,925
Including			
UKR	78	4%	2,001
Others	112	6%	1,873
Internal market supply	1,784	93%	

Sources: own display based on Eurostat, intra-EU trade based on export data

EU imports of apple juice from UKR, 2024



Sources: own display based on Eurostat, value of imports

- **2024:** Imports from UKR played a moderate role in the EU apple juice market:
  - 4% of the EU production
  - 41% of imports from outside the EU
  - Key importers: POL (24%), DEU (28%)
- **New TRQ**: The out-of-quota duty for apple juice is high, 33%, and estimated imports from UKR will reduce by 11 tt to 66 tt, though staying above the new TRQ level of 30 tt
- The change in imports concerns about **0.7% of the EU market supply** (see slide 8)
- Imports from UKR could be replaced by internal EU production or other extra-EU imports, depending on the qualitative characteristics of the juice
- Internal prices are likely to stay stable, given the price structure of the market
- **Lower imports from UKR could benefit both domestic producers and importers**

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Financed by the Federal Ministry for Economic Affairs and Energy, 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 1: Methodology

- **The EU import change** is calculated based on:
  - The change in the EU import volume is estimated based on the GET UKR PS/03/2025 methodology. The EU import volume is assumed to be equal to the UKR export volume. The change in import volume is assumed to be distributed proportionally across the EU member states based on their imports from UKR in 2024
  - The import unit value (CIF) for the EU member states from UKR in 2024
  - The estimates are conducted for each EU member state and each TRQ separately and then aggregated across member states and products
- The discrepancy between UKR export value and the EU import value is attributed to the difference between unit values, expressed in FOB for exports and in CIF for imports
- **The EU internal market reaction** is analysed based on the market balance identity:

  EU output + Extra-EU imports = EU Internal Market Supply (Use) + Extra-EU Exports

- The reduction in imports results in one or a mix of outcomes:
  - Increase in imports from other destinations
  - Decrease in exports and reorientation to the domestic market
  - Decrease in domestic use and potentially a switch to product substitutes
  - Increase in production
- We conducted a qualitative assessment of potential changes, based on analysis of data, public sources and consultation with sector experts and businesses
- An in-depth market analysis is required for a quantitative assessment

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Annex 2: Product-level changes in the EU TRQs (1/2)

No	Description	EU imports from UKR, 2024, tt (ATMs)	New TRQ, tt	Estimated EU imports from UKR, tt (new TRQs)	Change in EU imports from UKR, tt	Change in EU imports from UKR, %
1	Beef meat	0	12	0	0	0%
2	Pork meat	0	40	0	0	0%
3	Sheep meat	0	2.25	0	0	0%
4	Poultry meat	137	120	122	-15	-11%
5	Milk, cream	3	15	3	0	0%
6	Milk powder	15	15	15	0	0%
7	Butter, spreads	1	7	1	0	0%
8	Eggs and albumins	59	18	53	-6	-11%
9	Honey	54	35	51	-3	-6%
10	Garlic	0	0.75	0	0	0%
11	Sugars	325	100	100	-225	-69%
12	Other sugars	12	30	12	0	0%
13	Wheat	6,343	1,300	1,300	-5,043	-80%
14	Barley	632	450	450	-182	-29%
15	Oats	7.7	7.7	7.7	0	0%
16	Maize	13,737	1,000	13,737	0	0%

Sources: own display based on the GET UKR PS/03/2025 methodology and Eurostat data on the EU imports from Ukraine, as retrieved on 23 November 2025; the quantity of UKR exports to the EU is assumed to be equal to the quantity of EU imports from UKR

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Product-level changes in the EU TRQs (2/2)

No	Description	EU imports from UKR, 2024, tt (ATMs)	New TRQs, tt	Estimated EU imports from UKR, tt (new TRQs)	Change in EU imports from UKR, tt	Change in EU imports from UKR, %
17	Barley groats; other cereal grains	26	33	26	0	0%
18	Malt and wheat gluten	15	17.5	15	0	0%
19	Starches	17	24.4	17	0	0%
20	Starch processed	5	8	5	0	0%
21	Bran, shaps, residues	48	85	48	0	0%
22	Processed tomatoes	25	25	25	0	0%
23	Apple juice	78	30	66	-11	-15%
24	Processed oil products	0	0.375	0	0	0%
25	Sweetcorn	1	2.25	1	0	0%
26	Sugar processed products	5	7.50	5	0	0%
27	Cereal processed products	1	3	1	0	0%
28	Ethanol	80	125	80	0	0%
29	Cigars and cigarettes	0	2.5	0	0	0%
30	Mannitol-sorbitol	0	0.15	0	0	0%
31	Flour	27	30	27	0	0%

Sources: own display based on the GET UKR PS/03/2025 methodology and Eurostat data on the EU imports from Ukraine, as retrieved on 23 November 2025; the quantity of UKR exports to the EU is assumed to be equal to the quantity of EU imports from UKR

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Annex 3: The effect on EU welfare

	EU deadweight welfare losses, USD m	as % of EU imports from UKR, 2024
Poultry meat & preparations	0.2	0.1%
Eggs & albumins	0.9	0.8%
Honey	0.5	0.5%
Sugars	5.7	2.5%
Common wheat	68.4	4.7%
Barley	0.6	0.4%
Apple juice	3.5	2.2%
Total	**79.8**	**3.1%**

Sources: own display and estimates

- The decline in imports caused by the ATMs' expiration, not entirely mitigated by the introduction of new TRQs, results in deadweight welfare losses for the EU
- These losses are estimated at USD 79.8 m or 3.1% of the EU imports from UKR in 2024
- The losses for wheat are the most pronounced, amounting to USD 68.4 m, followed by losses for sugars and apple juice

Methodology:

- The deadweight welfare losses are the net loss in total (consumer, producer and government revenues) surplus resulting from the inefficient allocation of resources, occurring due to the introduction of restrictions (in the form of TRQs) on the previously free imports
- The deadweight losses are estimated based on the changes in import quantity and import price

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Annex 4: Overview of the DCFTA revision

- The new Annex to the EU-Ukraine Association Agreement entered into force on 29 October 2025
- The parties agreed on the continued liberalisation of import duties
- The changes envisage:
  - Mutual abolishment of import duties for selected products
  - The reduction of tariff barriers for the remaining products, including:

    Expanded EU TRQs for UKR products

    Lower UKR duties and expanded TRQs for the EU products
  - Additional safeguards if the envisaged liberalisation endangers the domestic producers
  - UKR commitment to adopt and implement 22 EU production standards covering animal welfare, feed safety, wastewater treatment, pesticides, etc. by the end of 2028.

    Note: 14 out of 22 norms were listed in the AA, and 20 out of 22 have already been at least partly implemented in UKR legislation
  - The legal alignment revision and a potential further liberalisation in 2028

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Annex 5: Combined effect of the DCFTA revision

	Effect on UKR	Effect on EU
EU change	UKR exports to the EU: - USD 1,144 m UKR total exports: - USD 253 m Source: PS/03/2025	**EU imports from UKR:** **- USD 1,428 m** **Source: PB/10/2025**
UKR change	UKR imports from the EU: + USD 53.9 m (2030) Source: PS/04/2025	EU exports to UKR: + USD 41.8 m (2030) Source: PS/04/2025

Sources: own display; the difference in mirror flows is attributed to the difference in Incoterms, as export prices are FOB, and import prices are CIF

- Changes in the EU (ATMs expiration and new TRQs) have much larger trade implications than the changes in UKR

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