

**Voluntary Report** – Voluntary - Public Distribution

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**Report Name:** Ukraine Self-Imposes Export Restrictions on EU Trade

**Country:** Ukraine

**Post:** Kyiv

**Report Category:** Agricultural Situation, Sugar, Poultry and Products

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**Report Highlights:**

Matching import restrictions imposed by several EU member states on Ukrainian grains, oilseeds, and poultry, Ukraine adopted export licensing and export quotas for 2025. Ukraine's measures are designed to prevent the triggering of EU safeguard measures envisaged by EU Regulation 2024/1392.

On December 24, 2024, the Government of Ukraine (GOU) published [Decree 1481](#) establishing export quota licensing and export quotas. The GOU is requiring export licensing for the entirety of calendar year 2025, while establishing export quotas from January 1 to June 5, 2025. The Ministry of Economy of Ukraine will manage the export quotas and licensing, while the Customs Service will be responsible for monitoring and enforcement.

Ukraine imposed these voluntary export restrictions in order to avoid triggering the safeguard mechanism of the [EU's Autonomous Trade Measures](#) (ATMs). Decree 1481 is an extension of a similar decree ([link in Ukrainian](#)) that introduced licensing for calendar year 2024. The lists of countries and commodities remains the same. As the [official link](#) (in Ukrainian) to the Decree may be unavailable to some IP addresses, this report contains a copy downloaded by Post in the two attachments.

### Export Licensing

Addendum Four to Decree 1481 provides the list of agricultural commodities subject to licenses (Table 1). Licensing is compulsory for all shipments destined for Poland, Hungary, Slovakia, Bulgaria, and Romania; licensing of sunflower seeds destined for Bulgaria is non-binding.

**Table 1: List of Agricultural Commodities Subject to Export Licenses**

Products	Ukrainian HS Code (10-digit)
Wheat and meslin, other	1001 99 00 00
Corn, other	1005 90 00 00
Rape or colza seeds, whether or not broken, rapeseeds or colza with low erucic acid content, other	1205 10 90 00 1205 90 00 00
Sunflower seeds, whether or not broken, other	1206 00 91 00 1206 00 99 00

This mechanism allows the Ministry of Economy to regulate trade flows to those countries that limited and/or banned certain Ukrainian agricultural products from their markets.

### Export Quotas

The export quotas will last until June 5, 2025, when the ATMs, which provide limited increased market access over the Deep and Comprehensive Free Trade Agreement (DCFTA), expire. The quotas are equal to 5/12 of the respective arithmetic mean of import volumes recorded from July 1 to December 31, 2021, 2022, and 2023.

Addendum Five to Decree 1481 provides the list of agricultural commodities subject to export quotas (Table 2). Quotas will be distributed among domestic producers proportionate to their 2024 production volumes. A dedicated 1,165 metric tons (MT) of chicken meat is reserved for new exporters.

**Table 2: List of Agricultural Commodities Subject to Export Quotas**

<b>Product</b>	<b>Ukrainian HS Code (reduced to the internationally recognized 6-digit system)</b>	<b>Quota Size, MT</b>
Sugar	1701 12 1701 91 1701 99 1702 20 1702 90	107,238.62
Edible meat and offal of domestic poultry: chicken ( <i>Gallus domesticus</i> ), ducks, geese, and guinea fowl*	0207 11 0207 12 0207 13 0207 14 0207 41 0207 42 0207 44 0207 45 0207 51 0207 52 0207 54 0207 55 0207 60	55,536.17
Edible meat and meat offal of turkey	0207 24 0207 25 0207 26	1,565.00

\* Refer to the most recent [Poultry Annual GAIN Report](#) for more information about the EU's poultry import tariff rate quota

### *Sugar*

Post notes the GOU established a zero quota for 2024 sugar exports to the EU at the end of May 2024 in order to prevent Ukrainian exports from breaching the quota set under the ATMs. Actual sugar exports (HS 1701 and 1702) to the EU reached 313,000 MT from January to October 2024. These were slightly above the Post-estimated ATM annual quota for sugar (265,000 MT based on EU imports from Ukraine). (Note: EU Regulation 2024/1392 contains only the formula, but no actual numeric volumes, for specific commodities. End Note.) The GOU-established quota for 2025 is slightly below the estimated 5/12 of the annual EU quota (110,000 MT), presumably to avoid such a situation. Please refer to [GAIN Report UP2024-0012](#) for more information about Ukraine's sugar industry.

### *Poultry*

The five-month 2025 chicken meat export quota is equivalent 5/12 of the annual export quota of 133,282 MT adopted for 2024. Therefore, in the first five months of 2025, the Ukrainian poultry industry will retain the same access to the EU market as in 2024. Upon expiration of the ATMs, Ukraine's market access may be reduced to a respective portion of 90,000 MT (12-month quota size) as envisaged by the DCFTA, unless there is a new agreement.

**Attachments:**

[Commodity Lists \(ukr\).pdf](#)

[Resolution 1481 \(ukr\).pdf](#)