



Policy brief

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A Study of Ukrainian farmers' opinions on the EU environmental policies

Soil Management and Land Use

Policy brief based on

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Soil Management and Land Use



Research context

Ukraine's accession to the European Union (EU) requires transposing numerous European directives and standards, in particular those related to the European Green Deal (EGD), i.e. the EU roadmap for the sustainable development of Europe to make it a climate-neutral and toxin-free continent by 2050 in a fair and inclusive manner.

The EGD gives special attention to soil health and sustainable land use in agriculture, as healthy soils are the foundation for 95% of the food we eat, host more than 25% of the biodiversity in the world and are the largest terrestrial carbon pool on the planet¹.

At the same time, the state of soils in Europe is alarming: more than 60% of EU soils are in unsatisfactory condition due to erosion, loss of organic matter and other types of degradation². What is more, almost half of such “unhealthy” EU soils are used for agricultural purposes³, i.e. they lose organic carbon or receive more nutrients than necessary, are being eroded or compacted, suffer from secondary salinisation, or display a combination of these problems⁴. Scientists on the Board⁵ for the EU Mission ‘A Soil Deal for Europe’ estimate that soil degradation costs the EU at least €50 billion annually and puts food security at risk.⁴

Even though, over the past 30 years, the European Union has developed a strong legal framework for environmental protection, soils, unlike water, marine environment and air, remained the only ecosystem that was not

covered by special legislation. According to many stakeholders, this gap was one of the significant causes of systemic soil degradation in Europe⁶. The European Green Deal, in particular its EU Soil Strategy for 2030, highlights the importance of changing this “derogatory” approach by recognising soils as a key element of sustainable climate-oriented development and prioritising the development and implementation of the first-ever soil health law. In October 2025, the European Parliament voted to approve the Soil Monitoring and Resilience Directive, which set out the framework for establishing a system of harmonised soil monitoring by EU Member States⁷.

A number of important steps under the EGD Action Plan preceded the adoption of this new EU Soil Monitoring Law. In 2020, to “green” the EU Common Agricultural Policy, that is the main instrument for achieving the objectives of the EGD in the agri-food sector, the European Commission adopted the Farm to Fork Strategy. In addition, key initiatives include the EU Biodiversity Strategy for 2030 aiming at conserving and restoring ecosystems; the New Circular Economy Action Plan and EU Action Plan ‘Towards Zero Pollution for Air, Water and Soil’. Ultimately, these initiatives contributed to the reform of the EU Common Agricultural Policy (CAP): 40% of the €387 billion CAP budget for 2023–2027⁸ is to be allocated to climate-related measures and significantly support the EU's overall commitment to devote 10% of its budget to biodiversity conservation⁹.

1) Council of the European Union. Soil monitoring law: Council reaches deal with Parliament [Press release, 10 April 2025]. <https://www.consilium.europa.eu/en/press/press-releases/2025/04/10/soil-monitoring-law-council-reaches-deal-with-parliament>

2) EUSO (European Union Soil Observatory). Soil Degradation Dashboard. <https://esdac.jrc.ec.europa.eu/esdacviewer/euso-dashboard>

3) In 2020, EU farms used 157 million hectares of land for agricultural production, which is 38% of the total land area of the EU (Eurostat). More than 89% of EU agricultural soils are unhealthy.³

4) Caring for Soil is Caring for Life: Ensure 75% of soils are healthy by 2030 for healthy food, people, nature and climate: Report of the Mission Board for Soil Health and Food, Publications Office, 2020. <https://data.europa.eu/doi/10.2777/821504>

5) European Commission. Register of Commission Expert Groups: Consultation, ID 3816. <https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupID=3816>

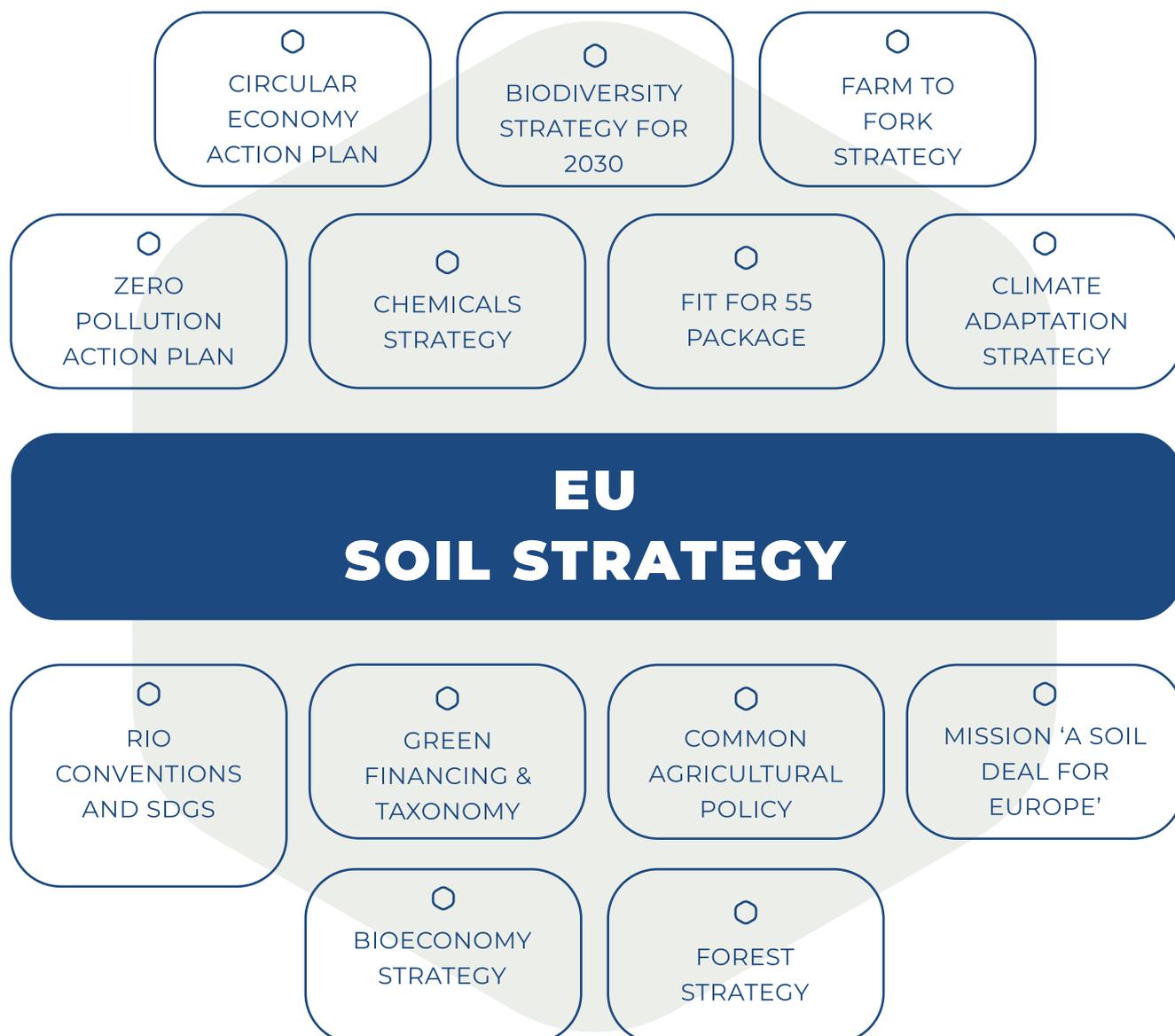
6) European Commission. EU Soil Strategy 2030 (Communication from the Commission COM/2021/699 final, 17.11.2021). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0699>

7) European Parliament. Proposal for a directive on soil monitoring and resilience [Legislative Train Schedule]. <https://www.europarl.europa.eu/legislative-train/theme-sustaining-our-quality-of-life-food-security-water-and-nature/file-healthy-soils>

8) European Commission. Common Agricultural Policy Funds [Information page]. https://agriculture.ec.europa.eu/common-agricultural-policy/financing-cap/cap-funds_en

9) European Commission. An Environmentally Sustainable CAP [Information Page]. https://agriculture.ec.europa.eu/cap-my-country/sustainability/environmental-sustainability/cap-and-environment_en

Links between the EU Soil Strategy and other EU initiatives



Source: own infographic based on the EU Soil Strategy 2030

A landmark victory within the EGD was the adoption in the summer of 2024 of the Nature Restoration Law¹⁰, which made it mandatory for EU Member States to implement practices that, among other things, aligns with six of the nine standards for good agricultural and environmental conditions of land (GAEC)¹¹.

The EGD measures presented above encompass both voluntary incentive-based instruments and legally binding regulations, combining

economic schemes for farmers with legislative requirements for EU Member States, and, in some cases, the entire European Economic Area (EEA), where the relevant EU acts are marked as having EEA relevance.

Before 2022, the scale of soil degradation in Ukraine was somewhat smaller than in Europe, amounting to 10–12 million hectares or about 20% of the country's territory¹². The 2022 Concept of Nationwide Target Programme for

10) European Parliament and Council of the EU. Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (Text with EEA relevance) (Regulation of 24.06.2024). <http://data.europa.eu/eli/reg/2024/1991/oj>.

11) According to the reformed CAP for 2023–2027, GAECs apply only to farmers who receive financial support from their states.

12) S.A. Baliuk, L.I. Vorotyntseva et al. Recommendations on the use of bottom sediments from fish farming ponds to improve the condition of agricultural lands and restore lands damaged as a result of hostilities. – Kharkiv, 2023. – 112 p. DOI:10.31073/issar9786178122799.

Ukraine's Land Use and Protection emphasised that the economic damage from soil degradation amounts to UAH 40–50 billion per year¹³. As a result of the Russian Federation's full-scale war against Ukraine, the situation has dramatically deteriorated: active hostilities have been causing the degradation of more than 15 million additional hectares of Ukrainian land¹⁴.

Currently, soil erosion affects 40% of Ukraine's territory (24 million hectares). Inefficient land use practices and intensive tillage also accelerate erosion processes. Industrial and agricultural activities have resulted in the contamination of 9–11% of arable land with heavy metals, pesticides, and other pollutants. Radioactive contamination resulting from the Chernobyl nuclear power plant accident continues to affect more than 5 million hectares of land in Ukraine, including 1.24 million hectares of arable land¹⁵.

The agricultural sector has suffered significant losses: mining and destruction in the fields, loss of farmland in the occupied territories, soil contamination and pollution. This has significantly undermined the sector's productivity¹⁶. Halting this process and restoring already depleted soils requires urgent, coordinated action by authorities at all levels, the agricultural sector, scientists, and society as a whole.

At the same time, Ukraine's policy on soil management and land use is partially aligned with EU standards, but requires further improvement. The legislative framework for environmental monitoring (including that of soils) is only partially harmonised with EU requirements, and the ongoing war complicates its implementation (it is objectively impossible to technically conduct monitoring due to security risks, the moratorium on inspections, etc.). Institutional capacity remains limited: the

European Commission highlights corruption risks and weak oversight in the area of land use, including cases of illegal land privatisation that may subsequently be legalised¹⁷.

At the same time, the latest EU Ukraine report¹⁷ recognises some progress in the country's approximation to the EU policies. In 2024, in order to align its priorities with the EU Common Agricultural Policy, Ukraine adopted a national Strategy for Agriculture and Rural Development to 2030 and a relevant action plan to 2027¹⁸. Also, for harmonisation with the EU CAP, the Integrated Administration and Control System (IACS), the digital Land Parcel Identification System (LPIS), and the Farm Sustainability Data Network (FSDN) are being rolled out together with the mandatory State Agrarian Register¹⁹, which increases the transparency of the state subsidies distribution among agricultural producers. Steps have also been taken in the field of climate and environmental policies: for example, the above-mentioned Strategy contains strategic goal 5 'Climate-oriented agriculture: climate change mitigation and adaptation'.

All the above-mentioned national-level measures make up the basis for Ukrainian agricultural producers to be able to gradually implement the European Green Deal – from organic farming to soil fertility preservation – and, in the longer term, to engage in relevant EU initiatives, despite the current wartime challenges.

13) The Cabinet of Ministers of Ukraine. On the approval of the Concept of the Nationwide Target Programme for Land Use and Protection (Decree No.70-p of 19 January, 2022). <https://zakon.rada.gov.ua/laws/show/70-2022-%D1%80#Text>.

14) Soil cover of Ukraine in the conditions of hostilities: state, challenges, activities for soil restoration: monograph; ed. S.A. Baliuk, A.V. Kucher, M.I. Romashchenko. Kyiv: Ahrarna Nauka, 2024. 340 p. DOI:10.31073/978-966-540-612-9.

15) Belis, C., Petrosian, A., Turos, O., Marenhuka, T., Morhulova, V., Kona, A., Djatkov, D., Caudullo, G., Ceccherini, G., Beck, P.S.A., San-Miguel, J., Arias Navarro, C., Wojda, P., Jones, A., Hanke, G., Mariani, G. and Carravieri, A., Status of Environment and Climate in Ukraine, Publications Office of the European Union, Luxembourg, 2025. <https://data.europa.eu/doi/10.2760/6292177>.

16) Prof. Yuriy Dmytruk, The State of Soil in Ukraine (2024). [Analytical report "The State of Soil in Ukraine" / Report, 4th EUSO Stakeholders Forum]. https://esdac.jrc.ec.europa.eu/public_path/EUSO/4rd-young-soil-researchers-forum/02_The-State-Soil-Ukraine_22.10.2024.pdf.

17) European Commission. Ukraine 2025 Report (2025 Communication on EU enlargement policy of 4 November 2025). https://enlargement.ec.europa.eu/document/download/17115494-8122-4d10-8a06-2cf275eecd7_en?file-name=ukraine-report-2025.pdf.

18) Cabinet of Ministers of Ukraine. On Approval of the Strategy for the Development of Agriculture and Rural Areas in Ukraine for the Period until 2030 and the operational plan of measures for its Implementation in 2025–2027 (Order No. 1163-p of 15.11.2024) <https://zakon.rada.gov.ua/laws/show/1163-2024-%D1%80#Text>.

19) Verkhovna Rada of Ukraine. On Amendments to Certain Laws of Ukraine Concerning the Organisational Principles of Support in the Agricultural Sector (Law of Ukraine No. 4619-IX of 08.10.2025). <https://zakon.rada.gov.ua/laws/show/4619-20#Text>.

A Study of Ukrainian Farmers' Attitudes Towards the Adoption of EU practices in Soil Management and Land Use

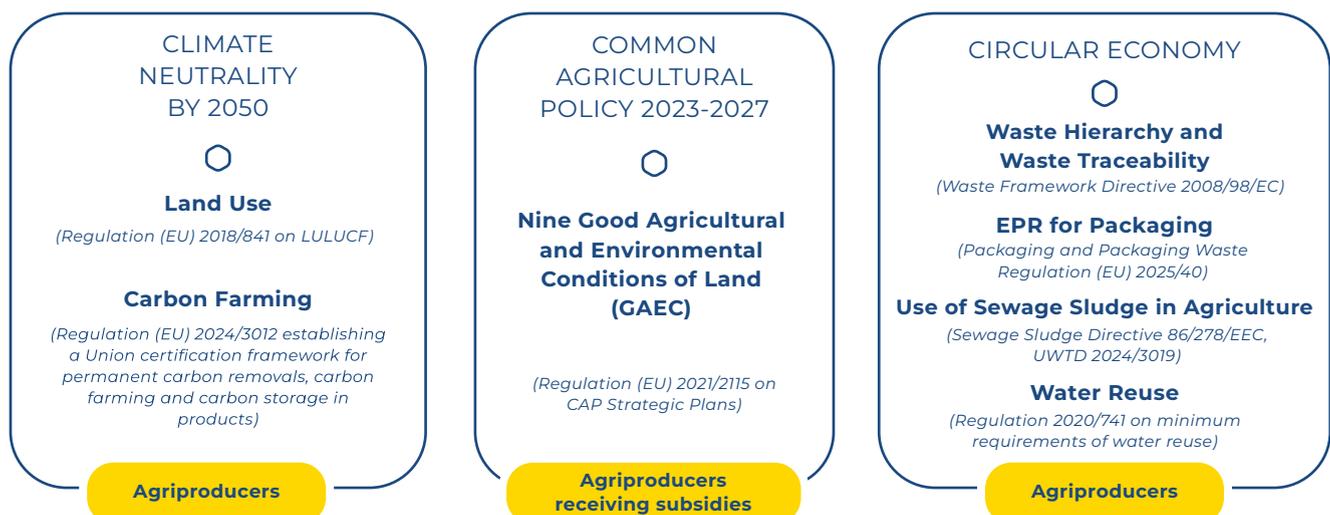
Between August and October of this year, 364 Ukrainian farmers took part in an online survey on the opportunities and barriers to implementing the requirements of the European Green Deal, in particular in the areas of soil management and land use. The questionnaire covered the following thematic sections:

- land and soil management (soil monitoring, GAEC, land use, carbon farming / agriculture),
- integrated pollution prevention and control, including best available techniques (applicable to livestock farming only),
- the circular economy and waste management.

EU strategies and legislation underpinning the survey of Ukrainian farmers in August–October 2025



SOIL HEALTH AND SUSTAINABLE LAND USE UNDER THE EGD



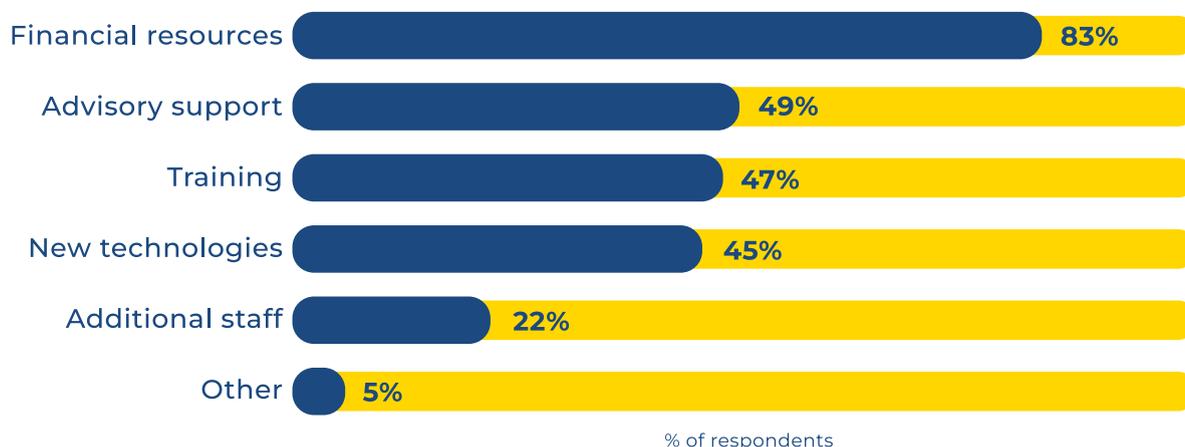
Source: author's own elaborations

Farmers' responses clearly show the common challenges and needs that arise when new practices are introduced and compliance with European standards is required. The most important ones concern the following:

- **Financial constraints.** The vast majority of challenges come down to a lack of funding. The acquisition of equipment for precision farming, construction of manure storage facilities, and soil testing – all require finance, which farmers often lack. As the figure shows, more than 80% of respondents mentioned the need for funding for environmental measures.

In their answers to the open-ended question “What do you find the most important or expect most of all from the State (Government) regarding the agricultural sector in the coming year?” farmers ask for grants, affordable loans, compensation for environmental practices, and reduced tax burdens. They specifically focus on helping small farmers and those affected by the war (frontline farmers), saying that without support, “micro-farms cannot withstand competition.” There is also a request “not to add new fines and penalties.”

Resources required for sustainable soil and land management practices among Ukrainian farmers



- **Risk of crop and profit loss. It is the second biggest fear, closely related to finance.** Farmers are anxious that environmental requirements, such as a ban on fertilising during certain periods or allocating part of their field for buffer strips, will reduce yields and income. In the absence of compensation factors, this becomes a decisive argument against many initiatives. 54% of respondents described the threat of economic losses as the main challenge in preserving biodiversity. The same is true for GAECs: for example, the ban on ploughing grasslands in protected areas or the requirement to create non-productive areas was perceived by many as “difficult to fulfil” because of the potential loss of area and yield.

- **Lack of knowledge and information.** In almost every respect, ~40–70% of participants indicated that they did not have enough information: be it about standards or about implementation methods. Many farmers are genuinely unaware of Natura 2000, manure storage requirements, best available techniques (BAT), and support programmes. For example, 67% of livestock farmers have not heard of BAT, 58% do not know about the rules of slope tillage, and 29% have not heard about the extended producer responsibility (EPR). The need for training is one of the top priorities exceeded only by money. Accordingly, around 49% and 47% of respondents pointed to these needs for implementing the practices under review, while in the biodiversity area 35% cited a lack of knowledge and examples among the key challenges. Farmers ask

for expert advice, hands-on training, and demonstrations: “knowledge and proven examples are needed to grasp the benefits of these practices.” Obviously, the development of a system of agricultural consultants and educational programmes is critical for the implementation of EU standards.

- **Insufficient infrastructure and technology.** We are referring to the lack of storage facilities (for manure and fertilisers), equipment for precision application, irrigation systems, equipment for testing, etc. 45% of respondents need new technologies – specifically, farmers mentioned the need for modern machinery for minimum tillage and equipment for recycling waste and water. Without modernising the equipment, it is difficult to achieve environmental standards, so technical support (for example, cheaper environmental technologies and equipment grants) is another request farmers have to the authorities.
- **Regulatory uncertainty.** Many responses indicate that farmers do not always understand how this or that requirement will be implemented. This fuels rumours (“extortion”, “corruption schemes”) and disheartens people. For example, 45% of the respondents are not certain whether they support mandatory monitoring of soils – many of them commented that “the purpose is not clear, what exactly the state will do with the data.” Similarly, one in three are hesitant about changing approaches to tillage on slopes or near water bodies, because they do not have information about effective methods. The answers contain a request: “spell out the rules of the game in a clear manner so that they are transparent and equal for everyone”. Consequently, the level of adoption of innovations depends on the quality of communication on the part of the authorities.

- **Law enforcement aspects.** For bodies responsible for the enforcement of environmental regulations, the survey results offer a few markers:

- 1. The low awareness of many farmers** means that a period of training / accommodation will be required before a full-fledged penalty system is rolled out – otherwise it will be perceived as hostile.
- 2. Material and technical barriers** (lack of proper infrastructure, lack of funds for investing) – without support programmes, strict enforcement may stir wide-spread discontent and even cause closing up of businesses.
- 3. Differentiation of approaches:** small and medium-sized farms are particularly vulnerable; their active involvement in the development of Green Deal policies for Ukraine’s agricultural sector is essential.
- 4. Priority areas:** there are practices that are already well-accepted (e.g. stubble burning ban and crop rotation, which are adhered to by 65% and 85% of respondents, respectively), so they may be relatively easy to enforce. At the same time, aspects such as Natura 2000 or carbon accounting are completely new, so they require at least an information campaign, and it would be premature to punish people for not complying with them without any preparation.

Key Recommendations for the Agri-Sector Working Group Involved in Ukraine's EU Accession Negotiations

The recommendations concern soil protection policies, sustainable land use, and introduction of circular economy principles and climate measures in agriculture. The focus is on helping Ukrainian policies and institutions adapt, supporting farmers in the transition period, and legislative changes and proposals for the negotiating position, including implementation stages and transition periods²⁰.

Soil Health Policy: Protection, Monitoring, and Resilience Building

- Improve the current Concept for the National Target Programme for Land Use and Protection²¹ or develop and adopt a national strategy for sustainable soil and land management to take into account the requirements of the EU Soil Monitoring Directive, additional tools of the EU Soil Strategy and CAP (GAECs).
- Establish a national soil monitoring system with up-to-date laboratory and information capabilities. Identify an authorised body (for example, under the auspices of the Soil Protection Institute) – i.e. the National Soil Monitoring Agency – with regional offices for regular sampling, holding tests that measure soil quality indicators (organic matter content, pollutants, erosion indicators, etc.), and for maintenance of a unified database.
- Harmonise the legislation of Ukraine on soil protection, in particular the Law of Ukraine “On Land Protection”²² by transposing the key provisions of the

★ Key to good governance

Build the process of developing and enforcing new rules in line with the EU Better Regulation principles, which are based on adopting legislation that is evidence-based, transparent, and effective, and that ensures stakeholder participation at all stages of policy-making. The core principles include ensuring that rules are well justified, avoiding excessive administrative burdens for citizens and businesses, and delivering tangible, sustainable, and proportionate benefits in light of the expected costs. The process covers the full policy cycle—from planning and drafting through implementation and evaluation.

*https://commission.europa.eu/law/law-making-process/better-regulation_en

recently adopted EU Directive on Soil monitoring and Resilience, in particular the definitions of the terms “soil health”, “soil health assessment”, “soil district”, “soil unit”, “soil descriptor”, “soil sealing”, etc. and introduce criteria for assessing its condition.

- Institutional strengthening and reporting. Provide the central executive body that will be appointed responsible for implementing soil monitoring policies, as well as other monitoring actors, with resources for training staff to use the European monitoring toolkit.

20) Expanded explanations and the full list of recommendations are provided in the detailed report presenting the results of the farmer survey.

21) Cabinet of Ministers of Ukraine. On Approval of the 2022 Concept for Ukraine's National Target Programme for Land Use and Protection (Decree No. 70-p of 19 January 2022) <https://zakon.rada.gov.ua/laws/show/70-2022-%D1%80#Text>.

22) Verkhovna Rada of Ukraine. On Land Protection (Law of Ukraine No. 962-IV of 19.06.2003, as amended on 08.11.2024). <https://zakon.rada.gov.ua/laws/show/962-15/ed20241108#Text>.

- Support farmers in their efforts to preserve fertility and provide soil and land use data. Introduce incentives for agricultural producers who implement soil protection practices.
- Transition periods and the negotiating position. Given that the new EU soil legislation has just been adopted (October 2025), Ukraine might offer a synchronised implementation schedule. For example, there may be a transitional period of up to 3 years from the date of accession for the full implementation of the Soil Directive – similar to the deadlines granted to Member States. During this time, Ukraine will implement pilot monitoring projects in different regions and gradually introduce the relevant standards. It would also be a good idea to initiate cooperation with the EEA countries to exchange experience in soil data gathering and soil restoration.

Climate Action: Sustainable Land Use and Carbon Farming

Legislative and political integration

- Approve and ensure the implementation of an action plan for adapting agriculture to climate change to include Good Agricultural and Environmental Conditions of Land (GAECs).
- Adopt and enforce the Resolution of the Cabinet of Ministers of Ukraine “On Aspects of the Legal Regime for the Use of Land within Peatlands and Their Potential Designated Purposes” (GAEC 2)²³.
- Enshrine in legislation the “no-debit” principle, which mandates that any emissions from the Land Use, Land Use Change and Forestry (LULUCF) sector cannot exceed the accounted removals (carbon absorption)²⁴, and develop appropriate measures to be included in the National Energy and Climate Plan.
- Improve the national inventory of greenhouse gas emissions from point, line, and area sources through the use of Geographic Information Systems (GIS).

- Enshrine in legislation the concepts of “carbon farming/agriculture”, “ecosystem services” and “ecosystem accounts”, including mechanisms for the creation and certification of carbon units and accounting for ecosystem services²⁵.

Institutional coordination and management

- Establish an interagency coordination platform (Ministry of Economy, Environment and Agriculture, State Service of Ukraine for Geodesy, Cartography and Cadastre, State Agency of Water Resources of Ukraine, State Service of Geology and Mineral Resources of Ukraine, State Environmental Inspectorate, Paying Agency, scientific institutions and public organisations, etc.).
- Promote projects aimed at strengthening institutional capacity and sharing best practices with member states of the European Economic Area whose agricultural sector is similar to that of Ukraine.
- Complete a proper inventory of peatlands on the territory of Ukraine and integrate the data into the State Land Cadastre to ensure a full and relevant account of these sites.
- Ensure proper enforcement of the current requirements of Ukraine’s national legislation:
 - restrictions on agricultural activities within buffer strips (GAEC 4),
 - ban on burning dry plants, specifying cases when it is necessary for the protection of plants (GAEC 3).

Incentives and support for farmers

- Develop an effective incentive/compensation mechanism for landowners whose land plots have been or have to be conserved.

23) Ecoaction NGO. Appeal concerning the use of peatlands of 30 January 2025. <https://ecoaction.org.ua/zvernennia-vykorystannia-torfovyshch.html>.

24) European Commission. EU Climate Action Progress Report 2024 (Commission Communication COM/2024/498 final, 31.10.2024). <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52024DC0498>.

25) Ostapchuk, S.M., Tsaruk, N.H., & Voliak, L.R. (2024). Ecosystem accounting as a component of managing Ukraine’s recovery on the basis of sustainable development. https://www.researchgate.net/publication/385114852_Ecosystem_accounting_as_a_component_of_managing_Ukraines_recovery_on_the_basis_of_sustainable_development

- Develop training materials / online courses on certified carbon farming, as well as financial tools to support farmers who engage in sustainable practices, primarily:
 - in wetlands and peatlands (GAEC 2),
 - support pastures and grasslands (GAEC 1),
 - support biodiversity (GAEC 8).

Monitoring, reporting, digitalisation

- Incorporate the matters of GAEC monitoring and control into the IACS.
- Train Payments Agency staff to increase their awareness and understanding of GAECs

Circular Economy in Agriculture: Closed Resource Loops

Recommendations:

- Draft a Strategy for the Development of Circular Economy in Ukraine until 2050, including a section on preventing waste generation from the agri-food sector (manure, plant residues, food waste) and its conversion (preparation for reuse or recycling) into fertilisers and biogas. Identify specific (with figures) fiscal and other incentives for the implementation of the Polluter Pays Principle and the development of market conditions that are of critical importance for the introduction of the waste hierarchy under the Waste Framework Directive and the Best Available Techniques (BAT).
- Introduce Extended Producer Responsibility (EPR) for packaging: develop and adopt a law on EPR for packaging and packaging waste, aligning the packaging standards for agricultural products with the new EU rules (harmonisation with the new EU Regulation 2025/40 on packaging and packaging waste²⁶, aimed to reduce the consumption of single-use plastics

and increase the percentage of recycled content recovered from post-consumer plastic waste in new products).

- Support small agricultural producers in waste management: small farms should be a focus of concern, otherwise the new environmental requirements might disproportionately impact their financial viability.
- Harmonise Ukraine's legislation with the provisions of Regulation 2020/741²⁷ on minimum requirements for water reuse and Directive 86/278/EEC on the protection of the environment, and in particular of the soil, when sewage sludge is used in agriculture²⁸: establish the limit values for the concentration of heavy metals in the soil and sludge (preferably in an annex to the Law "On Environmental Protection"²⁹); introduce the requirements for mandatory treatment of sludge before being used in agriculture; and ban the use of sludge in certain cases (in pastures before grazing, in fields for vegetables that are normally consumed raw, etc.).
- Integrate circular economy principles into consulting programmes for farmers. Develop training courses and create demo farms that could demonstrate the benefits of closed loops (for example, a farm that generates its own biogas and fertiliser from manure, or a farm that uses treated wastewater for irrigation).

For successful accession to the EU, formal transposition of European standards "on paper" only is not enough, Ukraine also has to ensure their effective practical implementation. This requires consistent institutional capacity building, strategic investment planning, and a high level of interagency coordination.

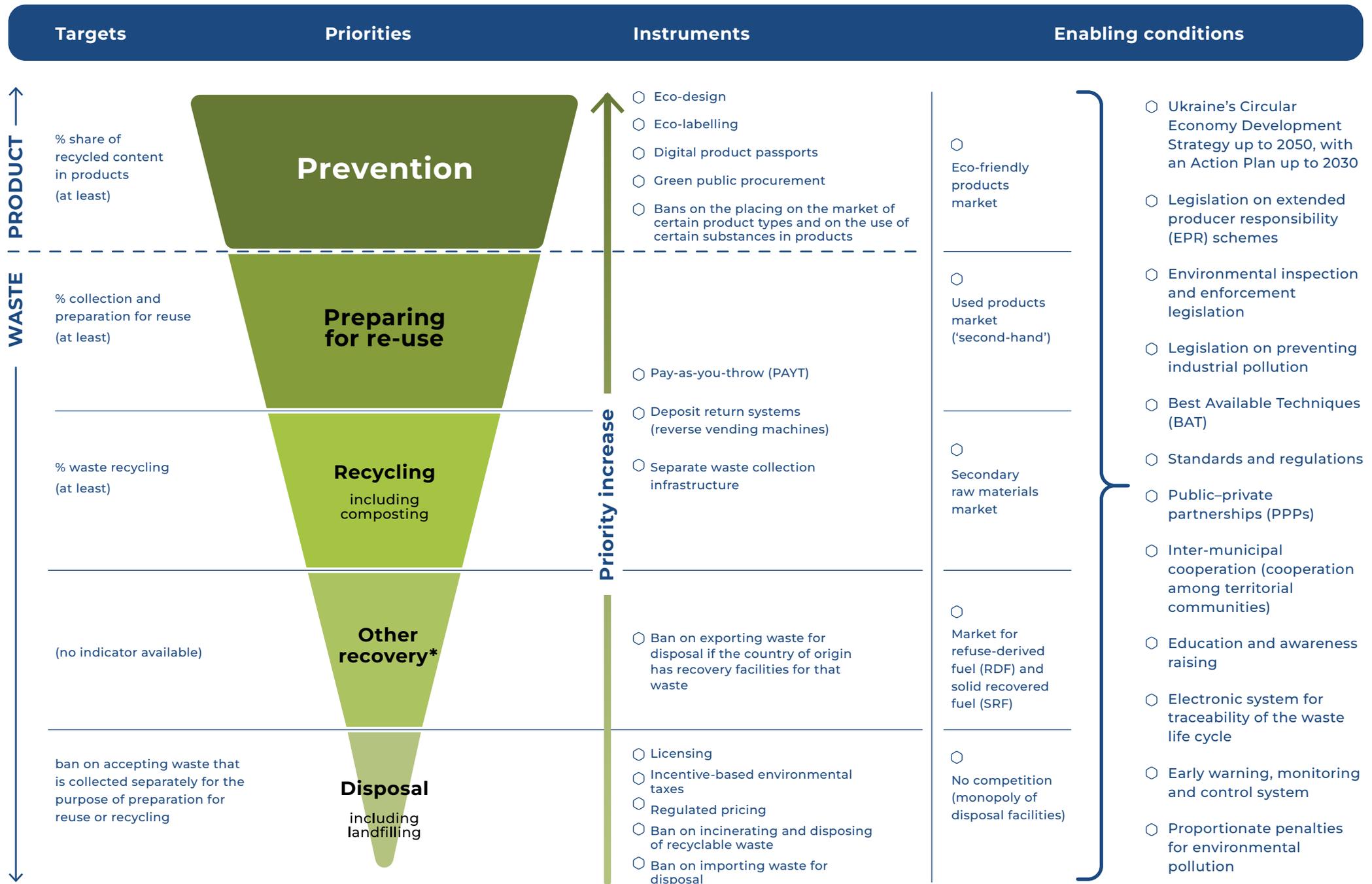
26) European Parliament and Council of the EU. Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste. <http://data.europa.eu/eli/reg/2025/40/oj>

27) European Parliament and Council of the EU. Regulation (EU) 2020/741 on minimum requirements for water reuse (Regulation of 25.05.2020). <http://data.europa.eu/eli/reg/2020/741/oj>

28) Council of the EU. Directive 86/278/EEC of 12 June 1986 on the protection of the environment, and in particular of the soil, when sewage sludge is used in agriculture. <http://data.europa.eu/eli/dir/1986/278/2022-01-01>

29) Verkhovna Rada of Ukraine. On Environmental Protection (Law of Ukraine of 25.06.1991 No. 1264-XII as amended on 08.08.2025). <https://zakon.rada.gov.ua/laws/show/1264-12#Text>

COMPONENTS OF IMPLEMENTING THE EU WASTE HIERARCHY



Priority increase ↑

*Other recovery – production of refuse-derived fuel (RDF) and solid recovered fuel (SRF), incineration with energy recovery (WtE), and backfilling.

The list of instruments and implementation conditions is not exhaustive.

Source: own infographic

As for the environmental sphere, which covers the agricultural sector too, the experience of the previous waves of EU enlargement shows that this area tends to require more transition periods than any other sector – not as in “delays”, but rather as in “reasonable stages of reform” agreed upon with the European Commission.^{30, 31}

Ukraine should be proactive: Ukraine needs to develop an accelerated implementation roadmap:

- clearly identify priorities and achievable steps (so-called “low hanging fruits”) that will quickly demonstrate progress;
- identify in advance the areas where transition periods are really needed and prepare detailed arguments based on objective quality data to justify them as well as a clear action plan specifying expected results at each stage of the reform. This may especially apply to the introduction of new EGD requirements, because we still have the “old” EU requirements to catch up with, such as those pertaining to the Nitrates Directive, sustainable use of pesticides and animal welfare.

The above recommendations are designed to strengthen Ukraine’s negotiating position with regard to the EU acquis in the field of agriculture and environment. They combine concrete steps to adapt legislation and support implementation in practice – from soil protection to modern waste management. The key is balancing ambition and realism: Ukraine must show willingness to comply with European directives, while honestly assessing challenges and proposing reasonable transition periods with a clear action plan. This approach will ensure European partners’ trust and protect the interests of Ukrainian farmers during the integration process.

Ultimately, the successful implementation of these recommendations will bring the Ukrainian agricultural sector closer to EU standards, laying the foundations for the resilient development of United Europe’s agriculture and its global agri-food leadership.

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30) Shulima, A. (2025, November 10). Not a “delay”, but rather a reform plan: How Ukraine should negotiate transition periods with the EU [Article]. European Pravda. <https://www.eurointegration.com.ua/articles/2025/11/10/7224481/>

31) European Commission. Report on the results of the negotiations on the accession of Cyprus, Malta, Hungary, Poland, the Slovak Republic, Latvia, Estonia, Lithuania, the Czech Republic and Slovenia to the European Union [EU Document]. https://enlargement.ec.europa.eu/document/download/47655a00-80ef-4452-a100-96419e67dd98_en?filename=negotiations_report_to_ep_en.pdf&prefLang=bg



UKRAINIAN CENTRE
FOR EUROPEAN
POLICY

The Ukrainian Center for European Policy (UCEP) is an independent think tank for policy analysis and development, established in 2015.

Our mission is to promote reforms in Ukraine for sustainable economic growth and to build an open society in partnership with institutions at all levels.

Priority activity areas:

- development of expert-analytical materials to promote European integration reforms in Ukraine;
- promotion of European values among Ukrainian society;
- informing the public on opportunities and benefits of close cooperation with the EU;
- promoting enhanced economic, political, and trade cooperation between Ukraine and the European Union;
- informing the international community about the challenges and achievements of Ukraine's reform process under the EU-Ukraine Association Agreement.

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