

To the Minister of Trade -  
Estonia

Brussels, 12th February 2024

**Subject: Joint request for improving the Commission's proposal for the renewal of Ukraine ATM in assistance to EU producers**

Dear Minister Riisalo,

Our six associations representing farmers and manufacturers from the sugar, cereals/oilseeds, poultry meat and eggs sectors would like to **express strong concerns regarding the impact of unlimited imports from Ukraine, and the need to stress the necessity to further improve the Commission's proposal concerning the renewal of Ukraine Autonomous Trade Measures (ATMs).**

Before going into further details, it is important for us to emphasize that the Russian aggression to Ukraine is intolerable and as the EU it is our duty, but also our interest as Europeans to continue supporting Ukrainian citizens. We thus, as producers, are ready to do our part in the EU efforts to help Ukraine. Unfortunately, we believe that this effort is currently inequitably shared among EU citizens, with the agricultural sector bearing a disproportionate and unsustainable burden.

The reality is that EU agricultural markets are highly impacted by the trade liberalisation with Ukraine. The quantities imported have more than doubled for cereals, oilseeds and poultry meat, and have been multiplied by 6 for eggs. Regarding sugar, exports from Ukraine have been multiplied by 20 for the market year 2022/2023 compared to before the trade liberalisation. Those quantities are seriously impacting EU producers (please find attached a document with concrete facts on prices, loss of markets, disturbance in trade flows and storage issues).

**The Commission published on Wednesday 31<sup>st</sup> of January the proposal for the renewal of the ATMs with important improvements, but which unfortunately will not be effective to provide the necessary relief or improve the situation on the ground and will not provide the right signal. We thus hope that at the next meeting, you will stress the importance of this issue and call for further improvement of the text, allowing for an EU solution that will deliver in preserving both the survival of European farmers and the support to Ukraine.**

This situation has simply become untenable for many producers in the neighboring countries but is also **now spreading to the rest of the EU Member States** and worsening month after month, with increasing imported quantities. We see now that farmers in France, Belgium, Germany, Austria, the Netherlands and Spain are also affected more and more.

**With the increasing number of farmers protests across the EU and general discontent across the farming community, we fear that if the solution is not effective enough to help the affected farmers, the discontent will grow and the support to Ukraine will decrease more generally. This should be avoided at all costs, especially in the buildup to the European elections.**

We would also like to express our concerns about the fact that this proposal could provide incentives to Ukrainian exporters to export as much as they can before the entering into force of the proposal in June, worsening the situation in short term. This we believe is something that should also be addressed in your discussions.

Furthermore, we also fear that by not addressing this issue at EU level, **we endanger the EU's unity and the integrity of the Single Market.**

**EU producers are ready to contribute,** if some more concrete measures are put in place to ensure their burden is lessened. **We would thus suggest that the Commission's**

**proposal be amended with the points outlined below:**

- Introduction of import thresholds for any agricultural commodity subject to trade liberalization based on the yearly or quarterly average for the combined years **2021 and 2022 with a shorter activation period of 10 days (instead of 21 days)**. We firmly believe that basing such thresholds on the years 2022 and 2023 will not deliver sufficient relief as the impact of the imports during the past two years has already exceeded all expectations and caused a lot of issues for our farmers.
- Likewise, we do not agree with the **exclusion of cereals and oilseeds** from the automatic safeguard measures. For those categories where TRQs existed before the introduction of ATMs the safeguards should be applied as well when the thresholds based on the 2021/22 average are reached.

These measures would not alleviate all the burden of our producers' shoulders and the ATM would still require a considerable effort from them, but at least it could make it more viable and ensure a better distribution of the effort to help Ukraine among all EU citizens, as well as to ensure that the Ukrainian products also find their traditional markets outside the EU.

In addition, it would also be important to question if Ukrainian farmers really benefit from this situation as traders take advantage of the situation to offer very low prices, as this study on the margins of Ukrainian farmers published by the Ukrainian Ministry of agriculture shows very well:

- <https://minagro.gov.ua/en/news/profitability-grain-and-oil-crop-production-still-decreasing-while-exports-sea-are-slowly-recovering>
- <https://minagro.gov.ua/storage/app/sites/1/uploaded-files/impact-of-the-war-on-agriculture-profitabilityissue-2.pdf>

We hope that you share our concerns and will call for further improvement to the Commission's proposal that both preserves our producers' interests and ensures sufficient support to Ukrainian citizens.

Yours sincerely,

On behalf of the following associations:

- **AVEC** – Association of Poultry Processors and Poultry Trade in the EU countries
- **CEFS** – European Association of Sugar Manufacturers
- **CEPM** – European Confederation of Maize Production
- **CIBE** – International Confederation of European Beet Growers
- **Copa-Cogeca** - the united voice of farmers and their cooperatives in the European Union
- **EUWEP** – European Union of Wholesale with Eggs, Egg Products, Poultry and Game



CC:

- Minister of Agriculture
- Agricultural Permanent Representatives to the European Union
- Trade Permanent Representatives to the European Union