



Conclusions of the 8th joint meeting of the European and Ukrainian Domestic Advisory Groups under the EU-Ukraine Association Agreement
Brussels – Kyiv, online meeting

5 November 2025

The representatives of the European and Ukrainian Domestic Advisory Groups (DAGs), set up under the Trade and Sustainable Development chapter of the Association Agreement between the European Union and Ukraine, held their 8th joint meeting on 5 November 2025.

The participants expressed their commitment to fulfilling the mandate laid down in the Trade and Sustainable Development (TSD) chapter of the Association Agreement, to monitoring the implementation of the chapter and to providing advice to the parties to the agreement.

They continued to strongly and unequivocally condemn the unprovoked, unjustifiable and unilateral armed aggression initiated by the Russian Federation against Ukraine on its independent and sovereign territory, violating the UN Charter and the global Sustainable Development Goals, as well as other international conventions.

They also took note the EU's Enlargement Package 2025 and Ukraine's country report published on 4 November 2025, and welcomed the progress made in the screening process, including on legislation under the remit of the DAG, while recognising the need to continue work and focus on the fundamentals.

The DAGs discussed the following issues:

- labour;
- the environment; and
- the economic aspects of sustainability.

With regard to trade and labour issues, the DAG members:

1. welcome the extension of the temporary protection for Ukrainians in the EU Member States until 4 March 2027, as well as the Council's recommendations on supporting the refugees, and stress that they must be granted the same rights as EU citizens when it comes to healthcare and access to the labour market; in this regard, highlight the role of social partners, who can use collective bargaining and ad hoc measures to help integrate workers and prevent them from becoming subject to exploitation and social dumping;
2. reiterate the need to uphold workers' labour rights, even in times of war, taking into account the principle of ensuring decent working conditions and social dialogue;

3. condemn the recent attacks against the rights of trade unions in Ukraine, including the arrest of the leader of Federation of Trade Unions of Ukraine and the recent seizure of the Union's building, which both violate ILO core conventions and are therefore contrary to the commitments undertaken in the DCFTA (art.289-291); emphasise that, in the current circumstances, trade unions are key in supporting displaced workers and promoting social dialogue;
4. call for the agreements concluded during the Ukraine Recovery Conference in Rome on 10-11 July 2025 to be implemented, and highlight the need to direct the joint efforts of the state, trade unions and employers towards full alignment of labour legislation to EU norms and standards, as a condition for EU membership and the integration of the Ukrainian labour market into the single European space, and the greatest possible approximation of working conditions in Ukraine to those provided to Ukrainians enjoying temporary protection in EU Member States, as a prerequisite for their return to Ukraine and participation in its reconstruction;
5. stress that the reconstruction of the country must lead to the creation of decent work and of green jobs, the reintegration in the labour market with reasonable accommodation of those injured in or experiencing mental strains due to the conflict; the need to scale up the demining of Ukraine's land to reduce health and safety risks to workers, and the respect of all health and safety standards including strict limits on asbestos exposure, proper training, and independent inspections with the effective participation of trade unions. Any changes to occupational safety and health regulations must be fully aligned with the European Union's *acquis Communautaire*;
6. point out that mobilisation of eligible men from lists of registered employees is likely to have encouraged greater undeclared work, resulting in poorer working conditions, less investment by their employer in their skills and lower productivity;
7. call on the EU to continue to support ILO technical assistance, country office and capacity building for social partners.

With regard to economic aspects of sustainability, the DAG members:

8. welcome the steps taken by the Government of Ukraine and the European Commission to review the conditions of tariff liberalisation within the framework of the EU-Ukraine Association Agreement, while requiring the gradual alignment of agricultural production standards with those of the EU including animal welfare by end 2028;
9. take note of the principle of a reinforced general safeguard clause that can be triggered in the event of market disruption in a Member State, but remain doubtful about its practical effectiveness due to the lack of automaticity and clear criteria for its triggering; call for the implementation of a robust and automatic system for monitoring imports of the most sensitive products; at the same time, recognise the importance of ensuring that it remains legally sound, transparent, and balanced while recognizing legitimate interest on both sides; in this context, particular attention should be paid to preventing regional trade restrictions through dialogue and such restrictions shall be perceived as a solution of last resort;

10. point out that the planned alignment of Ukrainian production standards, in particular on animal welfare and on plant protection products use, with EU rules by 2028 is a progress but no guarantees have been provided regarding its genuine implementation; thus call for controls on the ground and for strict traceability controls by the European Commission as well as for an increased support to Ukraine in implementing the EU animal welfare standards to ensure country's smooth integration into the EU internal market and subsequent accession;
11. call for a swift implementation of reviewed agreement guaranteeing that vital interests of Ukrainian society are respected, ensuring transparency throughout the process – including by involving civil society – and providing targeted support for sectors and communities impacted by the transition;
12. highlight that strengthening the rule of law, designing regulations that effectively address market failures while limiting compliance costs, and maintaining a business tax system that is efficient yet fiscally sustainable are key to encouraging greater domestic and foreign private investment.
13. acknowledge that Ukraine's exports are gradually transforming from raw materials to value-added products and that this progress contributes to key sustainability objectives and demonstrates the capacity of Ukrainian industry to integrate into European value and supply chains, while fully respecting the EU's environmental standards and requirements.
14. note that the production of military equipment and essential defence-related goods has stimulated the development of advanced technologies in Ukraine, notably in the IT and artificial intelligence sectors; note that there is a shared expectation that, after the war, these innovations will find wide application in civilian industries, fostering economic recovery and technological modernisation.
15. welcome the steps taken by the Cabinet of Ministers of Ukraine, which enable Ukrainian companies to start implementing reporting on the integration of sustainable development principles into their operations and agree that this will facilitate the collection of sustainability data and ensure comparability with European partners.
16. underline the importance of further efforts by the Government and the Parliament of Ukraine to align Ukraine's sanctions framework and policies with those of the European Union, with a view to strengthening control over goods originating from Russia or/and Belarus, or goods originating in third countries, but containing considerable inputs, originating in Russia or Belarus, and allowing the possible introduction of so-called "secondary sanctions" in Ukraine.
17. take note of the Steel and Metals Action Plan, the European Commission has recently proposed a new measure to replace the existing steel safeguards as of 1 July 2026, in order to provide the EU with a highly effective level of protection against negative trade-related effects caused by global overcapacities; however Ukraine is concerned that the new measure may conflict with the Regulation 2025/1153, adopted on 5 June 2025, which suspends certain provisions of

Regulation 2015/478 as regards imports of Ukrainian products into the EU. This may have a profound negative impact on existing trade flows of steel from Ukraine into the EU, underline that any safeguard measures must strike a fair balance between protecting EU industry and maintaining open, rules-based trade that supports quality jobs, workers' rights, and the green transition in both the EU and Ukraine.

With regard to trade and the environment, the DAG members:

18. reiterate concern about the significant and long-term impact of Russia's war of aggression on the environment, including the state of atmospheric air, water, biodiversity, forests, soil in Ukraine;
19. call for coordinated cooperation among the stakeholders and EU and international partners to protect and restore environments damaged by the war and to sanction environmental crimes, as they will inevitably have long-lasting consequences;
20. welcome Ukraine's ambition to align with the objectives of the EU's Green Deal, including the intention to update the national Energy and Climate plan by the end of 2025, the publication of the Action Plan to introduce Emissions' Trading System (ETS) as of 2028, and the adoption of the climate law of Ukraine;
21. draw attention to the need to ensure civil society oversight within the Ukraine Investment Pillar under the Ukraine Facility in order to guarantee that environmental standards "Do no significant harm" principle are followed; noted that environmental and climate requirements and the need to implement relevant legislation in these areas can become "red lines" to ensure that the post-war reconstruction of Ukraine is green and based on the "Build back better" and "Do no significant harm" principles; call on EU and Ukrainian authorities to operationalise both principles as enshrined in the Ukraine Facility and Ukraine Plan, in particular by applying relevant measurable indicators to monitor the implementation of the second and third elements of this instrument (Investment Framework and EU Accession Assistance);
22. underscore the need to ensure a green and socially just transition by integrating environmental policy into all sectoral development programmes and harmonising legislation in the field of sustainable development with EU standards;
23. recognise the efforts of Ukraine to comply with stringent EU legislation in the field of the environment and climate change and call on the Parties to consider ways to further support Ukraine's implementation efforts, for instance in the context of the EU's Carbon Border Adjustment Mechanism (CBAM) with the view to reducing the financial burden on Ukrainian businesses and help accumulate additional resources to partially restore the level of production affected by the war; note that Art. 30 of Regulation (EU) 2023/956 of the European Parliament and of the Council, which provides for temporary measures, can be the legal basis for the discussions; point out that this will help reduce the financial burden on Ukrainian businesses and help accumulate additional resources to partially restore the level of production affected by the war.

24. point out that Ukraine continues to take consistent steps towards the phased implementation of the necessary legal acts and IT solutions to ensure readiness for the application of the EU Deforestation Regulation (EUDR) in Ukraine; call on the European Union and Ukraine reaffirm their readiness to cooperate closely in this process to support the effective and transparent integration of Ukraine into relevant EU mechanisms.
25. welcome the start of the process of developing the National Programme for the Adaptation of the Legislation of Ukraine to the Law of the European Union (EU acquis) taking into account the results of the official EU assessment (screening) of the state of implementation of the EU acquis into the national legislation of Ukraine, and draw attention to the need to ensure proper prioritisation of measures in the field of environment and climate change;
26. draw attention to the importance of restoring nature, including the sites of national nature reserve fund, nature protection infrastructure, water bodies and soils, as an integral part of post-war reconstruction initiatives planned and implemented at the international, national and local levels;
27. express support to applying green taxonomy approach to greening the reconstruction of Ukraine and creating robust and transparent framework for green investments, including through setting legislative foundations for green recovery and investment;
28. urge the State Statistics Service of Ukraine to propose, as soon as possible, concrete ways to align national statistics with environmental and economic accounts in accordance with Regulation (EU) No. 2015/2174 and start estimating the quantity and the quality of employment in the field of environmental goods and services and to ensure comprehensive support for green jobs, including promotion of their creation and relevant technical support

With regard to institutional aspects of the Association Agreement and the Deep and Comprehensive Free Trade Area (DCFTA) affecting the effective implementation of the TSD Chapter:

29. call for the swift finalisation of the procedure to set up a group of experts on both the EU and the Ukrainian side charged with assisting in dispute settlement under the Association Agreement, according to the highest and most rigorous standards to ensure the independence and efficacy of the body;

With regard to ensuring a close dialogue and cooperation between the TSD Sub-Committee and the DAGs:

30. request the continuation of the good practice to deepen dialogue between the EU-Ukraine Trade and Sustainable Development (TSD) Sub-Committee and the Domestic Advisory Groups (DAGs), including by facilitating direct exchanges between the TSD Sub-Committee and the Chairs of the DAGs.