

# THE PATH OF EU INTEGRATION FOR BELARUS

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## **Abstract**

This paper develops a structured framework for Belarus's potential path toward European Union integration under conditions of deep structural and institutional constraints. Unlike typical enlargement cases, Belarus faces a dual transition challenge: it must simultaneously undertake internal institutional transformation and external disengagement from Russia-led integration frameworks, including the EAEU and the Union State. Building on comparative evidence from Ukraine, Moldova, and Armenia, the paper proposes a continuous, stage-based integration pathway. This framework combines an initial transition phase anchored in a CEPA-type arrangement, a core convergence phase based on the implementation of an Association Agreement and DCFTA, and a final stage of formal accession negotiations. The analysis emphasizes that successful integration requires early institutional anchoring, a clearly defined long-term trajectory, and careful synchronization of reforms with exit procedures from existing Russia-centered integration frameworks. The paper also provides an indicative timeline, suggesting that, under favorable political and institutional conditions, full integration could be achieved within a 10–15 year horizon. A central insight is that EU integration for Belarus represents a case of “integration under constraints,” where forward convergence to EU standards must be combined with backward institutional disentanglement. In this context, the Belarusian case illustrates how accession pathways can be operationalized in structurally constrained environments while remaining consistent with the formal logic of EU enlargement

JEL codes: F15, O52, P21, P27, P29

## Introduction

From today's perspective, Belarusian accession to the European Union (EU) remains primarily a political dream scenario rather than an immediate policy task. Nevertheless, analyzing such a trajectory has substantial analytical value, including making this policy option more analytically tractable and therefore more realistic. In Kruk & Karaitis (2026), we demonstrate that EU integration constitutes a coherent and economically meaningful regime shift for Belarus. That study provides a structured assessment of the macroeconomic rationale for integration and evaluates its potential consequences across different stages, including the transition period, the post-integration steady state, and long-run convergence dynamics. However, once the economic desirability of integration is established, a more operational question emerges: how can such a transformation be implemented in practice?

This question defines the central focus of the present paper. While the economic logic of integration can be articulated within standard frameworks of trade, institutional convergence, and long-run growth, translating this logic into a feasible policy pathway is substantially more complex. It requires moving from a desired outcome to a sequence of procedures, institutional adjustments, and political-economic decisions that are consistent with both domestic constraints and the formal requirements of the EU accession process. In this sense, the problem of European integration is not only analytical but also procedural and strategic.

The logic and practice of EU enlargement itself are far from uniform. Over time, the process has evolved alongside changes in the depth of European integration, the expansion of the *acquis communautaire*, and shifts in the political environment within the EU. Early waves of enlargement were characterized by relatively limited institutional requirements. The 2004 “big bang” enlargement marked a turning point, involving a large group of Central and Eastern European countries and a significantly expanded regulatory framework. Subsequent enlargements, including Croatia's accession in 2013, took place under stricter conditionality and more demanding institutional criteria. In recent years, enlargement policy has become increasingly politicized, with greater emphasis on rule-of-law conditions, institutional resilience, and geopolitical considerations. As a result, past accession experiences, while informative, are only partially applicable to current candidates. The institutional content of the *acquis* has deepened, the sequencing of reforms has become more complex, and the political economy of enlargement has changed substantially. Therefore, historical cases should not be treated as directly replicable templates, but rather as sources of partial lessons that need to be reinterpreted in the context of contemporary conditions.

At present, the most relevant empirical references are the ongoing integration processes of Ukraine and Moldova, as well as the Western Balkan countries. These cases reflect different integration logics and speeds, ranging from accelerated, geopolitically driven candidacy to more gradual and protracted accession paths. For Belarus, Ukraine and Moldova are particularly informative due to geographical proximity and partially comparable initial conditions. Importantly, these cases are unfolding in real time, allowing for the observation of emerging constraints, policy trade-offs, and institutional bottlenecks that were less visible in earlier enlargement episodes. In addition, the case of Armenia provides an example of partial and hybrid integration under constraints imposed by membership in the Eurasian Economic Union (EAEU), illustrating that limited forms of alignment with the EU may be feasible even in the presence of conflicting integration commitments.

Despite these reference points, the Belarusian case remains structurally distinct. Unlike most EU candidates, Belarus has been deeply embedded for a prolonged period in alternative integration frameworks led by Russia, including the EAEU and the Union State. These arrangements have shaped tariff policies, technical regulations, energy pricing mechanisms, and broader institutional configurations. As a result, EU integration for Belarus would not represent a marginal adjustment or continuation of an existing trajectory, but rather a fundamental reorientation – a shift between

competing integration regimes. This implies not only the need for alignment with EU standards, but also the necessity of disengagement from existing institutional commitments.

This dual constraint fundamentally differentiates Belarus from other accession cases. First, the country faces institutional lock-in effects associated with its participation in Russia-centered integration frameworks. Second, a transition toward the EU is likely to encounter political and economic resistance, including potential barriers to exiting existing agreements and disruptions in established economic linkages. Third, the domestic economic model, which is characterized by a significant role of state-owned enterprises, administrative interventions, and elements of dirigisme, implies a relatively large gap between current institutional arrangements and EU standards. Taken together, these factors suggest that Belarus represents a case of constrained or "reversal" integration, where accession requires both forward alignment and backward disentanglement.

This paper aims to develop strategic contours of a feasible pathway for Belarusian EU integration under these constraints. The central research question can be formulated as follows: how can Belarus, given its structural, institutional, and geopolitical constraints, enter and successfully navigate the process of European integration? This question extends beyond the Belarusian case and has broader analytical relevance. In this context, Belarus can serve as a particularly illustrative and informative case of how EU accession may be operationalized under conditions of deep structural and institutional constraints.

Addressing this question requires combining two analytical dimensions. On the one hand, it is necessary to assess the internal constraints that may hinder integration, including economic structure, institutional capacity, and existing external commitments. On the other hand, it is essential to map these constraints onto the formal and informal mechanisms of EU accession, ensuring that the proposed pathway remains consistent with the procedural logic of enlargement. To answer this question, the paper proceeds in several steps. First, we assess the current distance between Belarus and EU standards, providing a benchmark for the scale of required transformation. Second, we analyze relevant international cases: primarily Ukraine, Moldova, and Armenia. From their experience, we aim at extracting policy-relevant lessons regarding sequencing, institutional adaptation, and constraint management. Third, we examine the implications of Belarus's membership in the EAEU and the Union State, with a particular focus on identifying possible avenues for reconciling these commitments with elements of European integration. Finally, based on the synthesis of these analytical components, we propose a set of strategic principles for Belarus's integration pathway and outline an indicative timeline for its implementation.

A particular emphasis in the analysis is placed on the energy sector, which emerges as a critical transmission channel in the integration process. The Belarusian economy has historically benefited from preferential energy pricing arrangements, and the transition toward EU-compatible market conditions implies a substantial structural adjustment. Given the strong intersectoral linkages of energy with the rest of the economy, developments in this sector have the potential to amplify both transitional shocks and long-term adjustment dynamics. For this reason, the energy sector serves as a focal point for illustrating how the general logic of EU integration interacts with sector-specific constraints and reform requirements.

The remainder of the paper is structured as follows. Section 2 assesses Belarus's current distance from EU standards, providing a benchmark for the scale and nature of the required transformation. Section 3 analyzes relevant international cases—primarily Ukraine, Moldova, and Armenia—in order to extract lessons for sequencing and institutional design of the integration process. Section 4 develops the strategic logic of Belarus's EU integration pathway, including key constraints related to EAEU and Union State membership, and proposes an indicative timeline for implementation. Section 5 focuses on the energy sector as a critical and highly sensitive domain, illustrating how the general logic of EU integration interacts with sector-specific constraints, risks, and reform requirements. Section 6 concludes.



## 2. The Starting Point for Belarus: Compliance with European Standards

### 2.1 EU Enlargement: Formal Procedure

European integration is grounded in a formally open-access principle: any European State may apply for membership, provided it respects the Union's foundational values. This principle is codified in Article 49 of the Treaty on European Union (TEU), which links eligibility to compliance with the values set out in Article 2 TEU, including democracy, the rule of law, and respect for human rights (European Union, 2012a, 2012b). In practice, these broad legal provisions are operationalized through the Copenhagen criteria (1993), which define three overarching conditions for accession: (i) stable institutions guaranteeing democracy, the rule of law, and fundamental rights; (ii) a functioning market economy capable of withstanding competitive pressures within the EU; and (iii) the ability to assume the obligations of membership.

The accession procedure follows a structured and conditional sequence, although in practice some stages (such as screening and negotiations) may partially overlap. From a legal perspective, the procedure starts with an application submitted by a country seeking to become an EU member and includes the following steps:

1. Submission of application by the country
2. European Commission opinion
3. Decision of the EU regarding the granting of candidate status
4. Opening of accession negotiations
5. Acceptance of the negotiation framework (by the candidate)
6. Negotiations
  - a. Screening
  - b. Negotiating positions
  - c. Conclusion of negotiations
7. European Commission opinion on readiness
8. EU decision on admission
9. Signing and ratification of the Accession Treaty

The application is submitted to the Council of the European Union, which informs the European Parliament and national parliaments. Article 49 TEU also explicitly states that the conditions of eligibility agreed upon by the European Council must be taken into account. The European Commission prepares an Opinion (Avis) assessing the applicant country's readiness to proceed. On the basis of this assessment, the Member States decide whether to grant candidate status. Once the necessary conditions are deemed to be met, the Council unanimously agrees to open accession negotiations. The country then undergoes a comprehensive screening process conducted by the European Commission to assess alignment with EU law. Negotiations are then conducted chapter by chapter of the *acquis communautaire*, although the opening and closing of chapters do not necessarily follow a strictly linear sequence, covering the full scope of EU policy domains. For each chapter, progress requires not only legislative alignment but also credible administrative and institutional capacity for implementation and enforcement. Transitional arrangements may be granted in limited cases, but are subject to strict conditions and time limits. Chapters can be provisionally closed only once sufficient alignment is demonstrated, and the process culminates in the signing and ratification of an Accession Treaty by all member states. Throughout the process, progress is strictly conditional and reversible, reflecting the EU's emphasis on credible and sustained reform.

After all chapters are provisionally closed and negotiations are concluded, the Commission provides an assessment of the country's readiness for membership. This leads to a unanimous decision by the Member States to admit the new member, subject to the consent of the European Parliament. Finally, an Accession Treaty is signed and ratified by all Member States and the acceding country. The formal logic of accession thus combines treaty-based provisions (Article 49 TEU), substantive eligibility criteria (Copenhagen criteria), and an institutionalized negotiation process coordinated by the Commission and governed by the Member States.

## **2.2. EU Enlargement: De Facto Procedure**

While the framework described above accurately reflects the formal, legally codified stages of accession, it does not fully capture the broader political and institutional dynamics of EU enlargement. In practice, the accession process rarely begins in a substantive sense with the submission of a formal application. Rather, the application typically marks the transition to a visible and legally structured phase of a process that has already been unfolding over a longer period. This earlier phase can be described as the pre-accession phase, which, although not codified in a single legal instrument, plays a critical role in shaping the feasibility and trajectory of accession.

Substantively, this preparatory stage encompasses at least two interrelated dimensions. The first is alignment and coordination with the European Union. This involves the establishment of a stable political dialogue, the development of a shared understanding of the prospective integration path, and an implicit assessment by EU institutions and Member States of the country's readiness to move forward. Although Article 49 TEU does not formally require prior approval before submitting an application, in practice countries rarely apply without prior signaling and engagement with the EU, given that subsequent decisions depend on unanimous agreement among Member States and on the Commission's assessment. The second dimension is domestic preparation. This includes the initial alignment of national legislation with EU law, strengthening of administrative and regulatory capacity, institutional reforms, and the development of mechanisms necessary for the implementation and enforcement of the *acquis*. It is at this stage that many of the most complex and resource-intensive transformations are undertaken. Without sufficient progress in this preparatory phase, the formal stages of the accession process – ranging from the Commission's Opinion to negotiations across *acquis* chapters – are likely to be delayed, constrained, or rendered politically unviable.

From an analytical perspective, it is therefore essential to distinguish between the formal and *de facto* logics of accession. The formal framework begins with the submission of an application and proceeds through candidate status, screening, negotiations, and ultimately accession. In contrast, the *de facto* process often begins earlier, with political alignment and institutional preparation preceding the formal application. The summary of the *de facto* procedure can be presented as follows:

1. Preparation phase (pre-accession)
  - a. Institutional reforms
  - b. Initial integration of the *acquis* at the national level
2. Submission of application
3. Screening and negotiations
  - a. Screening procedures
  - b. Implementation of the *acquis Communautaire*
  - c. Negotiations
4. Accession

Depending on the model of integration, this pre-accession phase may involve substantial structural reforms, including strengthening the rule of law, reforming public administration, establishing independent regulatory institutions, and initiating sectoral harmonization. These transformations are

frequently decisive for the overall success of the accession process, as they determine the country's capacity to navigate and complete the formal stages. In this sense, the formal procedure provides the legal architecture of accession, while the pre-accession phase underpins its practical feasibility.

### **2.3. The Role of Acquis Communautaire**

The *acquis communautaire* constitutes the operational core of European standards and serves as the benchmark to be implemented by the candidate country. The *acquis* encompasses the full set of rights and obligations binding on EU member states, including primary law (the TEU and the Treaty on the Functioning of the European Union), secondary legislation (regulations, directives, and decisions), the jurisprudence of the Court of Justice of the European Union, and a broad range of policy frameworks governing the internal market, competition, energy, environment, and public administration. In this sense, the *acquis* can be understood as a detailed specification and institutionalization of the Copenhagen criteria, translating high-level principles into concrete legal, regulatory, and administrative requirements.

Operationally, the *acquis* is divided into 35 negotiating chapters (Chapters of the *Acquis* – Enlargement and Eastern Neighborhood, 2012), each corresponding to a specific policy domain, such as free movement of goods, competition policy, energy, taxation, or judiciary and fundamental rights. These chapters can be interpreted in a simplified manner as reflecting six thematic clusters used in the EU accession framework (European Commission, 2025): (i) Fundamentals (including judiciary and fundamental rights, justice, public administration, and financial control); (ii) Internal Market (free movement of goods, services, capital, company law, competition, financial services, consumer protection); (iii) Competitiveness and Inclusive Growth (taxation, economic and monetary policy, social policy, enterprise and industrial policy, digital transformation); (iv) Green Agenda and Sustainable Connectivity (transport, energy, trans-European networks, environment and climate); (v) Resources, Agriculture and Cohesion (agriculture, rural development, food safety, fisheries, regional policy, budgetary provisions); and (vi) External Relations (trade policy, foreign, security and defence policy). This structure operationalizes the Copenhagen criteria by linking (a) economic convergence to internal market and competitiveness clusters, (b) institutional and rule-of-law requirements to the fundamentals cluster, and (c) sectoral and policy alignment to thematic clusters covering sustainability, connectivity, and external relations. This grouping highlights that the *acquis* is not a fragmented checklist, but a coherent system translating high-level accession criteria into operational policy domains. The accession process is therefore effectively structured as a process of progressive alignment with the *acquis* across these domains. Screening exercises identify gaps between national legislation and EU requirements, while negotiations define the pathways, timelines, and institutional changes needed to close these gaps.

A critical feature of this framework is that compliance with European standards extends well beyond formal legal transposition. The EU places strong emphasis on effective implementation and enforcement, reflecting lessons from previous enlargements, particularly in Central and Eastern Europe. In these cases, successful integration depended on deep structural reforms, including the establishment of independent regulatory institutions, credible competition policy frameworks, and functioning market mechanisms.

Economic evidence from past enlargement rounds indicates that the benefits of EU accession—such as increased investment, productivity growth, and income convergence—are closely linked to the depth and credibility of institutional reforms undertaken prior to membership. In this sense, the *acquis* operates not only as a legal framework, but also as a mechanism of economic convergence, shaping incentives, reducing uncertainty, and anchoring expectations (IMF, 2024; World Economic Forum, 2024).

At the same time, the accession process is inherently asymmetric. Candidate countries are required to fully adopt the *acquis* without participating in its design prior to accession. This creates strong incentives for front-loaded reforms but also implies significant administrative, political, and

economic costs. The experience of previous enlargements suggests that the speed and sustainability of convergence critically depend on state capacity, policy coherence, and the ability to manage distributional consequences of reform.

Thus, European standards should be understood not as a static regulatory checklist, but as a comprehensive framework for institutional and economic transformation. Their role in the accession process is both procedural—structuring negotiations and conditionality—and substantive, defining the trajectory of convergence toward the EU’s economic and governance model.

## **2.4. Belarus: Measuring the Distance from the European Standards**

### 2.4.1 EaP Index as the Tool for Measurement

A direct and comprehensive assessment of a country’s proximity to the EU acquis is inherently complex and resource-intensive. In practice, such an evaluation requires a systematic, chapter-by-chapter screening of national legislation against the evolving body of EU law. This process is typically conducted within the formal accession framework by the European Commission or through detailed national pre-screening exercises. It entails not only identifying formal legal alignment, but also assessing institutional capacity, enforcement mechanisms, and practical implementation. As a result, a full-fledged measurement of convergence with the acquis is less an analytical exercise and more a procedural undertaking embedded in the accession process itself.

At the same time, there is no single comprehensive and universally accepted methodology that would allow for an exhaustive, comparable, and static measurement of acquis alignment outside this procedural context. This reflects both the breadth and the dynamic nature of the acquis. On the one hand, EU law is continuously evolving, with new directives, regulations, and jurisprudence regularly updating the scope of required alignment. On the other hand, domestic legal systems are also in flux, particularly in transition economies, where reforms may be partial, uneven, or subject to reversal. Moreover, formal legal approximation does not necessarily translate into effective implementation, creating a persistent gap between *de jure* alignment and *de facto* outcomes. These factors collectively limit the feasibility of constructing a fully standardized and comparable metric of acquis convergence across countries and over time.

Against this background, the Eastern Partnership (EaP) Index (Eastern Partnership Civil Society Forum, 2025a) provides a practical and analytically grounded framework for assessing countries’ proximity to European standards in a comparative and tractable manner. The index was specifically designed to address the need for a structured, cross-country evaluation of reform progress among the EU’s Eastern partners, without requiring the full procedural depth of formal accession screening. Its core objective is to approximate the degree of alignment with EU norms and practices by combining a broad set of indicators that capture both formal policy convergence and elements of implementation.

Conceptually, the EaP Index operates as an intermediate analytical tool between high-level qualitative assessments and full legal-institutional screening. It translates the multidimensional nature of European integration into a set of comparable metrics, allowing countries to be benchmarked both across peers and over time. This longitudinal and cross-sectional comparability is a key feature of the index, enabling the identification of reform trajectories, stagnation periods, and divergence patterns since its initial implementation in 2011.

Importantly, the index is not intended to replicate the acquis-based negotiation framework; however, it remains closely linked to the acquis and is grounded in its underlying logic of policy alignment and institutional convergence. Rather, it serves as a diagnostic instrument, highlighting areas of relative strength and weakness across key domains relevant for EU integration. In doing so, it provides a structured entry point for policy analysis, helping to identify priority reform areas and systemic bottlenecks. For countries without an active accession track – such as Belarus – this type of tool is particularly valuable, as it allows for an evidence-based assessment of alignment with European standards in the absence of formal screening procedures.

Over time, the EaP Index has evolved to reflect both changes in EU policy priorities and lessons learned from previous rounds of measurement. While its core architecture has remained stable, successive iterations have refined indicators, expanded coverage, and improved the balance between de jure and de facto dimensions of convergence. As such, the index represents a cumulative effort to operationalize the concept of European integration readiness in a way that is both methodologically robust and practically applicable.

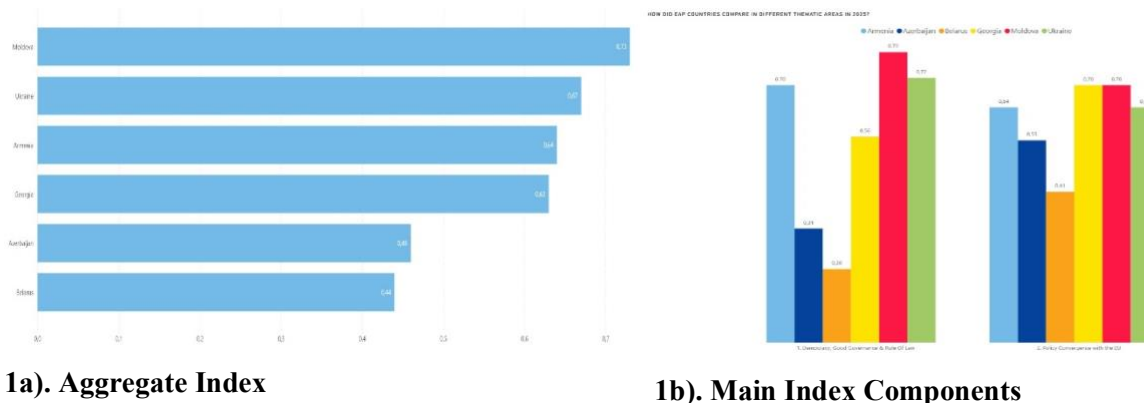
Methodologically, the EaP Index is constructed as a composite indicator combining both quantitative and qualitative inputs (Eastern Partnership Civil Society Forum, 2025b). Its empirical foundation rests on a large-scale expert survey complemented by systematic desk research, drawing on national legislation, official statistics, and international data sources. The 2025 edition, for example, is based on a detailed questionnaire comprising several hundred individual indicators, completed by country experts from the civil society sector, whose assessments are subsequently validated through peer review and cross-country comparison. This approach allows the index to capture not only formal legal developments but also the practical realities of implementation, including informal constraints and institutional performance gaps.

The structure of the index reflects a hierarchical conceptual framework. At the highest level, it aggregates performance across three core dimensions: democracy, good governance and the rule of law; policy convergence with the European Union; and sustainable development. Each of these dimensions is further disaggregated into thematic sub-indicators, which are scored on a standardized scale and aggregated using consistent weighting rules. For the purposes of this study, particular attention is paid to the second dimension—Policy Convergence with the European Union—as it most directly captures the extent of alignment with EU economic and regulatory standards. Within this dimension, three sub-components are of primary relevance: (2.1) Market Economy and DCFTA, which reflects the functioning of market institutions, competition policy, and trade integration; (2.3) Energy Policy, which captures regulatory convergence and structural reforms in the energy sector; and (2.4) Environment and Climate Policy, which reflects alignment with EU environmental acquis and climate-related commitments. These areas collectively provide a focused lens for assessing the structural and sectoral dimensions of convergence most pertinent to the Belarusian case. This design ensures internal coherence while preserving sufficient granularity to identify specific areas of progress or stagnation. In the construction of the index, benchmark values (typically normalized to 1) are generally derived from the corresponding performance of Lithuania. This choice reflects both substantive and methodological considerations. On the one hand, Lithuania, as a fully integrated EU member state, represents compliance with the acquis and thus provides a meaningful reference point for convergence. On the other hand, as a relatively recent member state and a former Soviet economy, it offers a degree of structural comparability with Eastern Partnership countries. Consequently, the distance of a given country's score from the benchmark value of 1 can be interpreted as the distance from EU-consistent outcomes along a specific indicator.

Importantly, the methodology explicitly accounts for the distinction between de jure and de facto convergence. By combining factual indicators with expert-based qualitative assessments, the index is able to capture discrepancies between formal legislative alignment and actual enforcement outcomes. While this approach inevitably introduces some degree of subjectivity, it is widely regarded as a necessary trade-off in the analysis of complex institutional transformations, particularly in transition contexts where purely quantitative metrics often fail to reflect underlying realities.

#### 2.4.2. EaP Index for Belarus: Data and Facts

In 2025 EaP Index, Belarus is ranked among the lowest-performing countries in the Eastern Partnership region, forming a distinct group of laggards together with Azerbaijan. Its overall index score remains significantly below that of the leading countries – Moldova, Ukraine, Georgia, and Armenia – indicating a structural gap in terms of integration towards the EU standards (see Figure 1a). This divergence is not marginal: rather, it reflects a persistent and systemic distance from EU-oriented reform paths, as captured by the composite nature of the index.



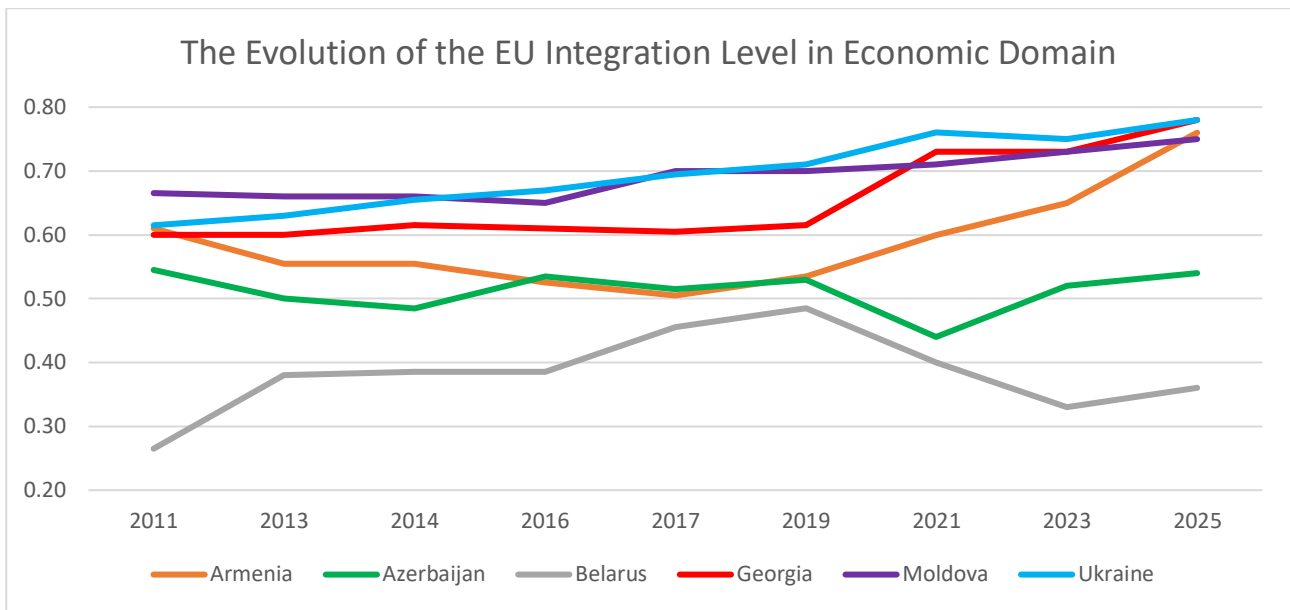
**Figure 1. EaP Index-2025 and Its Components**

Source: Eastern Partnership Civil Society Forum (2025a).

Importantly, this position of Belarus cannot be explained solely by weaknesses in the domain of democracy, governance, and the rule of law, although these remain substantial. The decomposition of the index into its main components (see Figure 1b) shows that Belarus also underperforms in the dimension of policy convergence with the European Union. This is a critical observation, as it points to deficiencies not only in political and institutional fundamentals, but also in the alignment of economic, regulatory, and sectoral policies with EU standards. In other words, the gap is not confined to “fundamentals,” but extends to the core areas of acquis-related convergence, suggesting a broader pattern of institutional and policy divergence.

The dynamics of Belarus’s performance in the EaP Index over time reveal a persistent pattern of structural lagging combined with episodic, yet ultimately limited, improvements (see Figure 2). Throughout the entire observation period, Belarus remains among the lowest-performing countries, forming a distinct cluster with Azerbaijan and consistently trailing behind the group of more advanced reformers such as Moldova, Ukraine, and Georgia. This positioning reflects not merely cyclical fluctuations, but a stable divergence in the underlying model of economic and institutional development.

A period of partial and selective improvement can be identified in 2016–2019. During these years, Belarus demonstrated some progress in specific elements of market regulation, including aspects of competition policy, financial sector regulation, and selected areas of sectoral cooperation. In particular, earlier reforms and regulatory adjustments, such as the gradual implementation of international banking standards and preparatory work on competition policy frameworks, contributed to a relative strengthening of formal indicators. However, these improvements were fragmented and did not amount to a systemic transformation of the economic model. Even at that stage, maintaining the existing institutional setup often represented the most tangible outcome, rather than a consistent forward movement toward EU standards.



**Figure 2. The Dynamics of Economic Component of EaP Index**

Note: Due to multiple revisions of the EaP Index methodology over time, the reported values for the economic component of the Index, are not fully comparable across years. Nevertheless, they provide a sufficiently consistent basis to approximate the direction and relative magnitude of changes over time, allowing for a cautious interpretation of temporal dynamics.

Source: Own computations based on EaP-Index.

Crucially, even during this comparatively favorable period, Belarus exhibited persistent structural gaps in key domains of policy convergence. Trade policy remained one of the most significant areas of divergence. The country showed limited progress in aligning with EU frameworks in areas such as technical barriers to trade (TBT), sanitary and phytosanitary measures (SPS), and customs procedures. This was closely associated with Belarus's increasing reliance on the EAEU as the primary regulatory benchmark. While certain EAEU norms are partially based on international or even European standards, the overall institutional logic, governance mechanisms, and trajectory of convergence differ substantially from those embedded in the EU acquis. Similarly, the domain of competition and state aid represents a long-standing weakness. Despite the existence of formal legislation, the practical framework is characterized by a high degree of state intervention, the dominance of state-owned enterprises, and the absence of an independent authority responsible for enforcing competition policy. Over time, the role of the state has expanded further, with growing reliance on direct and indirect support mechanisms for SOEs, including directed lending, tax arrears, and other quasi-fiscal instruments. These practices undermine competitive neutrality and limit the development of a market-based environment. Other areas of persistent divergence include energy policy and sectoral regulation more broadly, where the absence of EU-type liberalization logic and regulatory independence constrains convergence. In parallel, domains related to governance, justice, and institutional accountability reflect a structurally different model, which is not only weakly aligned with EU standards but, in many respects, incompatible with them.

An important analytical insight emerging from the data is that Belarus's trajectory should not be interpreted solely as slow convergence. Rather, it increasingly reflects movement along an alternative regulatory path. In many domains, policy development has been oriented not toward approximation with the EU acquis, but toward alignment with the regulatory and institutional frameworks of the EAEU and Russia. This is particularly evident in trade policy, technical regulation, and elements of sectoral governance. As a result, the gap with EU standards is not only maintained, but in some areas structurally reinforced. Another defining feature of Belarus's trajectory is the growing divergence between *de jure* and *de facto* convergence. While certain elements of legislation formally incorporate international norms, their implementation is often partial, inconsistent, or overridden by

administrative practices. This creates a widening gap between formal compliance and actual policy outcomes, particularly in areas such as competition policy, state aid, and regulatory enforcement. The period 2020–2022 marks a clear turning point in this trajectory. The termination of earlier reform initiatives, most notably the suspension of the competition development measures, combined with the expansion of state intervention and support for state-owned enterprises, signaled a shift away from even limited convergence efforts. The broader political and economic environment, including the impact of sanctions and increasing international isolation, further reinforced these trends. As a result, the dynamics of convergence with EU standards not only stalled, but reversed in a number of domains.

In the subsequent period (2022–2025), these tendencies became institutionalized. The economic model evolved toward a more centralized and dirigiste system, characterized by the growing role of the state in resource allocation, investment decisions, and sectoral coordination. Policy adjustments during this period were largely driven by the need to stabilize the economy under sanctions, rather than to advance structural reforms. Institutional changes that did occur were either incremental or driven by obligations within the EAEU framework, rather than domestic reform agendas. At the same time, integration with Russia and within the Union State and EAEU frameworks deepened significantly. What had previously been a gradual drift became a dominant structural feature of the Belarusian economic model. Integration shifted from a programmatic and declarative stage toward the establishment of functioning institutional mechanisms, including joint industrial projects, financial arrangements, and technological cooperation. This process was selective – concentrated in priority sectors such as industry and technology – but increasingly systemic in its implications. In parallel, the growing role of security considerations further reshaped economic policy choices, reinforcing dependence and reducing policy autonomy.

A complementary way to interpret these dynamics is through the lens of cumulative progress and the remaining distance to the benchmark. Over the full observation period, Belarus has closed only a limited portion of the gap toward the reference level, with progress significantly lagging behind most peer countries. At the same time, the remaining distance to the benchmark remains substantial, indicating that the country still faces one of the largest convergence gaps in the region. This combination of modest cumulative gains and a persistently wide gap underscores the structural nature of Belarus’s divergence from EU-oriented development trajectories. Taken together, these developments suggest that Belarus’s trajectory can be characterized not simply as delayed convergence, but as a transition from lagging to structural divergence. The evolution of its institutional and policy framework increasingly reflects a process of lock-in within an alternative regulatory system, making future convergence with EU standards more complex and path-dependent.

The disaggregated structure of the EaP Index-2025 provides a more granular view of Belarus’s current position, allowing one to identify not only the overall gap, but also its specific sources (see Table 1). Consistent with the broader structural dynamics outlined above, the most pronounced areas of underperformance are concentrated in trade policy, energy (particularly its institutional setup), and the domains of competition and state aid.

**Table 1. EaP-Index 2025: Detailed Scores**

	ARM	AZE	BLR	GEO	MDA	UKR	MV*	BMV**
<b>2.1 Market Economy [score]</b>	<b>0.76</b>	<b>0.54</b>	<b>0.36</b>	<b>0.78</b>	<b>0.75</b>	<b>0.78</b>	0.72	-0.36
2.1.1 Market economy and DCFTA	0.80	0.67	0.39	0.76	0.79	0.76	0.76	-0.37
2.1.1.1 Competition policy and state aid	0.93	0.65	0.40	0.69	0.76	0.88	0.78	-0.38
2.1.1.2 Private property	0.82	0.67	0.34	0.89	0.70	0.62	0.74	-0.40
2.1.1.3 Intellectual property rights (IPRs)	0.65	0.69	0.42	0.69	0.90	0.77	0.74	-0.32
2.1.2 Trade policy convergence	0.71	0.48	0.26	0.76	0.62	0.86	0.69	-0.43
2.1.2.1 Technical Barriers to Trade (TBT)	0.70	0.45	0.10	0.88	0.70	0.83	0.71	-0.61

2.1.2.2 Sanitary and phytosanitary measures	0.71	0.48	0.42	0.60	0.65	1.12	0.71	-0.29
2.1.2.3 Customs and trade facilitation	0.71	0.51	0.26	0.79	0.52	0.64	0.63	-0.37
2.1.3 Sectoral cooperation	0.78	0.47	0.43	0.82	0.84	0.72	0.73	-0.30
2.1.3.1 Financial services and movement of capital	0.55	0.49	0.49	0.91	0.82	0.80	0.71	-0.22
2.1.3.2 Digital Services	1.00	0.45	0.36	0.73	0.86	0.64	0.74	-0.38
<b>2.3 Energy Policy</b>	<b>0.58</b>	<b>0.74</b>	<b>0.51</b>	<b>0.65</b>	<b>0.73</b>	<b>0.64</b>	0.67	-0.16
2.3.1 Institutional framework of energy market	0.39	0.61	0.08	0.49	0.66	0.57	0.54	-0.46
2.3.1.1 Independent energy regulators	0.67	0.50	0.00	0.83	0.67	0.50	0.63	-0.63
2.3.1.2 Energy market competitiveness	0.50	0.33	0.00	0.63	0.63	0.38	0.49	-0.49
2.3.1.3 Energy distribution and connections	0.00	1.00	0.25	0.00	0.67	0.83	0.50	-0.25
2.3.2 Energy Security	0.63	1.00	0.75	0.75	0.75	0.75	0.78	-0.03
2.3.3 Renewable Energy	0.61	0.81	0.45	0.79	0.69	0.65	0.71	-0.26
2.3.4 Energy efficiency	0.67	0.54	0.76	0.57	0.82	0.60	0.64	0.12
<b>2.4 Environment and climate policy</b>	<b>0.55</b>	<b>0.54</b>	<b>0.46</b>	<b>0.57</b>	<b>0.57</b>	<b>0.51</b>	0.55	-0.09
2.4.1 Environmental policy	0.37	0.57	0.41	0.47	0.63	0.59	0.53	-0.12
2.4.1.1 Comprehensiveness of strategy documentation	0.00	0.06	0.06	0.06	0.81	0.50	0.29	-0.23
2.4.1.2 Adoption by parliament/government of sectoral environmental strategies	0.60	0.70	0.70	0.60	0.90	0.30	0.62	0.08
2.4.2 Climate Change	0.73	0.50	0.50	0.67	0.50	0.42	0.56	-0.06

Note: Cells are color-coded according to performance thresholds: red (score below 0.3), orange (0.3–0.5), yellow (0.5–0.7), and green (above 0.7), reflecting increasing levels of alignment with EU standards.

\* The column ‘MV’ represents the mean value across 5 EaP countries excluding Belarus; \*\* - the column ‘BMV’ indicates the deviation of Belarus’s score from the 5-country average benchmark.

Source Eastern Partnership Civil Society Forum (2025a), own calculations.

A closer look at the underlying indicators helps to specify the sources of these weak scores. In trade policy, the sharpest gaps are concentrated in TBT, where Belarus scores particularly poorly due to the absence of affiliation with key European standardization bodies, the lack of direct harmonization with EU product safety and market surveillance legislation, and the fact that only a very small share of technical regulations is based on EU rules. In customs and trade facilitation, the country retains electronic procedures and selected modern instruments, but remains outside the WTO Trade Facilitation Agreement, the Common Transit framework, and EU-compatible customs arrangements. In competition and state aid, the weakness stems not from the absence of any legal basis, but from the lack of an independent competition authority, the absence of a transparent state aid register, and the proliferation of opaque support mechanisms for SOEs. In energy, the institutional gap is even more explicit: Belarus scores near zero on independent regulation and market competition, reflecting the continued dominance of vertically controlled and administratively managed arrangements. These examples show that the weakest domains are underpinned not by isolated technical omissions, but by broader institutional choices.

In the area of trade policy convergence, Belarus exhibits the deepest and most systematic gaps. However, these weaknesses are not primarily the result of administrative incapacity, but rather reflect the country’s integration within an alternative regulatory framework, namely, the EAEU. In practice, technical regulations, conformity assessment procedures, and customs rules are largely aligned with EAEU norms, which only partially overlap with EU standards and differ in their institutional logic and enforcement mechanisms. As a result, Belarus’s low scores in this domain largely capture a

misalignment of regulatory anchors rather than an absence of formal rules. Importantly, this implies that, under a change in the integration framework, the direction of convergence could be altered. However, such a transition would not be automatic: the revision of technical standards, regulatory procedures, and certification systems represents a complex and resource-intensive process that would require sustained administrative effort.

A different type of constraint is observed in the domains of competition policy and state aid, as well as energy. Here, the gap with EU standards is rooted in the underlying economic model. In the domain of competition, despite the existence of formal legislation, the practical environment is characterized by a dominant role of the state, widespread use of direct and indirect support mechanisms for state-owned enterprises, and a lack of transparency in the allocation of such support. Over recent years, these tendencies have intensified, with expanding use of directed lending, quasi-fiscal instruments, and ad hoc interventions aimed at maintaining the financial stability of key enterprises. Moreover, the institutional capacity and independence of competition authorities remain limited, and the policy focus has shifted away from promoting competition toward preserving stability within the existing economic structure. As a result, the gap in this domain reflects not only regulatory shortcomings, but also a fundamentally different policy paradigm. The situation in the energy sector reveals similarly deep-rooted constraints, particularly in its institutional dimension. The absence of independent regulators, limited competition in energy markets, and the persistence of administratively determined pricing mechanisms stand in contrast to the liberalization principles embedded in the EU acquis. Moreover, energy policy is closely intertwined with broader patterns of economic governance and external dependence, including long-standing structural ties with Russia. This further constrains the scope for convergence, as energy sector reforms would require not only regulatory changes, but also a reconfiguration of underlying economic and geopolitical relationships.

Taken together, these patterns suggest a clear differentiation between types of divergence. In the case of trade policy, the gap is primarily driven by alignment with an alternative regulatory framework and can, in principle, be addressed through administrative and technical adjustments, albeit at significant cost. In contrast, the gaps observed in competition policy and energy are structural in nature, reflecting deeply embedded features of the current economic model. Addressing them would require more fundamental changes in policy orientation, institutional design, and the role of the state in the economy. For this reason, these domains should be considered priority areas for any future strategy aimed at advancing convergence with EU standards.

### 3. EU-integration Experience of other CIS-countries and Lessons for Belarus

#### 3.1. The Case of Ukraine and Moldova

##### 3.1.1. Key Milestones of the EU Integration Path

The integration paths of Ukraine and Moldova are best understood as a sequence of distinct, yet interlinked stages: initial engagement within the EU neighborhood framework, deep legal and economic integration through Association Agreements and DCFTAs, and, finally, transition to the formal accession track. While the timing and political context differed, both countries followed a structurally similar trajectory (see Table 2).

**Table 2. Ukraine and Moldova: Timeline of the EU-Integration Path**

Stage	Ukraine	Moldova
ENP participation/ early engagement	mid-2000s	mid-2000s
AA negotiations launched	2007	2010
Eastern Partnership	2009	2009
DCFTA negotiations	integrated in AA process	2012
AA initialled	2012	-

AA signed	2014 (March/June)	27 June 2014
Provisional application	2014 (political), 2016 (DCFTA)	1 September 2014
Visa liberalisation	2017	2014
AA entry into force (fully)	1 September 2017	1 July 2016
EU membership application	28 February 2022	3 March 2022
Candidate status	23 June 2022	23 June 2022
Decision to open negotiations	December 2023	December 2023
Accession negotiations launched (IGC)	25 June 2024	25 June 2024
Screening process initiated	July 2024	July 2024
Screening process completed	September 2025	September 2025
Current stage (early 2026)	Preparation for opening negotiation clusters	Preparation for opening negotiation clusters

Source Own elaboration.

The first stage was defined by incorporation into the EU’s neighborhood architecture. Both Ukraine and Moldova became part of the European Neighborhood Policy (ENP) in the mid-2000s and later joined the Eastern Partnership in 2009. This phase established the initial framework for political dialogue, sectoral cooperation, and gradual regulatory approximation. The second stage consisted of negotiating and implementing Association Agreements (AA), including Deep and Comprehensive Free Trade Areas (DCFTAs). For Ukraine, negotiations started in 2007 and were concluded in 2011, with the agreement initialed in 2012. Following the political crisis of 2013–2014, the agreement was signed in 2014 and fully entered into force in 2017. For Moldova, negotiations began later (2010 for the AA, 2012 for the DCFTA), but the agreement was signed already in 2014 and entered into force in 2016. In both cases, visa liberalization was achieved in parallel (Moldova in 2014, Ukraine in 2017), marking an important step in societal integration with the EU.

The third stage marks the transition from neighborhood policy to formal enlargement. Following Russia’s full-scale invasion of Ukraine, both countries applied for EU membership in early 2022 (Ukraine on 28 February, Moldova on 3 March). In June 2022, the European Council granted candidate status to both countries. A decisive step followed in December 2023, when the European Council decided to open accession negotiations. In June 2024, the first intergovernmental conferences were held, formally launching the negotiation process. Since then, both countries have entered the technical phase of accession negotiations. Throughout 2024–2025, the European Commission conducted the screening of national legislation against the EU acquis. By September 2025, both Ukraine and Moldova had formally completed the screening phase, marking the transition toward the opening of individual negotiation chapters. At the current stage (2026), both countries are preparing for the opening of negotiation clusters, subject to continued progress on reform conditionality.

This sequence highlights a key analytical point: accession readiness in both cases is the result of a long preparatory period. The AA/DCFTA phase played a critical bridging role, creating the institutional and regulatory foundation necessary for the transition to candidate status and the launch of negotiations. At the same time, the recent acceleration of the process demonstrates the importance of geopolitical factors and specific context in shaping the timing of enlargement decisions.

### 3.1.2. Key Thematic Priorities and Obstacles Across Different Stages of Integration

The Ukrainian and Moldovan cases suggest that the content of European integration evolves significantly across stages. Prior to the Association Agreements, the agenda was not yet framed in terms of accession, but it already centered on building the political, legal, and administrative preconditions for deeper integration. In Moldova, this pre-AA stage was anchored in the 2005 EU-Moldova ENP Action Plan and later in the Eastern Partnership framework. It focused on democratic governance, rule of law, human rights, public administration reform, mobility, border management, and initial legislative approximation. In Ukraine, a similar function was performed by the Association Agenda, which served as a preparatory instrument for the AA while advancing political association

and economic integration. Reform priorities included constitutional and judicial reform, anti-corruption, public administration, trade facilitation, and visa liberalization. Across both countries, the core obstacles at this stage were institutional: weak administrative capacity, limited regulatory predictability, insufficient judicial independence, and challenges in border and customs governance.

The Association Agreements marked a qualitative shift, moving from preparatory reforms to a structured and legally binding framework for integration. Both AAs combine political conditionality with extensive commitments to approximate national legislation to EU law. However, this approximation was selective and sequenced rather than equivalent to full *acquis* adoption. The agreements define priority sectors and establish detailed annexes specifying EU directives and regulations to be transposed over medium- to long-term horizons, often with transition periods. The scope is particularly extensive in areas directly linked to market integration: customs, technical regulation, SPS measures, competition policy, public procurement, intellectual property, financial services, and parts of environmental and energy regulation. Monitoring and enforcement mechanisms were central to this framework. Both agreements created institutional architectures: Association Councils, Committees, and sectoral subcommittees responsible for overseeing implementation. Progress was assessed through regular reporting, benchmarking, and dialogue with the European Commission, with a strong emphasis not only on formal transposition but also on effective implementation and enforcement. The approximation process was dynamic, with commitments periodically updated to reflect developments in EU law and implementation progress. In this sense, the AA stage introduced a quasi-accession logic, but without the full institutional framework of enlargement policy.

A central component of both AAs was the DCFTA, which operationalizes economic integration. The DCFTA went beyond traditional free trade agreements by combining tariff liberalization with regulatory convergence. On tariffs, both sides committed to substantial liberalization: the EU granted near-complete duty-free access for most goods relatively quickly, while Ukraine and Moldova implemented asymmetric liberalization schedules with longer transition periods for sensitive sectors. Temporary exemptions and tariff-rate quotas remained in place for certain agricultural products, reflecting domestic sensitivities and adjustment constraints. The “comprehensive” dimension of the DCFTA was equally important. Market access was conditional on regulatory approximation, particularly in areas such as TBT, SPS standards, customs procedures, and competition policy. This created a functional link between legal convergence and trade integration: access to parts of the EU internal market was progressively expanded as countries aligned their regulatory frameworks and demonstrate enforcement capacity.

Despite the structured nature of the AA/DCFTA framework, implementation proved challenging. Both Ukraine and Moldova faced persistent capacity constraints, including limited administrative resources, weak inter-agency coordination, and uneven technical expertise in complex regulatory areas (European Parliament, 2017). Legislative transposition often outpaced practical enforcement, leading to gaps between formal compliance and actual implementation. In addition, political economy constraints played a significant role: vested interests in sectors affected by competition policy, public procurement reform, or state aid control often resisted change. These factors resulted in uneven progress across sectors.

The candidate-stage agenda represents a further shift toward a fully structured accession framework. Following the granting of candidate status in June 2022 and the opening of accession negotiations in June 2024, both Ukraine and Moldova moved into a process defined by screening, negotiation clusters, and opening benchmarks. At this stage, reforms are organized around the enlargement methodology, with particular emphasis on the “Fundamentals” cluster – rule of law, democratic institutions, public administration reform, and anti-corruption – which effectively conditions progress in other areas. The sectoral and technical reforms continue in parallel, but their advancement is increasingly linked to performance in these core domains. An important innovation of this stage is the closer integration of financial support with accession-related reforms. For Ukraine, the Ukraine

Facility (passed in 2024) links large-scale EU funding to a reform and investment plan aligned with accession priorities. For Moldova, the Reform and Growth Facility (passed in 2025) plays a similar role, supporting economic convergence and institutional reform within an accession-oriented framework. In substantive terms, both instruments combine three core components: (i) macro-financial support and budgetary assistance conditional on reform progress; (ii) investment windows aimed at infrastructure, energy, connectivity, and private sector development; and (iii) a reform agenda structured around accession priorities, including rule of law, public administration, and market regulation. Disbursements are explicitly tied to the achievement of predefined milestones and targets, effectively embedding conditionality into financial flows. This creates a tighter coupling between reform implementation and external support, while also increasing the credibility of commitments through monitoring and verification mechanisms. Compared to the AA phase, the candidate stage is therefore more tightly sequenced, more benchmark-driven, and more explicitly anchored in the logic of enlargement conditionality.

### 3.2. The Case of Armenia

#### 3.2.1. Key Milestones of the EU Integration Path

Armenia’s trajectory of relations with the European Union differs fundamentally from the cases of Ukraine and Moldova. While it initially followed a similar path within the ENP and EaP, its integration process diverged at a critical juncture and evolved into a hybrid model combining selective convergence with the EU and deep integration within the EAEU. As a result, Armenia represents a distinct pathway of partial and non-linear alignment with EU standards (see Table 3).

**Table 3. Armenia: Timeline of the EU-Integration Path**

Stage	Armenia
ENP participation	2004
ENP Action Plan	2006
Eastern Partnership	2009
AA/DCFTA negotiations launched	2010
AA/DCFTA negotiations concluded	2013 (not signed)
Strategic shift toward Customs Union	September 2013
EAEU accession	2 January 2015
CEPA negotiations launched	2015
CEPA signed	November 2017
CEPA provisional application	1 June 2018
CEPA entry into force (fully)	1 March 2021
EU monitoring mission (EUMA)	2023
Deepening EU engagement / policy reorientation	2023–2025
Strategic Agenda for EU–Armenia Partnership	2025

Source Own elaboration.

The first stage of Armenia’s engagement with the EU was embedded in the ENP framework. Armenia joined the ENP in 2004, and in 2006 adopted an EU–Armenia ENP Action Plan, which defined priorities in areas such as democratic governance, rule of law, human rights, economic reform, and sectoral cooperation. This was followed by Armenia’s participation in the Eastern Partnership from its launch in 2009. As in the cases of Ukraine and Moldova, this stage focused on institutional development, regulatory approximation, and political dialogue, laying the groundwork for deeper integration.

A significant shift occurred in the late 2000s and early 2010s, when Armenia entered negotiations on an AA with the EU, including a DCFTA. Negotiations were launched in 2010 and were largely concluded by mid-2013. However, in September 2013 Armenia announced its decision to join the Russia-led Customs Union (later the EAEU), effectively halting the signature of the negotiated AA/DCFTA. This marked a major turning point: Armenia abandoned a full-fledged integration track with the EU in favor of deeper integration with the EAEU, which it formally joined on 2 January

2015. Despite this strategic reorientation, Armenia did not disengage from the EU. Instead, a new framework for cooperation was developed, resulting in the Comprehensive and Enhanced Partnership Agreement (CEPA). Negotiations on CEPA were launched in 2015 and concluded in 2017. The agreement was signed in November 2017 and provisionally applied from 1 June 2018. CEPA entered fully into force on 1 March 2021. Unlike the AA/DCFTA, CEPA does not include a deep trade component, reflecting Armenia's commitments within the EAEU. However, it retains a broad agenda of political dialogue, institutional reform, and sectoral cooperation, including elements of regulatory approximation to EU standards in selected areas.

The post-2020 period introduced a new dynamic into EU-Armenia relations. Following the 2020 Nagorno-Karabakh war and subsequent geopolitical shifts, Armenia gradually increased its engagement with the EU, including in areas such as resilience, connectivity, and governance reforms. The EU expanded its presence in Armenia, including through the deployment of a civilian monitoring mission (EUMA) in 2023. In parallel, EU financial and technical assistance increased, particularly under the Economic and Investment Plan for the Eastern Partnership. A more pronounced reorientation emerged in 2023–2025, amid Armenia's growing tensions with Russia and reassessment of its external alignments. While Armenia remains formally a member of the EAEU, it has signaled an interest in deepening cooperation with the EU beyond the existing CEPA framework. In 2024–2025, discussions intensified around strengthening political dialogue, expanding sectoral cooperation, and potentially revisiting elements of economic integration, although no formal accession perspective has been granted.

An important recent development in EU–Armenia relations is the adoption of the Strategic Agenda for the EU-Armenia Partnership, which builds on the CEPA and sets a more structured and forward-looking framework for cooperation. The document defines a comprehensive set of short- and medium-term priorities across governance, security, and economic domains, with a strong emphasis on democratic institutions, rule of law, and socio-economic resilience. It also introduces a more operational approach to implementation, with clearly defined timelines, monitoring mechanisms, and linkage to EU financial assistance instruments. Notably, the Agenda expands cooperation into new areas, including security and defense, while deepening sectoral alignment in energy, transport, and digital connectivity. At the same time, it explicitly recognizes the need to advance regulatory approximation to EU standards where compatible with Armenia's existing international commitments, particularly within the EAEU. In this sense, the Strategic Agenda represents an attempt to maximize the integration potential of the CEPA framework without formally entering the accession track.

As of 2026, Armenia's position can be characterized as a hybrid integration model: legally anchored in CEPA/Strategic Agenda with the EU, structurally embedded in the EAEU, and increasingly exploring avenues for deeper engagement with European institutions. Unlike Ukraine and Moldova, Armenia has not applied for EU membership and is not part of the formal enlargement process. However, its trajectory demonstrates that partial convergence with EU standards can be sustained even under constraints imposed by alternative integration frameworks, albeit with clear limits.

### 3.2.2. Key Thematic Priorities and Obstacles Across Different Stages of Integration

Unlike the Association Agreement/DCFTA model, Armenia's CEPA-based pathway reflects a constrained but progressively deepening form of sectoral integration, shaped by both institutional commitments and external constraints. At the initial (pre-CEPA) stage, the core priorities were concentrated in governance and institutional reforms. CEPA phase explicitly served as a legal and institutional framework for strengthening democratic institutions, rule of law, and public administration capacity. The Strategic Agenda further operationalizes these priorities, placing emphasis on judicial reform, anti-corruption measures, electoral integrity, and alignment with European human rights standards. This stage broadly corresponds to the “foundational convergence” phase, where political conditionality and institutional alignment dominate.

During its path, Armenia demonstrated relatively strong performance in selected regulatory domains, particularly in areas such as intellectual property protection and basic trade-related legislation (see Table 1). The CEPA stage of integration was characterized by gradual sectoral approximation and economic cooperation. Key priorities included trade diversification, energy and transport connectivity, digitalization, and the development of regulatory frameworks in areas such as services, public procurement, SPS measures, and technical standards. Furthermore, the CEPA framework underpinned expansion of regulatory approximation in selected sectors, including food safety, services regulation, and technical barriers to trade. These reforms were directly linked to facilitating market access and enabling Armenian firms, particularly SMEs, to integrate into EU value chains. Simultaneously, EU financial and technical assistance instruments (e.g., TAIEX, Twinning, Global Gateway investments) were mobilized to support capacity building and infrastructure development.

However, implementation gaps remained significant, indicating that formal alignment often outpaces effective enforcement and institutional capacity. The CEPA stage also is the illustration of the case when structural constraints of Armenia's integration model become most binding. Membership in the EAEU implies that key elements of trade policy, particularly tariff-setting and parts of external trade regulation, are delegated to a supranational framework. As a result, EU-related regulatory approximation must remain selective and compatible with Armenia's existing international obligations. This fundamentally limits the scope for deep trade integration comparable to DCFTA countries.

The Strategic Agenda introduces a more structured prioritization between short- and medium-term priorities, with increasing emphasis on measurable implementation and regulatory convergence. At the advanced stage, integration priorities expand into more complex and politically sensitive domains, including security and defense-related cooperation, resilience to hybrid threats, and deeper sectoral integration in areas such as energy transition, climate policy, and digital economy. In parallel, horizontal priorities such as socio-economic resilience, migration management, and the integration of displaced populations become increasingly important, linking internal reforms with broader regional stability considerations. The introduction of monitoring frameworks, conditional financial assistance enhance the link between reform progress and EU support.

Despite this progression, several cross-cutting obstacles persist across the Armenia's EU-integration path. First, administrative and absorption capacity constraints continue to limit the effective implementation of CEPA commitments, necessitating ongoing institutional strengthening. Second, the geopolitical environment remains highly volatile, directly affecting reform priorities and resource allocation. Third, the hybrid nature of Armenia's integration model, which tries to combine EU-oriented regulatory convergence with EAEU membership, creates structural inconsistencies that constrain the depth and speed of alignment. Overall, Armenia's integration pathway can be characterized as a model of incremental and selective convergence: meaningful progress is achieved in governance and sectoral regulation, while structural external constraints prevent a transition toward full market integration.

### **3.3. Lessons for Belarus**

The following 10 lessons from Ukrainian, Moldovan, and Armenian cases are relevant for Belarus:

#### 1. EU integration is inherently long-term and implementation-driven.

Even under accelerated and politically favorable conditions, convergence with EU standards requires sustained effort over many years. The key constraint is not the formal adoption of EU legislation, but its effective and durable implementation. This, in turn, depends on administrative capacity, institutional quality, and the ability to ensure the irreversibility of reforms over time.

#### 2. Political and economic criteria are deeply interlinked.

Although this paper focuses primarily on economic aspects, in practice progress in economic convergence is closely tied to developments in governance, rule of law, and institutional stability.

Weaknesses in political institutions tend to translate into implementation gaps, regulatory uncertainty, and reduced credibility of reform commitments.

3. The AA/DCFTA pathway represents the dominant and most structured model of integration.

In the Eastern European context, gradual convergence followed by formalization through an Association Agreement with a DCFTA has emerged as the most institutionalized and predictable pathway. This model provides a clear roadmap, combines incentives with obligations, and allows for progressive alignment with EU standards.

4. The AA stage functions as a quasi-accession framework.

Association Agreements combine political conditionality with selective and sequenced approximation to EU law. While not equivalent to full *acquis* adoption, they effectively act as a preparatory phase, building both regulatory alignment and the institutional capacity required for eventual accession negotiations.

5. A preparatory phase is practically indispensable.

Transition to advanced stages of integration is highly unlikely in practice without a prolonged preparatory phase, typically associated with AA/DCFTA implementation. This phase reduces risks during formal negotiations and ensures that countries are capable of meeting the more stringent requirements of the accession process.

6. The Armenian case illustrates a hybrid integration model with structural limits.

Armenia demonstrates that partial convergence with the EU is possible even within an alternative integration framework such as the EAEU. However, such a model is inherently constrained: regulatory approximation must remain selective and compatible with existing international commitments, limiting both scope and depth of integration.

7. Hybrid integration creates long-term trade-offs.

The absence of a deep trade component, as in the CEPA framework, significantly restricts market integration and reduces the economic benefits associated with convergence. At the same time, dual alignment generates systemic inconsistencies. At more advanced stages, a strategic choice between integration frameworks becomes increasingly unavoidable.

8. The candidate stage introduces a qualitatively different logic.

Compared to the AA phase, the candidate stage is more tightly sequenced, benchmark-driven, and anchored in strict conditionality. Progress is increasingly structured around predefined benchmarks, with particular emphasis on the “fundamentals” (rule of law, governance, and administrative capacity), which condition advancement in other areas.

9. Institutional capacity is the key binding constraint.

Across all stages, the ability of the state to design, implement, and enforce reforms determines the speed and depth of integration. Limited administrative capacity, weak coordination mechanisms, and insufficient technical expertise consistently emerge as major bottlenecks.

10. Integration pathways are path-dependent.

Early strategic choices—particularly regarding external economic alignment—create long-term constraints and shape the feasible trajectory of convergence with the EU. Once embedded in a specific integration framework, shifting to an alternative model becomes increasingly complex and costly.

## **4. The Logic, Strategy and Indicative Time-Line for Belarus’ EU-Integration Case**

## 4.1. Strategic Considerations

### 1. Belarus faces a dual transition challenge.

Unlike most other cases, Belarus will need to simultaneously undertake internal institutional transformation and external economic reorientation. This dual transition significantly increases systemic risks and requires careful coordination of reforms across multiple domains.

### 2. Belarus starts from a structurally disadvantaged position.

Belarus faces a significantly larger gap relative to EU standards compared to other Eastern Partnership countries, as demonstrated in Section 2. In addition, the country is deeply embedded in economic and institutional integration frameworks with Russia, including the EAEU and the Union State, which creates strong path-dependence effects. These are reinforced by deep trade, energy, and financial linkages. Furthermore, Belarus has a relatively low level of formalized relations with the EU and lacks a sustained track record of institutional cooperation, which reduces mutual trust and increases uncertainty at the outset of integration.

### 3. A hybrid pathway is strategically constrained and cannot be considered as a full-fledged integration model.

Armenia demonstrates that partial convergence with the EU is possible within an alternative integration framework. However, such a model is inherently limited: regulatory approximation remains selective and constrained by external commitments, and the absence of a deep trade component restricts economic integration. This suggests that hybrid models may be viable only as temporary or second-best solutions under strong geopolitical constraints.

### 4. Full EU integration requires disengagement from the EAEU and the Union State.

Deep integration into the EU—particularly participation in the internal market—requires alignment with EU trade, regulatory, and competition frameworks, which is incompatible with continued membership in the EAEU and the Union State. While temporary hybrid arrangements may be possible during a transitional phase, full convergence with EU standards ultimately necessitates a strategic disengagement from these integration structures.

### 5. Exit from the EAEU and the Union State is the main source of uncertainty.

The timing, sequencing, and conditions of disengagement from existing integration frameworks represent a major uncertainty factor. These elements will critically shape both the feasibility and the speed of Belarus's EU integration trajectory.

### 6. Democratization is the necessary starting point.

Under the current political regime, meaningful EU integration is not feasible. Democratization acts as a trigger that enables integration to begin and opens a window of opportunity for reforms and engagement with the EU. This moment must be used to establish a comprehensive and forward-looking integration strategy. Following democratization, Belarus will face a limited time window during which reforms and integration efforts are most feasible. Delays or loss of momentum may increase the risk of policy reversal and re-entrenchment of previous institutional patterns.

### 7. Early institutional anchoring and access to EU benefits are critical.

At early stages, it is essential for Belarus to establish a strong institutional linkage with the EU and gain access to key benefits, including market access, financial support, and technology transfer. Without such anchoring, there is a risk of incurring the adjustment costs associated with reforms without receiving compensatory gains, leading to economic and political backlash. Furthermore, such anchoring enhances credibility, reduces uncertainty, and strengthens reform incentives.

### 8. A preparatory phase is critical for reducing the initial gap.

Given the significant initial distance from EU standards, a preparatory phase is indispensable. This phase should focus on both de jure and de facto convergence with EU norms, with reforms driven by domestic economic needs while simultaneously aligning with EU integration logic. Early movement toward an Association Agreement framework is particularly important in this regard.

#### 9. Acceleration matters, but within institutional and capacity constraints.

A faster integration trajectory can help reduce the duration of adjustment costs and accelerate access to benefits. However, acceleration must be consistent with the country's administrative and institutional capacity. Poor sequencing or overextension of reform efforts may undermine implementation and lead to systemic instability.

#### 10. EU integration for Belarus requires a clear, coherent, and accelerated strategy.

Given the structural constraints, the integration process must be designed to be as transparent, consistent, and time-efficient as possible. Policy inconsistency or fragmented reform efforts may lead to reversals, undermine credibility, and generate reform fatigue. A clearly articulated and sequenced strategy is therefore essential to maintain momentum and ensure alignment between domestic reforms and integration objectives.

### **4.2. Exit from the EAEU and the Union State: Legal Constraints, Scenarios, and Strategic Choices**

The incompatibility between deep integration in the EU and continued participation in the EAEU and the Union State is structural, legal, and rooted in fundamentally different integration logics. The EU is based on principles of market competition, strict state aid control, and supranational rules with direct effect. In contrast, the EAEU relies to a greater extent on coordinated industrial policies and administered economic arrangements. As a result, the two frameworks are impossible to reconcile at a fundamental level and do not allow for their simultaneous application in a deep integration format. Structurally and legally, there are three major sources of incompatibility. First, at the level of trade policy, participation in the EU internal market presupposes alignment with the EU's common commercial policy (Article 3(1)(e) and Article 207 TFEU), while the EAEU entails a common external tariff and coordinated external trade measures. Second, at the level of regulatory sovereignty, EU integration requires systematic adoption and enforcement of EU-based rules in areas such as technical regulation, SPS, competition, and state aid, whereas the EAEU and the Union State embed alternative rule-making and coordination mechanisms. Third, at the legal–institutional level, Union State commitments envisage coordinated external policy and a unified legal space, which constrains the ability to assume obligations that could conflict with EU law (Article 4(3) TEU). Taken together, these factors imply that participation in alternative integration arrangements involving autonomous trade policy or conflicting regulatory commitments is fundamentally incompatible with full EU membership. Therefore, deep integration within both the EU and EAEU frameworks is not feasible.

Both frameworks – EAEU and Union State – provide formal exit clauses, but these define only minimum legal timelines rather than realistic adjustment horizons. In the EAEU, withdrawal follows written notification to the depositary, with termination of obligations after a fixed notice period of roughly twelve months. In the Union State, exit requires domestic constitutional procedures, including a referendum, followed by written notification, with termination after a longer notice period of roughly eighteen months. Legally, these periods should be understood as the minimal exit terms.

However, on the one hand, they do not capture the time required to unwind practical linkages or to substitute existing arrangements with new ones compatible with EU integration. Legal withdrawal is not equivalent to functional disentanglement. Beyond the core treaties, Belarus is embedded in a dense network of sectoral arrangements and de facto dependencies, including energy pricing and supply, transit and logistics, financial linkages, standards and certification chains, and defense and security cooperation. Effective exit therefore entails renegotiation, substitution, or reconstruction of

these links. This process is inherently complex and can substantially extend timelines and amplify transition costs, even if legal withdrawal is completed within the formal notice periods.

On the other hand, potential full dismantle of these Russia-led integrational frameworks – which might be probable in case of weakened Russia – might lead to accelerated procedures and terms of dismantle. Hence, there is a binding uncertainty, which is more strategic rather than procedural. Economic outcomes and the feasibility of a pivot to the EU depend critically on Russia’s response, which may range from loyal to openly hostile. Similar legal pathways can therefore produce markedly different macroeconomic and institutional trajectories depending on the external environment. Existing studies visualize the potential dispersion of outcomes. Estimates in Kruk & Karaitis (2026) and Hartwell et al. (2022) suggest that transition costs and adjustment paths can vary widely across scenarios, particularly with respect to trade reorientation, energy prices, and short-run output dynamics. Given the difficulty of assigning reliable ex ante probabilities to this or that scenario of exit from Russia-led integrational frameworks, for the purposes of this paper we consider two scenario-based approaches. Both of them stem from a normative approach, and assume relatively rapid exit from these integrational frameworks. The logic here is as follows: unless relatively rapid exit happens – either due to Belarusian initiative or given a geopolitical shock resulting in the disruption of the Russia-led integrational frameworks – the chances for a full-fledged pivot to the EU for Belarus are pretty low. The first scenario assumes a duration of up to 2 years needed for the exit. It relies on formal terms envisaged by the corresponding legal commitments. It assumes that phased dismantle of supranational obligations happens, and a special transitory regime is introduced for the exit phase. The second one, accelerated exit, assumes the duration of up to 1 year and is associated with disruptive trends coming from inside the EAEU and the Union State. It assumes simultaneous denunciation of key obligations, and rapid move to autonomous trade and regulatory policy. However, we admit that exit from the EAEU and the Union State, its scenarios and duration are highly sophisticated and sensitive issues. Unless our ‘normative’ logic works, these issues may result in a protracted procedures of both EAEU and the Union State exit, as well as EU-integration.

The process of exit from the EAEU and the Union State raises a complex set of interrelated economic, institutional, and coordination challenges that must be addressed in a highly synchronized manner. On the economic side, a central issue concerns the conditions of access to the Russian market during the transition period, given the high degree of trade dependence and the risk of sudden disruptions. This is closely linked to the need to rapidly restore autonomous tariff policy and customs administration, while simultaneously building capacity to operate under a new external trade regime aligned with EU requirements. Energy represents another critical vulnerability: existing contractual arrangements and preferential pricing regimes may be revised or withdrawn, potentially triggering significant cost increases and short-term inflationary pressures. Institutionally, the transition implies the re-establishment of full national sovereignty over trade and regulatory policy, including the creation or strengthening of national regulatory bodies capable of implementing EU-aligned frameworks in areas such as competition, technical standards, and market supervision. A key risk in this process is the emergence of legal and regulatory gaps during the transition period, especially if withdrawal from existing frameworks is not carefully sequenced with the introduction of new rules and institutions.

Hence, the external and coordination dimension is of critical importance. To avoid an institutional vacuum, the exit phase should be tightly coupled with immediate EU anchoring. Based on the experience of Armenia, it might be feasible to underpin this stage by CEPA for Belarus or a functional equivalent. Early anchoring might provide regulatory guidance, financial support, and to some limited improvement in access to the EU markets. Thus, it would mitigate the risk of “adjustment without compensation,” and enhances the credibility of the reform trajectory. CEPA can be conceptualized as a transitional institutional framework that helps structure Belarus’s early-stage integration with the EU without immediately entering the full accession track. Its primary function is to anchor the direction of convergence, providing a clear signal to both domestic and external actors about the strategic orientation of reforms. At the same time, it facilitates institutional and regulatory preparation

for eventual *acquis* adoption, allowing the gradual build-up of administrative capacity and policy alignment. By establishing a formalized framework of cooperation, CEPA also helps reduce uncertainty during the transition period, particularly for businesses and investors. However, it should be clearly understood that CEPA does not substitute for either withdrawal from the EAEU or the conclusion of an Association Agreement, but rather complements and precedes these steps.

### **4.3. Core Principles and Indicative Time-line of EU-Integration for Belarus**

Building on the specific structural constraints of the Belarusian case, as well as on the experience of other countries in the region, the logic of EU integration for Belarus should be constructed around a set of core principles that ensure both feasibility and consistency of the process.

#### 1. Democratization is the enabling starting point of EU integration (t = 0).

A credible EU integration trajectory for Belarus becomes feasible only after a democratic transition that restores international subjectivity and enables formal engagement with EU institutions. At this stage, it is critical to make an explicit European choice and rapidly institutionalize relations with the EU. Belarus starts from a comparatively low baseline, including the absence of a fully operational Partnership and Cooperation Agreement (the 1995 PCA was never ratified), which creates an institutional vacuum that must be filled as soon as possible.

#### 2. Early commitment to a continuous, end-to-end integration pathway is essential.

From the outset, Belarus should anchor its reforms to a clearly articulated, continuous pathway that leads from the initial transition phase to full EU membership. Avoiding stop-and-go dynamics is critical: fragmented or reversible reforms would undermine credibility and delay subsequent stages, particularly when moving to *acquis*-based processes.

#### 3. A preparatory phase is critical to close the initial gap.

Given the substantial distance from EU standards (both *de jure* and *de facto*), a preparatory phase is indispensable. This phase should combine rapid legislative approximation in priority areas with institutional capacity building (regulators, courts, enforcement bodies) and policy credibility (consistent application and enforcement). It also serves a second function: creating the legal and economic conditions necessary for disengagement from the EAEU and the Union State.

#### 4. The transition phase should be anchored in a formal EU framework (CEPA/Strategic Agenda).

The first integration stage – synchronized with exit procedures from the EAEU and the Union State – should be formalized through a CEPA-type agreement and a Strategic Agenda (similar to Armenia). This framework anchors the direction of convergence, structures reform priorities, and provides immediate access to EU technical and financial support. Its purpose is transitional: to reduce uncertainty, coordinate reforms, and accelerate movement toward the next stage rather than substitute for deeper integration instruments.

#### 5. The Association Agreement (AA/DCFTA) is the core engine of convergence.

The decisive phase of integration is associated with the negotiation, signing, and implementation of an Association Agreement, including a DCFTA. This stage introduces structured, sector-by-sector approximation to EU law under conditionality, while the DCFTA drives economic integration through tariff liberalization and regulatory alignment (TBT, SPS, customs, competition, public procurement). In practice, this is where sustained convergence to EU standards occurs and where the institutional infrastructure for *acquis* adoption is built.

#### 6. De facto integration precedes de jure accession.

By the time AA/DCFTA commitments are largely implemented, Belarus would have achieved substantial *de facto* integration with the EU. However, from a legal perspective, the formal accession process begins only with the submission of a membership application and the launch of screening and negotiations on the *acquis*.

7. Time compression is desirable but constrained by capacity.

An accelerated trajectory reduces the duration of adjustment costs and the risk of reform reversal. At the same time, sequencing must remain consistent with administrative capacity to avoid implementation gaps. In practice, phases will partially overlap (e.g., CEPA implementation, exit procedures, and AA preparation), which allows time compression but requires strong coordination.

8. Indicative horizon reflects an ambitious but feasible benchmark.

Under favorable political conditions and strong EU support, a full integration horizon of approximately 10–15 years is an ambitious yet plausible benchmark (see Table 4). This estimate assumes effective coordination of overlapping phases, sustained reform momentum, and timely external anchoring.

**Table 4. Indicative Timeline of the EU-Integration Path for Belarus**

Stage	Key Actions	Indicative Duration
t = 0	Democratization; restoration of international subjectivity; political decision on EU path	Immediate
Transition (CEPA + exit launch)	Signing CEPA/Strategic Agenda; launching exit procedures from EAEU and Union State; initial regulatory alignment	~1–2 years
AA/DCFTA preparation	Negotiation and preparation of Association Agreement and DCFTA; priority legislative alignment; institutional build-up	~1–2 years
AA/DCFTA implementation	Phased implementation of AA commitments; tariff liberalization; deep regulatory convergence across sectors	~4–5 years
Accession process	Membership application; screening; negotiations on acquis chapters/clusters	~4–6 years
<b>Overall horizon</b>	<b>From democratization to membership</b>	<b>~10–15 years</b>

Source Own elaboration.

Within this timeline, CEPA (or a functional equivalent) plays a strictly transitional role. Its scope should prioritize governance, rule of law, public administration reform, and selected regulatory domains that can be advanced without conflict with legacy commitments during the exit phase. CEPA structures short- and medium-term priorities, aligns them with EU support instruments, and creates a predictable policy environment for economic agents. In practical terms, the content of such an agreement for Belarus can be anchored in the structure and scope of the EU-Armenia CEPA, which provides a workable template for transitional integration under constraints. This includes a strong focus on governance, rule of law, public administration reform, and selective regulatory approximation in areas such as competition, public procurement, and technical standards. Adapting this model would allow Belarus to operationalize early convergence while maintaining flexibility during the exit phase from existing integration frameworks. Crucially, it provides early anchoring of expectations, both domestically and externally, reducing uncertainty during the most volatile stage of transition. At the same time, its limitations must be explicit: it does not provide deep trade integration and cannot substitute for the AA/DCFTA framework.

The AA/DCFTA phase determines both the content and the speed of convergence. The agreement should prioritize high-impact domains: customs and trade facilitation; technical regulation and standards (TBT); sanitary and phytosanitary measures (SPS); competition policy and state aid control; public procurement; financial services; and selected areas of energy and digital regulation. Implementation requires detailed sequencing, transitional periods, and strong enforcement capacity. The DCFTA component is critical for early economic gains—market access, investment attraction, and integration into EU value chains—which, in turn, support political sustainability of reforms. The indicated timelines (1–2 years for preparation and 4–5 years for implementation) are consistent with

regional experience but assume effective coordination, sufficient administrative capacity, and continuous EU support.

The energy sector represents the most sensitive and structurally specific domain in the Belarusian case, given its deep integration with Russian supply systems, pricing arrangements, and infrastructure dependencies. As a result, any transition in this sector carries both significant economic risks and broader macroeconomic implications. Initial steps toward reform, particularly in areas such as regulatory governance, market transparency, and gradual alignment with EU energy principles, should already be embedded within the CEPA/Strategic Agenda framework. However, comprehensive restructuring of the sector, including market liberalization, tariff reform, and integration into EU energy markets, can only be realistically achieved at the AA/DCFTA stage, where stronger conditionality, regulatory alignment, and investment support mechanisms are in place.

## **5. Synchronizing Energy Sector with the EU Standards**

Based on the experience of other countries (the Baltic states, Ukraine, Moldova, Poland, Slovakia, etc.), it can be concluded that integration with the EU takes place either under a “gradual” scenario of planned system reform, or under an “emergency” scenario in the context of an energy crisis caused by a sharp increase in energy prices or the disruption of supply. Therefore, it is necessary to clearly distinguish between measures that would hinder the organization of emergency supplies from the European Union and those that can be implemented under stable conditions with long-term planning of reforms.

### **5.1. Gas Supply**

As of today, Belarus is 100% dependent on gas supplies from Russia. At the same time, the share of gas in total energy consumption is around 50% (depending on the volume of processing). In 2020, the share of gas in electricity and heat generation exceeded 85%. This figure has since declined due to the commissioning of the Belarusian Nuclear Power Plant. As a result, the share of gas in electricity generation has decreased to about 65%, while its share in heat generation has remained almost unchanged, as the operation of the nuclear power plant does not affect the structure of fuel consumption for heat production.

In addition to energy dependence, gas supplies from Russia also create economic dependence: gas prices for Belarus are relatively low, on average 2–3 times lower than prices on EU gas trading hubs. At the same time, it should be noted that under the agreement on the terms of purchase and sale of shares of OJSC “Beltransgaz”, all trunk gas networks, the Yamal–Europe gas pipeline, and underground gas storage facilities are owned by PJSC “Gazprom”.

Therefore, when integrating Belarus’s gas system, it is necessary to take into account both technological requirements (requirements for gas system equipment) and regulatory requirements (requirements for the management and operation of the gas system).

#### **5.1.1. Regulatory Framework**

Unbundling of the network by type of activity. The European Union is convinced that, in order to ensure sufficient and efficient attraction of investment into the development of gas and hydrogen transport systems (the new directive already regulates hydrogen transport systems as well), it is necessary to guarantee non-discriminatory access to the various segments of the gas market. Such non-discriminatory access can only be ensured through the separation of different types of activities. This includes:

- the establishment of an independent gas market operator that owns neither gas pipelines nor gas, but carries out the operational management of the gas network;
- the separation of the owner of the gas transmission network;

- the separation of the owner of gas storage facilities;
- the separation of natural gas owners (suppliers and consumers);
- the establishment of a supervisory body to ensure compliance with unbundling requirements;
- the establishment of an independent natural gas market regulator.

It should be noted that the transition to such an advanced structure must be implemented gradually and step by step. PJSC Gazprom owns gas, gas pipelines, and gas storage facilities. The separation of these activities may be significantly complicated by the terms of the sale of OJSC “Beltransgaz”. Moreover, existing agreements do not allow for the separation of ownership of trunk gas networks and gas storage facilities for the purpose of alternative gas supplies. At the same time, the remaining stages can be implemented within the framework of national legislation and negotiations with the European Union regarding minimum requirements and reform milestones. For example, requirements for information exchange and interaction between system operators will be necessary from the outset, while the unbundling of Beltransgaz as a gas owner and an owner of distribution networks may be implemented at a later stage.

In addition to unbundling, it is necessary to adopt a large number of regulatory documents governing the overall operation of gas networks and access to their services, the allocation of transmission capacities, and the maintenance of network balance. There are also requirements related to gas market transparency, energy security, and reliability of supply. Furthermore, there are requirements concerning the certification of independent market participants (operators, regulators, etc.).

These are already EU regulations, meaning that they do not require transposition at the national level. In EU member states, they enter into force immediately upon adoption. In the context of the initial phase of Belarus’s European integration, certain parts of these regulations will need to be incorporated into national legislation, while some provisions cannot be implemented directly and will require gradual approximation to EU standards.

#### 5.1.2. Technological Arrangements

The separation of state monopolies and the introduction of independent regulation will require a restructuring of data collection and operational planning systems (IT/SCADA systems), the development of online platforms for information disclosure and automated management, as well as significant efforts in the education and training of specialists.

The Regulation on security of gas supply requires that the system be able to ensure reliability under the N-1 standard (the failure of any single element must not lead to a disruption of supply). In the case of supplies from a single country, this requirement cannot be met. To comply with European legislation, it may be necessary to construct additional gas pipelines or to modify the operating regimes of existing ones. It is also necessary to consider investments in LNG terminals located in coastal areas of other countries.

Along the path of integration with the EU, several stages can be identified:

- **Phase A — Legal and regulatory framework.** The establishment of national gas market legislation implementing the requirements of EU directives.
- **Phase B — Modernization and integration.** Technological modernization of enterprises and organizations in parallel with the development of the necessary “soft” infrastructure (communication and data-exchange systems, etc.) and workforce training. At the same time, continuous work is carried out on the implementation of EU regulations into the Belarusian legal framework.
- **Phase C — Supply diversification and physical readiness.** Planning of projects and investments for the development of internal and cross-border “hard” infrastructure,

including the construction of gas pipelines, gas storage facilities, and LNG terminals in other countries, etc.

## **5.2. Oil and Oil Products**

The oil and oil products market is regulated to a much lesser extent than the gas market. There are several reasons for this. From the outset, the oil refining market has been more competitive, and therefore the need for strict competition control and investment incentives has been significantly lower. In addition, supply systems are usually based on discrete deliveries (by tankers or rail transport). Such a system does not require continuous real-time regulation, and operational stocks are created by companies to meet the needs of their commercial activities. The main regulatory requirement concerns the volume of oil and oil product storage. According to Directive 2009/119/EC, countries must maintain stocks equivalent to 90 days of imports and at least 61 days of domestic consumption.

In Belarus, oil and oil product stock requirements are set out in the Energy Security Concept, which requires crude oil reserves sufficient for 10 days of refinery operation. Reserves of oil products must cover domestic demand for 30 days. Reserve fuel (fuel oil) must also be stored in volumes exceeding 30 days. In 2020, plans were announced to increase crude oil storage capacity to 1 million tons (up to 30 days) and to begin construction of a connecting pipeline between the oil pipelines serving the Mozyr Refinery and Naftan, which would allow crude oil to be redirected between the two plants. In 2022, it was announced that this task had largely been completed (storage capacity of 0.9 million cubic meters, with the interconnection completed), and further expansion plans were presented. The interconnection has indeed been completed, and it was planned to further increase storage capacity by an additional 1.35 million tons.

Taking into account the need to use part of the storage capacity for operational purposes, the remaining volumes can be used for long-term storage, providing reserves for up to two months. Thus, meeting the oil stock volume requirements does not constitute a significant challenge for Belarus. Environmental fuel quality parameters are also regulated in the EU. However, Belarus is most likely already compliant with these requirements, as meeting them was necessary for supplying fuels to the EU market. Therefore, no substantial changes or major reforms are required in this area.

## **5.3. Electricity and Nuclear Power**

At present, Belarus has no technical capability to transmit electricity to EU countries. Therefore, even under an “emergency” scenario, it would not be possible to organize electricity supplies to Belarus. As a result, reform of the electricity market is less dependent on external conditions; instead, political factors are likely to have a greater influence on the pace of reforms.

### **5.3.1. Regulatory Framework**

To harmonize legislation on electricity market regulation, it is necessary to implement Directive (EU) 2019/944, which sets out the requirements for the organization of the internal electricity market. It is also necessary to implement the requirements of Regulation (EU) 2019/943. The core objective of these documents is the establishment of a competitive electricity market, which is currently entirely absent in Belarus. Therefore, at the initial stage, only certain provisions of these directives and regulations can realistically be implemented.

At the first stage, it is necessary to ensure the independence of the transmission system operator and the market operator. From 1998 to 2019, Belarus had the Republican Unitary Enterprise “ODU”, which performed the functions of a system operator. Although the influence of the State Production Association “Belenergo” on this organization was significant, ODU nevertheless enjoyed a certain degree of independence. However, in 2019 the organization was liquidated, and all its assets and personnel were transferred to “Belenergo”. In practice, the first step towards implementing European legislation should therefore be the restoration of an independent system operator, as well as the establishment of a market operator and a market regulator.

Previously, an analysis of possible options for reforming the internal electricity market was carried out, identifying five stages:

- Stage 1: Establishment of a regulator
- Stage 2: Establishment of a market operator
- Stage 3: Transition to a “single buyer” (purchasing agency) model
- Stage 4: Transition to a wholesale market model
- Stage 5: Transition to a retail market model

The first three stages can be implemented simultaneously. This would require amendments to national legislation and corresponding changes to the organizational structure governing interactions between existing and newly created institutions. At the third stage, it would be necessary to unbundle “Belenergo” by type of activity, separating networks (to be transferred to the system operator), generation, and supply and distribution companies.

Transition to Stage 4 would require further unbundling of generation into several companies capable of competing with each other on the wholesale market. At this stage, significant challenges may arise due to the structure of electricity generation in Belarus. Combined heat and power plants (CHPs) and nuclear power plants typically operate under special load dispatch rules and are prioritized in dispatch. Given that these facilities account for a large share of electricity generation, the remaining volumes of electricity and available capacity may be insufficient to ensure the minimum level of liquidity required for the formation of an efficient market. Addressing this issue may take a considerable amount of time—years or even decades—either through additional demand growth or through the replacement of existing generation capacity.

Overall, the requirements of European legislation regarding the governance structure of the electricity market are similar to those applicable to the gas market.

When establishing a system operator, it is also necessary to comply with the requirements of Commission Regulation (EU) 2017/1485. Article 118 of this regulation requires system operators within a synchronous area to develop a Synchronous Area Operational Agreement (SAOA) for their system. This agreement must include a set of methodologies for frequency and load control, load allocation among generators, and procedures for emergency situations in the system. It also defines the rules for the establishment of primary, secondary, and tertiary reserves.

For the electricity market to function, it is also necessary to establish its various segments (the long-term market, day-ahead market, balancing market, etc.). Requirements for these market elements are set out in Regulation (EU) 2019/943, which must likewise be gradually implemented into national legislation.

### 5.3.2. Technological Arrangements

From a technological perspective, synchronization of the power system with the EU system implies a transition to European standards of system interaction and the application of common reliability standards. From a technical standpoint, the system must be capable of maintaining a stable frequency within a defined range. Under European rules, each country is required to control its own frequency and to be able to operate in island mode in the event of failures in neighboring countries or system desynchronization.

Such frequency control differs from the current control practices in Belarus and will require modernization of equipment at generating units within the power system. In addition to frequency control, it is necessary to ensure sufficient system inertia, which depends on the structure of connected generation and equipment. Meeting these requirements may require the construction of new generating units or specific technical modifications.

Data transmission systems, automation, and relay protection equipment will also require modernization in line with new requirements for transparency, public access to information, and cybersecurity. Requirements related to distributed generation may necessitate the upgrading of distribution networks to enable bidirectional power flows. Furthermore, it will be necessary to implement all requirements related to information exchange between the transmission system operators of neighboring countries.

Regulation (EU) 2022/869 (TEN-E) requires that countries have cross-border interconnection capacity of at least 15% of peak electricity demand. For Belarus, this corresponds to approximately 1 GW. At present, Lithuania has announced plans to dismantle existing transmission lines between Belarus and Lithuania. At the same time, interconnections with Poland (0.1 GW, currently not operational) and with Ukraine, with a combined capacity exceeding 1 GW, remain in place. It is therefore likely that this requirement could be met; however, if Ukraine were also to decide to dismantle its interconnections, Belarus would lack sufficient cross-border capacity. The construction of new transmission lines is a very time-consuming process and may take decades.

### 5.3.3. Nuclear Power Plant

For integration with the EU, Belarus will also need to address a number of technical, regulatory, and legal requirements related to the operation of the Belarusian Nuclear Power Plant (NPP).

The first step should be the establishment of an independent nuclear regulator. At present, regulatory functions are performed by Gosatomnadzor, which is legally part of the Ministry for Emergency Situations. This organizational structure does not ensure genuinely independent regulation.

Subsequently, Belarus will need to implement the requirements of Council Directive 2009/71/Euratom, which sets out nuclear safety rules for nuclear installations and requirements for the independence of the regulatory authority.

Equally important from a safety perspective is Council Directive 2014/87/Euratom, meaning that these issues will be subject to particularly detailed scrutiny. It should be noted that in the operation of nuclear installations, most operational activities are governed by dedicated technical and procedural documents. At present, Belarus relies either directly on Russian regulatory documents or on adapted versions whose requirements are largely aligned with Russian standards. For harmonization with EU legislation, it will be necessary to transition to Euratom standards and requirements. This may require modernization of equipment at the nuclear power plant.

In addition to the direct operation of the NPP, it is necessary to regulate systems for the management of spent nuclear fuel and radioactive waste, which over time will also need to be gradually aligned with European standards.

An important element of nuclear safety assurance is the conduct of stress tests and various monitoring missions. European legislation requires the periodic implementation of monitoring and peer-review missions, and Belarus will need to organize such missions to demonstrate the safe operation of its nuclear installations.

In terms of priorities and sequencing, several phases can be identified:

#### **Phase A — Immediate measures**

- Publication of available materials required to be disclosed under European legislation;
- Strengthening the independence of the regulator.

#### **Phase B — Medium term (6–24 months)**

- Adaptation and harmonization of national legislation in line with EU regulatory requirements;
- Organization and conduct of monitoring missions and stress tests;

- Signing of international agreements and accession to associations related to the operation and safety of nuclear installations.

### **Phase C — Long term (24–60 months)**

Modernization of installations that do not meet EU requirements, until full compliance is achieved.

#### 5.3.4. Decarbonization and EU Climate Policy

Decarbonization is a key element of EU energy policy, while in Belarus it currently receives little practical attention. The development of renewable energy sources for heat production is legally constrained to such an extent that it can effectively be described as a near-total ban on RES development. These policies will need to be repealed. In addition, a range of regulatory and strategic documents will need to be adopted in order to harmonize Belarusian legislation with EU standards.

For many years, the European Union has operated an emissions trading system (ETS) for greenhouse gas emissions (Directive (EU) 2023/959) . However, implementation of this directive requires a number of additional measures, including the introduction of a system for monitoring, reporting, and verification (MRV) of greenhouse gas emissions (Regulation (EU) 2015/757). Belarus has previously begun work in this area: international projects were implemented, analytical studies were prepared, and draft regulatory documents were developed, but the system was never formally adopted. The establishment of a greenhouse gas emissions trading system involves the creation of an independent market operator, a system for allocating emission allowances, the establishment of a trading platform, and other related infrastructure elements.

For Belarus, implementation of such a system will also be driven by the EU’s carbon border regulation – Regulation (EU) 2023/956 (CBAM, Carbon Border Adjustment Mechanism). This regulation introduces a system under which payment for greenhouse gas emissions is levied not only for emissions occurring within the EU, but also for emissions generated in third countries during the production of goods subsequently imported into the EU. At the same time, the regulation provides that if a carbon price has already been paid in another jurisdiction, no additional payment is levied upon import into the EU. Thus, in the absence of an ETS in Belarus, exports of energy-intensive goods (cement, chemical fertilizers, steel, etc.) will be subject to additional charges, and producers will pay for greenhouse gas emissions regardless. If an ETS is in place in Belarus, these payments will accrue to the Belarusian budget; without such a system, they will be paid into the EU budget.

There are also EU directives and regulations governing reporting on greenhouse gas emissions and ESG requirements. Separate legislation exists on energy efficiency (Directive 2012/27/EU ), which establishes not only mechanisms and instruments for improving energy efficiency in buildings, equipment, and other areas, but also specific target indicators for achieving defined levels and rates of improvement in energy efficiency. A similar directive applies to the development of renewable energy sources (Directive (EU) 2018/2001), which sets a specific target (32% renewable energy in final energy consumption by 2030) and defines support mechanisms and instruments to achieve this target.

Each EU Member State is required to have a National Energy and Climate Plan (NECP) under Regulation (EU) 2018/1999. This plan includes measures related to energy efficiency, internal energy markets, energy security, and support for innovation and research in designated areas. On the path to integration, Belarus will also need to develop and implement such a plan. Moreover, all strategic planning will need to be reformatted in line with European standards.

Overall, European climate policy (not limited to energy policy) is set out in Regulation (EU) 2021/1119, which establishes the objective of achieving climate neutrality by 2050. This does not formally require Belarus to assume identical obligations, but legislative harmonization will entail EU involvement at each stage of developing strategic documents. All of these legal acts are collectively known as the Fit for 55 package — a set of legislative measures aimed at reducing greenhouse gas emissions by 55% by 2030 compared to 1990 levels.

Based on the analysis, the following steps can be proposed for implementing EU climate legislation:

#### **Phase 0 — Immediate objectives (0–6 months)**

- Analysis of exports to the EU with respect to CBAM risk — categorization of goods and assessment of greenhouse gas emissions associated with their production;
- Introduction of MRV systems for leading export-oriented sectors.

#### **Phase 1 — Strategic documents and emissions trading system**

- Preparation of an NECP (Regulation (EU) 2018/1999) with acceptable scenarios for 2030 and 2050;
- Inclusion of renewable energy and energy efficiency targets in strategic planning documents;
- Making MRV mandatory for industry and the energy sector, ensuring compatibility with the EU ETS, and launching a reporting system;
- Introduction of a carbon emissions trading system and adaptation of legislation in line with CBAM requirements.

#### **Phase 2 — Technical transformations**

- Preparation of a legislative framework and launch of investment projects in the renewable energy sector: tenders for solar, wind, and biogas generation, and support programs;
- Reform of the legislative framework and launch of investment projects in energy efficiency: thermal renovation programs, updated standards for new construction, building labelling, etc.;
- Implementation of reforms required to gain access to European financing mechanisms (EU funds, EBRD, EIB, bilateral donors) for “green” investments.

### **5.4. Aligning Arrangements in the Energy Sector with the Indicative Timeline for the EU-integration Path for Belarus**

Based on an analysis of EU and Belarusian legislation, as well as the experience of other countries joining the European Union (primarily Ukraine and Moldova), it is possible to outline a tentative timeline for the necessary actions at each step of integration: preparation for the CEPA preparation for the AA, and direct accession to the EU.

These requirements must be adjusted to national specifics, in particular through the adoption of domestic legislation within a separate track that is not directly linked to EU integration but is necessary to improve Belarus’s economic situation and enhance its energy independence.

Moreover, the divergences in the existing systems are so significant that they cannot be synchronized in a single stage through legislative changes. Some changes will need to be implemented gradually: initially adopting the relevant regulatory act, modernizing the existing systems in accordance with it, and then amending the act further to implement subsequent steps in legislative harmonization.

#### **5.4.1. CEPA**

At the CEPA stage, the following steps are necessary:

##### **A. Gas**

1. Adoption of a framework law on the gas market. This law may not require immediate implementation of all requirements in accordance with EU legislation. For example, requirements for unbundling can be significantly softened due to the absence of market participants and the full state ownership of the gas infrastructure.

2. Creation of a market operator and a gas system operator, which will remove restrictions on further market development and allow subsequent steps for unbundling.
3. All requirements related to data exchange and interaction between operators should be implemented as much as possible. This is necessary to harmonize rules for forming the gas balance, which will, in turn, enable obtaining gas from the EU in case of supply disruptions from Russia.

#### B. Oil and Oil Products

4. Conduct an audit of strategic reserves of oil and oil products and develop a plan to increase reserve levels in accordance with requirements.
5. Transition to reporting forms in accordance with European standards regarding oil and oil products.

#### C. Electricity

6. Update and adopt the developed Electricity Law. During the update, the requirements of Regulation (EU) 2019/943 should be considered as much as possible.
7. Restore the system operator (TSO) as a legally independent entity. Even at this stage, the requirements of Regulation (EU) 2017/1485 (SAOA) should be taken into account to simplify further synchronization.
8. Launch the electricity market according to the “Purchasing Agency” model, which will create incentives for the development of independent generation, primarily from renewable energy sources (RES), and will form the foundation for liquidity growth necessary to transition to a “Wholesale Market” model.

At this stage, the above documents cannot be fully implemented. However, it is essential to lay the foundation for future reforms and demonstrate the intention to develop an electricity market.

The first step in synchronizing nuclear power plant (NPP) regulation is to ensure the real independence of the regulator, organize the publication of operational safety data, and prepare and conduct comprehensive audits and stress tests of the NPP with participation from EU representatives.

#### D. Climate and decarbonization

9. Implement an MRV system at least for major exporters and, if necessary, introduce payments for greenhouse gas emissions into a dedicated decarbonization fund. This will exempt Belarus from making payments to the EU budget under CBAM.
10. Begin the development of the NECP (National Energy and Climate Plan). Considering the volume of changes required in later stages, it is likely that this stage could even complete its development and approval.

#### 5.4.2. Association Agreement

##### A. Gas

1. Implementation of unbundling.
2. Implementation of key directives and parts of regulations, including legislation on third-party access to Belarusian gas infrastructure.
3. Continued development and synchronization of functions of the gas system operator, the market operator, and the gas market regulator.

At this stage, it is also necessary to develop a strategy for diversifying gas supplies, including the implementation of investment projects in Belarus and other EU countries.

##### B. Oil and Oil Products

4. Implementation of a program to increase oil storage volumes in Belarus.

Possible future requirements for the operation of the oil and petroleum products market may emerge, including environmental standards. Belarus must monitor these changes and implement them into national legislation, including projects at refineries and oil infrastructure.

### C. Electricity

5. Full implementation of the requirements of Directive 2019/944.
6. Separation of DVA “Belenergo” by type of activity.
7. Formation of electricity market liquidity and launch of the wholesale market model.

Regarding the NPP, the provisions of Euratom directives should be implemented as fully as possible, necessary stress tests conducted, and work carried out on transitioning to Euratom operational standards.

### D. Climate and decarbonization

8. Adoption of the NECP (National Energy and Climate Plan).
9. Implementation of the MRV system for all significant emitters, in accordance with similar EU requirements.
10. Development and launch of an ETS system is desirable. This will simplify foreign trade and reduce costs under the CBAM mechanism.

At this stage, full synchronization of prices with the EU ETS system will not be achieved, so a direct link to EU ETS carbon prices may be necessary. Legally, this point is not mandatory at the stage of signing the Association Agreement, but it is important for Belarus to simplify foreign trade and reduce CBAM-related costs

#### 5.4.3. EU Accession Stage

### A. Gas

1. Full compliance with EU directives and regulations regarding the gas market.
2. Complete unbundling and supply diversification (likely including the creation of a price stabilization fund).
3. Full integration with the European gas market.

### B. Electricity

4. Completion of the wholesale and balancing market operation, as well as system services markets.
5. Completion of preparations for physical synchronization with ENTSO-E, including achieving the TEN-E requirement (15% cross-border capacity relative to installed capacity).

### C. Nuclear Power and Safety Systems

6. All NPPs and safety systems brought into full compliance with Euratom requirements.
7. Spent fuel and radioactive waste management systems are fully aligned with EU standards.

### D. Climate and decarbonization

8. A fully operational ETS system must be launched prior to full synchronization.
9. Strategic documents must ensure compliance with EU-wide Fit-for-55 requirements.

## **6. Conclusions**

This paper develops a structured framework for Belarus’s potential path toward European integration under conditions of deep structural and institutional constraints. The analysis demonstrates that,

unlike most previous enlargement cases, Belarus faces a dual transition challenge: it must simultaneously undertake internal institutional transformation and external disengagement from existing integration frameworks. This fundamentally shapes both the sequencing and feasibility of the integration process.

The key contribution of the paper lies in articulating a coherent strategic logic of integration that is consistent with both EU accession procedures and the specific constraints of the Belarusian case. Building on comparative evidence from Ukraine, Moldova, and Armenia, we propose a continuous, stage-based pathway that combines an initial transition phase (anchored in a CEPA-type framework), a core convergence phase (based on AA/DCFTA implementation), and a formal accession stage. Within this structure, the paper also outlines an indicative timeline, suggesting that, under favorable conditions, a full integration horizon of approximately 10–15 years may be feasible.

A central analytical insight is that EU integration for Belarus cannot be interpreted as a standard convergence process. Rather, it represents a case of integration under constraints, where forward alignment with EU standards must be combined with backward institutional disentanglement. In this sense, the Belarusian case contributes to partially filling an existing research gap by illustrating how EU-oriented transformation can be operationalized in the presence of conflicting integration commitments.

At the same time, several important caveats apply. The most critical and uncertain element of the proposed pathway concerns the scenario, procedures, and duration of exit from the EAEU and the Union State. In this paper, we adopt a normative assumption of relatively rapid disengagement. However, in an analytical context, this issue requires further in-depth examination, as alternative exit trajectories may significantly alter both the timeline and the overall feasibility of integration.

Finally, the analysis highlights the importance of sectoral perspectives. While the paper focuses on the energy sector as the most sensitive and systemically important domain, similar analytical work is required across other key areas of *acquis* alignment. These include competition policy and state aid control, technical barriers to trade, sanitary and phytosanitary standards, public procurement, financial sector regulation, etc. Identifying sector-specific reform priorities and aligning them with the overall integration strategy represents an essential direction for future research.

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