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Editors: Wojciech Lorenz (Managing Editor)

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Transnistria Zig-zagging towards a DCFTA

Stanislav Secieru¹

Although Transnistria, in exchange for meeting certain conditions, was allowed to benefit from the free trade agreement that Moldova signed with the EU, there are plenty of obstacles which could derail the deal. The business community in the breakaway republic is eager to enjoy the fruits of the DCFTA but is reluctant to shoulder the price of necessary reforms, the outgoing leader of the separatist enclave could undermine the agreement for electoral reasons, Russia might be tempted to test the EU's resolve to defend its trade-related norms, and Moldova could erect bureaucratic barriers for producers from the left bank of the Nistru River. In the light of these many risks, the EU should persistently encourage all sides to stick to their commitments while averting disputes that would undermine enforcement of the DCFTA in Transnistria in a timely manner.

From Reluctant Observer to Noisy Spoiler

In March 2012 the EU opened negotiations on a Deep and Comprehensive Free Trade Area (DCFTA) with Moldova, as part of Association Agreement (AA).² It was anticipated that the new trade regime between the EU and Moldova would have spillover effects beyond national territory controlled by authorities in Chisinau, the separatist entity on the left bank of the Nistru River. Bearing this in mind, Moldova's government, with EU backing, invited representatives of Transnistria to attend DCFTA talks as observers. The invitation to join negotiations offered the breakaway republic a voice at the table and thus a permanent channel through which it could raise issues of primary concern for the region's economy. In December 2011, after highly competitive elections in the separatist region, Yevgeny Shevchuk defeated Anatoliy Kaminski, the former head of the local parliament behind which the Kremlin threw its weight. Not surprisingly, Russia gave Shevchuk the cold shoulder in the early days of his presidency in 2012. In this context, Transnistria decided, reluctantly and quietly, to join DCFTA talks as an observer. However, its representation was rather a formality than a serious effort to shape the course of negotiations. As talks on the DCFTA are cross-sectorial and require input of several teams of officials with expertise in variety fields, participation of a note-taker with diplomatic background from Tiraspol was suboptimal at best.

As relations between Shevchuk and the Kremlin were thawing in the second half of 2012, the separatist leader began playing a more active role, as noisy spoiler. His representatives have not given up attending the talks. At the same time, Transnistria's leadership introduced and gradually scaled up its discourse against the DCFTA and the AA in general. On a tactical level, while being an insider at the negotiation table,

¹ The author is grateful to diplomats, officials and experts who agreed to be interviewed for the purpose of this paper.

² EU-Moldova talks on the AA were launched in January 2010. In order to open the DCFTA talks, Moldova had to meet the EU's pre-conditions. For this reason, DCFTA negotiations between the EU and Moldova started in 2012.

Tiraspol tried to pretend to be an offended outsider, complaining of its incapacity to influence the substance of talks. Strategically, the breakaway republic resorted to several public arguments in order to torpedo DCFTA negotiations. It claimed the DCFTA would worsen the economic situation in the region (although experts forecast a 3.6% growth of GDP as a result of its application), and will undermine the confidence-building process between Chisinau and Tiraspol, having a direct impact on prospects of a final settlement of the conflict. Adding a geopolitical factor, it was hinted that the DCFTA seeks to force Transnistria to abandon the Eurasian vector of economic integration.

This approach to the DCFTA worked to pre-empt a change in the status quo. Since 2006 Moldova has benefited from the Generalised Scheme of Preferences Plus (GSP+) with the EU, which two years later was upgraded to the Autonomous Trade Preferences (ATP) scheme. To benefit from asymmetric trade with the EU, companies from the separatist region had to register and obtain export certificates in Chisinau. Despite complaints about an “economic blockade,” entrepreneurs from the left bank of the Nistru rushed to legalise their status in order to access the EU market on preferential terms.³ As a result, the breakaway’s republic’s exports to the EU have doubled. Whereas Transnistria’s leadership declared in late 2012 that it should have a separate trade deal with the EU, what it hoped was to extract an extension of the ATP even after activation of the DCFTA between Moldova and the EU.

Transnistria’s strategy went hand in hand with Russia’s agenda in Moldova. The Kremlin was vigorously promoting the narrative that Moldova’s European integration undermined the country’s reintegration chances, and might provoke further cracks in its territorial integrity (for example, in Gagauzia). Moscow tried to take advantage of Tiraspol’s complaints in order to slow down Moldova’s negotiations with the EU. The more vocally the breakaway republic promoted an anti-DCFTA line and Eurasian integration rhetoric, the greater were the favours it could obtain from the Kremlin. For instance, in November 2012 Russia established the GONGO⁴ “Eurasian Integration,” aimed at channelling funds (estimated at up to \$100 million) to Transnistria for various humanitarian and infrastructure projects.⁵

2015: Decision Time

Transnistria and Russia failed to stop DCFTA negotiations. In June 2013 the EU and Moldova held the seventh and final round of negotiations. One year later Moldova signed the AA with the EU. The DCFTA provisionally entered into force in September 2014. In November 2015 Italy ratified the document (the other Member States had already done so), opening the way for full application of the DCFTA in early 2016. Accordingly, since September 2014 the EU cancelled the ATP regime for Moldova. However, at Moldova’s proposal the EU approved an ATP extension for companies from the left bank of the Nistru, until the end of 2015. In the meantime, all sides were supposed to discuss terms of the application of the DCFTA in Transnistria, beginning in 2016. Tiraspol delayed for a short time, and received a fixed deadline to decide upon the DCFTA. Without agreement, the EU warned it would be compelled to replace asymmetric trade with customs duties on imports from the breakaway republic (in accordance with the “most favourable nation” (MFN) clause), which would undermine the competitive advantage of Transnistrian goods on the EU market.⁶

The EU ignored Tiraspol’s proposal to conclude a separate bilateral trade agreement. Since the second half of 2013 the EU had also been engaged actively in shuttle diplomacy, mediating between Chisinau and the separatist region about the terms on which businesses from the left bank of the Nistru could benefit from the DCFTA. Tiraspol used negotiations to delay any agreement for as long as possible, in the hope that

³ In mid-2007, 301 companies from the separatist region registered in Chisinau. By the end of 2012 their number had reached 820. For more see: “301 firme din Transnistria au fost înregistrate în Moldova,” *Moldova.org*, 14 May 2007, www.moldova.org/301-firme-din-transnistria-au-fost-inregistrate-in-moldova-47444-rom; “Aspecte multidimensionale ale reglementării conflictului transnistean. Evoluții și perspective,” *Institutul de Politici Publice*, 2012, www.ipp.md/pageview.php?l=ro&idc=175&id=547.

⁴ GONGO—a government organised non-governmental organisation.

⁵ For more about GONGO “Eurasian Integration” visit <http://eurasianintegration.ru/?q=node/71>.

⁶ “Luc Devigne: În cazul în care DCFTA nu poate fi aplicat în Transnistria, nu va exista nici o așa numită ‘blocadă,’” *Prime*, 5 May 2014, www.prime.md/rom/news/economic/item8381.

failure to strike a deal before the deadline would prompt the EU to once again extend the ATP in 2015.⁷ Negotiations entered a decisive phase in summer 2015, when the breakaway republic received a final offer and deadline to make its position clear on the DCFTA. After consulting with Moscow, it submitted a document that envisioned an agreement between Moldova and Transnistria, co-signed and guaranteed by the EU and the Eurasian Economic Union (EEU). Therefore, the Kremlin strived to squeeze Moldova into the EEU via the Transnistrian back door. It also sought to put the EEU on equal footing with the EU. As this counter-proposal has been ignored, Tiraspol expressed a willingness, in principle, to work with the draft agreement it had already received.⁸

At this stage, Germany had invested political and diplomatic capital to help reach a final agreement. The annual conference on reviewing confidence-building measures between Moldova and Transnistria, organised regularly by the OSCE⁹ and the German government, was used to this end. Held in Bavaria (Rottach-Egern) in late October 2015, the conference provided the necessary platform for Chisinau and Tiraspol to agree on details and hammer out a deal. After marathon negotiations, the sides agreed on special conditions under which economic entities from the left bank of the Nistru would benefit from the DCFTA regime. Taking into account political sensitivity, the sides refrained from using the term “DCFTA,” but instead referred in the document to a more ambiguous formula as trade facilitation measures meant to assist Transnistria’s access to the EU market.¹⁰

In early November 2015, Shevchuk travelled to Moscow, presumably to get Russia’s blessing too. In mid-November, Moldova’s government sent to Brussels a document agreed with Tiraspol, and consequently expressed its commitment to guarantee application of the DCFTA on the entire territory of Moldova. Apparently as a part of gentleman’s agreement, all sides consented not to announce the outcomes of the Bavaria conference in order to exclude this issue from “electoral” campaigning in the breakaway republic. One week later, after parliamentary elections in the separatist enclave, Tiraspol broke the news. In a face-saving exercise, the deal was presented as a bilateral agreement between the EU and the region, and one that did not introduce new conditions for Transnistria’s businesses while maintaining privileged access to the EU market.¹¹ Chisinau and Brussels refrained from engaging publically with Tiraspol over the real terms of the agreement. Meanwhile, an understanding on the trade facilitation measures agreed between Moldova and the separatist region went through the EU’s internal review process. As a result, on 18 December the EU-Moldova Association Council adopted the decision to apply provisions of the AA covering trade-related issues (the DCFTA) to the entire territory of Moldova from 1 January 2016.¹² Therefore, the decision confirms that the ATP applied to companies from the left bank of the Nistru has been cancelled, and the DCFTA extended to Transnistria.

What the Deal is About

Whereas the decision of the EU-Moldova Association Council is public, the agreement on the conditions that the separatist enclave has to meet in exchange for facilitated access to the EU market has not been revealed. Nevertheless, some basic parameters of the deal and transitional periods have been leaked. As far as the authorities in Chisinau are concerned, they have committed to provide transparent access to companies from the left bank of the Nistru, to the internal procedures necessary to obtain export documents to the EU. Basically, Chisinau agreed to continue issuing export certificates to economic entities from Transnistria as it has done since 2006.

⁷ Author’s interview with EU diplomat, August 2015.

⁸ Author’s interview with EU official, August 2015.

⁹ The conference on reviewing confidence building measures is organised by OSCE (its mission in Moldova and OSCE rotating presidency).

¹⁰ Author’s interview with EU diplomat, December 2015.

¹¹ “Tiraspol a convins Uniunea Europeană să nu anuleze preferințele comerciale,” *Infotag*, 8 December 2015, www.infotag.md/rebellion-ro/214251.

¹² Decision 1/2015 of the EU-Republic of Moldova Association Council, 18 December 2015, <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:22015D2445>.

In exchange for immediate facilitated access to the EU market, the breakaway republic has to fulfil certain conditions. The first obligation is linked to standardisation of the customs tariff regime with Moldova towards the EU. As the DCFTA stipulates the reciprocal elimination of import tariffs between Moldova and the EU, Tiraspol will have to adjust its policy accordingly. For the EU, the red line for the extension of the DCFTA to Transnistria was the gradual lifting of import duties applied by Tiraspol.¹³ The adjustments to the customs tariff regimes will, in turn, require reform of the breakaway republic's fiscal legislation, although this is not specified in the agreement. Secondly, the separatist enclave should provide access to Moldova's competent bodies in order to verify companies' compliance with standards and certify the quality of products, which was happening before on an ad hoc basis.¹⁴ The deal requires Chisinau and Tiraspol to improve and develop more systemic mechanisms to certify the origin and quality of goods. Thirdly, Transnistria should harmonise its economic and trade-related legislation with European standards in order to reduce non-tariff barriers that could hamper access to the EU market.

The EU has signalled its readiness to provide assistance to smooth the implementation of the understanding reached between Moldova and Transnistria. Moreover, in anticipation of an extension of the DCFTA to the separatist region, the EU upgraded the mandate of its monitoring mission on the Ukraine-Moldova border (EUBAM) and prolonged it for a further two years (until 2017). The renewed mandate gives EUBAM a greater role in the facilitation of border and customs issues between Moldova (Transnistria) and Ukraine, related to the DCFTA. Further attuning to new realities, the EU moved EUBAM management and coordination responsibilities from its delegation in Kyiv, swamped with dossiers in the aftermath of the 2014 Ukrainian revolution, to the delegation in Chisinau. Apart from the advantages of proximity and facilitated logistics, the EU's delegation in Moldova dealing, permanently with various aspects of Transnistrian conflict (for example, confidence-building measures), is better positioned to coordinate EUBAM's work.

In order to meet the benchmarks, the sides negotiated periods of transition. Tiraspol tried to secure two years period to deliver on commitments, Moldova and the EU sought six months. It seems that they ultimately agreed on almost a year, although sources in the separatist region claim that Tiraspol extracted as it sought for two years.¹⁵ The decision of the EU-Moldova Association Council sets the first review of the application of the trade-related part of the AA at 10 months later (October 2016), with regular assessments to be conducted every year thereafter. Judging by the timing of the first review, the breakaway republic will have to show progress in delivering on obligations taken under the deal with Moldova by October 2016.

Why Transnistria and Russia Accepted the Deal

Despite harsh rhetoric regarding the DCFTA, Tiraspol and Moscow accepted the deal. Several factors throw light on why they caved in. Until the end of summer 2015, Transnistria's leadership was confident that the EU would prolong the ATP's December of the same year, to avoid causing a trade shock to region's already ailing economy (a GDP decline of up to 12% in 2015). Simply put, they tried to leverage their own weakness. But the strong message from the EU, that the ATP would not be extended, forced the separatist enclave to negotiate. Inside the EU there were several Member States ready to block the extension of the ATP anyway.¹⁶

Lack of facilitated access to the EU, the main destination of Transnistria's exports (between 30% and 40%), would have reduced foreign trade and exacerbated the economic and social crisis on the left bank of the Nistru. According to experts, the EU's application of the "most favoured nation" clause would increase the

¹³ Author's interview with EU diplomat, August 2015.

¹⁴ Author's interview with EU official, October 2014.

¹⁵ Author's interview with former high-ranking Moldovan official, December 2015. See also, N. Pakholnitschi, V. Soloviev, "Vishenkana torte," *NewsMaker*, 17 December 2015, <http://newsmaker.md/rus/novosti/vishenka-na-torge-nm-vvyasnil-o-chem-dogovorilis-pridnestrove-i-evrosoyuz-20811>.

¹⁶ Author's interview with EU Member State diplomat, January 2016.

price of Transnistria's goods on the EU market by 15%, substantially undermining their competitive edge.¹⁷ For some companies, which depend almost totally on the European market (for example, those in the textile industry), the EU's import tariffs would seriously damage business and certainly lead to redundancies. Shevchuk estimated that, in pessimistic scenario (without the DCFTA), the region's budget would be short of up to \$50 million, and around 10,000 people would lose their jobs.¹⁸ With such grim economic and social prospects, Tiraspol had to find a way to avoid EU tariff barriers being introduced. Moreover, Shevchuk would presumably run for another term in office in late 2016. Profound economic and social crisis is a far from perfect environment in which to renew a mandate to rule. His party's resounding defeat in the parliamentary elections rang the warning bell. Thus, the trade deal with Moldova had also to be factored into Shevchuk's electoral calculations. Last but not least, the Kremlin, one of the big hitters in the region, blessed the understanding as well.

Russia has no direct terrestrial link with Transnistria (unlike in cases of Donbas, Abkhazia and South Ossetia) and did not create one via Ukraine in 2014, even though there were signals that it might attempt to do so just after the annexation of Crimea. This very fact imposes some constraints on Russia and requires subtler tactics. The Kremlin accepted the deal after exhausting all available means to prevent it in a form that is less acceptable. Moscow tried to come up with an alternative initiative by inserting the EEU into the game. Russia's diplomats also struggled to secure their own presence during final talks in Bavaria, the goal of which was unlikely to have been helping to narrow down disagreements.¹⁹ In the end, although without much enthusiasm, Moscow gave the green light.

From Russia's perspective, the deal helps to preserve Transnistria's access on advantageous terms to the EU market, preventing faster economic decline and social instability in the breakaway republic. Basically, the agreement helps Tiraspol to muddle through, requiring little additional effort from Moscow. In the absence of its own facilitated access to the EU market, crisis-ridden Russia would, in one way or another, have had to offset the separatist region's losses. Moreover, Transnistria relies heavily (approximately 50%) on imports from Russia (dominated by energy resources).²⁰ Therefore, as long as Russia represents the main source of energy supplies for the left bank of Nistru (and thus can cut off supplies at any time) it will maintain a tight grip on the region's economic activity.

In addition, Russia's military foothold (2,000 to 2,500 troops) and presence in the Transnistrian security services endows it with hard power levers that can be used to limit drastically the Tiraspol leadership's room for manoeuvre. While reluctantly approving the deal, Russia also will work to deepen trade with the separatist region and speed up the process of granting Russian passports to the local population. After visiting Moscow in November 2015, Shevchuk hinted that Moscow and Tiraspol are looking for modalities to increase Russia's imports (especially agricultural) from the region. At the same time, Russia's ambassador to Moldova unveiled plans to increase administrative capacity of the consular point in Tiraspol, in order to boost the distribution of passports. Therefore, in the event of a military scenario, Russia will claim to have the right to protect its citizens living in the breakaway republic.

Prospects for 2016

While the deal represents an incremental step in the right direction, it is too early to celebrate. Some EU Member States praise the agreement but warn that Transnistria might not respect the deadlines, noting that

¹⁷ See A. Lupușor, A. Fala, Iu. Morcotilo, V. Prohnițchi, "Economia regiunii transnistrene la răscruce," *Expert-Grup*, 10 December 2015, www.expert-grup.org/ro/biblioteca/item/1192-rer-trn-dec2015&category=7.

¹⁸ "Yevgeny Shevchuk: Kogda esti neobkhodimosti vybirati mezhdu tem, shto segodnya siesti ili vlozhiti v armiu, prioritet budet otdan armii," *NewsMaker*, 24 December 2015, <http://newsmaker.md/rus/novosti/evgeniy-shevchuk-kogda-est-neobhodimost-vybirat-mezhdu-tem-chto-segodnya-sjest-ili-21062>.

¹⁹ Author's interview with diplomat, January 2016.

²⁰ A. Lupușor, "DCFTA in the Transnistrian Region: Mission Possible?," *Expert-Grup*, 20 September 2015, www.expert-grup.org/en/biblioteca/item/1173-implementare-aa-transnistria&category=7.

the EU has few instruments to monitor and verify the fulfilment of conditions.²¹ This guarded scepticism is not entirely baseless.

Firstly, the business community on the left bank of the Nistru is not homogeneously pro-DCFTA. Apart from businesses heavily dependent on the EU market (for example, 60% of the MMZ steel factory's exports go to the EU) or in the process of penetrating the EU market (the Ribnita cement factory is knocking on Romania's doors), there are others that have little interest in the DCFTA or would like to obtain the advantages that it offers while avoiding paying the price for it. For instance, the Cuciurgan power plant, owned by Russia's RAO UES, exported electricity to Romania between 2007 and 2009. When Romania reached a surplus of domestically generated electricity, RAO UES lost the market. However, speculating on Ukraine's DTEK withdrawal from Moldova in 2014, Cuciurgan, via its murky intermediary Dnestrenergo, increased deliveries to Moldova proper, the latter covering around 75% of its needs from Transnistria. In the absence of short-term alternatives for Chisinau (interconnections with Romania are yet to be upgraded), RAO UES is more concerned about locking potential competitors out of Moldova's market, rather than seeking new export opportunities in the EU.

Sheriff, one of the biggest companies in Transnistria, is the perfect example of the having it both ways approach. On the one hand, Sheriff supports the DCFTA as its assets include factories with EU-oriented exports (for example the wine and brandy distillery Kvint, and the textile producer Tirotext). On the other hand, as a result of the elimination of import duties for EU goods, and the need to compensate losses of budget revenues, Tiraspol will have to introduce value-added tax (VAT), which will hit Sheriff's local retail business (it controls the largest network of supermarkets). Although Sheriff consented to the Moldova-Transnistria deal, it has enough political clout (via control of the Renewal Party, which has an overwhelming majority in the local "supreme council") to derail or at least to slow down implementation measures for facilitated trade with the EU.

In addition, the separatist republic will hold "presidential elections" in late 2016. Regardless of the personal ambitions of political players, election years are not generally favourable for the implementation of unpopular reforms with delayed positive effects. Transnistria is no exception in this case. Moreover, if Sheriff pitches its own candidate (the current prime minister, Pavel Prokudin, is rumoured to be the potential pick²²), it will have more reasons to obstruct fiscal reforms and push for populist measures via the local "legislature." Despite antagonistic relations, the outgoing leader of the separatist region might tactically join Sheriff in blocking the introduction of VAT. Otherwise, the adoption of VAT would put pressure on the local currency (in 2015 the "government" spent 30% of its foreign exchange reserves in an attempt to defend it) and may cause inflation in the region to spiral. If Shevchuk runs for re-election, he will struggle to safeguard whatever economic stability and prosperity remains, while having to oppose the regional oligarchy (Sheriff), as he did in his campaign during the "parliamentary elections." To boost his campaign, he is likely to appeal for financial help from Russia in order to pay social benefits.

And, of course, while Russia approved the deal this does not mean that it will support its implementation, at least on Transnistria's side. Even without the reference to the DCFTA, the Kremlin perceives the agreement as further encroachment of the EU in Russia's "sphere of influence," which could trigger much deeper transformations in the breakaway republic in the long run. Therefore, it is likely that the Kremlin will deter Tiraspol from implementing the terms of agreement. Given the domestic situation in Transnistria, and the positioning of political players, little resistance will come from the separatist enclave. In addition, an understanding between Moscow and Tiraspol, to test the EU's resolve by not delivering on obligations related to the DCFTA, cannot be totally ruled out.²³ Elections and economic crisis in the region would be used as an excuse for such a move. Tiraspol could also use the EU's tolerance to some extent of Moldova's weak performance on AA implementation as an argument. In this logic, leaders on the left bank of the Nistru might expect some degree of tolerance for free-riding too. Russia, driven by its power relations paradigm, could calculate that the EU, after constructing a trade lever in Transnistria over the last decade,

²¹ Author's interview with diplomat from EU Member State, January 2016.

²² Author's interview with diplomat, January 2016.

²³ Author's interview with former high-ranking Moldovan diplomat, December 2015.

might tacitly concur with Tiraspol's misbehaviour on the DCFTA. In the Kremlin's view, the alternative for the EU would be to lose its tool of influence in the breakaway republic. At the same time, if the EU and Moldova decide to cease application of the DCFTA to Transnistria, both Tiraspol and Moscow are ready to resurrect discourse on an "economic blockade," "humanitarian catastrophe" and "aggressive" EU, which instead of solving the problem only contributes to escalation of the conflict.

How to Make It Work

In the light of many risks that could undermine DCFTA enforcement on the left bank of the Nistru, the EU should keep the issue in focus. To succeed it will require coherence, perseverance and a certain degree of flexibility.

The EU should advise Moldova's authorities against raising artificial bureaucratic obstacles in the process of issuing export certificates for those Transnistrian companies that meet all legal conditions. The EU should also encourage Chisinau to show flexibility and gradualism in the process of fine-tuning mechanisms for certification and verification of standards in regard to businesses from the separatist enclave. At the same time, the EU also should stand firm in defending the red lines on DCFTA-related conditions assumed by Tiraspol (for example, the elimination of import tariffs for EU goods). It should signal to the left bank that repetitive attempts to leverage weakness will fail (just as in 2015). The EU's tougher conditionality regarding Moldova proper, for example, the suspension of EU funds in 2014 for the lack of progress on the AA, should serve as an example for the breakaway republic, too. Transnistrian elites are business pragmatists used to navigating between opposing currents. They are unlikely to risk losing access to the EU market completely, and if faced with a principled EU position they will fall in line. But the EU should be ready to prove flexibility, accepting short-term delays on some DCFTA issues that do not represent red lines, for example, on various aspects of harmonisation of economic legislation). Moreover, the EU, together with the World Bank, should use its full potential to smooth the modernisation of economic "legislation" in the separatist enclave (via, for example, adoption of international financial reporting standards, public procurement procedures, and statistical evidence standards).

Last but not least, the EU should push more vigorously for enhancement of customs and border control on the Transnistrian segment of the Moldova-Ukraine border. On the one hand, this should strengthen the capacity to monitor how the DCFTA is implemented in the region. On the other hand, it could also fulfil the breakaway republic's transit time potential (the M14 transport corridor passes through Tiraspol and links it with routes to Odessa and Chernivtsi), integrating it with the wider regional goods transportation network. The pilot project at the Cuciurgan-Pervomaisk border check, where customs and border guard officers from Ukraine and Moldova will work together, should be implemented swiftly in 2016. In the mid-term perspective, the EU should push for an extension of this joint practice along Ukraine's entire border with the separatist enclave. Anticipating spoiler tactics from Tiraspol, the EU should advise Moldova to invite Transnistrian to be embedded observers with Moldova's officers. Although it is up to Tiraspol to decide whether to join the process, Chisinau should deprive the separatists of arguments to claim that they are being left out and thus play the victim card again.