

ANALYTICAL NOTE

Transition from temporary protection of displaced persons from Ukraine: options, challenges and recommendations

Developed by: Law Center of Advocates

Reference framework: Directive 2001/55/EC;¹ EU Council Recommendation C/2025/5129²; Law no. 270 of 18.12.2008 on asylum in the Republic of Moldova; Law no. 200 of 16.07.2010 on the regime of foreigners in the Republic of Moldova, Law no. 66 of 30.04.2026 on the admission, stay and supervision of foreigners in the Republic of Moldova, Law no. 200 of 10.07.2026 on the free movement and residence on the territory of the Republic of Moldova of citizens of the European Union and their family members, Government Decision no. 21 of 18.01.2023 on granting temporary protection to displaced persons from Ukraine

The central message of this document

Urgent adoption of a post-temporary protection transition plan is a priority

Including the period of temporary protection in the period necessary to grant the right of permanent residence is essential

Granting a transitional status adapted to the economic realities of the Republic of Moldova is essential

The development of a structured voluntary return programme, in line with EU Council Recommendation C/2025/5129, is a priority

Facilitating and encouraging verification visits to Ukraine, under self-financing conditions, while maintaining temporary protection, is a simple measure with a major impact

Early information, accessible legal advice and dialogue with beneficiaries of temporary protection are as important as legislative reforms

The possible termination of temporary protection before the entry into force of Law no. 66 of 30.04.2026 on the admission, stay and supervision of foreigners in the Republic of Moldova may generate a period of legislative vacuum, in which certain new ways of legalizing residence will not yet be available.

¹ Council Directive 2001/55/EC of 20 July 2001 on minimum standards for granting temporary protection in the event of a mass influx of displaced persons and measures to promote a balance between Member States' efforts to receive such persons and bearing the consequences of such reception: <https://eur-lex.europa.eu/legal-content/RO/ALL/?uri=celex%3A32001L0055>

² Council recommendation of 16 September 2025 on a coordinated approach to the gradual exit from the temporary protection regime for displaced persons from Ukraine: https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=OJ:C_202505129

1. Background

Since the start of the Russian invasion of Ukraine in February 2022, the Republic of Moldova has become one of the main transit and destination states for forcibly displaced persons from Ukraine. By establishing temporary protection, national authorities have ensured access to protection and essential services, as well as provisional legal status for thousands of refugees.

According to UNHCR data, in May 2026 there were approximately 53000 beneficiaries of temporary protection on the territory of the Republic of Moldova, of which 39% were women, 23% children and 8% people over 60 years of age.

According to IGM records³, on May 11, 2026, a number of 47612 beneficiaries requested the extension of temporary protection. At the same time, 3807 Ukrainian citizens had the right of temporary residence on the territory of the Republic of Moldova, granted for various purposes, including work, studies, investments or volunteer activities, and 2562 persons benefited from the right of permanent residence. On the same date, 327 Ukrainian citizens were registered in the national asylum system, of which 78 had asylum seeker status, 2 had refugee status, and 247 had humanitarian protection status.

Temporary protection is an exceptional and time-limited measure and is due to expire on 1 March 2027. In the absence of sufficient information on the options to remain legally in the territory of the Republic of Moldova or to return to Ukraine, as well as a clear mechanism for transitioning to other forms of residence, there is a risk that, after the possible cessation of temporary protection, a significant number of beneficiaries of this form of protection will face difficulties in making informed decisions about their future legal status. In some cases, this could also lead to an increase in the number of cases of illegal stay. Such a scenario can have negative consequences for both the data subjects and the public authorities, generating administrative and social pressures, increasing vulnerability to exploitation and trafficking of human beings, affecting integration processes and amplifying certain risks to public order.

According to projections developed by UNHCR based on an *agent-based simulation model*, in the scenario of a fragile peace with territorial concessions, approximately 42,814 refugees from Ukraine would remain on the territory of the Republic of Moldova, representing 34% of the total refugees registered at the time of the start of the simulation.⁴ This is the lowest retention rate recorded among all the countries included in the analysis, reflecting both the geographical proximity to Ukraine and the specific characteristics of the hosted population.

The geographical origin of refugees is a determining factor in the likelihood of staying in the host country. UNHCR data indicate that refugees from the eastern and southern regions of Ukraine are overrepresented among those who do not intend to return, for whom the release of

³ <https://igm.gov.md/protect-ia-interna-ional-i-documentarea-ucrainenilor-n-republica-moldova-12/>

⁴ UNHCR, Regional Bureau for Europe, Transitioning from Temporary Protection: Projected Stay, Legal Pathways, and Policy Options for Refugees from Ukraine, May 2026, <https://reliefweb.int/report/ukraine/transitioning-temporary-protection-projected-stay-legal-pathways-and-policy-options-refugees-ukraine-may-2026>

the temporarily occupied territories is an essential prerequisite for any decision to return. This reality has direct implications for the size of groups at high risk of illegal stay in the Republic of Moldova and for the profile of beneficiaries who will require alternative legal residence solutions after March 1, 2027.

The EU Council Recommendation of 16 September 2025 (C/2025/5129) sets out the European reference standard for managing the transition after the end of temporary protection. Although the Republic of Moldova is not legally obliged to apply this instrument, its status as a candidate country for accession to the European Union gives the document a particular relevance in the context of progressive alignment with the European acquis.

This document summarises the main options available in the Republic of Moldova in view of the likely termination of temporary protection on 1 March 2027, highlights the challenges and risks associated with the transition process, identifies groups at increased risk of illegal stay, and makes priority recommendations to facilitate the transition to other forms of legal residence, as well as to support voluntary return to Ukraine, in conditions of safety and dignity.

2. EU Council Recommendation of 16 September 2025 (C/2025/5129): relevance for the Republic of Moldova

The EU Council Recommendation of 16 September 2025 on a coordinated approach to the gradual exit from temporary protection is the first European policy instrument to explicitly address the management of the transition after the end of temporary protection. The document establishes a framework of actions structured in four main areas, further analyzed from the perspective of applicability and relevance for the Republic of Moldova.

2.1. Transition to other legal statuses before the end of temporary protection

Content of the recommendation: The Council of the EU recommends that Member States promote and facilitate the transition of beneficiaries of temporary protection to national legal status, in situations where the conditions for continued legal residence for other purposes are met, such as for work, self-employment, studies, vocational training and research, family reunification or other grounds provided for by national law. At the same time, Member States are encouraged to allow access to forms of residence governed by Directives (EU) 2016/801⁵, (EU) 2021/1883⁶ and (EU) 2024/1233⁷ of the European Parliament and of the Council,

⁵ Directive (EU) 2016/801 of the European Parliament and of the Council of 11 May 2016 on the conditions of entry and residence of third-country nationals for the purposes of research, studies, vocational training, volunteering services, pupil exchange programmes or educational projects and au pair work, <http://data.europa.eu/eli/dir/2016/801/oj>

⁶ Directive (EU) 2021/1883 of the European Parliament and of the Council of 20 October 2021 on the conditions of entry and residence of third-country nationals for the purpose of employment in highly qualified employment and repealing Council Directive 2009/50/EC, <http://data.europa.eu/eli/dir/2021/1883/oj>

⁷ Directive (EU) 2024/1233 of the European Parliament and of the Council of 24 April 2024 on a single procedure for applying for a single permit for third-country nationals to reside and take up employment in the territory of the Member States and a common set of rights for third-country workers legally residing in the territory of a Member State, <http://data.europa.eu/eli/dir/2024/1233/oj>

provided that the persons concerned do not simultaneously benefit from temporary protection in the European Union.

Relevance for the Republic of Moldova: This approach is directly applicable in the national context as well. Law no. 200/2010 on the regime of foreigners in the Republic of Moldova already provides mechanisms that allow the granting of the right of temporary residence for the purpose of work, studies, family reunification, volunteering or investment activities, as well as in other situations.

At the same time, Law no. 66 of 30.04.2026 on the admission, stay and supervision of foreigners in the Republic of Moldova, which is to enter into force in June 2027, develops, diversifies and modernizes these instruments, partially transposing the mentioned EU directives. A novelty is the possibility of granting the right of temporary residence on the territory of the Republic of Moldova to vulnerable groups of foreigners and in other justified situations, not expressly provided for by law, when this is necessary for the observance of the fundamental principles of human rights and freedoms, for the protection of major interests of public order, humanitarian or national security, based on an individual and proportionate assessment of the circumstances of each case.

However, the normative acts in the field do not regulate specific procedures for transitioning from temporary protection to other legal statuses and do not establish a dedicated mechanism for managing such a process.

Critical issues: The transition process must simultaneously respond to the interests of temporary protection beneficiaries, Ukraine's reconstruction needs and the state's obligation to maintain the functionality and integrity of the national asylum system. The possible termination of temporary protection before the entry into force of the Law on the Entry, Residence and Supervision of Foreigners in the Republic of Moldova may generate a period of legislative vacuum, in which certain new ways of legalizing residence will not yet be available. This situation risks disproportionately affecting people in vulnerable situations who have difficulties in fulfilling the general conditions for obtaining another legal status.

2.2. Creating the conditions for a sustainable reintegration in Ukraine

Content of the recommendation: EU Council recommends the adoption of a set of measures aimed at facilitating the voluntary and sustainable return to Ukraine. These include: (i) the possibility of carrying out verification visits to Ukraine, under conditions of self-financing, without losing temporary protection (art. 21 para. (2) of Directive 2001/55/EC); (ii) the development of strategic voluntary return programmes in cooperation with the Ukrainian authorities, prioritising the support of community reintegration over individual packages; (iii) ensuring the continuity of legal residence after the expiry of the temporary protection for persons with special needs, other than those related to health, by applying the domestic law transposing art. 23 para. (1) of Directive 2001/55/EC and for parents of children attending educational institutions (art. 23 para. (2) of Directive 2001/55/EC).

Relevance for the Republic of Moldova: All these measures are of practical relevance for the Republic of Moldova. Verification visits can be an important tool for making informed decisions

on return, allowing beneficiaries of temporary protection to assess the real conditions in their localities of origin without the risk of losing the legal protection they enjoy. Equally, the development of a voluntary return program developed in cooperation with the Ukrainian authorities and development partners could become one of the main tools for managing the post-temporary protection period. The implementation of such measures could also benefit from external financial support.

Critical: EU Council Recommendation expressly highlights that Ukraine will need time to rebuild its capacity to sustainably reintegrate people displaced by the war. Under these circumstances, an approach based on the rapid or involuntary return of refugees appears neither realistic nor humane, even in the event of an armistice. Therefore, the transition process must be gradual, flexible and adapted to individual circumstances, so as to contribute both to the protection of the persons concerned and to Ukraine's efforts to reintegrate its own citizens.

2.3. Informing beneficiaries of temporary protection

Content of the recommendation: EU Council stresses the need to ensure full and accessible information to beneficiaries of temporary protection on: options for transitioning to other legal statuses and their benefits/rights; the situation in Ukraine and the conditions for carrying out verification visits; the support measures available under voluntary return programmes. To this end, national contact points, information campaigns aligned with EU communication and unity centres, developed in cooperation with the Ukrainian authorities, are recommended.

Relevance for the Republic of Moldova: Early and systematic information of beneficiaries of temporary protection is one of the most important measures to prevent illegal stay after March 1, 2027. The fact that IGM keeps the records of the beneficiaries of temporary protection creates favourable premises for carrying out proactive and targeted information campaigns. Such activities should target at least the following categories of recipients: beneficiaries of temporary protection, employers and local public administration authorities. Each of these groups needs specific information on the transition options available, the necessary documents, the applicable deadlines, the conditions for voluntary return and the support available.

Critical: Lack of information, late communication, disinformation and limited access to official sources of communication are factors that can significantly affect the success of the transition process. Particular attention must be paid to people who intend to return to Ukraine, as they also need clear information on the conditions of return and the forms of support available. An insufficient information campaign can reduce interest in voluntary return and indirectly lead to increased pressure on the national asylum system.

2.4. Coordination, monitoring and exchange of information

Content of the recommendation: EU Council recommends continued cooperation between Member States through systematic exchange of information within the framework of the Solidarity Platform, regular updating of data on displaced persons from Ukraine (number of beneficiaries of temporary protection or other forms of protection under national law, number of persons who have transitioned to other states and no longer benefit from temporary protection or other forms of protection, etc.). protection under national law, as well as the number of persons whose registrations are inactive) and the exchange of data and information on

beneficiaries of temporary protection under the migration crisis preparedness and management mechanism (EU Action Plan Network) in preparation for possible future developments in the field of migration.

Relevance for the Republic of Moldova: The Republic of Moldova has joined the European Migration Network (EMN) as an observer and collaborates with the Solidarity Platform. These mechanisms provide important opportunities for the exchange of best practices, access to up-to-date information and coordination of measures to manage the transition of temporary protection beneficiaries.

Critical: In order to substantiate public policies and transition measures on objective data, it is appropriate to strengthen capacities to collect, update, analyse and report disaggregated data on beneficiaries of temporary protection. The existence of complete and reliable data will make it possible to estimate risks, identify vulnerable groups and assess the impact of measures taken during the transition process.

2.5. Degree of applicability of the measures recommended by the Council of the EU in the Republic of Moldova

The analysis of the EU Council Recommendation of 16 September 2025 (C/2025/5129) highlights that most of the measures proposed for the management of the transition after the end of temporary protection can be adapted and implemented in the Republic of Moldova under the conditions of the existing regulatory framework or through targeted legislative and administrative interventions.

The table below summarises the main measures envisaged by the EU Council Recommendation, their degree of applicability in the Republic of Moldova and their implications for the transition process from temporary protection to other forms of legal residence or to voluntary return to Ukraine.

Recommended measure	Addressees	Relevance for Moldova
A(1). Promoting and facilitating the access of beneficiaries of temporary protection to national legal statuses (residence permits for work, vocational training or education and research, on family or other grounds) before the end of temporary protection	EU Member States	Directly applicable: The Republic of Moldova may facilitate the granting of the right of temporary or permanent residence to beneficiaries of temporary protection who meet the conditions established by law, through simplified procedures
A(2). Access to authorisations under Directives (EU) 2016/801, EU 2021/1883 and EU 2024/1233) in situations where access to national legal statuses is not possible	EU Member States	Partially applicable: The Republic of Moldova does not directly apply the mentioned EU directives, but they are partially transposed into Law no. 66/2026 on the admission, stay

		and supervision of foreigners in the Republic of Moldova, in force on June 1, 2027
B(3). Verification visits to Ukraine, under conditions of self-financing, with the maintenance of temporary protection and in compliance with art. 21 para. (1) of Directive 2001/55/EC	EU Member States	Applicable: The Republic of Moldova can encourage verification visits without ceasing temporary protection, with the establishment of clear conditions and requirements, as well as the point of contact –General Inspectorate for Migration(GIM).
B(4). Structured voluntary return programmes, with the establishment of the period of departure after the end of temporary protection, coordinated with the Ukrainian authorities	EU Member States Development Partners	Applicable: The Republic of Moldova can develop a voluntary return program in partnership with development partners and Ukrainian authorities, financed from external funds
B(5). Residence for people with special needs, who do not meet the requirements to have access to other legal statuses	EU Member States	Applicable: Pursuant to Law no. 270/2008, one of the forms of protection granted on the territory of the Republic of Moldova is humanitarian protection. The granting of humanitarian protection, according to Article 19 of the Law, involves an assessment of the risk of serious harm defined in Article 45 paragraph 3) of the Law. Respectively, the serious and individual threat to the life or bodily integrity of a civilian due to generalized violence in situations of international or internal armed conflict may serve as a basis for granting humanitarian protection At the same time, Law no. 200/2010 grants the right of temporary residence for purposes other than those provided for by law, in compliance with the

		established conditions (art. 43 para. (1) letter b). Law no. 66/2026 (in force from June 1, 2027), offers the right of temporary residence to vulnerable groups (art. 31, para. (2) letter v) and in other reasoned situations, not provided for by law, when the granting is necessary for the observance of the fundamental principles of human rights and freedoms, for the protection of major interests of public order, humanitarian or national security and is justified by an individual, thorough and proportionate assessment of the concrete circumstances (art. 31, para. (2)(w)). None of the mentioned mechanisms is explicitly dedicated to people with special needs, beneficiaries of temporary protection. A subsequent normative act is needed to operationalize art. 43 para. (1) letter b) of Law no. 200/2010 and art. 31, para. (2), letters v) and w) of Law no. 66/2026
B(6). Continuation of stay after the end of temporary protection for persons with children attending school (until the end of the school year)	EU Member States	Directly applicable: The Republic of Moldova may adopt a similar regulation, so as to support the stability of the family and the continuity of the educational process
C(7). Adequate information on available possibilities for transition to other legal statuses, the situation in Ukraine, verification visits and voluntary return programmes	EU Member States Ukrainian authorities	Urgently applicable: The Republic of Moldova must immediately launch information campaigns in Ukrainian and Russian. In order to streamline efforts, GIM is encouraged to benefit from the knowledge, capacities and networks provided by international organisations and civil society organisations

D(8)-(9). Coordination, monitoring, data exchange in the context of the Solidarity Platform; working with Member States and Ukrainian authorities at technical and political level	European Commission EU Member States	Partially applicable: The Republic of Moldova collaborates with the Solidarity Platform. GIM is encouraged to regularly update relevant information on the status of displaced persons in Ukraine
--	--------------------------------------	---

Note: The Republic of Moldova, as an EU candidate state, is not legally obliged to apply the Council Recommendation, but it constitutes the political and technical benchmark against which its efforts to align with the European acquis in the field of migration and asylum can be assessed.

The analysis reveals that the Republic of Moldova already has legal instruments that allow the implementation of a significant part of the European recommendations. However, the lack of an integrated national transition mechanism, simplified procedures dedicated to beneficiaries of temporary protection and explicit solutions for vulnerable groups may create significant difficulties in the context of the termination of temporary protection on 1 March 2027.

Consequently, the process of preparation for the post-temporary protection period should include, in addition to information and institutional coordination measures, the development of a regulatory and procedural framework that facilitates access to other forms of legal stay, prevents the occurrence of illegal residence and provides appropriate solutions for persons who do not meet the general immigration conditions, but which continue to require protection or support from the state.

3. The normative framework of the Republic of Moldova: opportunities, limitations and needs for intervention

The national regulatory framework offers, in principle, more possibilities for the beneficiaries of temporary protection to continue their legal residence on the territory of the Republic of Moldova after its termination. Currently, the main instruments are Law no. 270/2008 on asylum in the Republic of Moldova and Law no. 200/2010 on the regime of foreigners in the Republic of Moldova.

Of particular importance for the transition process is the new Law on the Admission, Residence and Supervision of Foreigners in the Republic of Moldova, which will replace Law no. 200/2010 and will enter into force on June 1, 2027, three months after the probable expiry of temporary protection. Overall, the national legislation, in conjunction with the international instruments ratified by the Republic of Moldova and with the European standards in the field of migration and asylum, provides a relatively developed legal framework. However, the analysis highlights the existence of gaps that can significantly affect the management of the transition after 1 March 2027.

3.1. International protection under Law no. 270/2008 on asylum in the Republic of Moldova)

Refugee status (art. 17) is recognised on application by virtue of a well-founded fear of persecution on grounds of race, religion, nationality, membership of a particular social group or political opinion. It is less used for displaced people from Ukraine due to the massive influx of people and the adequate level of immediate protection.

Humanitarian protection (art. 19) is granted to foreigners who do not meet the conditions for recognition of refugee status, but in respect of whom there are reasons to believe that if they are sent to their country of origin they will be subjected to a real risk of suffering serious harm (threat to the life or bodily integrity of a civilian due to generalised violence in situations of armed conflict). It is the most relevant option for most beneficiaries of temporary protection, as the active phase of the war in Ukraine is, in principle, a solid basis for this form of protection. Law No 270/2008 already provides the necessary legal basis, but there is a lack of simplified procedures for granting this form of protection to beneficiaries of temporary protection and clear guidelines on the uniform application of the concept of 'generalised violence'.

Procedures and guarantees: Individual interview, free legal aid, free provision of an interpreter (translator), protection against return during the procedure, right to appeal decisions. GIM's case-processing capacity could remain a major constraint in the 2027 perspective.

Problematic aspects:

- the lack of a simplified transition mechanism from temporary protection to humanitarian protection;
- the limited capacity of the GIM to handle a large volume of asylum applications simultaneously;
- the lack of an internal guide on the application of humanitarian protection in the specific context of the war in Ukraine;
- the risk of misinterpretation of the concept of 'generalised violence', as clarified by the Court of Justice of the EU in *Elgafaji v. Staatssecretaris van Justitie* (C-465/07,2009);⁸
- and complexity of the procedure.

3.2. Temporary and permanent residence under the Law on the Regime of Foreigners in the Republic of Moldova no. 200/2010

Law no. 200/2010 regulates the entry, finding and exit of foreigners on/from the territory of the Republic of Moldova and establishes the general conditions for granting the right of temporary residence and the right of permanent residence. It remains in force until June 1, 2027, including during the critical window of March-June 2027, when temporary protection has probably ceased, but Law no. 66/2026 has not yet entered into force. The new law preserves the conditions of admission and stay for certain categories of foreigners and regulates new categories of migrants who did not have an express or sufficiently regulated legal regime in national law. At the same time, Law no. 66/2026 delimits the regime applicable to third-country nationals from EU citizens and their family members.

⁸ <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:62007CJ0465&from=LT>

(a) Temporary stay for work purposes

Temporary residence for work purposes is the most realistic and accessible transition option for economically active people. On the one hand, beneficiaries of temporary protection already have access to the labour market under simplified conditions, which facilitates the transition to this legal status. On the other hand, the legal requirements for obtaining the right of temporary residence for work purposes could hardly be applicable in the situation of beneficiaries of temporary protection who opt for that legal status. At the same time, informal workers, women with childcare responsibilities and people without complete or expired documents are at risk of exclusion. Other options would be temporary residence for digital nomads and foreigners who have made investments, with the cumulative fulfilment of the conditions set by law.

Requirements: individual employment contract, proof of the right of ownership or use of the dwelling on the territory of the Republic of Moldova, criminal record, medical insurance, proof of means of maintenance. The right of temporary residence for work purposes is granted for different periods, depending on the type of activity carried out. It can evolve to permanent residence after 5 years of continuous legal residence.

Advantage: beneficiaries of temporary protection already have access to the labour market, which is a natural transition towards obtaining the right of temporary residence for work purposes.

Problematic aspects:

- the lack of a simplified transitional mechanism from temporary protection to temporary residence for work purposes;
- complex requirements for supporting documents;
- the inaccessibility of the procedure for informal workers, who do not have individual employment contracts;
- difficulties in integrating into the labour market for women with young children and people caring for people with disabilities;
- limited recognition of qualifications and professional experience acquired in Ukraine;
- the mismatch between the competences/abilities of temporary protection beneficiaries and the availability of suitable job offers.

b) Temporary stay for studies

The right of temporary residence for studies is granted to foreigners admitted to studies in accredited state or private educational institutions for the entire period of study. It is particularly relevant for young people and for people pursuing reskilling as an integration strategy

Advantage: foreigners with the right of temporary residence for studies can carry out work activities on the territory of the Republic of Moldova.

Problematic aspects:

- the lack of a simplified mechanism for transitioning from temporary protection to temporary residence for studies for persons already enrolled on the date of termination of temporary protection;
- limited accessibility due to financial and language barriers.

c) Temporary residence for family reunification

Temporary residence for family reunification is an option for a relatively limited number of people, especially for family members of citizens of the Republic of Moldova and family members of persons who have the right to reside in the Republic of Moldova.

The right of temporary residence for family reunification with foreigners who have the right of residence in the Republic of Moldova is granted to foreigners married to foreigners who have the right of temporary or permanent residence, except for those who benefit from this right for the purpose of studies, or with foreigners who have been recognized as stateless. Family reunification can be requested for the spouse, children, unmarried adult children if they cannot support themselves for medical reasons, the dependent parents of the holder of the right of residence or his/her spouse, the persons over whom guardianship or guardianship is established. It is granted individually, to each family member, for a period of 3 years.

The right of temporary residence for family reunification with citizens of the Republic of Moldova may be granted to the spouse, the partner who lives with the citizen of the Republic of Moldova who is unmarried and with whom he or she has at least one child, minor children, adult children who cannot support themselves for medical reasons, dependent parents, persons over whom guardianship or trusteeship is established. It is extended, individually, for each family member, for periods of 5 years.

In both cases, the approval for family reunification is required, which is issued by the IGM.

Advantage: it can be granted to beneficiaries of temporary protection who have married foreigners with the right of residence in the Republic of Moldova or citizens of the Republic of Moldova, provided that there is no polygamy and the marriage is not fictitious.

Problematic aspects:

- complex requirements for supporting documents;
- the risk of the marriage being classified as fictitious in the absence of clear and transparent evaluation criteria.

d) Temporary residence in other cases

The right of provisional residence may be granted for other purposes, not provided for by law, in cases where the foreigner's presence does not contravene the legislation of the Republic of Moldova, if the foreigner presents evidence justifying his presence on the territory of the Republic of Moldova and meets the conditions for granting the right of temporary residence. For such situations, applications for the right of provisional residence are examined by the Special Commission, set up by the GIM. Temporary residence in other cases could be the only way to legalise residence for persons who do not fall under any other legal basis and could be relevant for the elderly, persons with disabilities and their carers or other vulnerable persons, who do not meet the conditions for granting the right of residence for work purposes, studies, etc. The mechanism appears to be flexible enough to cover atypical individual situations, but the discretionary nature and lack of information on eligibility conditions could create uncertainty and make it virtually inaccessible without legal advice.

Advantage: it could be granted in exceptional circumstances and could function as a safety net for vulnerable groups.

Problematic aspects:

- discretionary mechanism, without clear and predictable eligibility conditions;
- limited public information on the existence of this mechanism, the eligibility conditions and the necessary supporting documents.

e) Permanent residence

The right of permanent residence may be granted, upon request, to foreigners holding the right of temporary residence. Permanent residence offers the highest degree of legal stability after acquiring citizenship and is relevant for holders of the right of temporary residence. For beneficiaries of temporary protection, this is not an immediately accessible prospect due to the non-inclusion of the period of temporary protection in the calculation of the necessary period of legal residence for granting the right of permanent residence.

General conditions: legal and continuous provisional residence on the territory of the state for at least 3 years in the case of foreigners married to citizens of the Republic of Moldova and for at least 5 years – in the case of foreigners of other categories; proof of means of maintenance, except for foreigners married to citizens of the Republic of Moldova; proof of the right of ownership or use of the dwelling; average level of knowledge of the Romanian language, except for beneficiaries of old-age pensions; lack of criminal record in the last 3 years.

The period of temporary protection is not counted for the calculation of the 5 years necessary to obtain the right of permanent residence. This aspect presents a major inequity compared to the integration efforts already made by the beneficiaries of temporary protection in the Republic of Moldova since 2022, which could discourage integration and stimulate illegal stay.

Advantage: the right of permanent residence is granted for an indefinite period.

Problematic aspects:

- the non-inclusion of the period of temporary protection in the period of legal residence necessary for the granting of the right of permanent residence;
- the requirement regarding knowledge of the Romanian language.

3.3. Acquisition of citizenship under the Law on Citizenship of the Republic of Moldova no. 253/2025

a) Acquisition of citizenship by recognition

Certain categories of beneficiaries of temporary protection could apply to acquire the citizenship of the Republic of Moldova through recognition, by virtue of their historical roots in this territory and the premise that the citizenship was not legitimately lost, but was forcibly interrupted by historical events. These include:

- persons born abroad, who have at least one of the parents, grandparents or great-grandparents born on the territory of the Republic of Moldova;

- persons who were born and domiciled, until June 28, 1940 in Bessarabia, in Northern Bukovina, in Herța County or in the Moldavian Autonomous Soviet Socialist Republic and their descendants;
- persons deported or refugees from the territory of the Republic of Moldova, starting with June 28, 1940 and their descendants.

The main conditions are: lack of proof of citizenship of the Republic of Moldova, knowledge of the Romanian language and the provisions of the Constitution.

Advantages:

- limited administrative discretion and bureaucratic arbitrariness;
- sufficiently broad eligibility conditions, as the genealogical criterion is extended to three generations (parents, grandparents, great-grandparents);
- Once acquired, citizenship can be passed on to children, providing legal protection to future generations as well.

Problematic aspects:

- the risk of losing the citizenship of Ukraine with the acquisition of the citizenship of the Republic of Moldova;
- the long duration of the procedure and the considerable administrative costs;
- the requirement of knowledge of the Romanian language and the provisions of the Constitution.

b) Acquisition of citizenship by naturalization

Acquiring citizenship through naturalisation is a long-term perspective, inaccessible in the context of the end of temporary protection. The conditions established by the law imply different periods of legal and continuous stay on the territory of the Republic of Moldova, depending on the legal status: at least 10 years of permanent legal residence on the territory of the Republic of Moldova and 8 years - for stateless persons and beneficiaries of international protection. The period of temporary protection is not taken into account, which places this option outside the relevant planning horizon for most beneficiaries of temporary protection.

Problematic aspects:

- the non-inclusion of the period of temporary protection in the period of permanent legal residence on the territory of the Republic of Moldova, necessary for the acquisition of citizenship through naturalization;
- the risk of losing the citizenship of Ukraine with the acquisition of the citizenship of the Republic of Moldova;
- the long duration of the procedure and the considerable administrative costs;
- increased administrative discretion;
- the requirement of knowledge of the Romanian language and the provisions of the Constitution.

3.4. Legal residence on the basis of citizenship of an EU member state under the Law on free movement and residence on the territory of the Republic of Moldova of citizens of the European Union and their family members no. 200/2025

A substrate of the beneficiaries of temporary protection in the Republic of Moldova are people with dual citizenship: Ukrainian and of a member state of the European Union, according to the list of states agreed by Ukraine. These persons and their family members have the option of legal residence on the territory of the Republic of Moldova, distinct from the other beneficiaries of temporary protection, and based not on their refugee status, but on their status as citizens of the European Union. The most reliable options are staying for more than 90 days and staying permanently. The procedures are significantly simplified and the legal and social advantages are clearly superior.

a) Stay for a period of more than 90 days

In order to stay on the territory of the Republic of Moldova for a period of more than 90 calendar days, it is necessary to obtain a residence card, with a declaration of having medical insurance, admission to studies or carrying out the activity of salaried or self-employed work, having financial means of maintenance. At the same time, it is necessary to present the valid travel document, the declaration regarding the lack of criminal record, the civil status documents confirming the marriage, proof of the right of ownership or use of the home. The residence card is issued for a term of 5 years.

The granting of the right of residence to the family members of the EU citizen shall be made in accordance with the requirements laid down by law. The exit from the territory of the state of the EU citizen or his death does not entail the loss of the residence card and the right of residence for the children and for the parent who has custody of those children, regardless of the nationality they hold, as long as they have their domicile or temporary residence in the Republic of Moldova and are admitted to studies, until the completion of the studies.

b) Permanent residence

The right of permanent residence is granted for an indefinite period to EU citizens and their family members if their stay on the territory of the Republic of Moldova is legal and continuous for at least 5 years and they meet the conditions for entry into the country, have not had interruptions of stay, do not have an unextinguished criminal record, have financial means of maintenance and medical insurance, does not pose a danger to national security, public order and public health.

Significant advantages of both options:

- significantly simplified procedures;
- unconditional access to the labour market;
- integration measures;
- the lack of requirement of knowledge of the Romanian language and the provisions of the Constitution;
- expanding the list of countries with which Ukraine accepts dual citizenship.

Problematic aspects:

- uncertainties may arise for the family members of the EU citizen who has left the territory of the Republic of Moldova or has died;
- condition of having a travel document issued by an EU Member State.

3.5. Transitional status

The experience of some Member States of the European Union that have already put in place transition mechanisms shows that one of the most effective solutions is to establish a temporary interim status, lasting between one and three years, intended to ensure the continuity of legal residence and access to the labour market after the end of temporary protection, until lasting solutions are identified, including voluntary return to Ukraine.

Transitional status, also referred to in some sources as a 'bridge status', is an intermediate temporary residence permit granted to beneficiaries of temporary protection for a fixed period, which ensures the continuity of legal residence between the end of temporary protection and the attainment of another lasting legal status. The transitional status does not constitute a form of international protection and does not replace other legal statuses, but functions as an intermediate mechanism aimed at preventing the emergence of a legal vacuum and situations of illegal stay.

The national regulatory framework does not currently contain an explicit mechanism for transitioning from temporary protection to other legal statuses. This gap acquires a critical dimension in the context of the chronological sequence of the two events: the probable termination of temporary protection on March 1, 2027 and the entry into force on June 1, 2027 of Law no. 66/2026, which allows the granting of the right of temporary residence to vulnerable groups and for humanitarian reasons. The three-month interval between these two moments (March - June 2027) represents a period in which the beneficiaries of temporary protection who do not meet the conditions for granting the right of provisional residence, provided for by Law no. 200/2010, could automatically end up in a situation of illegal residence, in the absence of a specific legal instrument.

Pursuant to Law no. 200/2010, the right of temporary residence may be granted for purposes other than those expressly provided for by law, in cases where the foreigner's presence on the territory of the Republic of Moldova does not contravene the legislation and he presents evidence justifying his stay in the country. This provision could provide a legal basis for establishing a transitional status between March and June 2027, by adopting a normative act setting out clear eligibility criteria, the necessary documents and the procedure for examining applications. As of June 1, 2027, the right of temporary residence could be granted pursuant to Art. 31 para. (2) letter v) (vulnerable groups) and letter w) (in other justified situations, not expressly provided for by law, when this is necessary for the observance of the fundamental principles of human rights and freedoms [...]) of the new law.

Based on the European models analysed in Section 6.2, in particular the Polish model CUKR and the Dutch model of the transition document, transition status could be granted to beneficiaries of temporary protection who cumulatively meet a set of minimum conditions,

including the condition of a certain period of stay on the territory of the Republic of Moldova on the basis of temporary protection.

The transitional status should guarantee the continuity of legal residence, access to the labour market without the obligation to obtain the right of residence for work purposes, access to medical and social assistance under the law, as well as the possibility of subsequent transition to other legal statuses provided for by Law no. 200/2010 or the new law, through simplified procedures adapted to the individual situation of each person.

Transitional status should be granted for a period of at least one year, with the possibility of extending it depending on the evolution of the situation in Ukraine and the level of integration of the beneficiary. At the same time, the period of stay on the territory of the Republic of Moldova based on the transitional status should be taken into account, in whole or in part, when calculating the period necessary to obtain the right of permanent residence, in accordance with the recommendation made in subsection 8.1 of this document.

4. Map of post-temporary protection options available in the Republic of Moldova

The following table provides an overview of the legal statuses available to beneficiaries of temporary protection, after its likely termination in March 2027:

Status / Mechanism	Legal basis	Main conditions	Accessibility assessment
Refugee status	Law no. 270/2008, art.17	Well-founded fear of persecution; Individual procedure	★★ Relevant in individual, specific cases Duration of the procedure
Humanitarian protection	Law no. 270/2008, art.19	Real risk of serious threat to life and bodily integrity due to generalized violence in situations of armed conflict; Individual procedure	★★★★ Relevant to the majority Duration of the procedure
Temporary stay for work purposes	Law no. 200/2010, art.431-4317, other articles	For migrant workers - individual employment contract, criminal record, proof of ownership or use of the home, health insurance For other categories of people (specialists, digital nomads, etc.), as the case	★★★ The main pathway for the active elderly Bureaucratic barriers

		may be - medical insurance, proof of means of maintenance	
Temporary stay for study purposes	Law no. 200/2010, art.37	Admission to an accredited educational institution, means of maintenance	★★★ Particularly relevant for young people and people seeking reskilling
Temporary residence for family reunification	Law 200/2010, Articles 38 and 381	Family reunification with the holder of the right of residence in the Republic of Moldova or with the citizen of the Republic of Moldova	★★★ Relevant for mixed families (citizenship)
Temporary stay in other cases	Law 200/2010, art.31 para. (2) letter f) and art.43	Exceptional circumstances; Decision of the GIM Special Committee	★★ Relevant for vulnerable groups Discretionary mechanism, without clear criteria and dependence on individual decisions of officials
Permanent residence	Law no. 200/2010, art.44	Legal and continuous provisional stay (3 or 5 years); knowledge of the Romanian language; means of maintenance; proof of the right of ownership or use of the dwelling	★ Distant perspective The period of temporary protection is not included in the period of lawful and continuous temporary stay
Citizenship by recognition	Law no. 253/2025, art.10	Historical roots on the territory of the Republic of Moldova; knowledge of the Romanian language and the provisions of the Constitution	★★★ Relevant for people with historical roots Significant duration and costs of the procedure
Citizenship by naturalization	Law no. 253/2025, art.14	10 or 8 years of permanent legal residence; knowledge of the Romanian language and the provisions of the Constitution	★ Distant perspective The period of temporary protection is not included in the period of permanent legal residence
Staying as an EU citizen with	Law no. 200/2025, Art.14-20	Citizenship of an EU Member State or family member of the citizen of an	★★★ Relevant for persons holding the nationality

family members		EU Member State; Possession of a travel document from an EU member state	of an EU Member State Significantly simplified procedures
Transition status (bridge status, which could be created)	Transition instrument based on EU Council Recommendation C/2025/5129	Temporary protection → transitional status → other legal status in the Republic of Moldova or voluntary return to Ukraine	★★★★★ Urgent Priority

Note: The assessment reflects both the regulatory framework and the practical barriers to access.

★★★★★ - maximum accessibility;

★ - Minimal/theoretical accessibility

5. Barriers to transition and critical issues

5.1. Barriers

The analysis of the normative and institutional framework reveals the existence of a number of barriers that may affect the ability of beneficiaries of temporary protection to access other forms of legal residence after the termination of this legal status:

- the lack of simplified procedures for the transition from temporary protection to other legal statuses;
- the non-inclusion, in whole or in part, of the period of temporary protection in the period of legal residence necessary on the territory of the State for granting the right of permanent residence or acquiring citizenship through naturalization;
- the limited capacity of the GIM to handle a potential influx of asylum applications in the context of the cessation of temporary protection;
- the risk of disinformation and under-information, in the absence of official communication channels and dedicated information campaigns;
- complex requirements regarding the supporting documents necessary to obtain other legal statuses (apostilles, notarized translations, sectoral opinions and other supporting documents);
- limited recognition of qualifications and professional experience acquired in Ukraine.

5.2. Critical issues

The lack of a simplified mechanism for transitioning from temporary protection to humanitarian protection or other legal status for people who meet the conditions set by law is one of the main vulnerabilities of the current system. In the absence of such a solution, there is a risk of overloading the asylum system, increasing the number of people staying illegally and amplifying the social and economic vulnerabilities faced by displaced persons from Ukraine.

An important problem arises from the time lag between the probable termination of temporary protection and the entry into force of the Law on the Entry, Residence and Supervision of Foreigners in the Republic of Moldova. Temporary protection expires on 1 March 2027, while the new law, which provides for the possibility of granting the right of temporary residence to

vulnerable groups and for humanitarian reasons, will only enter into force on 1 June 2027. Consequently, during the three-month period between the termination of temporary protection and the entry into force of the new law, a large number of beneficiaries of temporary protection who do not meet the conditions laid down by Law No 200/2010 for granting the right of temporary residence risk becoming illegally resident. In the absence of transitional measures or a dedicated legal mechanism, this situation can create significant difficulties for both the persons concerned and the authorities responsible for managing the field of migration and asylum.

5.3. Groups at high risk of staying illegally

The analysis of the legal options available after the end of temporary protection reveals the existence of categories of beneficiaries who may face increased obstacles in accessing other forms of legal residence. In the absence of support measures and transition mechanisms tailored to their needs, people in the groups described below are at increased risk of being left without legal status after the end of temporary protection:

Vulnerable groups at increased risk of being left without legal status after the end of temporary protection
Older people who will not apply for the right of temporary residence for work purposes, and face multiple barriers, including medical, financial, procedural and linguistic barriers
Persons with disabilities and their caretakers , who face similar difficulties and who, in many cases, do not meet the necessary conditions to access other forms of legal residence
Single mothers with young children , who find it difficult to integrate into the labour market as a result of care responsibilities and limited access to support services
Workers in the informal economy , who do not hold individual employment contracts and therefore cannot demonstrate the fulfilment of the necessary conditions for obtaining the right of temporary residence for work purposes
Individuals with incomplete, expired, or difficult-to-obtain documents , including those who do not have an IDNP or who have limited access to the DIA app and the consular services of Ukraine
Ukrainian seafarers , whose legal situation is not regulated by the legislation in force and who may encounter difficulties in identifying a legal basis for continuing their legal stay on the territory of the Republic of Moldova

5.4. Main risks for the Republic of Moldova in the context of the transition from temporary protection

In the absence of measures to prepare and manage the transition process, the termination of temporary protection can generate a number of legal, administrative and social risks, both for data subjects and for public authorities. The main risks identified are:

- the increase in the number of persons staying illegally after the end of temporary protection;
- overload of the national asylum system, as a result of the increase in the number of applications;

- the exclusion of vulnerable groups from existing mechanisms for legalising their stay;
- the amplification of the phenomenon of exploitation through labour and the expansion of the informal economy;
- increasing the risk of human trafficking, abuse and social marginalisation;
- difficulties in planning and managing the voluntary return process after the expiry of temporary protection;
- increasing the pressure on the authorities with responsibilities in the field of education, social assistance and health;
- diminishing the effectiveness of the integration measures implemented in recent years and losing the progress made in the process of socio-economic inclusion of temporary protection beneficiaries.

6. European experience

6.1. European context

At European level, the management of the transition from temporary protection to other forms of legal residence remains, so far, without a coherent and unified response. The European Commission demonstrated anticipation by triggering the temporary protection mechanism in March 2022, subsequently adopting a pragmatic *wait-and-see* approach. Initially, the Temporary Protection Directive was interpreted as allowing a maximum of two extensions, which limited the duration of protection to three years, i.e. until March 2025. The Commission subsequently adopted a more extensive interpretation, which allowed for a further extension until March 2026 and finally a further extension until March 2027. This succession of extensions gave Member States additional time to develop long-term solutions, but was not accompanied by proposals on the management of the period after the end of temporary protection.

In the absence of a common European framework, Member States have developed their own national solutions, which has led to the emergence of a patchwork of approaches that differ significantly from one country to another. Member States and specialist organisations continue to support the need for a common European strategy on exiting the temporary protection regime, arguing that strong coordination at European level would reduce the risk of fragmentation, help ensure fair treatment of beneficiaries, regardless of their country of residence, and reduce the risk of secondary movements arising from differences between national protection systems.

6.2. Relevant national models

Approaches to the transition from temporary protection to other forms of legal residence differ considerably between European states. In many cases, the solutions identified are based on the usual migration mechanisms, which do not always respond to the socio-economic profile, protection needs and vulnerabilities of displaced persons who intend to remain in the host state. At the same time, while asylum systems continue to be an essential component of the institutional response, there is a risk that the number of applications submitted after the end of temporary protection will exceed the existing administrative capacity, especially in the absence of viable legal residence alternatives for vulnerable groups.

The experience of some European Union member states provides relevant examples for the Republic of Moldova, with the clarification that although it is not an EU member state and does not apply Directive 2001/55/EC on granting temporary protection directly, it faces the same structural problem: the identification of sustainable solutions for the beneficiaries of temporary protection after its cessation.

Poland

The solution adopted by Poland is probably the model with the greatest relevance for the Republic of Moldova. As of 4 May 2026, beneficiaries of temporary protection in Poland who hold the identity number 'PESEL UKR' can apply for the CUKR residence permit, valid for three years, intended for displaced persons from Ukraine and their family members. The conditions for granting them are clear and easily verifiable: legal residence in Poland on the basis of temporary protection, holding the status of beneficiary of temporary protection on 4 June 2025, maintaining this status on the date of submission of the application for the CUKR residence permit and an uninterrupted period of temporary protection of at least 365 days. Applications are submitted exclusively in electronic format, through the portal "File Management Module", with the stamp duty and the residence permit fee being charged, in the total amount of 440 zlotys (approximately 100 euros).

The CUKR license offers significant benefits. Once granted, it transforms the status of beneficiary of temporary protection into a right of temporary residence valid for three years. The holder enjoys full access to the labour market without the obligation to obtain an additional work permit and can carry out economic activities under the same conditions as Polish citizens. CUKR residence permit holders benefit from the rights granted to foreigners holding temporary residence permits in Poland and can travel within the Schengen area for up to 90 days in a period of 180 days, based on the permit and a valid travel document. At the same time, the period of stay based on the CUKR permit will be taken into account when determining the period required to obtain a long-term residence permit in the EU. With the granting of the CUKR residence permit, the person loses the status of beneficiary of temporary protection and its associated rights, including access to free accommodation and food in accommodation centres.

Czech Republic

The Czech Republic has introduced a special long-term residence permit, valid for five years, intended for beneficiaries of temporary protection who are employed and have lived in the country for more than two years. In the case of children, the additional condition is to attend an educational institution. The Czech model emphasizes labour market integration as the main eligibility criterion.

Austria

As of October 2024, Austria introduced a policy change by which they introduced a new option for displaced persons from Ukraine who hold a displaced persons' identity document, have been working for at least 12 months in the last two years, are financially self-sufficient and possess knowledge of German at A1 level. These people can obtain the Rot-Weiß-Rot Plus Card (Red-

White-Red Plus Card), a special extension permit for displaced persons from Ukraine, valid for 12 months, which can be extended as long as the legal conditions are met. Under additional conditions, the same card can be granted for a period of three years. The Austrian model is relevant by using an already existing legal instrument and by making access conditional on the existence of a certain level of economic and social integration.

Italy

Italy has adopted a flexible approach, allowing beneficiaries of temporary protection to apply for any work permit for which they meet the conditions laid down by law. This solution does not imply the creation of a new legal category, but facilitates access to existing instruments. The Italian model is an example of minimal legislative intervention, based on building on existing mechanisms.

Estonia and Latvia

These two states have amended national legislation so that beneficiaries of temporary protection can apply from within the country for any other legal status for which they are eligible. This approach removes the obligation to leave the territory and subsequently re-enter in order to change legal status, a procedure that in some States constitutes a significant procedural barrier.

Lithuania

Lithuania has adapted the regulatory framework to facilitate the transition of beneficiaries of temporary protection to other forms of legal residence. Eligible persons are exempted from the obligation to obtain the opinion of the Employment Service on the compliance of employment with the needs of the labour market, thus removing an administrative obstacle that in other states may delay or prevent access to work.

Norway and Germany — models of differentiated eligibility restriction

Norway and Germany illustrate a differentiated approach, based on restricting eligibility for certain categories of people, while developing alternative pathways. Norway, which has a national temporary protection regime outside the EU, has gradually limited access to temporary protection for people from 14 regions of Ukraine considered safe, directing new applicants to ordinary asylum procedures.

Germany has excluded certain categories - stateless persons and third-country nationals who left Ukraine without a permanent residence permit - from the extension of temporary protection, giving them access to residence permits for work or study, the ordinary asylum procedure or voluntary return schemes.

The Netherlands — model of the 'transitional document'

The model developed by the Netherlands deserves attention due to its high degree of clarity and predictability. The Dutch government has announced that, after the end of temporary protection, beneficiaries will automatically be able to receive a transition document valid for three years,

without the need to submit an individual application. The Immigration and Naturalization Service will send them notifications directly. The main condition is the withdrawal of asylum applications under examination. Holders of the transition document will be able to work without a work permit, have access to medical insurance and benefit from reduced university fees. Dutch policy focuses on voluntary return, with the transition document designed as a tool to give people time to prepare for repatriation, in parallel with the implementation of a special assisted voluntary return programme.

6.3. Implications for the Republic of Moldova

The comparative analysis of European experiences highlights several conclusions relevant for the Republic of Moldova.

The transition status (bridge status) is a validated and functional solution. Models implemented in Poland, the Czech Republic, Austria and the Netherlands demonstrate that an interim residence permit, granted for a period of 3–5 years and based on clear and verifiable conditions, is a viable solution for managing the period after the end of temporary protection. The main difference from the situation of the Republic of Moldova is that these states have increased institutional capacities to process a large number of requests for change of legal status. Although the Republic of Moldova has a regulatory framework on the integration of foreigners, it may be necessary to strengthen institutional and operational capacities in order to effectively manage a transition process to other forms of legal residence.

Including the period of temporary protection in the calculation of the duration of legal residence for obtaining another legal status is essential to stimulate integration. The Polish model provides a relevant example of this, with the period of temporary protection (CUKR) being taken into account when calculating the period required to obtain long-term resident status. In the absence of a similar mechanism, the national regulatory framework may be a deterrent for beneficiaries of temporary protection who intend to establish their long-term residence in the Republic of Moldova and who have already made significant progress in the integration process.

The removal of procedural barriers is as important as the establishment of new forms of residence. The experience of Estonia, Latvia and Lithuania shows that facilitating the transition does not always mean the creation of new legal instruments. In many situations, simplifying procedures and removing administrative obstacles can have comparable effects. Relevant examples include the elimination of the obligation to leave the territory of the state for a change of legal status or the waiver of certain administrative opinions that are not strictly necessary. In the context of the Republic of Moldova, similar barriers are represented by excessive requirements on supporting documents, complex procedures for examining applications and the lack of simplified mechanisms for some categories of persons.

Transparency and early information reduce administrative pressure and the risk of illegal stay. The Dutch model, in which the competent authority for foreign nationals proactively informs beneficiaries of temporary protection of the options available after it ends, is one of the most advanced practices identified. Clear and accessible information to beneficiaries at least 6–

12 months before the expiry of temporary protection helps to reduce the number of people who arrive illegally due to ignorance of the procedures and options available.

The differentiated approach reduces pressure on the system and allows for more efficient use of administrative resources. No European state has applied a one-size-fits-all solution to all beneficiaries of temporary protection. Most models are based on criteria such as the length of stay, the degree of integration into the labour market, the existence of vulnerabilities or the presence of children in the education system. Such an approach allows resources to be directed to the categories with the greatest chances of integration or to people who require additional protection measures. With a significantly lower number of beneficiaries of temporary protection compared to most European Union member states, the Republic of Moldova has favourable premises for the implementation of more flexible solutions more adapted to individual circumstances.

6.4. Large-scale illegal residence – a common European risk

According to ECRE (Working Paper No 22, February 2026), the lack of clarity on the legal options available after the end of temporary protection, the absence of adequate planning and the limited use of transition mechanisms create the risk of a large-scale illegal stay phenomenon. Illegal stay is not only a migration problem, but can generate complex social and economic effects, including labour exploitation, exclusion from health and social services, increased vulnerability to human trafficking, social marginalisation and community tensions. In the long term, these effects can fuel political debates and conflicts on migration management and refugee protection.

For the Republic of Moldova, such a scenario could have particularly significant consequences, given the limited capacity to manage illegal migration. From this perspective, the early preparation of the transition process and the establishment of clear mechanisms for access to other forms of legal residence are not only a measure to protect the beneficiaries of temporary protection, but also an essential condition for the prevention of administrative, social and economic risks with an impact on society as a whole.

7. Post-March 2027 scenarios and implications

The EU Council Recommendation explicitly acknowledges that Ukraine will need time to rebuild its capacity for the reintegration of displaced persons (recital 3). Under these circumstances, the Republic of Moldova must base its planning process on several possible scenarios of evolution of the situation, without relying exclusively on the most favourable scenario.

Scenario	Background	Implications for Moldova
Scenario A: Maintaining the active phase of the	Temporary protection is extended or replaced at EU level. Voluntary return is not possible safely. Ukraine's ability to ensure the	This is the scenario with the highest degree of probability. The Republic of Moldova must develop its own transition mechanism,

war after March 2027	reintegration of returnees is limited.	independent of any decisions adopted at EU level. The establishment of a transitional status becomes essential to prevent the occurrence of illegal residence.
Scenario B: Armistice or fragile peace	Temporary protection ceases. Voluntary return becomes possible in principle but remains uncertain in practice. A significant number of beneficiaries of temporary protection choose to stay in the Republic of Moldova. Ukraine's ability to ensure reintegration is still limited.	This represents the most complex scenario, characterized by mixed flows of people: some people choose to return to Ukraine, and others choose to stay in the Republic of Moldova. In this context, it becomes essential to implement a structured voluntary return programme, while ensuring greater flexibility in the mechanisms for granting the right of residence for persons who decide to stay.
Scenario C: Sustainable peace, sustainable reintegration	Voluntary return becomes feasible and safe. Ukraine has the necessary capacity to reintegrate returnees. However, some of the beneficiaries of temporary protection choose to continue their stay in the Republic of Moldova.	The main focus shifts to assisted voluntary return and reintegration measures in Ukraine. At the same time, the Republic of Moldova must maintain functional mechanisms for granting the right of legal residence to persons who choose to stay. Any decision to terminate the stay must be preceded by an individual assessment of each person's circumstances.

Conclusion on the scenarios analysed

The Council of the EU recognises that the return of displaced persons to Ukraine cannot be rushed and must be carried out safely, voluntarily and sustainably

The Republic of Moldova must plan actions and interventions, starting from Scenario A, which poses the greatest challenges in terms of legal protection, migration management and institutional capacity. At the same time, the response framework must remain flexible enough to allow for rapid adaptation to developments in scenarios B and C

Basing public policies solely on the assumption of a lasting peace and a large-scale voluntary return to Ukraine would entail significant risks and could lead to insufficient preparation of the authorities for less favourable scenarios

Regardless of the evolution of the situation in Ukraine, two elements appear to be necessary in all the scenarios analysed: the establishment of a transition mechanism to other forms of legal residence and the early information of the beneficiaries of temporary protection. These measures involve relatively low administrative costs, but require early initiation and implementation to produce the expected effects

8. Recommendations

Based on the analysis of the national regulatory framework, the Recommendation of the Council of the EU (C/2025/5129) and the European comparative experiences, this document formulates the following recommendations, structured by areas of intervention. The table below provides a summary of the recommendations, the responsible institutions and the deadlines for implementation, the rationale and detail of each recommendation being developed in subsections 8.1 to 8.5.

Recommendation	Responsible institutions	Priority / Deadline
The adoption of a transition mechanism (bridge status) of at least one year, including as a transitional instrument between Law no. 200/2010 and Law no. 66/2026	GIM, MIA, Parliament	URGENT December 2026
Inclusion of the period of temporary protection, in whole or in part, during the period necessary for granting the right of permanent residence (amendments to Law no. 200/2010)	GIM, MIA, Parliament	URGENT December 2026
Simplifying the transition to other legal statuses by reducing procedural and documentary barriers (amendments to Law no. 270/2008 and Law no. 200/2010)	GIM, MIA, Parliament	URGENT December 2026
Develop a structured voluntary return programme to Ukraine, according to EU Council Recommendation C/2025/5129	GIM, MIA, MEA, International Organizations	URGENT October 2026
Encouraging and supporting self-financing verification visits to Ukraine while maintaining temporary protection (instruction)	GIM, MIA	URGENT October 2026
Launch of an information campaign in Ukrainian and Russian and development of a transition guide	GIM, NGOs, international organizations	URGENT immediately
Providing free legal advice for beneficiaries of temporary protection	MIA, CNAJGS, NGOs, UNHCR	MEDIUM continuous action
Creation of a one-stop-shop for post-temporary protection transition files within the GIM	IGM	MID October 2026

Simplification of procedures for the recognition of Ukrainian diplomas and professional qualifications	MEC	MID October 2026
Establishing a special transition mechanism for vulnerable groups (older people, people with disabilities, single mothers, etc.)	GIM, MLSP, MH, LPA, UNHCR	MID October 2026
Expanding access to Romanian language courses (including online)	MEC, LPA, NGOs	AVERAGE continuous action
Initiating a structured dialogue with Ukrainian civil society and communities in the Republic of Moldova	State Chancellery, NGOs, diaspora	MEDIUM continuous action
Strengthening cooperation with the EU and international partners; building on the technical and financial support provided by the EU and international organisations to manage the post-temporary protection transition	Government	MEDIUM continuous action

8.1. URGENT legislative recommendations (until December 2026)

1. **Establishment of an explicit transitional status (bridge status).** Amending the relevant regulatory framework to introduce a temporary residence permit of at least one year for beneficiaries of temporary protection who meet minimum criteria for self-sufficiency. Considering that Law no. 66/2026 will enter into force on 1 June 2027, i.e. three months after the probable termination of temporary protection, it is essential to adopt a transitional legal instrument covering the critical window of March-June 2027. Starting with June 1, 2027, transitional status could be granted pursuant to Art. 31 para. (2) letters v) and w) of Law no. 66/2026. The right of temporary residence under the transitional status should guarantee the continuity of legal residence, access to the labour market, as well as access to healthcare and social care.
2. **Inclusion of the period of temporary protection (in whole or in part) in the period necessary to grant the right of permanent residence.** Amending the relevant regulatory framework in order to recognise in whole or in part the period of temporary protection as a period of temporary residence that can be taken into account for granting the right of permanent residence. Law no. 66/2026 (in force from 1 June 2027) maintains in art. 99 the condition of a period of 5 years of continuous temporary residence, without solving the problem of not calculating the period of temporary protection. That amendment should therefore be adopted before or at the same time as the new law enters into force. Even the partial recognition of half of the period of temporary protection when calculating the period of legal residence necessary to obtain the right of permanent residence would represent a significant step forward compared to the current situation, in which that period is not taken into account at all. Such a measure would also create a

strong incentive for the long-term integration of beneficiaries of temporary protection in the Republic of Moldova.

3. **Explicit regulation of the situation of Ukrainian sailors.** Adaptation of the relevant regulatory framework to allow the recognition of international maritime contracts as proof of means of maintenance and to ensure the consideration of periods of absence from the Republic of Moldova, specific to the professional activity carried out by this category of persons.

8.2. Recommendations on voluntary return (in line with EU Council Recommendation C/2025/5129, Block B)

4. **Developing a Structured Voluntary Return Program.** In line with the principles of EU Council Recommendation C/2025/5129, it is appropriate to develop a voluntary return programme to Ukraine, in cooperation with development partners and the Ukrainian authorities. The programme should provide for a clear period of registration in the programme, transparent eligibility criteria, maintenance of legal residence for the duration of participation in the programme and coordination mechanisms with the host authorities and communities of Ukraine.
5. **Encouraging and supporting self-financing verification visits to Ukraine, while maintaining temporary protection.** Adopt an instruction clarifying that beneficiaries of temporary protection may carry out temporary visits to Ukraine, on a self-financing basis, for the assessment of return conditions, property management or other personal matters, without losing the status of beneficiary of temporary protection.
6. **Ensuring the continuity of legal residence for vulnerable groups.** Establish a special transition mechanism for vulnerable groups, including the elderly, persons with disabilities and single mothers, in line with EU Council Recommendation C/2025/5129. In particular, the mechanism should allow: (i) the extension of stay for persons with special needs for whom Ukraine cannot provide the necessary care at the time of the termination of temporary protection; (ii) the extension of the stay for the parents of children attending educational institutions, at least until the end of the current school year.

8.3. Institutional and administrative recommendations

7. **Creating a one-stop-shop within the GIM** for the management of post-temporary protection transition files, with specialized staff, simplified procedures and mechanisms for prioritizing vulnerable cases.
8. **Develop an official guide** in Ukrainian and Russian outlining all available legal residence options after the end of temporary protection, including procedural steps, required documents, indicative deadlines and related costs.
9. **Strengthen the capacity of the GIM** to manage a potential influx of asylum applications in the context of the end of temporary protection, including by leveraging the technical and financial support provided by development partners. At the same time, it is recommended to develop an internal guide on the provision of humanitarian

protection in the specific context of the war in Ukraine, in order to ensure a unitary and predictable administrative practice.

10. **Establish a mechanism to suspend forced returns** while maintaining the active phase of the war in Ukraine, in line with the principle of non-refoulement.

8.4. Information recommendations (in line with EU Council Recommendation C/2025/5129, Block C)

11. **Launch, without delay, an information campaign** in Ukrainian and Russian through online platforms, media, accommodation centres, educational institutions and other relevant channels. The campaign should be addressed at least to beneficiaries of temporary protection, employers and local public administration authorities, and should include practical information on the options available after the end of temporary protection, not just legal explanations.
12. **Establishment within the GIM of a contact point** dedicated to beneficiaries of temporary protection (telephone line, e-mail address, online chat), intended to provide information on the transition to other legal statuses or voluntary return to Ukraine.
13. **Active involvement of NGOs, Ukrainian diaspora and communities in the Republic of Moldova** in the dissemination of official information, given the high degree of accessibility and trust enjoyed by these structures among beneficiaries of temporary protection.
14. **Expanding access to free legal advice services** by developing partnerships with specialized NGOs, UNHCR and CNAJGS, with a focus on vulnerable people and those who do not have sufficient financial resources.

8.5. Recommendations on socio-economic integration

15. **Accelerate the recognition of diplomas and professional qualifications obtained in Ukraine**, including by developing bilateral cooperation with the Ukrainian authorities and using flexible procedures based on available documents.
16. **Expanding free access to Romanian language courses**, including through online programs, courses organized outside working hours and other flexible forms of training, both as an integration tool and as a means of facilitating access to certain legal statutes.
17. **Develop labour market mediation programmes** to facilitate contact between temporary protection beneficiaries and employers in sectors affected by labour shortages, with a focus on capitalising on the qualifications and professional competences of the persons concerned.
18. **Dedicated support for vulnerable groups**, including the elderly (facilitating access to social and healthcare care, regardless of legal status); (ii) persons with disabilities (simplification of procedures for recognising disability and access to specialised services); (iii) single mothers (facilitating priority access to early childhood education and care services, in order to support their participation in the labour market).

9. Conclusions

The Republic of Moldova is at a decisive moment in the process of managing the stay of displaced persons from Ukraine. The normative framework in force, in particular Law no. 270/2008 and Law no. 200/2010, provides the necessary tools to facilitate the transition from temporary protection to other forms of legal residence.

An element of major importance is the Law on the Admission, Residence and Supervision of Foreigners no. 66/2026, adopted on April 30, 2026, which will enter into force on June 1, 2027, respectively three months after the probable expiry of the temporary protection. This temporal succession creates a critical period, between March and June 2027, in which certain categories of beneficiaries of temporary protection risk not having clear and accessible transition mechanisms to other forms of legal residence on the territory of the Republic of Moldova.

EU Council Recommendation C/2025/5129 provides a coherent reference framework for managing this transition and indicates the main courses of action needed.

The main challenge is not the lack of legal solutions, but their practical accessibility, the existence of procedural barriers, and the need for early and coordinated planning of the transition process.

The experience of European states confirms that early measures, transparent communication with beneficiaries of temporary protection and simplification of administrative procedures contribute significantly to reducing the risks of illegal stay after the end of temporary protection. On the other hand, delaying the preparation of the transition process can lead to a large number of applications being submitted at the same time, overburdening asylum systems and increasing social tensions.

The Council of the EU stresses that the transition from temporary protection should respond both to the needs of people currently benefiting from temporary protection and to Ukraine's needs in the process of reconstruction and the reintegration of its own citizens. This approach is fully relevant for the Republic of Moldova. Consequently, the return to Ukraine cannot be the result of hasty or coercive measures, but must be based on voluntary, informed and sustainable decisions taken according to the individual circumstances of each person and the evolution of the situation in Ukraine.

The Republic of Moldova has the advantage of learning from the experience of other states before the end of temporary protection, has a relatively developed regulatory framework, which requires only small adjustments and, moreover, already has a new modern law that will enter into force on June 1, 2027. In addition, national authorities can count on the technical and financial support of the European Union, international organisations and other development partners. Under these conditions, the main challenge is not to identify solutions, but to adopt and implement them in a timely manner.

The establishment of transition mechanisms for the critical period March-June 2027, the simplification of access to other forms of legal residence, the early information of beneficiaries and the preparation of a voluntary return programme are essential measures to prevent illegal

residence and to ensure an orderly, predictable transition in line with European and international standards in the field of protection of displaced persons.

10. References and sources

European and international instruments:

- EU Council Recommendation of 16 September 2025 on a coordinated approach to the gradual exit from the temporary protection regime for displaced persons from Ukraine (C/2025/5129).
- Council Directive 2001/55/EC on minimum standards for granting temporary protection in the event of a mass influx of displaced persons and measures to promote a balance between Member States' efforts to receive such persons and bearing the consequences of that reception.
- Convention relating to the Status of Refugees (Geneva, 1951) and the 1967 Protocol

National legislation (Republic of Moldova):

- Law on Asylum in the Republic of Moldova no. 270/2008
- Law on the regime of foreigners in the Republic of Moldova no. 200/2010
- Law on Admitting, Staying and Supervising Foreigners in the Republic of Moldova no. 66/2026
- Law on Citizenship of the Republic of Moldova no. 253/2025
- Law on free movement and residence on the territory of the Republic of Moldova of citizens of the European Union and their family members no. 200 of 10.07.2026

Studies and analyses:

- BICC: "Before 2027: Urgent Policy Actions for Ukrainian Refugees in Germany" (February 2026), https://bicc.de/Publikationen/pb_inna_Feb_Before%202027_urgent%20policy%20actions-web.pdf~dr4132
- "Transitioning to What? Legal Statuses Available After Temporary Protection" (ECRE Working Paper 22, February 2026), https://ecre.org/wp-content/uploads/2026/02/ECRE-Working-Paper-22_Transitioning-to-What_Legal-Statuses-Available-After-Temporary-Protection-for-People-Displaced-from-Ukraine_Paper-1.pdf
- ECRE: "Transitioning Out of the Temporary Protection Directive: Analysis of the Main Options" (Policy Paper 13, February 2024), https://ecre.org/wp-content/uploads/2024/02/ECRE-Policy-Paper-13_Transitioning-Out-of-the-Temporary-Protection-Directive.pdf
- JRS Romania: "The transition after the end of Temporary Protection (March 2027): Survey results and public policy recommendations" (February 2026), <https://jrsromania.org/ro/resurse/>

- PICUM: "What Comes After Temporary Protection Comes to an End? Case Study: Czech Republic" (May 2025), https://picum.org/wp-content/uploads/2025/06/What-comes-after-temporary-protection-comes-to-an-end_Case-study_Czech-Republic.pdf
- UNHCR: "Recommendations on the continued use of Temporary Protection and Guiding Principles for Transition in relation to the Ukraine Refugee Situation" (May 2025), <https://www.refworld.org/policy/countrypos/unhcr/2025/en/150064>
- UNHCR, Regional Bureau for Europe, Transitioning from Temporary Protection: Projected Stay, Legal Pathways, and Policy Options for Refugees from Ukraine, May 2026, <https://reliefweb.int/report/ukraine/transitioning-temporary-protection-projected-stay-legal-pathways-and-policy-options-refugees-ukraine-may-2026>

11. Abbreviations

PLA	Local public administration authorities
GIM	General Inspectorate for Migration
MIA	Ministry of Internal Affairs
MEC	Ministry of Education and Research
MH	Ministry of Health
MEA	Ministry of External Affairs
NGO	Non-governmental organization
PT	Temporary protection