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MOLDOVA



European
Network on
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CDA
Centrul de Drept al Avocaților

JOINT SUBMISSION
TO THE HUMAN RIGHTS COUNCIL
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MOLDOVA

INTRODUCTION

1. The Law Center of Advocates (CDA) and the European Network on Statelessness (ENS) make this joint submission to the Universal Periodic Review (UPR), on the right to a nationality and human rights challenges pertaining to statelessness in Moldova.
2. This submission focuses on:
 - I. Children's right to a nationality;
 - II. Upholding the right to a nationality through facilitated naturalisation of recognised stateless people;
 - III. Upholding the right to a nationality through procedures that recognise or confirm Moldovan nationality.
3. The Law Center of Advocates (CDA) is a public association, registered on 24 February 1997 at the Ministry of Justice of the Republic of Moldova. The organisation's mission is to promote the fundamental rights of people in need of international protection (refugees and asylum seekers), stateless persons, people at risk of becoming stateless, and vulnerable immigrants, who are the most marginalised and at risk of human rights violations. The CDA is a partner of the UN Refugee Agency (UNHCR) and an associate member of the European Network on Statelessness (ENS), the European Council on Refugees and Exiles (ECRE) and the Global Alliance to End Statelessness.¹
4. The European Network on Statelessness (ENS)² is a civil society alliance of NGOs, lawyers, academics, and other independent experts committed to addressing statelessness in Europe. Based in London, it currently has over 180 members in 41 European countries. ENS organises its work around three pillars – law and policy development, awareness-raising, and capacity-building. ENS provides expert advice and support to a range of stakeholders, including governments. This submission partially draws on information and analysis from ENS's Statelessness Index, which covers Moldova.³

PREVIOUS UPR AND UN TREATY BODIES' RECOMMENDATIONS TO MOLDOVA

¹ For more information about CDA, see: <https://cda.md/index.php/en/>.

² For more information, see <https://www.statelessness.eu>.

³ ENS, Statelessness Index: Moldova, <https://index.statelessness.eu/country/moldova>.

5. Moldova was previously reviewed during the 12th, 26th and 40th sessions of the UPR, in 2011, 2016, and 2022 respectively. During the first cycle, Moldova received one recommendation by Brazil to work towards addressing statelessness and protecting the rights of stateless people, which it accepted⁴. During the third cycle, Moldova received a recommendation by Brazil to ensure that all births are registered, which it accepted.⁵
6. In 2017, the Committee on the Rights of the Child welcomed Moldova's efforts in expanding the network of civil status offices into remote locations, the establishment of an electronic birth register, and increased monitoring, but recommended that Moldova continue to strengthen efforts to ensure that all births in the territory are registered, including of Romani children, children born at home, children born to adolescent mothers and children born out of wedlock.⁶
7. In 2020, the Committee on the Elimination of Discrimination against Women recommended that Moldova facilitate the birth registration of children born in the Transnistria and Gagauzia regions, as well as to ensure access to citizenship for Roma children.⁷ It also recommended that Moldova "raise awareness among women living in those entities, as well as Roma women, on the importance of birth registration and the procedural requirements for obtaining citizenship".⁸ The Committee further recommended that Moldova strengthen the resilience of women against trafficking, including stateless, undocumented and Romani women.⁹
8. In 2024, the Committee on the Elimination of Racial Discrimination recommended that Moldova collect and provide disaggregated data from its 2024 census, including on certain groups such as Romani and stateless people, to assess their enjoyment of fundamental rights, such as access to education, employment, healthcare, and housing.¹⁰ The Committee also recommended that Moldova "strengthen its efforts to resolve the remaining statelessness cases, including by developing and adopting a policy framework on combating statelessness to enable all stateless persons, without discrimination, to have their status ascertained and to obtain identity documents".¹¹
9. In 2026, the Human Rights Committee welcomed reforms granting nationality to children born to stateless parents and beneficiaries of international protection in Moldova. However, it expressed concern that amendments to the nationality-by-recognition procedure introduced language and constitutional knowledge requirements that could disproportionately affect people with limited literacy, linguistic minorities, older people, and people with disabilities. The Committee also warned that changes to eligibility criteria could restrict access to nationality for people at risk of statelessness following the dissolution of the Soviet Union. It recommended that Moldova "consider amending the legal framework on citizenship by recognition to eliminate any potential for indirect discrimination against groups in situations of vulnerability or at risk of statelessness".¹²

⁴ Human Rights Council, 19th session, Universal Periodic Review, Report of the Working Group on the Universal Periodic Review – Republic of Moldova, A/HRC/19/18, 14 December 2011, para 73.62.

⁵ Human Rights Council, 50th session, Universal Periodic Review, Report of the Working Group on the Universal Periodic Review – Republic of Moldova, A/HRC/50/13, 18 April 2022, para 127.146.

⁶ Committee on the Rights of the Child, Concluding observations on the combined fourth and fifth periodic report of the Republic of Moldova, CRC/C/MDA/CO/4-5, 20 October 2017, para. 18.

⁷ Ibid. para. 29.

⁸ Ibid.

⁹ Committee on the Elimination of Discrimination against Women, Concluding observations on the sixth periodic report of the Republic of Moldova, C/MDA/CO/6, 10 March 2020, para. 25(b).

¹⁰ Committee on the Elimination of Racial Discrimination, Concluding observations on the combined twelfth to fourteenth period reports of the Republic of Moldova, C/MDA/CO/12-14, 23 May 2024, para. 6.

¹¹ Ibid. para. 30.

¹² Human Rights Committee, Concluding observations on the fourth periodic report of the Republic of Moldova, CCPR/C/MDA/CO/4, 2 April 2026, paras. 35-36.

MOLDOVA'S INTERNATIONAL OBLIGATIONS

10. Moldova is State party to both the 1954 Convention on the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness, following its accession in 2012. Moldova has international obligations to protect the right to a nationality and protect the rights of stateless people on the basis of other UN and regional treaties to which it is State party. These include, among others:

- International Covenant on Civil and Political Rights (ICCPR) (see article 24.3)
- International Covenant on Economic, Social and Cultural Rights (ICESCR) (see articles 2.2 and article 3)
- Convention of the Rights of the Child (CRC) (see articles 2, 3, 7 and 8)
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (see article 9)
- International Convention on the Elimination of All Forms of Racial Discrimination (CERD) (see article 5(d)(iii))
- Convention on the Rights of Persons with Disabilities (CRPD) (see article 18)
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT).

Furthermore, the right to a nationality is included in Article 15 of the Universal Declaration on Human Rights.

Moldova is not State party to the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, nor the International Convention for the Protection of all Persons from Enforced Disappearance.

11. At regional level, Moldova is State party to the 1997 European Convention on Nationality (ECN), the 2006 Council of Europe Convention on the Avoidance of Statelessness in Relation to State Succession, the 1950 European Convention on Human Rights and Fundamental Freedoms (ECHR) and the European Social Charter (ESC).

12. During the 2023 Global Refugee Forum, Moldova pledged to implement and expand programs and state mechanisms for the inclusion of refugees and stateless people into socio-economic and protection systems.¹³ Moldova also pledged to join the Global Alliance to End Statelessness, which it fulfilled in 2024, and vowed to learn from and apply good practices in other countries in relation to preventing statelessness.¹⁴

SNAPSHOT OF STATELESSNESS IN MOLDOVA

13. Statelessness in Moldova is a persistent and statistically underestimated phenomenon. Information on the stateless population remains limited. The State does not collect disaggregated statistics on the socio-economic situation of stateless persons, on their access to education, employment, health care, housing and on their participation in public and political life. The lack of disaggregated data from the perspective of the human rights-based approach does not allow the creation of an empirical basis for assessing the equal enjoyment of the rights enshrined in the core universal human rights

¹³ See <https://www.unhcr.org/what-we-do/protect-human-rights/ending-statelessness/ibelong-campaign-end-statelessness>

¹⁴ See https://globalcompactrefugees.org/pledges-contributions?_cf_chl_f_tk=35VSYb8Zt_POPfyj0H_AGpign0zkLloxbNYTA2EgRag-1783416540-1.0.1.1-6r8g3OI55WSYgrm7EnEUx4DkfvoiRREZY21yYrCPfE, Pledge ID: GRF-08339.

treaties, including the identification of needs of vulnerable and underrepresented groups, ensuring equality and non-discrimination, informing public policy, effectively targeting interventions, monitoring progress, and strengthening participation and empowerment.

14. There are problems with the way official data on statelessness is collected in Moldova, including the use of overlapping categories, such as 'people with former Soviet Union passports', and people with 'undetermined citizenship'. Combined with the fact that there is a lack of reliable data for the disputed Transnistrian region, this means that the stateless population is likely to be underreported. The Public Services Agency, which oversees the State Registry of Population, provides that there are 3,422 stateless people living on the territory of the Moldova and 2,634 people with undetermined nationality, as of 1 January 2026. By May 2026, this number had decreased considerably and inexplicably (1,813 stateless people, and 1,180 people with undetermined nationality).¹⁵ According to data on the country of origin of these groups, the majority of stateless people are from Moldova (942 people), followed by Russia (423), Ukraine (283), and Kazakhstan (93). According to UNHCR, there were 4,704 people in Moldova under its statelessness mandate by the end of 2024, representing a 48.7% increase compared to the previous year.¹⁶ Data on stateless people entering or leaving immigration detention centres is not published by the General Inspectorate for Migration.
15. The main cause of statelessness in Moldova is linked to the process of State succession that followed the dissolution of the Soviet Union and the establishment of Moldova as an independent State. Part of the population that had lived on the national territory for several generations did not acquire the nationality of the new State due to the failure to replace Soviet passports in a timely manner, the inability to present proof of permanent residence, or discriminatory policies.¹⁷ The statelessness mapping exercise conducted by CDA in 2025¹⁸ showed that Moldova faces a significant lack of data on people at risk of statelessness, and that lack of documentation is the primary cause of statelessness among people born in the former Soviet region, including Moldova.
16. Moldova established a dedicated statelessness determination procedure (SDP) in law in 2011, which is particularly relevant for statelessness in a migratory context.¹⁹ The procedure has several positive aspects, although with some issues with regards to implementation and protection of applicants pending the procedure. The SDP is accessible, with no fee or residence requirement, and can be initiated *ex officio*, in person, orally or in writing. The dedicated Statelessness Unit must examine claims within six months (with the possibility to extend to 12 months). While free legal aid during the administrative procedure is provided for in law, in practice it is provided by NGOs. An interview is mandatory, interpreters are made available, and training is provided by UNHCR. The burden of proof is shared, and although not established in law, the standard of proof is the same as in the asylum procedure, and cross-referral between procedures is established. Applicants to the SDP are protected from expulsion and have access to some procedural rights and the right to work. Unlike asylum seekers who benefit from a wide spectrum of rights, stateless applicants have limited rights, which has negative consequences for them. People recognised as stateless are granted permanent

¹⁵ See <https://www.asp.gov.md/en/date-deschise/date-statistice/rsp-cet>

¹⁶ See <https://www.unhcr.org/refugee-statistics>

¹⁷ Ombudsperson of Moldova, Raport special privind fenomenul apatridiei și respectarea drepturilor persoanelor apatride în contextul cadrului legal național (the phenomenon of statelessness and respect for the rights of stateless persons in the context of the national legal framework), 2024: <https://ombudsman.md/post-document/raport-special-privind-fenomenul-apatridiei-si-respectarea-drepturilor-persoanelor-apatride-in-contextul-cadrului-legal-national/>

¹⁸ Law Center of Advocates, Cartografierea persoanelor apatride și nedocumentate pe teritoriul Republicii Moldova (Mapping stateless and undocumented persons on the territory of the Republic of Moldova), 2025: https://cda.md/wp-content/uploads/2026/02/Studiu_CARTOGRAFIERE_Final_machetat-1.pdf

¹⁹ Law 200/2010 on foreigners in the Republic of Moldova, available at: <https://www.refworld.org/search?keywords=Moldova%3A+Law+on++Foreigners+&sort=score&order=desc> (English) and the original at: https://www.legis.md/cautare/getResults?doc_id=151193&lang=ro# (Romanian)

residence and rights (except political rights) in line with nationals. They have facilitated access to Moldovan nationality by way of naturalisation after eight years of continuous lawful residence, but this is still a long period.

17. The Law on the Admission, Stay and Supervision of Foreigners will enter into force on 1 June 2027 and will replace the Law on the Regime of Foreigners. Positively, it expands the list of rights afforded to applicants for the SDP and establishes protection safeguards for stateless children and children who are applicants for the SDP, whether accompanied or unaccompanied, in accordance with international treaties.
18. In 2025, Moldova introduced a new Citizenship Law.²⁰ Positively, the law provides safeguards to prevent statelessness for foundlings and for children born in Moldova and abroad, though the implementation of these safeguards should be closely monitored to ensure effective protection. The law also amended the grounds for deprivation of nationality under the law, which include cases where a person acquired nationality fraudulently, committed particularly serious acts prejudicial to the State, has links to terrorist groups, enlisted in illegal military formations or in the armed forces of an unconstitutional entity, an aggressor State, or a State with which Moldova has severed diplomatic relations or is at war. Deprivation of nationality may result in statelessness under some of these grounds. Deprivation does not affect the nationality of the person's spouse or children.
19. The Citizenship law was subsequently amended in May 2026 to address practical difficulties identified in its implementation, including in relation to naturalisation and to the acquisition of nationality by recognition; these amendments, and their implications, are addressed in turn at Issues 2 and 3 below.

ISSUE 1 – CHILDREN’S RIGHT TO BIRTH REGISTRATION AND TO A NATIONALITY

20. As a State party to the Convention on the Rights of the Child (CRC), Moldova must implement Article 7, which guarantees every child’s right to be registered immediately after birth and to acquire a nationality, and Article 8, which protects the right of the child to preserve their identity, including their nationality. In addition, as a State party to the 1961 Convention, Moldova has further obligations to prevent and reduce statelessness on its territory, including to grant nationality to children who would otherwise be stateless. Every child’s right to legal identity and nationality is not only essential to the prevention and reduction of statelessness but is a core principle of international law. Article 7 CRC applies irrespective of the nationality, statelessness, or residence status of the parents,²¹ and States should register the birth of all children born on their territory even if they are born to a foreign parent with an irregular immigration status or the parents are unknown.²² Birth registration must be free and take place immediately after birth without delay.
21. Although Moldovan law provides for free birth registration and establishes that all children must be registered, efforts to prevent statelessness are hindered by barriers to universal free birth registration in practice. For a child born in Moldova to be registered and issued a birth certificate, the child’s mother is required to submit identity documents. As a result, some parents face difficulties

²⁰ Law 253/2025 on Citizenship of the Republic of Moldova, available at: https://www.legis.md/cautare/getResults?doc_id=154591&lang=ro#

²¹ UNHCR, Guidelines on Statelessness No. 4: Ensuring Every Child’s Right to Acquire a Nationality through Articles 1-4 of the 1961 Convention on the Reduction of Statelessness, 21 December 2012, HCR/GS/12/04.

²² See also, at the regional level, Council of Europe: Committee of Ministers, Recommendation CM/Rec(2009)13 and explanatory memorandum of the Committee of Ministers to member states on the nationality of children, 9 May 2009, CM/Rec(2009)13.

registering their children's births, without alternative safeguards being in place to protect the child's right to a nationality. There are credible reports from the Ombudsperson and NGOs of barriers to birth registration for undocumented parents and children remaining unregistered as a result.²³

22. A persistent issue with implications for statelessness concerns the state procedure for registering births. The state registration of a birth occurring in Moldova is possible only on the basis of the electronic registration of the birth in the *Information System for the Registration of Births and Deaths*, or following a court decision establishing the fact of birth.²⁴ Electronic registration is carried out on the basis of identity documents included on a list approved by the Ministry of Health,²⁵ including expired documents. However, where no such documents are available, registration can only proceed after the mother's identity has been established. In practice, this creates barriers for certain groups. The birth notification document required for the state registration of birth is not issued to undocumented people and cannot be obtained based on documents held by applicants for the SDP or asylum seekers. As a result, the births of children born to undocumented parents, asylum seekers, and SDP applicants may only be registered once the required identity documents have been obtained. This increases the risk that children will remain unregistered and, in some cases, be left without proof of nationality. Although the issue has been discussed at the interministerial level, no legal or administrative solution has yet been adopted.
23. Moldova recognises Transnistrian civil status acts, making it easier for parents of Transnistrian origin to register the births of their children in Moldova and for children born to Transnistrian parents to acquire Moldovan nationality. However, this recognition does not extend to civil status records obtained through the Transnistrian courts. Additionally, children born in the Transnistrian region to parents who are foreign nationals and hold residence permits issued by the de facto authorities of the region cannot obtain birth certificates issued by the constitutional authorities as long as their parents do not regularise their stay in the Republic of Moldova in accordance with national legislation.
24. Another issue affecting children's access to nationality concerns the implementation of the 2025 Citizenship Law. Although the law contains a safeguard intended to prevent childhood statelessness, it requires that a child born in Moldova who would otherwise be stateless must 'meet the legal conditions for being recognised as stateless'. This wording and its practical implications remain unclear. There are concerns that children may be required to undergo the statelessness determination procedure before they can acquire Moldovan nationality, although discussions are ongoing within the authorities.
25. If this interpretation is adopted, an otherwise stateless child may first need to establish their statelessness through the SDP and then submit a separate application for Moldovan nationality, including supporting documentation such as their parents' identity documents. This may create barriers for some children, particularly because Moldova's SDP currently contains no specific child-sensitive procedural safeguards in line with international good practice. Children born to

²³ Ombudsperson of Moldova, Report Observing Child Rights in the Republic of Moldova in 2023, page 32, right to name and nationality. Available at: <https://ombudsman.md/rapoarte/drepturile-copilului/anuale/>; Law Center of Advocates, Cartografierea persoanelor apatride și nedocumentate pe teritoriul Republicii Moldova (Mapping stateless and undocumented persons on the territory of the Republic of Moldova), 2025: https://cda.md/wp-content/uploads/2026/02/Studiu_CARTOGRAFIERE_Final_machetat-1.pdf

²⁴ See Ordinul Ministerului Sănătății nr. 756 din 17 septembrie 2024 cu privire la lansarea și implementarea Sistemului Informațional "Constatarea medical a nașterii și decesului": <https://ms.gov.md/wp-content/uploads/2024/09/Ordinul-MS-nr.-756-din-17.09.2024-cu-privire-la-lansarea-%C8%99i-implementarea-Sistemului-informa%C8%9Bional-%E2%80%9EConstatarea-medical%C4%83-a-na%C8%99terii-%C8%99i-decesului-%E2%80%9D-eCMND.pdf>

²⁵ Lista actelor de identitate în baza cărora pot fi înregistrate constatările medicale de naștere include: buletinul de identitate provizoriu (fără IDNP), pașaportul de tip sovietic (modelul anului 1974), pașaportul național al cetățeanului străin/apatridului, pașaportul diplomatic/de serviciu al cetățeanului străin, pașaportul/pașaportul intern al persoanei fără cetățenie (stat străin), actele de identitate ale personalului navigant

undocumented parents may also face difficulties accessing the SDP in the first place. While a child born in Moldova who is recognised as stateless can acquire Moldovan nationality regardless of their parents' status, the complexity of the current framework risks leaving some children without an effective route to nationality, potentially prolonging children's statelessness and leaving them in legal limbo while multiple procedures are completed.

ISSUE 2 – THE RIGHT TO A NATIONALITY THROUGH FACILITATED NATURALISATION OF RECOGNISED STATELESS PEOPLE

26. Under Article 32 of the 1954 Convention relating to the Status of Stateless Persons, Moldova is obliged, as far as possible, to facilitate the naturalisation of recognised stateless people.²⁶ This includes an obligation to make every effort to expedite naturalisation proceedings and to reduce, as far as possible, the charges and costs of such proceedings.
27. Moldovan law provides for an accelerated naturalisation procedure for people recognised as stateless through the SDP, as well as for refugees, who may apply for naturalisation after eight years of lawful and continuous residence on the territory, rather than the standard ten years. Although this represents an improvement on the general regime, an eight-year residence requirement remains lengthy when compared with the requirements applied in other European States and constitutes a long period for a person already recognised as stateless to wait before resolving their lack of any nationality.²⁷
28. Substantive conditions attached to naturalisation are also onerous. Applicants must demonstrate knowledge of the Romanian language and of the Constitution, and must show a minimum income level (a period of at least three years equivalent to the minimum wage established for the current year). Unfortunately, there are no exemptions from these requirements available for stateless people.
29. The financial burden of naturalisation was significantly increased by amendments in 2025. Naturalisation now requires payment of a processing fee of 6,650 Moldovan lei (approximately EUR 335) plus a State tax of 180 lei (approximately EUR 9). Following naturalisation, further costs are incurred to obtain the documents necessary to exercise the rights attached to nationality in practice. An identity card costs 290 lei (approximately EUR 14) and a passport costs 650 lei (approximately EUR 33.50). Cumulatively, these costs present a significant barrier for stateless people, who are frequently among the most socio-economically vulnerable members of the population and are not exempt from any costs.
30. Naturalisation may further be barred on other grounds. In 2025, additional exclusionary grounds were introduced, extending the bar on naturalisation to people who have joined hostile military forces, who have submitted false or misleading information during the naturalisation process, or who are subject to international restrictive measures.
31. Certain groups may face disproportionate barriers to naturalisation. For example, the residence requirement excludes certain periods from the calculation of qualifying residence, including time spent under temporary protection by displaced people from Ukraine. Access to naturalisation is

²⁶ Article 32 of the 1954 Convention.

²⁷ Law 253/2025 on Citizenship of the Republic of Moldova, Art. 14, available at: https://www.legis.md/cautare/getResults?doc_id=154591&lang=ro (Romanian). For a comparison with other European countries, see: <https://index.statelessness.eu/>

also limited for stateless children, who cannot apply independently and may only acquire nationality through a joint naturalisation application with their parents.

ISSUE 3- UPHOLDING THE RIGHT TO A NATIONALITY THROUGH PROCEDURES THAT RECOGNISE OR CONFIRM MOLDOVAN NATIONALITY

32. Distinct from the naturalisation pathway available to recognised stateless people, Moldovan law provides a separate procedure for the acquisition of nationality by recognition, intended for people with ties of descent or birth to Moldova. This procedure may take up to 18 months to complete, involves payment of considerable taxes, and, for certain categories of applicants, requires demonstrated knowledge of the Romanian language and of the provisions of the Constitution. Notwithstanding its intended purpose of resolving the position of persons with genuine ties to the State, the procedure remains bureaucratic and difficult to access for applicants in situations of socio-economic vulnerability.
33. Individual cases highlighting practical difficulties in the implementation of these provisions attracted significant public attention and prompted legislative amendments in May 2026. Those amendments principally:
- (i) for people applying for **acquisition of nationality by recognition**, or its reacquisition, where they would otherwise become stateless: the changes removed the requirement to demonstrate knowledge of the Romanian language and the Constitution for children over the age of 14 and; and
 - (ii) for people who were considered nationals of Moldova by operation of the law applicable at the time of their birth but who had not obtained identity documents by the age of 18, the amendments introduce (for the first time), a procedure for the **determination of belonging to the nationality of Moldova**.

These amendments constitute positive measures aimed at confirming the nationality status of people in vulnerable situations and reducing the risk of statelessness, including in cases resulting from a lack of identity documents or difficulties in proving nationality status.

34. By comparison with the procedure for acquisition of nationality by recognition, the newly introduced determination of belonging procedure is free of charge, does not require knowledge of the Romanian language or the Constitution, and is intended to be completed within one month. However, the legislation in force does not yet sufficiently regulate the procedural aspects necessary to ensure the clarity, predictability and transparency of the procedure.
35. A related population affected by these gaps consists of people with unresolved nationality status who remain registered in the State Population Register as holders of expired Soviet-type passports and who are not recognised as nationals of Moldova. The State does not hold updated information regarding the nationality of this group. Critically, their children cannot benefit from the determination of belonging procedure and are instead required to undergo the more onerous procedure for acquisition of nationality by recognition, perpetuating the disadvantage across generations.
36. Documentation barriers compound these gaps in the legal framework. People who do not hold Moldovan nationality and who lack civil status or identity documents, notwithstanding ties of descent or birth to the State, face administrative obstacles in the procedure for acquisition of

nationality by recognition precisely because they lack the documents that procedure requires. In order to obtain identity documents, they are instead required to undergo the statelessness determination procedure. As a result, rather than facilitating the documentation of the people concerned, the State unjustifiably contributes to the perpetuation of statelessness.

37. The SDP itself, and the documentation of individuals under it, is governed by additional regulations set out in government decisions and internal instructions that are not publicly available. In some instances, these regulations fail to provide viable solutions for the efficient conduct of the SDP; in others, they impose requirements that bureaucratised the procedure to the point of making it impossible to obtain statelessness status or to secure the necessary civil status documents. By way of illustration, the national regulatory framework does not require civil status documents to be annexed to an application for recognition of statelessness status. Cases examined by CDA indicate that the absence of civil status documents has, in practice, served as grounds for the competent authority for foreigners to refuse to accept an application for examination, or to reject an application for recognition of statelessness status outright. The regulatory framework further contains no provision governing how applicants for statelessness status may obtain civil status documents, nor any provision addressing the subsequent options available to a person whose application has been rejected.

RECOMMENDATIONS

38. Based on the above information, the co-submitting organisations urge reviewing States to make the following recommendations to Moldova:
- I. To fully promote, respect, protect and fulfil its obligations to protect stateless people, prevent and reduce statelessness, and to uphold the right to a nationality under international human rights law, including by removing barriers for children to acquire a nationality, facilitating the naturalisation of stateless people, and effectively implementing procedures for confirmation of Moldovan nationality.
 - II. To take concrete steps to improve the recording of statelessness, namely by collecting comprehensive and disaggregated statistics on the demographic composition of stateless people, together with statistics on the socioeconomic situation, and on their access to education, employment, health care and housing, as well as their participation in public life with a view to creating an empirical basis for assessing the equal enjoyment of the human rights.
 - III. To ensure that policies and practices relating to birth registration and certification of all children born in Moldova take into account UNHCR guidelines and good practice to ensure that all children are correctly registered as soon as possible after birth, regardless of their parents' documentation status, in line with the Convention on the Rights of the Child and the 1961 Convention on the Reduction of Statelessness.
 - IV. To amend the Law on Citizenship of the Republic of Moldova to facilitate the naturalisation of stateless people, by exempting them from fees and taxes, including the period of temporary protection in the calculation of the residence requirement, and reducing the required period of lawful and continuous residence for the acquisition of nationality by naturalisation, in accordance with the 1954 Convention on the Status of Stateless Persons.

- V. To intensify efforts to resolve cases of statelessness, including by developing and adopting a policy framework on combating statelessness, which would allow all stateless people, without discrimination, to verify their status and obtain identity documents.
- VI. To adopt regulations that develop the procedural aspects necessary to ensure the clarity, predictability and transparency of the procedures for confirming nationality of the Republic of Moldova.