



PROTECTION BRIEF

BULGARIA

IMPLEMENTATION OF THE TEMPORARY PROTECTION DIRECTIVE

JULY - DECEMBER 2024



Ukrainian refugees taking part in a psycho-social activity at the Compass Centre in Burgas © UNHCR/Dobrin Kashavelov

Operational Context

The Council of Ministers extended temporary protection on 19 February until 4 March 2026, in line with the decision of the European Council.¹ The decision allows for re-registration of the TP beneficiaries until April 2025.

From July to December 2024, 13,306 refugees applied or renewed their TP in Bulgaria upon return from Ukraine or a third country, reflecting an increase in registration rates – by 13 per cent – compared to 2023. The total number of refugees under temporary protection present in Bulgaria as of end of December 2024 was 74,739. In the second half of 2024, there has been a five per cent increase in older individuals who have newly registered or re-registered for Temporary Protection compared to the first half of the year. The highest concentration of valid TP holders is in Burgas region (36%), Varna region (21%) and Sofia city (14%). For new arrivals, the deterioration in the security situation in Ukraine and ongoing crisis (e.g., electricity cuts) remain the main reasons for seeking temporary protection in Bulgaria. There are also refugees moving to Bulgaria from Germany, Poland, other EU Member States (9% of 2,320 newly arriving refugees surveyed), and Türkiye, as indicated by the UNHCR rapid assessment in the summer of 2024. The main reasons include the end of humanitarian support in these countries; prospects of job opportunities in a country with a language easier to learn; and closer proximity to Ukraine to allow family visits.

The Bulgarian Government maintains administrative practices that give access to people displaced from Ukraine through its borders, granting temporary protection to 204,000 refugees since March 2022 until the end of 2024. It maintains humanitarian accommodation to more than 5,620 Ukrainian refugees with specific protection needs. The Agency for Social Assistance provided at least one social benefit to almost 17,450 refugees by end of October 2024, and the Employment Agency supported the employment of 2,855 refugees under the Solidarity Platform. An expanded Humanitarian Support Programme is pending the approval of the Committee of Ministers.

Data used in this report was collected as part of UNHCR Bulgaria's Protection Profiling and Monitoring exercise² for the Ukraine Situation, in partnership with the Bulgarian Red Cross, for the purposes of understanding the profiles, protection risks and needs of refugees from Ukraine and monitoring changes over time. During July to December 2024, protection monitoring interviews with 781 respondents representing 2,010 household members were conducted in various locations in Bulgaria. The findings are complemented by UNHCR participatory assessments through focus group discussions with 350 individuals in December 2024³ and the Socio-Economic Insights Survey that was conducted in June-July 2024 with 1,072 households.

¹ [Ukrainian refugees: Council extends temporary protection until March 2026](#), 25 June 2024.

² UNHCR, [Regional Protection Profiling & Monitoring](#), updated 22 January 2025.

³ UNHCR Bulgaria, [Cash Assistance for Basic Needs – Participatory Assessment](#), January 2025.

Key Figures



74,739

Valid Temporary Protection beneficiaries



69%

Of valid Temporary Protection beneficiaries are women and children



33

Unaccompanied and Separated Children



12%

Of valid Temporary Protection beneficiaries are older persons



781

Total respondents (Jul-Dec 2024)



100%

of respondents are Ukrainian nationals



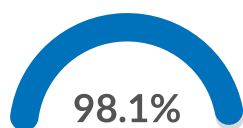
81%

Of respondents are women

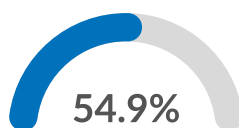


34%

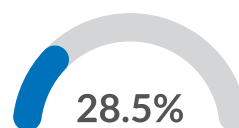
Of respondents are older persons



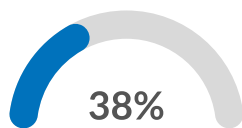
of respondents who have been granted temporary protection



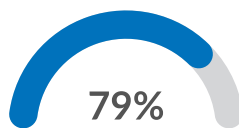
of households have at least one household member with a serious medical condition



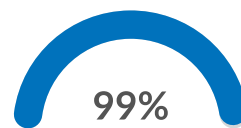
of households have at least one household member whose documentation is missing or expired



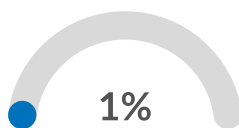
of respondents visited Ukraine at least once since their initial departure



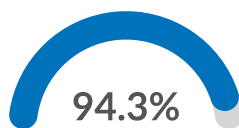
of respondents who have immediate family member who remained in Ukraine



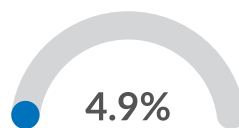
of respondents have at least one urgent need



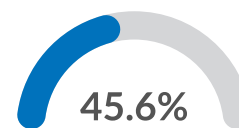
of respondents who visited Ukraine faced difficulties upon their return to the host country



of respondents have applied for social protection benefits



of respondents who are employed in the host country do not have an employment contract



of respondents who had been separated from their immediate family members could not reunite due to obstacles other than martial law

Protection risks

Access to legal status and documentation:

While monitoring TP registration at police stations in February 2024, UNHCR noted that newly registering refugees face various challenges, such as instances of the local police requesting a long-term rental agreement for registration, when the State Agency for Refugees (SAR) does not require an address for TP registration in Bulgaria. The police registration requires biometric passports; however, individuals without these or other documentation can still register for TP at SAR reception and registration centers in Nova Zagora, Haskovo, and Sofia provinces, provided they can verify their identity and nationality.

Due to the uncertainties surrounding refugees' legal status in Bulgaria beyond 2026, including the impact on their rental and labour contracts, increasing numbers of refugees have been requesting information on obtaining other types of legal status in the country such as permanent residency or citizenship. This also reflects refugees' uncertainty about the situation in Ukraine, which delays any decisions regarding their return in the near future.

Access to civil registration: Since their first arrival in Bulgaria, 11 per cent of respondents have reported the occurrence of events requiring civil registration such as birth (4%), divorce (3%), death (3%), and marriage (1%) in their households. Of these, 10 per cent reported facing difficulties registering them with both the Ukrainian consulates and civil authorities in Bulgaria because of the lack of required supporting documents and long waiting period. Refugees, who rely on community channels and inconsistent information, often have inaccurate details about the procedures. For instance, for birth registration, refugees have been informed to first apply for a Ukrainian passport for the newborn child and return to Ukraine to obtain a birth certificate, which is inaccurate.

Access to identity documents: More than one-fifth of households have at least one family member missing identity documents, primarily international passports (23%). Eight per cent of respondents who reported missing documentation also said they do not know how to replace or renew documentation in Bulgaria. The absence of identity documents impedes access to services, including financial services and social assistance, given that the document issued to temporary protection beneficiaries (registration card) does not constitute an identity document under the national law.

Accommodation and housing rights

Most respondents (46%) are currently living in rented accommodation, followed by government-sponsored accommodation schemes (26%). Of those in rental accommodation, 10 per cent do not have a formal rental contract with the property owner. To be placed in state-sponsored accommodation after entering Bulgaria through the border with Romania, newly arriving refugees are required to continue to first transit through the Elhovo Centre on the border with Türkiye before they are allocated to state facilities on the Black Sea coast.

Accommodation provided under the Humanitarian programme, including state recreational bases, hotels and other places of accommodation is often located in small towns, resorts or remote areas, with limited access to services, further exacerbated by lack of transport options and financial means to reach larger cities where these are available. There are no social workers employed at state-sponsored facilities, even where they accommodate a significant number of older persons and persons with disabilities, and separated children under their care.

There is no procedure to identify and refer persons with specific needs to specialized services or assistance. Lack of information and activities further exacerbate isolation and hamper their inclusion. Provisions stipulating that those accommodated in government-provided accommodation are not entitled to benefit from the programme following one month of signing a labor contract adversely affect employment prospects and encourage informal employment.

UNHCR's interviews with refugees in the context of participatory assessments show that only few refugees are able to find housing solutions when they have access to decent work conditions and achieve self-reliance. However, employment does not always lead to self-reliance and access to housing given the prevalence of underemployment. Refugees who can afford to find solutions in the housing market need guidance and support; for instance, they lack accurate information on housing or are denied rental contracts because of uncertainties of their stay in Bulgaria. Others prefer to stay closer to their new communities within the humanitarian accommodation centers to help each other in childcare or care of family members with disabilities, medical conditions or other vulnerabilities.

Persons with disabilities, older persons and persons with underlying serious medical conditions face additional challenges of accessibility in their accommodations. Several accommodation sites are in remote locations and isolated, raising barriers to inclusion and access to essential services, including health.

Furthermore, there are no provisions to subsidize or cover rental costs in the private market, and access to social housing is limited due to a lack of availability and administrative requirements in several municipalities, which demand long-term residence – criteria that refugees cannot meet. Residential social services for homeless individuals, such as shelters, are insufficient to meet the needs of both refugees and the local population. Similarly, nursing homes and residential services for people with disabilities lack sufficient capacity.

Socio-economic inclusion and social protection

Most respondents were retired (34%) while one-fifth (20%) said they were employed in Bulgaria and similar percentage (21%) said they remained unemployed. The main obstacles to employment are language barriers (39%) followed by lack of employment opportunities (21%).

The lack of opportunities is also linked to the difficult and expensive process for the recognition of the qualifications of refugees. Refugees continue to face challenges in validating their diplomas and professional certification obtained in Ukraine in Bulgaria.

In Bulgaria, of respondents who said they have found employment, five per cent said they do not have an employment contract and three per cent reported working excessively long hours. While Bulgarian legislation explicitly includes beneficiaries of temporary and international protection among those eligible for social assistance, administrative hurdles, complex and lengthy procedures and lack of information hinder their effective access to social protection. Furthermore, the Law on Family Benefits for Children does not include temporary and international protection beneficiaries within its scope; therefore, such applications are refused by the administrative authority and require an appeal and the legal assistance necessary to lodge it.

In addition, the amount of assistance to which beneficiaries are entitled to, including persons with disabilities, is insufficient to ensure an adequate standard of living. There is a high amount of co-payment for persons undergoing medical treatment, as the health insurance does not fully cover all medical procedures or expenses, as well as prescribed medicines. Persons with disabilities also need to undergo medical assessment in Bulgaria prior to applying for assistance for which additional support is required as well as registration with a general practitioner and health insurance coverage.

The Insights Survey (SEIS) showed that basic needs continue to be a top priority need of surveyed refugee households. Access to healthcare services was identified as the most critical need (34%) followed by food (30%) and accommodation (26%). These findings are supported by protection profiling and monitoring data in 2024 which show that material assistance was the most frequently cited urgent need (84%) among refugee respondents in Bulgaria.

With regards to socio-economic inclusion, the most frequently mentioned (53%) need for support in the SEIS was regarding refugees' access to social assistance. This is particularly relevant for older refugees (over 60 years of age) and other refugees with specific needs, including children under their care, living in state sponsored accommodation. For refugee households with young children who have not reached the age of mandatory education, 54 per cent responded that they have not been able to access childcare.

In the Protection Monitoring interviews, almost all surveyed households (99%) have applied for government social protection benefits in the form of cash for food, employment support and grants for vulnerable groups. Refugees, however, continue to face challenges due to procedural difficulties and administrative barriers. Refugees request information sessions on procedures to access one-time aid (e.g., for pregnant mothers).

- **55%** of households have at least one family member with a serious medical condition
- **34%** of households have at least one family member with a disability

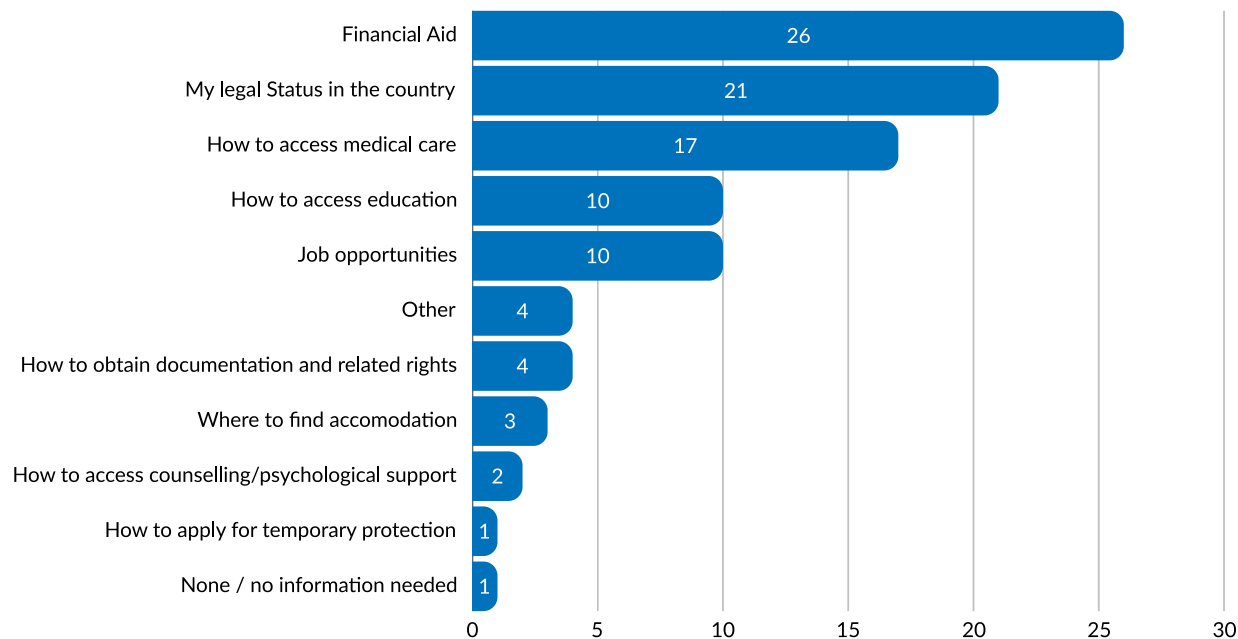
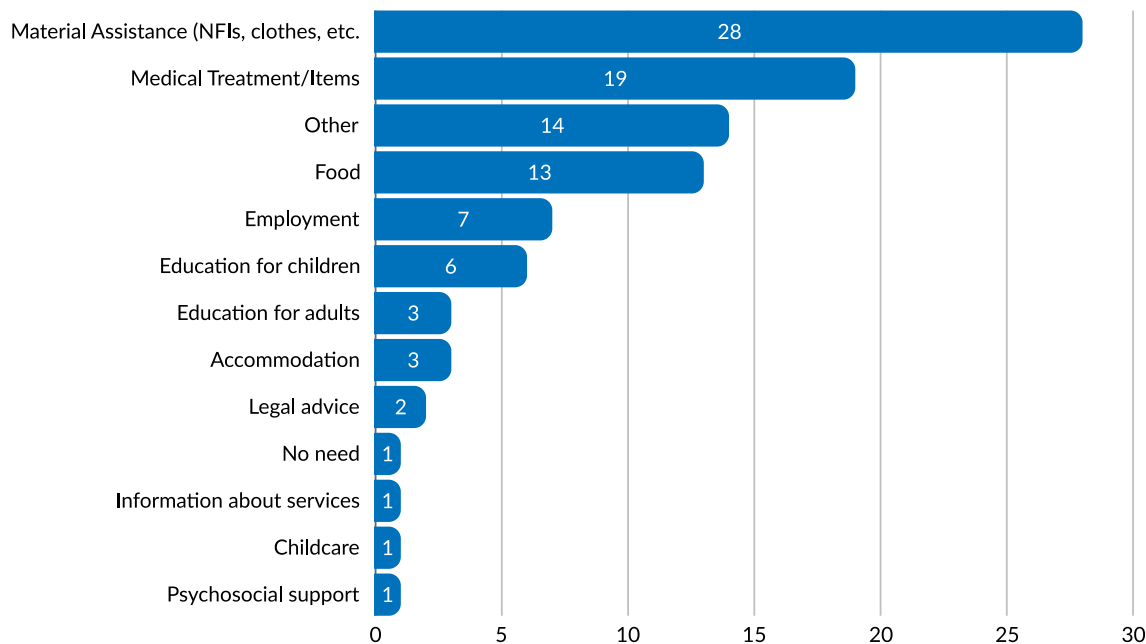
UNHCR partners in the Compass Protection and Inclusion Centres continued to provide assistance in navigating administrative requirements, including in litigation cases of denial of family and disability benefits.

99%

of respondents have at least one urgent need

99%

of respondents have at least one information need

Information needs (in %)

Most urgent needs (in %)


Calls to Action

UNHCR welcomes the ongoing generosity of the Government and civil society, the Bulgarian society in responding to the needs of refugees fleeing Ukraine. Even with this commitment and favourable protection environment, some challenges persist. The Bulgarian Government's openness to proactive engagement with UN agencies and other key interlocutors including the civil society has made it possible to identify and address gaps in the national systems.

- **Documentation:** Consider amending the current legislation to provide for the registration card of temporary protection holders to constitute an identity document in line with the Temporary Protection Directive, and pending the legislative amendments under the new Migration and Asylum Law envisaged in the National Implementation Plan for the EU Pact on Asylum and Migration.
- **Extend humanitarian program for refugees from Ukraine** on a timely basis to allow refugees to make well-informed decisions and avoid the negative impact on their mental health, and accommodation and employment. This should be in parallel with the adoption of a longer-term inclusion/integration program that enhances prospects of refugees' socio-economic inclusion.
- Consider facilitating access to **alternative residency pathways** within Bulgaria, outside the Temporary Protection framework, as appropriate, ensuring legal certainty and allowing informed decisions about their options, as well as the international protection procedures for those who may be eligible for such protection, in line with the TP Directive and the primacy of refugee protection in line with the caselaw of the Court of Justice of the EU.
- **Develop an accommodation and housing strategy** for all vulnerable local community and refugee households in collaboration with the RRP stakeholders, municipalities and other local actors. This should take into consideration the needs of older persons, women at risk, persons with disabilities and serious medical conditions. Bulgaria will benefit from establishing a data-based approach on housing opportunities and housing types on regional basis, and map existing and accessible accommodation and housing options, and create a database in collaboration with the RRP partners. Such an approach should consider the labour market and available essential services.
- **Mainstream safety and disability inclusion** for all populations with specific protection needs, including refugees, establishing monitoring of and safeguarding against protection risks, including risks of labour exploitation, sexual exploitation or abuse, and trafficking, as well as other potential risks for children, in the accommodation sector, including under the humanitarian program.
- **Facilitate the employment of refugee professionals** particularly in education, health and social protection sectors by streamlining relevant administrative procedures. This will also enhance available services to persons with specific needs.
- **Ensure the provision of tailored social services to the specific needs** of older persons and persons with disabilities in Bulgaria. Ensuring timely identification and referral, as well as facilitating access to social protection and assistance for the most vulnerable remains critical, especially considering the refugee demographics in the country.
- Support all refugees to reach fully informed, voluntary decisions on whether to remain in host countries or return to Ukraine, when feasible. **Information on access to legal status, services and support** must be tailored to and fully accessible by vulnerable groups.

END.