



Protection Working Group (PWG) ad hoc meeting

Meeting Details	
Date	10 February 2025
Time	13.00 - 15:00 pm (hybrid)
Chair	<i>Andrew Painter, Senior Protection Officer, UNHCR</i> <i>Alexandru Zubco, Directorate for the Prevention of Torture, Office of the Ombudsman of the Republic of Moldova (Co-chair)</i>
Reporting	<i>Sara Sivkova, Associate Protection Officer, UNHCR</i>
Email	painter@unhcr.org ; sager@unhcr.org ; sivkovas@unhcr.org ;
Talking points	
<ol style="list-style-type: none">1. Presentation from the Ministry of Internal Affairs on the proposed revision to the Government Decision on granting the Temporary Protection2. Discussion with partners	
Participants	



<i>Andrew Painter, UNHCR</i>	<i>Hanna Ursol, PiN</i>	<i>Alla Hnatysheya, Female Support Force</i>	<i>Alexandru Nicolescu, Tdh Moldova</i>
<i>Sean Sager, UNHCR</i>	<i>Svetlana Cires, CRS</i>		<i>Teodor Vicol, MLSP</i>
<i>Andrea Cuisana, UNHCR</i>	<i>Oleg Palii, CDA</i>	<i>Mircea Bustiuc, AO SIRM</i>	<i>Elena Sirbu, AO Femeilor Rome din Moldova</i>
<i>Loujine Khoury, UNICEF</i>	<i>Motoc Tatiana, NCUM</i>	<i>Ion Duminica, AO Porojan</i>	
<i>Cyristos Martiris, UNICEF</i>	<i>Almothana Hasan, ACTED</i>	<i>Cristina Berdos, CRS</i>	<i>Anton Zagoref, MAI</i>
<i>Serghei Zubco, IOM</i>	<i>Mihaela Gorceac, ACTED</i>	<i>Irina Stefan, Laolalta</i>	<i>Daniela Chipenco, MAI</i>
<i>Danielle Pedretti, HelpAge</i>	<i>Marie Laffeter, ACTED</i>	<i>Stefan Zauni, CNAM</i>	
<i>Victor Morari, Ombudsman Office</i>		<i>Ilinka Leger, HEKS/ESPER</i>	
<i>Alex Zubco, Ombudsman Office</i>			

Kindly note that due to technical difficulties, we do not have the list of online participants.

Summary of discussions and agreements/ action points

Agenda	Discussion	Agreements/ Actions
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<p>Introduction</p> <p><i>Andrew Painter, Senior Protection Officer, UNHCR</i></p> <p>painter@unhcr.org</p>	<p>The PWG co-chair welcomed participants, thanked them for their presence, and presented the talking point.</p> <p>The PWG co-chair introduced the main topic of the ad hoc meeting, which is dedicated to the proposed revisions to the Government Decision no. 21/2023 on granting Temporary Protection (hereafter referred to as revision to the Decision).</p> <p>The PWG shared the compilation of the comments for the proposed revision to the Decision in both EN and RO with the PWG partners.</p> <p>The main objective of the government Decision was the extension of the Temporary Protection (TP) status to refugees from Ukraine for one additional year, i.e. until March 2026. The deadline for submission of the final version of the decision and its approval will be on March 1, 2025, to ensure an easy transition of status for TP holders. Furthermore, there were new revisions to the Law on asylum lifting the time limit for granting TP for two years.</p>	
<p>Introduction</p> <p><i>Daniela Chipenco, Ministry of Internal Affairs (MAI)</i></p> <p>Daniela.chiperco@mai.gov.md</p> <p><i>Anton Zagoref, Ministry of Internal Affairs (MAI)</i></p>	<p>The representative of the Ministry of Internal Affairs gave a presentation about the revisions to the Government decision 21/2023.</p> <p><u>The main amendments to the Governmental decisions were:</u></p> <ul style="list-style-type: none">- Extension of TP status until 1 March 2026- Extension of the categories of persons eligible for temporary protection (i.e. extending the protection to persons residing in Ukraine with temporary residence status before the start of the war; seafarers)	



- Extending the right to apply for temporary protection to families and children born after the start of the war
- Extension of the list of documents accepted for temporary protection
- Uniform use of terms/definitions: (Temporary protection applicant/ pending registration /beneficiary/ child)
- Clarifying the process for unaccompanied minors and children accompanied by a non-authorized adult (separated children)
- Explicit regulation of the access of minors coming directly from Ukraine with their parents' passports; or other documents (i.e. this provision is separately referencing children up to 14 years old and children older than 14 years old).

Additionally, the Ministry reaffirmed Moldova's commitment to supporting displaced persons and developing an effective protection system. It also emphasized its alignment with European best practices for the protection of displaced persons, expressed gratitude to partners for their support in managing the flow of displaced persons from Ukraine, and highlighted the importance of continued collaboration with development partners for the implementation of necessary changes.

Approximately 40 partners, including ministries, UN agencies, INGOs, and NGOs, provided feedback on the latest revisions to the Decision. The most frequently mentioned comments from partners included:

- The disallowing of pre-registration for Temporary Protection (TP) as proof of entry into Moldova,
- The inclusion of refugees in the national insurance policy,
- Enabling refugee access to **patenta**,



- The limitation of cash assistance to residents of Refugee Accommodation Centres,
- Mandatory school visits to ensure children are enrolled in education, among other concerns.

A follow-up closed-door government working meeting is scheduled for **14 February**, with the approval expected between **19-26 February**. Partners who wish to submit additional comments or recommendations are encouraged to do so via email or letter as soon as possible. Afterward, they will be informed via an official email about whether their comments have been accepted or declined.

Discussion:

Crossing the border with the pre-registration for TP

UNHCR inquired about the provision regarding individuals who intend to cross into Moldova with only proof of pre-registration for TP, emphasizing that these individuals may face complications when attempting to re-enter the territory of the Republic of Moldova. This new provision could create difficulties for those seeking international protection, preventing them from entering the country and subsequently applying for TP.

CDA also reiterated its concerns about individuals in need of protection who may face challenges when seeking refuge in Moldova, stressing that the provision could place significant strain on stateless persons seeking international protection.

In response, the representative from MIA explained that, under the new provision, pre-registration will not be considered a legal basis for entering Moldova, as this could create security concerns and discourage refugees from acquiring legal status



in the country. The provision was introduced due to cases of individuals attempting to bypass the legal framework without obtaining official status. Therefore, the intent behind this revision is to encourage those misusing the current system to regularize their legal status in Moldova.

Provision of cash assistance to the residents in RACs

The Co-chair of the Basic Needs Working Group (BNWG) responded to the provision regulating financial assistance for individuals residing in Refugee Accommodation Centres (RACs). Based on multiple assessments conducted by the BNWG and the Cash Working Group, it was confirmed that the most vulnerable groups of refugees reside in RACs. Therefore, the BNWG strongly advocates for the removal of this provision, which denies financial aid to RAC residents.

The representative from MIA explained that, following further discussions with the Ministry of Labour and Social Protection (MLSP), this provision will be excluded. The MLSP representative clarified that the initial intent behind restricting cash assistance for RAC residents was to encourage their integration into Moldovan society. Discussions between MLSP and RAC residents indicated that some residents were reluctant to leave the accommodation centers due to the potential loss of financial assistance.

However, according to UNHCR data on beneficiaries of the cash assistance program, only **40% of RAC residents** were receiving financial aid.



Use of appropriate communication language

The AO Porojan/Roma Voices Coalition representative highlighted the need to make the revisions to the Decision more inclusive, particularly regarding provisions on applying for TP and pre-registration. This includes ensuring accessible language for applications and the communication of decisions, especially for individuals of Roma ethnicity who may not be able to read the decision independently.

A representative from IGM explained that when decisions on asylum claims are made, beneficiaries are informed in Romanian, Russian, and English. Additionally, they are provided with a CDA consultant who explains the results, as well as their rights and obligations, if necessary. There have been precedents where Roma applicants were unable to read the decision, in which case the document was read to them before they signed it.

The UNHCR representative suggested that the revised Decision could include a disclaimer ensuring that beneficiaries who are unable to read the decision independently receive an oral explanation of their claims.

Child Protection-related provisions

The UNICEF representative inquired about the status of comments submitted on child-related articles. The MIA representative explained that feedback from UNICEF and UNHCR had been forwarded to the Ministry of Education and Research (MER) for further analysis.

MER provided an update on point 17.1 of the proposed revisions, which concerns unannounced visits to families with children enrolled in education. It was clarified that regional education facilities will notify beneficiaries in writing before



conducting planned inspections. However, the feasibility of unannounced visits is still under review and remains under discussion.

Additionally, the provision states that parents are required to inform local education facilities if their children are enrolled in online schooling or alternative education formats. The UNICEF representative asked what kind of verification document parents should present to local education facilities. The Ministry of Education responded that operational procedures are still under development and that a template document will be provided for parents. For children studying online, a confirmation or certificate from a Moldovan education facility where the child is enrolled should suffice, though the mechanism for verifying online education remains under discussion.

The Co-chair of the Child Protection Working Group raised a question regarding legal procedures for children over 14 years old traveling to and from Moldova with only a birth certificate or no identity documents. The MIA representative explained that, under the new proposal, children over 14 years old will not be allowed to cross the border without a legal certificate, due to safety concerns such as preventing trafficking and abuse.

If a minor over 14 years old without a passport intends to enter Moldova, they may apply for asylum to be allowed to cross the border with their family, thereby avoiding complications upon entry. Regarding exiting the country, MIA recommended that all children over 14 years old possess proper documentation to prevent difficulties in re-entering Moldova.



Applying for TP from abroad

The IOM representative inquired about the TP application process, specifically whether it would be possible to apply from abroad via email or through consular services, and if so, what the procedures would be for completing such an application. The IGM representative clarified that while online pre-registration is possible, the interview must be conducted in person. Furthermore, beneficiaries are strongly encouraged to submit their applications in person at IGM offices.

The CDA representative noted that discussions had taken place regarding the possibility of allowing registration via email or phone calls, but no decision has been made on this matter. IGM reiterated that the current policy remains unchanged—applicants for TP must be physically present in the territory of Moldova to apply.

Pre-registration time limit of 30 days

The PWG Co-chair inquired about the implicit withdrawal of TP pre-registration or application if an applicant fails to attend the interview within 30 days. This issue concerns approximately 20,000 beneficiaries who are currently pre-registered for TP but have not yet completed the required follow-up interview.

MIA confirmed that the applicant's status will be maintained within the 30-day limit. IGM further clarified that if these beneficiaries wish to apply for TP after the 30-day period, they can reapply for a TP interview.

This measure is being introduced to improve clarity on TP applicant statistics and better assess their intention to acquire TP in the Republic of Moldova.



Provisions on self-employment

The representative from PIN inquired about including the provision on self-employment and access to patents. MIA confirmed that currently, the revision to the Decision does not include such a provision, nonetheless, due to many comments from civil society mentioning it, it will be further discussed with the Ministry of Economy to identify a solution.

Technical inspections and legal stay of Ukrainian cars

The representative from the Female Support Force asked about the inclusion of legal stay of Ukrainian vehicles in the Republic of Moldova and about the technical inspection requirement in the revisions for the Decision. MIA informed that a meeting with the Ministry of Regional Development and Infrastructure will be held to discuss this topic further.

Health and medical insurance

The representative from the Female Support Force inquired about the purchase of medical insurance for persons with TP status. MIA explained that currently there is no such provision in the revisions to the Decision.

The representative from HelpAge inquired about the provisions concerning access to health services for beneficiaries of TP. MIA informed that access to the health system services for TP holders is mainly subject to a different government decision and will be discussed later .



	More information about the legal requirements for entering and exiting the territory of Moldova can be found on DOPOMOGA .	
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Moldova Operational data portal: <https://data2.unhcr.org/en/situations/ukraine/location/10784>

If you have any difficulties accessing the Inter-agency shared folders or if any modifications are necessary to the minutes of the PWG please contact: sivkovas@unhcr.org