TRANSITIONING FROM TEMPORARY PROTECTION IN THE REPUBLIC OF MOLDOVA

Protection Working Group

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This brief presents protection considerations and priority actions to support government-led planning for the transition from Temporary Protection (TP) to other legal pathways. It does not assume one legal model. The considerations remain relevant whether the authorities facilitate access to existing residence pathways or adopt new arrangements.

CONTEXT AND PLANNING OUTLOOK

Temporary Protection (TP) has provided forcibly displaced people from Ukraine with lawful stay and access to essential rights and services in Moldova since 2023. Under the current national framework, TP is granted until 1 March 2027, and soon to be extended until 1 March 2028 by a new Government decision with the objective to align with the decision of the Council of the European Union 2026/1912. For Moldova, this would imply more restrictive access to TP, conditioned by the need to present, where applicable, proof of compliance with their military obligations in Ukraine. This condition may increase demand for asylum, reinforcing the need to prepare asylum systems for additional applications.

1 March 2027 current end date	**59,123 TP beneficiaries** 21 September 2026	increase about **523+** applications weekly	**70,000** central planning figure

On 29 August 2026, the Ministry of Internal Affairs announced that it had started drafting amendments to Government Decision No. 21/2023 to align Moldova's temporary protection framework with the EU extension. Separately, the authorities have indicated that they are considering easing access to existing residence pathways for TP holders, including residence based on employment or investment, rather than creating a special status. Possible adjustments may touch on documentation requirements, fees, passport validity, permit duration and arrangements for family members. Detailed proposals on these residence pathways have not yet been made public. Any transition arrangements will need to remain consistent with the new legislation on the admission and stay of foreigners currently being amended.

This note is informed by multiple sources of evidence collected by humanitarian partners in Moldova, including Protection monitoring conducted by UNHCR, Participatory Assessment with refugee communities, refugee consultations on legal status pathways, discussions within the Protection Working Group (PWG) and the Inclusion and Solutions Working Group (ISWG), and labour market analysis on refugee workforce participation. Additional findings come from the UNHCR Regional Bureau for Europe report on transitioning from TP from May 2026 and from consultations with the General Inspectorate for Migration (IGM).

KEY CHALLENGES FOR TRANSITION PLANNING

Transitioning from TP may affect people differently. Four challenges require particular attention:

Eligibility and coverage



Most existing residence routes depend on employment, study, investment or family links. They may not offer a practical option for some older people, children, caregivers, people with disabilities or serious health conditions, people outside formal employment or education, and people facing documentation or discrimination barriers.

Costs and documents



Application fees, translations, notarisation, criminal-record certificates, passport-validity rules and proof of housing or income can make access difficult, especially where documents cannot reasonably be obtained from Ukraine or costs are disproportionate to household income.

Procedures and information



People need clear information on available pathways, requirements, timelines, rights during processing and remedies. Individual counselling will be important for complex situations.

Continuity and capacity



A large number of simultaneous applications could create delays and gaps in documentation, lawful stay or access to services. Early, phased implementation would allow procedures to be tested, workloads distributed and problems corrected.

PROPOSED PRIORITY ACTIONS

The Protection Working Group proposes the following key messages, informed by the consultations:

1. Safeguard access to asylum for TP holders with international protection needs:
TP holders should be able to lodge an application for asylum in Moldova at any time and retain their TP status, together with all associated rights and entitlements, throughout the asylum procedure until a final decision is reached. This approach is consistent with EU legislation, which guarantees access to asylum for TP holders, and reflects good practices implemented in several EU Member States, including France and Slovenia. During the examination period, the rights and reception obligations governing asylum-seekers in Moldova would not apply. For as long as the TP regime remains in force, the TP status would cease only upon the granting of international protection.

This approach ensures minimal disruption to individuals' daily lives and socio-economic integration, preserving continuity in access to rights and services, safeguarding uninterrupted access to education, healthcare (including ongoing medical treatments), established housing arrangements, and employment relationships. Maintaining TP status during the examination of the asylum request would therefore facilitate a gradual and predictable transition from TP to international protection.

The approach would also benefit public authorities by avoiding unnecessary administrative transfers between systems and reducing the operational burdens associated with case management, re-housing logistics, and budgetary realignments across different reception systems. By ensuring continuity of rights while streamlining administrative processes, this approach represents a pragmatic solution that serves both the interests of affected people and the efficiency of public institutions.

2. Ensure inclusive options and preserve family unity:

Residence permits based on employment or investment may be suitable for some TP holders, but not for everyone. Other options, including asylum, will be needed for people who do not qualify for these residence pathways, including older people, caregivers, single-parent households, people with disabilities or serious health conditions, children and youth, and people outside formal employment or education. Some people, including members of Roma communities, may face additional documentation or discrimination barriers. Procedures should be flexible enough to address these barriers and ensure that no one is left behind.

Procedures should preserve family unity and, where possible, enable family members to move together to a new status. Where family documents are unavailable or cannot reasonably be obtained, other forms of evidence may be considered.

3. Make requirements proportionate and procedures accessible:

Application requirements for alternative residence pathways should be reviewed to ensure that they are necessary, affordable and possible to meet in practice. Attention shall be given to fees, criminal record certificates, passport validity, translations, notarisation and proof of housing or income. Alternative forms of evidence could be accepted when official documents cannot reasonably be obtained because of the situation in Ukraine.

Where permitted by law, public authorities could use information they already hold, including information collected during the TP registration, to avoid repeated document submissions and make procedures easier, while protecting personal data. Digital and in-person services, interpretation and support for people with specific needs would make procedures more accessible. The transition framework should also explain how documents and registrations linked to TP will be affected.

Disaggregated administrative data, protection monitoring and feedback from affected people can help identify exclusion, delays and gaps in access to services. These findings should inform regular adjustments to procedures, communication and institutional capacity to ensure transition arrangements remain effective and inclusive.

4. Provide clear information, counselling and legal assistance:

While TP remains valid, any transition to an alternative legal status must be voluntary and informed by clear, accessible information. People should have enough time to consider their options.

The Government should publish and regularly update practical information on the alternative legal pathways, including on eligibility, required documents, costs, timelines, rights during processing, implications for family members, and available remedies. Information should be available in relevant languages and accessible formats through trusted online and in-person channels.

Free legal assistance, counselling and interpretation should remain available, particularly for people with complex situations or heightened protection risks. Clear referral arrangements should connect people with social, health, education and child protection services.

5. Enable early and phased access to residence pathways:

To ensure continuity and preservation of rights TP holders meeting the requirements for residence pathways should retain their TP status, together with all associated rights and entitlements, until a final decision is made on their application.

A clear timetable for phased access to applications and transparent processing deadlines would distribute the caseload and reduce the risk of a last-minute surge. Early implementation would also allow procedures to be tested and help identify people for whom the available pathways do not provide a practical solution.

6. Protect continuity of rights and place children at the centre:

Transition arrangements should prevent gaps in documentation, lawful stay and access to employment, education, health care, social protection and child protection services. The best interests of the child should be a primary consideration throughout the process. A child's access to legal status should not depend solely on a parent's employment, investment or other eligibility criteria. Specific arrangements may be needed for unaccompanied and separated children.

7. Recognise time spent under TP:

When determining eligibility for longer-term or permanent residence, authorities should take into account periods of lawful stay in Moldova under TP, alongside family and community ties, employment, children's schooling and other indicators of integration. The authorities should also consider whether time spent under TP counts towards other rights based on length of residence, including eligibility for citizenship.

SUGGESTED IMPLEMENTATION SEQUENCE



PREPARE

- Publish the framework and timetable.
- Consult affected communities and stakeholders.



ENABLE

- Launch phased application processes.
- Provide information, counselling and legal aid.
- Ensure continuity of lawful stay.



REVIEW AND ADJUST

- Use data and community feedback.
- Identify bottlenecks and exclusion.
- Adjust procedures, staffing and support.

GOVERNMENT-LED COORDINATION AND SUPPORT

Across asylum, migration, labour, education, health, social protection and local authorities, with participation by TP holders, civil society, humanitarian and development partners.

Support focus: legal and procedural work • processing capacity • accessible communication and legal aid • responsible data systems • protection monitoring • targeted inclusion