UNHCR
United Nations High Commissioner for Refugees
Haut Commissariat des Nations Unies pour les réfugiés

PROTECTION BRIEF
BULGARIA

IMPLEMENTATION OF THE TEMPORARY PROTECTION DIRECTIVE

OCTOBER 2025

Ukrainian refugees taking part in a rehabilitation exercise at the Zheleznichar Government Facility, housing vulnerable people, people with disabilities and older people. UNHCR funds a social worker of the NRG Association to respond to the needs of the people housed wherein, but conditions remain difficult. © UNHCR/Nikolay Stoykov

Key Figures

73,880
Valid Temporary Protection beneficiaries

64%
Of valid Temporary Protection beneficiaries are women and children

31
Unaccompanied and Separated Children

9%
Of valid Temporary Protection beneficiaries are older persons

597
Total household members (Oct 2024-May 2025)

100%
of respondents are Ukrainian nationals

82%
Of respondents are women

42%
Of households who have older persons

Operational Context

The Council of Ministers extended temporary protection on 19 February until 4 March 2026. The European Council has extended temporary protection (TP) until 4 March 2027, in line with UNHCR recommendations.[1] However, such extension is pending a decision of the Council of Ministers in Bulgaria.

From 1 January to 31 October 2025, 79,061 refugees applied or renewed their TP in Bulgaria, reflecting an increase in registration rates – by 13 per cent – compared to 2024. The highest concentration of valid TP holders is in Burgas region (39%), Varna region (22%) and Sofia city (14%). The Bulgarian Government maintains access to people displaced from Ukraine through its borders, granting temporary protection to more than 220,800 refugees since March 2022 until October 2025. It maintains humanitarian accommodation[2] to more than 2,730 Ukrainian refugees with specific protection needs[3]. The Agency for Social Assistance provided at least one type of social benefit to almost 18,650 refugees by end of August 2025.

Data used in this report was collected as part of UNHCR Bulgaria's Protection Profiling and Monitoring exercise[4] 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. Since October 2024, protection monitoring interviews with 597 household members were conducted in various locations in Bulgaria. The findings are complemented by the Socio-Economic Insights Survey that was conducted in 2025 with 500 households.

[1] *UNHCR Recommendations on the continued use of Temporary Protection arrangements and Guiding Principles for Transition in relation to the Ukraine Refugee Situation*, May 2025.
[2] UNHCR Bulgaria, *Protection Brief #9: Implementation of the New Humanitarian Assistance Programme*, June 2025.
[3] Bulgarian News Agency, BTA :: Cabinet Reports on Progress of Humanitarian Support and Integration Programme for Displaced Persons from Ukraine, October 2025.
[4] UNHCR, Regional Protection Profiling & Monitoring, 1 October 2025.

Displacement and Protection Trends

- In 2024, almost 2 per cent of refugees had not yet received temporary protection at the time of the interview. In 2025, all respondents received temporary protection. While there were administrative barriers forcing refugees in the Black Sea region to travel long distances to State Agency for Refugees' registration centres in 2024, the situation improved in 2025. This reflects good inter-institutional collaboration and response to reporting of challenges refugees face.
- Access to documentation (such as passports and medical documents from Ukraine) has significantly improved from 28,5 per cent respondents missing identity documents in 2024 to 14 per cent in 2025. However, most refugees from Ukraine still face difficulties in accessing rights in Bulgaria related to lack of recognition of their temporary protection document as identity document.
- The number of households reporting additional vulnerabilities has increased. For instance, households reporting members with serious or chronic health conditions has risen from 55 per cent to 69 per cent, indicating potential unmet health care needs. Thirty-nine per cent reported members with disabilities in 2025.
- Family reunification challenges heighten refugee vulnerabilities and anxieties. Households reporting obstacles to family reunification, primarily due to the circumstances of the war, rose from 45,6 per cent in 2024 to 74 per cent.
- All refugees consistently reported high levels of urgent needs, including for healthcare and accommodation, as well as information needs and job opportunities. Forty-four per cent of respondents in Bulgaria heed from the occupied oblasts of Ukraine, aggravating their vulnerabilities and needs for humanitarian and longer-term support.
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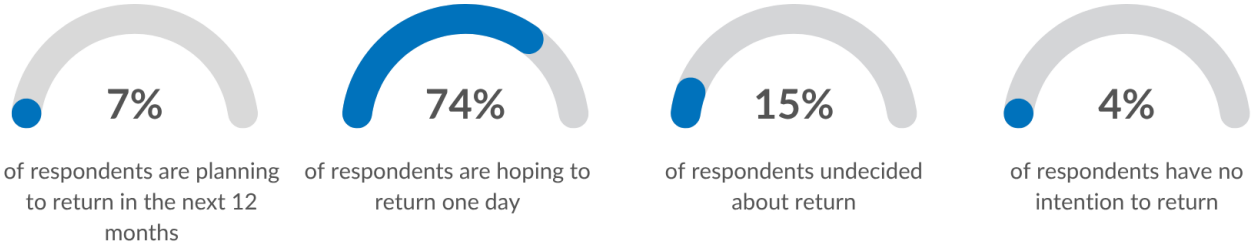
Key Findings

Protection Risks

Transition from Temporary Protection and access to legal status

Uncertainties and Return Intentions: UNHCR assesses that the ongoing international armed conflict in Ukraine does not currently permit safe and sustainable returns. Most refugees report that they are unlikely to return voluntarily in the near term, primarily due to ongoing safety and security concerns, while also indicating concerns about the stability of any potential ceasefire. UNHCR considers it important to maintain temporary protection and other forms of legal status linked to international protection in the event of a ceasefire, until a comprehensive assessment of the security and humanitarian situation inside Ukraine can be conducted, alongside monitoring adherence to the ceasefire and progress made towards an eventual peace settlement.

According to UNHCR's 6th intentions survey, 74 per cent of refugees from Ukraine hope to return one day, while only 7 per cent were planning to return in the next 12 months.[5] Approximately 44 per cent of the Ukrainian refugee population in Bulgaria originates from temporarily occupied territories.[6] Should the overall security and humanitarian situation inside Ukraine improve to the extent that temporary protection arrangements are brought to an end in the future, this group and other particular profiles may have continued international protection needs due to their individual characteristics which will require their continued access to international protection in host countries. In Bulgaria, temporary protection beneficiaries are not allowed to apply for asylum on the grounds that a third country national may not **simultaneously benefit from two forms of international protection**, a position that the Supreme Administrative Court has endorsed in a ruling in July 2022[7]. According to the Law on Asylum and Refugees, an applicant is to be registered and the application assessed after the expiry or revocation of the temporary protection.



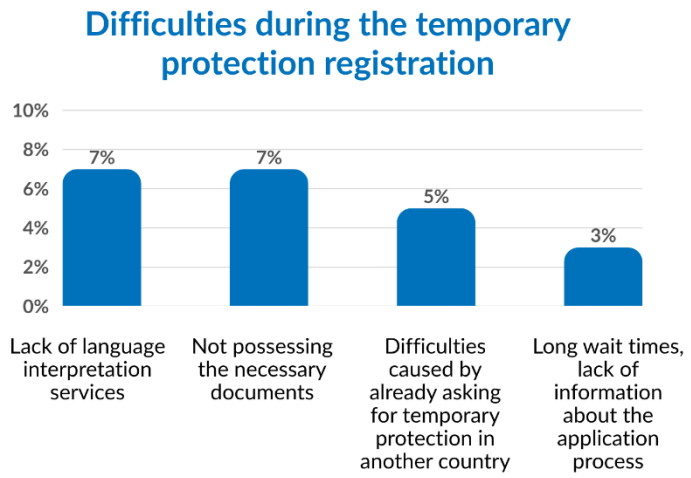
Transition and Legal Status: Due to the uncertainties surrounding refugees' legal status in Bulgaria beyond 2026, including the impact on their rental and labour contracts, increasing numbers of refugees have been requesting information on obtaining other types of legal status in the country such as 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. Under the Law on Foreigners, transitioning to another type of legal residence (e.g., single permit) is not possible, when refugees from Ukraine are already legally residing in Bulgaria on the grounds of Temporary Protection.

[5] UNHCR, *Intentions and Perspectives of Refugees from Ukraine*, March 2025.
[6] UNHCR, Regional Protection Profiling & Monitoring, 1 October 2025.
[7] Supreme Administrative Court of Bulgaria, ЕДИС Портал Справки, July 2022.

During the implementation of the Temporary Protection Directive, a negligible share of Ukrainian refugees transitioned from temporary protection status to other forms of legal stay in EU Member States, primarily through short-term and long-term residency permits. Whilst approximately a fifth of respondents during UNHCR's 6th round of intention survey[8] reported that they were planning to change their legal status from temporary protection to other kinds of residency permits within the next 12 months, protection monitoring results do not yet demonstrate evidence of these changes happening at scale. Both UNHCR and the European Commission have urged host states to prepare to transition temporary protection beneficiaries to alternative forms of legal status. The slow uptake of other forms of legal status amongst the Ukrainian refugee community indicates much work remains to be done in this regard.[9]

According to the intentions survey, 23 per cent of refugees from Ukraine wished to apply for residence permits in Bulgaria. While the Law on Foreigners allow for application for the EU Blue card, EU single permit, education or work-based residence, it is difficult for Temporary Protection beneficiaries to apply for them. The law requires the applicant to first apply for a type D visa, outside of Bulgaria. Furthermore, as the temporary protection beneficiaries are already residing legally on the territory of Bulgaria and Bulgarian law does not allow a person to reside on the basis of two different legal grounds at the same time – and there is no procedure to formally give up TP, beneficiaries should either wait for their temporary protection registration card to expire (currently 4 March 2026) to be able to apply for a different type of permit, or are advised to wait until the temporary protection under EU law has been terminated with a decision of the Council.

Short visits: UNHCR regional monitoring reports a gradual increase in the proportion of Ukrainian refugees temporarily visiting Ukraine, rising from 40 per cent in the first reporting period to 44 per cent in the third.[10] This was 42 per cent in Bulgaria in the current monitoring cycle. The primary motivations for these visits remained unchanged: visiting relatives, accessing healthcare, and obtaining documentation. Encouragingly, the percentage of refugees who reported encountering challenges upon return to their host countries steadily declined, from 12 per cent in the first reporting period, to 10 per cent in the second, and 6 per cent in the third. In Bulgaria, only 1 per cent of respondents reported such challenges. During all reporting periods, the most frequently reported challenges were the suspension of benefits and legal status in the host country due to their travel to Ukraine, though both became less prevalent over time.



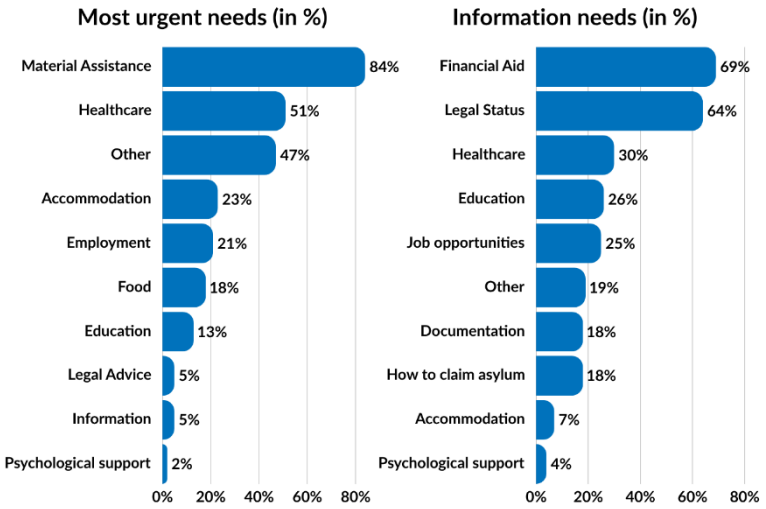
Access to identity documents: 14 per cent of households have at least one family member missing identity documents, primarily international passports, compared to 2024 when this was 23 per cent.[11] The absence of identity documents impedes access to services, including financial

[8] UNHCR, *Intentions and Perspectives of Refugees from Ukraine*, March 2025.
[9] *UNHCR Recommendations on the continued use of Temporary Protection arrangements and Guiding Principles for Transition in relation to the Ukraine Refugee Situation*, May 2025.
[10] UNHCR, *Displacement Patterns, Protection Risks and Needs of Refugees from Ukraine – Regional Protection Analysis #6*, August 2025.
[11] UNHCR Bulgaria, *Protection Brief on Implementation of TP Directive 2024*, 28 February 2025.

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. The main reason for lack of Ukrainian documents was unavailability of the service in Bulgaria (67% of those reporting missing documents), or lack of information on how to access it. With regards to Bulgarian documents, language barriers, lack of information and administrative challenges have prevailed.

In Bulgaria, 42 per cent of respondents visited Ukraine at least once since their arrival in Bulgaria. Nineteen per cent of those returned to obtain documents. Among this group, 42 per cent indicated identity documents, 37 per cent civil status documents, and 26 per cent medical documents.

Urgent Needs



Across the region, the proportion of respondents reporting at least one urgent need remained high, with an increase from 80 per cent in the first period to 86 per cent in both the second and third periods. In Bulgaria, it increased from 99 per cent to 100 per cent. While regionally health care is the highest reported unmet need, material assistance has been reported as the top urgent need in Bulgaria, including because of the higher proportion of extremely vulnerable households and those originating from occupied regions of Ukraine.

Unmet information needs remained high regionally (78%) as well as in Bulgaria (100%). Across the region and in Bulgaria, financial aid was the most frequently reported information need, followed by legal status, healthcare, education and job opportunities.

Socio-economic Inclusion and Social Protection

Most respondents were retired (43%) while 21 per cent said they were employed in Bulgaria and 18 per cent said they remained unemployed. The main obstacles to employment are language barriers (51%) followed by lack of employment opportunities (44%). Eighteen per cent of the employed reported lacking employment contracts (5% in 2024) and excessive working hours (3% in 2024), indicating an increase in potential labour exploitation.

The share of refugees who reported barriers to accessing social protection remained relatively stable at the regional level. In Bulgaria, 89 per cent of refugees applied for social assistance (99% in 2024), compared to high levels of vulnerability among respondents, and 16 per cent reported barriers to accessing social protection. Regionally, refugees most often cited language barriers and lack of information as the main obstacles to accessing social protection. However, challenges varied by host country, and included ineligibility, long waiting times, and a lack of documentation. In Bulgaria, the

main reason was the administrative position that refugees under TP were not considered eligible for some types of social assistance such as family benefits, while language barriers and long-waiting period accounted for 3 per cent each.

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.

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

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:** Amend 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 Law on Asylum and Refugees envisaged in the National Implementation Plan for the EU Pact on Asylum and Migration.
- Facilitate 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.
- **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.
- **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. Explicitly include beneficiaries of TP and International protection within the scope of the Law on Family Benefits for Children, as part of the pending Law on Amending and Supplementing it.
- 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.