

Temporary Protection Bulgaria 2024 Update

This annex on temporary protection complements and should be read together with the [AIDA Country Report on Bulgaria](#).

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Temporary Protection Procedure

A. General

Title (EN)	Original Title (BG)	Web Link
Law on Asylum and Refugees (LAR)	Закон за убежището и бежанците (ЗУБ)	https://bit.ly/4cqNDqm
COM №506 from 7 July 2011 for adoption of Action Plan on temporary protection in the Republic of Bulgaria	РМС №506 от 7 юли 2011 г. за приемане на План за действие при временна закрила в Република България	N/A
COM №144 from 10 March 2022 on granting temporary protection to displaced persons from Ukraine and amending the national Action Plan on temporary protection in the Republic of Bulgaria	РМС №144 от 10 март 2022 г. за предоставяне на временна закрила на разселени лица от Украйна и за изменение на Националния план за действие при временна закрила в Република България	https://bit.ly/48YrDzT
COM №145 from 10 March 2022 approving Humanitarian Aid Programme for displaced persons seeking temporary protection in the Republic of Bulgaria from the war in Republic of Ukraine	РМС №145 от 10 март 2022 г. за одобряване на Програма за ползване на хуманитарна помощ за лица, търсещи временна закрила в Република България вследствие на военните действия в Република Украйна	https://bit.ly/48YrDzT
COM №510 from 21 July 2022 adopting an Updated plan on temporary protection in the Republic of Bulgaria	РМС №510 от 21 юли 2022 г. за приемане на Актуализиран план за действие при временна закрила в Република България	https://bit.ly/48YrDzT
COM №95 from 1 February 2023 extending the temporary protection until 4 March 2024	РМС №95 от 1 февруари 2023 г. за удължаване на срока на временната закрила до 4 март 2024 г.	https://bit.ly/48YrDzT
COM №192 from 16 March 2023 amending the Updated action plan on temporary protection in the Republic of Bulgaria	РМС №192 от 16 март 2023 г. за изменение на Актуализирания план за действие при временна закрила в Република България	https://bit.ly/48YrDzT
COM №296 from 13 April 2023 amending the Updated action plan on temporary protection in the Republic of Bulgaria	РМС №296 от 13 април 2023 г. за изменение на Актуализирания план за действие при временна закрила в Република България	https://bit.ly/48YrDzT
COM №54 from 25 January 2024 extending the temporary protection until 4 March 2025	РМС №54 от 25 януари 2024 г. за удължаване на срока на временната закрила до 4 март 2025 г.	https://bit.ly/48YrDzT
COM №79 from 20 February 2025 extending the temporary protection until 4 March 2026	РМС №79 от 20 февруари 2025 г. за удължаване на срока на временната закрила до 4 март 2026 г.	https://bit.ly/48YrDzT

According to national legislation, temporary protection (TP) is granted through a general administrative act (*общ административен акт*). According to the law,¹ these are acts issued by a central authority with an automatic legal effect, which create rights for an indefinite number of persons, defined by common circumstances or characteristic. Under national asylum law,² the government (Council of Ministers) grants temporary protection, if it is activated by a decision of the EU Council, the latter also determining its duration. Therefore, the government's act to grant temporary protection is group-based, collective and automatic by nature, thus covering all individuals from the specified country with immediate legal effect.

¹ Article 65 of Administrative Procedure Code.

² Article 2(2) LAR.

On 10 March 2022, the Bulgarian government adopted Decision No.144,³ granting temporary protection to displaced persons from Ukraine, which entered into force on the date of its publication on 14 March 2022. The decision was given explicitly a retroactive effect to cover all persons displaced from Ukraine from 24 February 2022 onward. The temporary protection was extended twice, respectively, on 1 February 2023 with Decision №95⁴ until 4 March 2024 and on 25 January 2024 with Decision №54⁵ until 4 March 2025 and with Decision №79 until 4 March 2026.⁶

Until 14 March 2022, all Ukrainian refugees who claimed asylum in Bulgaria were still registered as asylum seekers with individual determination procedures and decisions. From 15 March 2022 onward, any Ukrainian refugee who entered the country and stated before the authorities to be in need of protection has to be immediately issued a document⁷ certifying their legal status as a person granted a temporary protection in Bulgaria and valid for the duration of the temporary protection regime.⁸

According to national asylum law,⁹ TP holders have the right to submit an individual asylum application, besides their temporary protection status. However, the asylum procedure is not open and the application of the TP holder is not examined or decided prior the end of duration of the TP.¹⁰

Not only the decision to enact the temporary protection, but all other decisions and measures to enable access to the rights connected to TP status, are of governmental competence; in this respect, the government also holds a coordination role.¹¹ The government is responsible for the adoption of a TP Action Plan, which should also determine the structure of a national task force.¹² Such provisional action plan¹³ was adopted in 2011 and amended on 10 March 2022 with the decision of the government which granted the temporary protection to Ukrainian refugees.¹⁴ On the same date the government appointed a national task force group (оперативна координационна група) to coordinate the work of six interdepartmental sub-groups, responsible for creating new points for initial reception and registration, securing the transport and accommodation of the Ukrainian refugees as well as their health care, education and employment. The national task force group operated until 1 August 2022 when the Parliament was dissolved as a result of a vote of no confidence and elections were scheduled for October 2022. The caretaker cabinet, appointed on 2 August 2022 did not resume the task force group's activity before 3 October 2022. The new task force group proved *pro forma* and generally inactive for what concerned the provision of support to Ukrainian refugees. This approach was attributed to the fact that the caretaker cabinet was appointed by, and accountable to, president Rumen Radev, known for his anti-refugees¹⁵ and pro-Russia¹⁶ positions.

The number of the Russian nationals in Bulgaria, who are displaced as a result of the war in Ukraine, is not known. In principle, those who are family members of Ukrainian nationals or who resided on the basis of a valid residence permit in Ukraine prior 24 February 2022 are in general registered under the TP. As of 31 December 2023, altogether 326 Russian nationals registered in Bulgaria as temporary protection holders, of whom 120 men, 188 women and 54 children.¹⁷ Some of the few who, for various reasons,

³ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁴ COM №95 from 1 February 2023 extending the temporary protection until 4 March 2024, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁵ COM №54 from 25 January 2024 extending the temporary protection until 4 March 2025, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁶ COM №79 from 20 February 2025 extending the temporary protection until 4 March 2026, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁷ Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

⁸ 24 February 2023.

⁹ Article 68(1), item 2 LAR.

¹⁰ Ibid.

¹¹ Article 80(2) LAR.

¹² Article 81(2) LAR.

¹³ COM №506 from 7 July 2011, available in Bulgarian at: <https://bit.ly/3CYpZSa>.

¹⁴ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

¹⁵ Dariknews, Дебятът на годината: Радев vs Герджиков, 18 November 2021, available in Bulgarian at: <https://bit.ly/3EHRv7C>.

¹⁶ Radio Free Europe, Bulgarian President Didn't Sign Document Backing Ukraine Because Of Wording On NATO Membership, available at: <https://bit.ly/3rXoA8g>.

¹⁷ 134th Coordination meeting from 19 December 2024.

were denied registration as temporary protection holders could still submit an asylum application and undergo individual assessment and determination under the general asylum procedure. From 24 February to 31 December 2023, a total of 354 Russian nationals submitted asylum applications in Bulgaria outside the TP scheme.¹⁸ However, it is not possible to establish how many among them fled from Ukraine as a result of the war and how many were fleeing directly from Russia.

Bulgaria adopted the approach to grant temporary protection to all Ukrainian nationals who sought it, regardless of whether they left Ukraine prior or after 24 February 2022.

As of 31 December 2024, data regarding persons entitled to temporary protection in Bulgaria reflected the following:

Refugees from Ukraine in Bulgaria – overall dynamics:¹⁹	
Registered under TP	201,484
➤ men	43,008
➤ women	98,704
➤ children	59,183
➤ unaccompanied children	589
➤ provided government accommodation:	5,961 ²⁰

In total, 955 third country nationals benefitted from TP in Bulgaria:²¹

Third country nationals under TP:	
Armenia	59
Belarus	45
Georgia	42
Moldova	108
Russia	416
Others	285
Total:	955

Most persons in need of temporary protection were registered in the country between March and May 2022, but a steady increase was registered throughout 2022, 2023 and 2024.

Refugees from Ukraine registered under temporary protection in 2022 - 2023²²					
As of date:	Total	Men	Women	Accompanied children	Unaccompanied children
31 March 2022	30,777	2,692	15,402	12,562	121
30 April 2022	92,257	8,116	47,068	36,689	384
31 May 2022	112,119	10,967	56,925	43,748	479
30 June 2022	119,037	12,711	60,307	45,523	496
31 July 2022	125,497	14,533	63,225	47,227	512
31 August 2022	132,254	16,737	66,168	48,820	529
30 September 2022	136,601	18,273	68,160	49,618	550
31 October 2022	143,670	19,897	71,688	51,496	589
30 November 2022	146,784	21,098	73,161	51,936	589

¹⁸ SAR reg №ПД05-31 from 15 January 2024.

¹⁹ As of 31 December 2024, source: <https://ukraine.gov.bg/>.

²⁰ As of 31 December 2024, source: <https://ukraine.gov.bg/>.

²¹ 134th Coordination meeting from 19 December 2024.

²² Ibid.

31 December 2022	149,268	22,057	74,348	52,274	589
31 January 2023	151,285	22,879	75,335	52,482	589
28 February 2023	153,046	23,689	76,144	52,624	589
31 March 2023	155,083	24,626	77,083	52,785	589
30 April 2023	156,637	25,291	77,726	53,031	589
31 May 2023	159,406	26,281	79,144	53,392	589
30 June 2023	162,768	27,120	81,069	53,990	589
31 July 2023	165,234	27,981	82,167	54,497	589
31 August 2023	167,358	28,827	83,120	54,822	589
30 September 2023	169,120	29,594	83,902	55,035	589
30 October 2023	170,937	30,497	84,697	55,154	589
30 November 2023	172,562	31,257	85,449	55,267	589
31 December 2023	173,709	31,840	85,960	55,320	589
31 January 2024	175,043	32500	86563	55391	589
29 February 2024	177,201	33496	87575	55541	589
31 March 2024	179,676	34585	88691	55811	589
30 April 2024	181,868	35527	89640	56112	589
31 May 2024	185,068	36595	91164	56720	589
30 June 2024	190,306	38175	93713	57829	589
31 July 2024	192,266	38904	94513	58260	589
31 August 2024	194,852	39938	95626	58699	589
30 September 2024	196,789	40805	96513	58882	589
30 October 2024	198,685	41707	97377	59012	589
30 November 2024	200,297	42485	98116	59107	589
31 December 2024	201,484	43008	98704	59183	589

B. Qualification for temporary protection

According to Decision No.144 of the Bulgarian government,²³ temporary protection is granted to displaced persons from Ukraine as outlined in the Council Implementing Decision (EU) 2022/382 of 4 March 2022. Temporary protection covers the following categories of beneficiaries:

- a) Ukrainian nationals residing in Ukraine before 24 February 2022;
- b) Stateless persons and nationals of third countries other than Ukraine, who benefited from international protection or equivalent national protection in Ukraine before 24 February 2022;
- c) Family members of the persons referred to in points (a) and (b).

The national arrangement does not envisage any limitations with regards to the date of arrival in Bulgaria; be it after 24 February 2022 or prior to this date. All Ukrainian nationals who approached the authorities and requested protection were registered under the TP regime and issued a document attesting their status as holders of temporary protection in Bulgaria.²⁴

In item 3 of its decision to grant temporary protection, the Bulgarian government included also as TP beneficiaries [quote]:²⁵

- d) Stateless persons and nationals of third countries, who left Ukraine as a result of the hostilities and entered and remained on the territory of Bulgaria no later than on 31 March 2022.

²³ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

²⁴ Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

²⁵ Ibid.

Therefore, this category of beneficiaries was also granted a TP, but only under the condition of having arrived in Bulgaria before 31 March 2022.

On 30 March 2022, the government adopted an amendment to its TP decision.²⁶ While the wording of the amendment generated doubts regarding its interpretation, legal practitioners established it entailed that the deadline for stateless person and third country nationals to register under temporary protection in Bulgaria was extended until 15 April 2022. In July, the Supreme Administrative Court ruled against the amendment based on the interpretation that the provision, as amended, referred to third country nationals and stateless persons who could receive temporary protection until 15 April 2022 without their explicit will and registration.²⁷ First of all, the Court found that establishing a deadline for obtaining temporary protection for third country nationals and stateless persons was contrary to the TP Directive, which does not enable Member States to introduce time limits for temporary protection applicants. Additionally, the Court ruled that it was unlawful to grant temporary protection to third country nationals or stateless persons without their explicit consent, as it might restrict their right to travel to another Member State. The Court underlined that the wording of the amendment lacked clarity as to the scope of persons entitled to temporary protection. For these reasons, the Court revoked the amendment and instructed the government to issue a new act to arrange these issues accordingly. Such decision however was not adopted as meanwhile the government was disbanded on 1 August 2022. However, the two caretaker cabinets appointed by the pro-Russian president Radev who governed until 6 June 2023²⁸ never adopted such provision. The amendment was made as late as with Decision No.54 of the regular Bulgarian government²⁹, which provided that as TP beneficiaries should be also considered:

- a) Stateless persons and other third-country nationals, who left Ukraine who can prove that they legally resided in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit issued in accordance with Ukrainian law, and who cannot return permanently to their country or region of origin under safe conditions, can receive temporary protection following their explicit request and registration under the temporary protection.

All family members of Ukrainian nationals or TCN/Stateless persons granted international protection in Ukraine had access to the temporary protection without any limitations in practice. The few cases where local police authorities refused registration as temporary protection holders to family members were attributed to a lack of knowledge on the correct procedures to follow,³⁰ and resolved either by the issuance of guidelines provided from the National Task Force,³¹ or by requesting individuals to register at the territorial units of the national asylum authority, the State Agency for Refugees (see [3. Registration under temporary protection](#)).

The definition of family member is outlined in national law under the acts regulating asylum and immigration, but it is broader under the Law on Asylum and Refugees (LAR).³² According to said law, includes as part of the nuclear family is composed by:

- ❖ Spouses;
- ❖ Children under the age of 18;
- ❖ Cohabitants with whom the status holder has an evidenced stable long-term relationship and their unmarried underage children;

Additionally, it includes:

- ❖ Unmarried children who have come of age, and who are unable to provide for themselves due to grave health conditions;

²⁶ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

²⁷ Supreme administrative court, IV department, case №3789/2022, Decision №6819 from 7 July 2022, available in Bulgarian at: <https://bit.ly/3yNCJIY>.

²⁸ AIDA 2023 update on Bulgaria, published in March 2024.

²⁹ COM №54 from 25 January 2024, available in Bulgarian at: <https://bit.ly/3rVTT33>.

³⁰ Council for development of civil society (CPFO) with the National Task Force, weekly meetings during the period between April and June 2022.

³¹ See at: <https://bit.ly/3MUIN9D> or <https://ukraine.gov.bg/issuance-of-temporary-protection/>.

³² Para. 1(3) of the Additional Provisions, LAR.

- ❖ Parents of either one of the spouses who are unable to take care of themselves due to old age or a serious health condition, and who have to share the household of their children; and
- ❖ Parents or another adult member of the family who is responsible, by law or custom, for the underage unmarried status holder who has been granted international protection in Bulgaria.

With respect to temporary protection however, in practice both police authorities and the State Agency for Refugees applied the narrower definition of a family member as outlined in the general immigration act, the Law on Foreigners in the Republic of Bulgaria (LARB),³³ namely:

- ❖ Spouses;
- ❖ Children of the foreigner and their spouse, including adopted children, who have not reached the age of 18 and are not married;
- ❖ Children, including adopted children, of the foreigner who have not reached the age of 18 and have not entered into a marriage, when they have parental rights and the children are dependent on them;
- ❖ Children, including adopted children, of the spouse who have not reached the age of 18 and are unmarried, when the individual holds parental rights and the children are dependent on them.

All those that, while displaced from Ukraine, do not fall under the adopted national scope of the temporary protection regime are entitled to submit an application for international protection and initiate an individual administrative assessment under the national asylum procedure.

Not only the temporal scope of temporary protection was not extended under the national scheme, but it was wrongfully adopted in the decision of the government, enacting and granting the TP,³⁴ that temporary protection is granted until 24 February 2022 instead of 4 March 2023 as outlined in paragraph 21 of the Council Decision's preamble. This was corrected on 1 February 2023, when the government extended the temporary protection until 4 March 2024.³⁵ On 25 January 2024, temporary protection was further extended until 4 March 2025.³⁶

C. Access to temporary protection and registration

1. Admission to territory

In March 2022, several individual reports were made by third country nationals who resided in Ukraine on the basis of a student permit, who were not allowed to access the Bulgarian territory or claim temporary protection before the border police. The exact number of these non-admissions is however unavailable.

In the beginning of March 2022, the Ministry of Foreign Affairs organised regular evacuation transport³⁷ from Ukraine, accessible not only to Bulgarian nationals, but also to Ukrainian nationals from Bulgarian ethnic origin concentrated in Bessarabia and Tavia regions (the so-called Bessarabic and Tavric Bulgarians). Despite this restriction, evacuation centres started listing without discrimination all Ukrainian nationals who applied for evacuation to Bulgaria. The total number of these evacuees is still not publicly available.

For what concerns people who returned to Ukraine and sought to re-enter Bulgaria, both in 2022 and 2023 there were no issues or cases reported where refusal of entry was applied, neither of the existence of any other obstacles to re-access the territory. Especially during the summer in 2022, when military activities reached their lowest level, many displaced persons from Ukraine opted to return for a short or longer

³³ Article 2(3) and 2(4) LARB.

³⁴ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

³⁵ COM №95 from 1 February 2023, available in Bulgarian at: <https://bit.ly/3rVTT33>.

³⁶ COM №54 from 25 January 2024, available in Bulgarian at: <https://bit.ly/3rVTT33>

³⁷ Offnews, МВНР организира редовни автобусни линии за евакуация от Украйна, available in Bulgarian at: <https://bit.ly/3TeA17A>.

period of time in order to obtain documents, visit family, relatives or friends or to take care of other matters, and they later re-entered Bulgaria without experiencing any legal or practical problems. This opportunity remained throughout 2023 as well, with TP holders leaving to Ukraine or other countries for short or longer periods of time and then re-entering Bulgaria as holders of temporary protection without any obstacles.

Based on the EC Communication “Providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders” the Border Police issued instructions to the border guards on how to proceed with respect to granting admission to the territory of displaced person fleeing from the war in Ukraine. Although not disclosed to the public, the content of the instructions was easy to deduce based on the information on the access to territory of Ukrainian war refugees, provided on the government online portal ukraine.gov.bg,³⁸ as well as through the observation of relevant practices.³⁹ Two main approaches were established regarding the access to territory.

The first approach, applied along the Northern border with Romania, where the vast majority of the arrivals were registered, was liberal and inclusive, allowing access to all displaced persons from Ukraine from categories designated as falling under the TP regime, still allowed access even when only in possession of:

- ❖ an old format passport without biometric data;
- ❖ an internal ID card;
- ❖ a driving license;
- ❖ a birth certificate – for children up to 14 years;
- ❖ none of these documents, but have other official documents that certify their identity – for example: certificates, passes, diplomas, membership cards, bank cards, employment records, property documents or any other types of photo IDs;
- ❖ no document – exceptionally and after an inspection by Border Police officers. In such cases, however, the person is not registered by the border guards or the other police services as a holder of temporary protection, but instead channelled to the national asylum authority, State Agency for Refugees (SAR) where they are registered as an asylum seeker, so that an individual assessment of their identity and claims under the usual asylum procedure is carried out. If during the assessment it is established that the person is indeed falling under a category covered by TP, the asylum procedure is terminated,⁴⁰ and the person immediately registered as temporary protection holder and issued the respective document,⁴¹ certifying their legal status.

The second approach, applied along the Southeastern border with Türkiye, is more restrictive. While Ukrainian nationals who declare to seek protection are still largely admitted to the territory regardless of the type and validity of the documents possessed, third country nationals and stateless persons claiming to be fleeing from Ukraine and to seek protection are refused entry, in case of not holding a valid passport and an entry visa. However, the Consulate in the town Edirne, close to this border, since the beginning of the war in Ukraine has been regularly issuing an entry visa in expedited proceedings for these and other categories of beneficiaries of temporary protection, the latter – if willing to transit via Bulgaria.

2. Freedom of movement

Both individuals entitled to temporary protection and those already registered and granted protection enjoy full freedom of movement in the country without any conditions or distinctions based on the type of Ukrainian documents they held at the moment of entry.

Same conditions as to entering Bulgaria are applied to Ukrainian refugees if they attempt to leave the country towards Romania in order to return to Ukraine. All displaced persons are allowed to exit even if

³⁸ See at: <https://ukraine.gov.bg/>, section On arrival: Entering Bulgaria.

³⁹ Council for development of civil society (CPFO) with the National Task Force, weekly meetings during the period between April and June 2022.

⁴⁰ State Agency for Refugees, Order № RD05-263 from 8 April 2022 of the Chairperson of the State Agency for Refugees regarding displaced persons from Ukraine, available at: <https://bit.ly/3MHdEVH>.

⁴¹ Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

not in possession of a biometric passport or a passport or any other type of travel document. This practice is based on the information provided by Ukrainian governmental sources,⁴² indicating that Romania allowed transit via its territory for a return to Ukraine with any available document.

When attempting to leave the country to continue their journey to other EU countries, persons displaced from Ukraine are requested by the Border Police to travel either with a biometric passport in order to benefit from their visa-free regime, or to obtain a visa, if their 90 visa-free period has expired or if they hold a non-biometric passport or other type of travel document. This practice is based on the guidelines provided in the EC Communication “Providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders”.⁴³

3. Registration under temporary protection

From 15 March 2022, just one day after the enactment of the national TP decision on 14 March 2022,⁴⁴ the Bulgarian government started to develop a new system for registration for temporary protection of people displaced from Ukraine. Along two of the reception centres of the national asylum authority (SAR) in Sofia (Ovcha Kupel) and Harmanli, the government opted to open numerous police registration points to ensure the registration process is carried out efficiently.

The prioritization of the roll-out was based on the number of displaced people from Ukraine accommodated in different places across the country, as well as on the statistics for the “hot spots” at border-crossing points and railway stations. Priority was firstly given to areas with high concentration of Ukrainian refugee population, such as the two main entry border crossing points at the Romanian border in Russe and Durankulak, the Central Railway Station as well as the cities of Varna, Burgas and Sofia. Later, new locations were made available every day along with the ongoing training of additional police staff and deployment of new equipment to enable the registration and immediate issuance of TP documents. The government portal “Bulgaria for Ukraine” (ukraine.gov.bg), initially created by volunteers from the IT sector, provides an interactive map of all registration points, updated at the beginning of the displacement crisis on a daily basis to reflect the opening of new registration offices for temporary protection.⁴⁵ From mid-May 2022, registration offices/points were open in all police stations across the country.

Temporary protection is granted upon an oral request. The process takes from 5 to 15 minutes. The officer in charge of registration has to verify the documents, presented by the person, which prove they qualify as beneficiaries of temporary protection. If the existence of the necessary pre-requisites is established, temporary protection is provided automatically, and a TP permit is immediately issued and submitted to the applicant.⁴⁶

People who are not in possession of any identity or other documents attesting their identity, are channelled to the national asylum authority, State Agency for Refugees (SAR) in one of the two designated for TP registration reception centres, namely – Ovcha Kupel in Sofia and the centre in Harmanli. There, the person is registered as an asylum seeker, followed by an individual assessment of their identity and claims undertaken under the rules of the usual asylum procedure. If during this assessment it is established that the person is indeed entitled to TP, the asylum procedure is terminated⁴⁷ and the person immediately

⁴² Ministry of Foreign Affairs of Ukraine, State Border Guards Service, Ministry of Health etc., available in English at: <https://bit.ly/3rZUCAx>.

⁴³ European Commission, Съобщение на Комисията за оперативни насоки за прилагането на Решение за изпълнение (ЕС) 2022/382 на Съвета за установяване на съществуването на масово навлизане на разселени лица от Украйна по смисъла на член 5 от Директива 2001/55/ЕО и за въвеждане на, временна закрита (2022/С 126 I/01), available at: <https://bit.ly/3vtZSS5/>.

⁴⁴ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁴⁵ See at: <https://bit.ly/3MUIN9D> or <https://ukraine.gov.bg/issuance-of-temporary-protection/>.

⁴⁶ Registration card of a foreigner granted temporary protection in the Republic of Bulgaria, issued on the basis of Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

⁴⁷ State Agency for Refugees, Order № RD05-263 from 8 April 2022 of the Chairperson of the State Agency for Refugees regarding displaced persons from Ukraine, available at: <https://bit.ly/3MHdEVH>.

registered as temporary protection holder and issued the respective document,⁴⁸ certifying their legal status.

The two border crossing points along the Romanian border in Russe and Durankulak, where the majority of Ukrainian refugees enter Bulgaria, are the only one points on the national border equipped with registration offices for temporary protection. All remaining border crossing points, including the one at Sofia's International Airport, do not provide means for applying and registering for temporary protection. In these cases, the persons who state to seek TP are allowed to enter the country under the 90 days visa-free regime. The border police refer the arriving displaced persons to the nearest police station inside the country's territory, or to the police station in the place of their destination – as many of the Ukrainian refugees reach Bulgaria with an idea as to where they will settle, at least at the beginning of their stay. This is due to the fact that information about hotels providing free of charge accommodation under the government Humanitarian Aid Programme (see [Access to asylum: Housing](#)) was available online until October 2022;⁴⁹ additionally, many displaced people plan to join family member or local relatives,⁵⁰ which is especially the case for Ukrainian nationals from Bulgarian Bess-Arabic origin.

The 90-days visa-free regime is also applied to those who arrive with non-biometric documents. Although they should not be benefitting from the visa-free regime in Bulgaria, they are also allowed to enter and remain without any obstacles, although they are usually instructed to proceed for temporary protection registration as soon as possible.

No specific time limits are established in the law or in practice for making the oral application for temporary protection. Even in the cases in which persons are allowed to enter with non-biometric or national IDs based on their claim to seek protection who do not register for temporary protection, no punishment or other negative consequences are envisaged or applied. On the contrary, if they opt to leave Bulgaria in order to return to Ukraine, they are allowed to do it without any obstacles or fines, even when they have exceeded the period of 90 visa-free days.

The renewal of the already issued TP id. cards follow a slightly different procedure.

At the beginning of 2023, after the extension of the TP period until 4 March 2024,⁵¹ the government also decided to extend by the law (*ex lege*) until 31 March 2023 the duration of all issued TP cards, which otherwise would have expired on 24 February 2023, thus allowing an additional period of time for the 52,125 Ukrainians who remained in the country as of 31 December 2023 to renew their TP documents without unnecessary crowdings. Similar approach was used in 2024 and the following 2025. At the beginning of 2025, following the third TP duration extension until 4 March 2026, the SAR announced⁵² that the renewal of the issued TP id. cards could be done both at SAR centers as well as the national police stations until 30 April 2025. The SAR center in Banya however experienced technical problems and was not operational from 24 February until 15 March 2025.

If certain persons omitted the renewal deadline they still are able to register themselves as TP beneficiaries for the period of its extension until 4 March 2025 without any obstacles. For the period between the expiration TP cards deadline on 30 April 2025 until the date of new TP cards issuance these persons would be considered foreigners under the general immigration regime, which for the Ukrainian nationals with biometric passports is visa free for a period of 90 days within 6 months. However, during the interruption period these persons are not covered in the national health and social security systems as no payments of monthly security fees can be done on their behalf as their civic identification number (ЛНЧ) will not be active in the national database. Notwithstanding, the health security status is not discontinued unless the monthly fee payments are not paid for more than three months during a period

⁴⁸ Registration card of a foreigner granted temporary protection in the Republic of Bulgaria, issued on the basis of Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

⁴⁹ The Ministry of Tourism removed the information from its website on 18 October 2022.

⁵⁰ Bulgarian Helsinki Committee, Hotline for Ukrainian TP holders, operated since 7 March 2022.

⁵¹ COM №95 from 1 February 2023, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁵² State Agency for Refugees, Удължава се срокът на временната закрила до 04.03.2026г., available in Bulgarian at: <https://bit.ly/3Vunxwn>.

of 36 months⁵³. If health security rights are discontinued, they can be re-established with payment of all monthly health insurance fees due in the last 60 months.

4. Legal assistance

Since 2013, the Law on Legal Aid provides that asylum seekers should be able to access mandatory legal aid at all stages of the status determination procedure, sponsored under the state budget.⁵⁴ In practice however, due to lack of funding, such service is provided only to vulnerable persons with specific needs upon their explicit request.⁵⁵ Amendments to the law in 2020 also entrusted to lawyers registered as legal aid providers the representation of unaccompanied asylum seeking and refugee children both during the procedure, and after status recognition. The law did not explicitly establish that legal aid should be provided to any other beneficiaries of international or temporary protection. The National Legal Aid Bureau developed a draft proposal to amend the law in order to include these categories in the scope of the legal aid. The amendments were adopted in December 2022.⁵⁶

The general legal aid system was introduced in Bulgaria in 2005, extending it to court representation in all types of cases beyond its mandatory provision in criminal, child protection and tort disputes. In 2017, the scope of the legal aid was extended⁵⁷ to include oral consultations at the national help line⁵⁸ or in regional legal aid centres. The condition for legal aid to be provided is the applicant lacks means and resources to privately request a lawyer's remunerated services.

Persons displaced from Ukraine could also benefit from the advice and assistance provided by legal NGOs working in the field of asylum, such as the Bulgarian Helsinki Committee (BHC), the Center for legal aid-Voice in Bulgaria (CLA-VIB), the Foundation for Access to Rights (FAR) and Bulgarian Lawyers for Human Rights. Since 8 March 2022, the Helsinki Committee also operates a legal aid hotline for Ukrainian refugees and developed a special section in the website asylum.bg in Ukrainian,⁵⁹ dedicated to providing information on the rules and conditions of the temporary protection in Bulgaria, as well as the rights and entitlements connected.

Legal information was also provided in the Blue Dots opened in June 2022 in several major hotspots (Ruse, Dobrich, Sofia, Burgas and Varna),⁶⁰ in which the biggest concentration of Ukrainian nationals was registered. The Blue Dots were a joint operation of UNHCR and UNICEF to provide safe spaces and one-stop hubs for protection and essential services, rolled out in countries hosting refugees from Ukraine (see [Information provision and access to NGOs](#)). The Blue Dots were closed on 31 December 2023. In 2024 these services were replaced by UNHCR funded Compass centers, where the legal assistance was provided solely by the Foundation for Access to Rights (FAR).⁶¹

After the beginning of the war in Ukraine the Centre for Continuing Education of the National Bar organised online trainings on refugee law with a focus on temporary protection, which were attended by more than 490 lawyers from across the country. Among them were also the legal aid lawyers operating the national help line or at the regional legal aid centres. No practical obstacles for persons entitled to temporary protection in accessing legal assistance were reported, as far as know by the author.

⁵³ Article 109(1) and (2) Law on Health Insurance.

⁵⁴ Article 22(8) Law on Legal Aid.

⁵⁵ §1(17) from Additional Clauses LAR, namely: children, unaccompanied children, disabled, elderly, pregnant, single parents taking care of underage children, victims of trafficking, persons with serious health issues, psychological disorders or persons who suffered torture, rape or other forms of psychological, physical or sexual violence.

⁵⁶ Article 22, Para 1(8) Law on Legal Aid, St. G. №102 from 23 December 2022.

⁵⁷ Articles 30d to 30o Law on Legal Aid, as amended St.G. №13 from 7 February 2017.

⁵⁸ National Legal Aid Bureau, tel. 0700 18 250.

⁵⁹ See at: <https://bit.ly/3sc2kYi>.

⁶⁰ UNHCR Bulgaria, Where can you find Blue Dots in Bulgaria?, see at: <https://bit.ly/3CLgBQB>.

⁶¹ UNHCR Bulgaria, COMPASS българска мрежа от центрове за закрила и включване, available in Bulgarian and English at: <https://www.unhcr.org/bg/compass>.

5. Information provision and access to NGOs

As previously mentioned, from mid-April to end of May 2022, UNHCR and UNICEF gradually opened Blue Dot services at two main border entry points in Ruse and Durankulak, as well as in the rest of the major hot-spots in Sofia, Varna, Dobrich and Burgas.⁶² Blue Dots expand the assistance provided by national government and are organized in coordination with state authorities and other partners along key transit routes and destinations to help children and families in need. The services are provided in partnership with local NGOs and representatives from the refugee community. The Blue Dots are safe spaces and one-stop hubs for protection and essential services, rolled out in countries hosting refugees from Ukraine (including Poland, Romania and Moldova) to provide key protection and social services including information, legal counselling, psychological support, identification and referrals for children, women, families, and other people and groups exposed to specific heightened risks as they flee the conflict in Ukraine.

The so-called “Light Blue Dots” with information displayed in posters are located at the two main entry points along the Bulgarian northern border with Romania, Ruse and Durankulak, where the vast majority of the arrivals are registered. The posters provide information in Ukrainian, Russian, and English and refer to the available telephone help lines and online resources.

All Blue Dots were closed down on 31 December 2023. In 2024 the UNHCR funded instead Compass centers for protection and inclusion aiming to promote collective empowerment, integration, and social cohesion for refugees of all nationalities and vulnerable people among the local host communities alike, through comprehensive support tailored to their diverse needs.⁶³

D. Guarantees for vulnerable groups

The registration process is conducted not only in the reception centres of the asylum authority (SAR), but also in all regular police stations across the country, and no real government mechanism to identify vulnerability exists or is implemented. Until the end of 2023 vulnerability assessments were only carried out in the several Blue Dots, as these were in principle designed to provide legal information and counselling, psychological support, but also identification and referrals for children, women, families, and other vulnerable people and groups. The identification, initial psychological and/or legal counselling and follow-up referrals were the key services provided at the Blue Dots with regard to vulnerable beneficiaries of temporary protection.

In Bulgaria, children under temporary protection constitute a significant part of the Ukrainian refugee population, representing nearly 30% of the total as of 31 December 2024. Therefore, from the beginning of the war the National Task Force Group developed and distributed guidelines directed at addressing cases in which⁶⁴ displaced unaccompanied children are located at a border checkpoint, hotspot, Blue Dot, initial reception points or by staff of the Migration Directorate or the State Agency for Refugees. General and specific activities by the child protection services were defined in detail in the follow-up guidelines to be undertaken with regard to the identified unaccompanied child, including accommodation with a foster parent or family or a child care facility.⁶⁵

No specific measures or services for persons under temporary protection with mental health problems were envisaged or provided outside the general health care system, which in itself suffers great

⁶² UNHCR Bulgaria, UNHCR and UNICEF open Blue Dot support hubs for Ukrainian refugees in Bulgaria, 9 May 2022, available at: <https://bit.ly/3eCAxgq>.

⁶³ UNHCR Bulgaria, COMPASS българска мрежа от центрове за закрила и включване, available in Bulgarian and English at: <https://www.unhcr.org/bg/compass>.

⁶⁴ National Task Force Group, Guidelines for action in case of an unaccompanied child displaced from Ukraine, located at a border checkpoint, checkpoint (initial reception points), Migration Directorate, Regional Police Department or SAR registration centre / place, available at: <https://bit.ly/3shwYj3>.

⁶⁵ ukraine.gov.bg, Information on unaccompanied children, available in Bulgarian at: <https://bit.ly/3Z00XKo>.

deficiencies. According to a report from 2014,⁶⁶ Bulgaria ranked last in Europe in terms of care for the mentally ill among 30 European countries included in the analysis. The report measured the care for people with mental health problems through the Mental Health Integration Index, which covers several indicators, including access to medical care, the protection of human rights, the ability of people with mental health problems to work, live fulfilling family lives, and among other people in general, is there a stigma, etc. No significant changes were registered in recent years, and Bulgaria still failed to undertake any real measures to reform the system for mental health care and introduce new means to support the identification, treatment and deinstitutionalization of individuals with mental health conditions. The most recent Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) report underlined the persistent failure by the Bulgarian authorities to address most of the fundamental shortcomings and to implement the specific recommendations repeatedly made, including those relating the mental health care and treatment.⁶⁷ The report re-iterated findings from the previously issued CPT's public statement addressing the persistent lack of implementation of long-standing recommendations concerning the situation of persons placed in psychiatric hospitals, including the phenomenon of physical ill-treatment of social care residents and patients with psychiatric disorders with the authorities failing to take necessary measures to eradicate this totally unacceptable practice.⁶⁸ In its following report⁶⁹ CPT remained highly critical of the lack of implementation of many of the its long-standing recommendations regarding the treatment, conditions and legal safeguards offered to patients in psychiatric hospitals, although noticing some progress appears to be being made as regards the treatment of persons in social care institutions, especially with the help of dedicated managers and staff.

⁶⁶ Offnews, Bulgaria last in Europe in terms of care for the mentally ill, available in Bulgarian at: <https://bit.ly/3MO30wq>.

⁶⁷ European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), Report to the Bulgarian Government on the periodic visit to Bulgaria carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 1 to 13 October 2021, available at: <https://bit.ly/3liYwEN>.

⁶⁸ Council of Europe, Public statement on Bulgaria, issued on 4 November 2021, available at: <https://bit.ly/3YQEcese>.

⁶⁹ European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), Report to the Bulgarian Government on the ad hoc visit to Bulgaria carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 21 to 31 March 2023, published on 31 January 2024, available [here](#).

Content of Temporary Protection

a. Status and residence

1. Residence permit

Indicators: Residence permit

- | | |
|--|--------------------------|
| 1. What is the duration of residence permits granted to beneficiaries of temporary protection? | Valid until 4 March 2026 |
| 2. How many residence permits were issued to beneficiaries from the activation of the Temporary Protection Directive until 31 December 2024? | 201,484 |

The Bulgarian asylum system does not require any additional residence permit to be issued by the immigration police, besides the document attesting having received an international protection status. Hence, the international protection granting act of the asylum authority SAR is sufficient for the protection holder to be able to apply for an identity document that is automatically issued. This arrangement applies also to TP beneficiaries. The decision of the government to grant temporary protection is therefore sufficient for them to be *automatically* issued the respective TP document, if and when they approach a registration office.⁷⁰

Temporary protection is granted upon an oral request made in TP registration offices or SAR reception centres (see 3. Registration under temporary protection, C.3.1.). The process takes from 5 to 15 minutes. Otherwise, the registration officer has to verify the documents, presented by the person, attesting the existence of the pre-conditions to be recognised as a beneficiary of temporary protection. Once this is established, temporary protection is provided immediately and automatically, and a TP card is directly issued and provided to the person.⁷¹

However, at the beginning of 2024, following the second extension of duration of temporary protection until 4 March 2025, the SAR announced⁷² that the renewal of the issued TP id. cards could be done both at SAR centers as well as the national police stations until 31 March 2024. SAR explicitly instructed that after this date the renewal of the TP cards would be available only the SAR centers in Sofia, Harmanli and Banya. However, in practice the police stations in many cities, including the capital Sofia, refused to proceed with the renewals and kept issuing only new TP cards, which caused queues and crowds in SAR centers in Sofia.

The TP document is valid until 4 March 2026.

The scope of rights to which the TP holders are entitled are outlined by the LAR⁷³ and apply for the duration of the temporary protection status. The displaced persons who are granted temporary protection have the right to:

- ❖ remain in the country;
- ❖ work and have access to vocational trainings;
- ❖ appropriate accommodation or means of accommodation if necessary;
- ❖ social assistance;
- ❖ health insurance, medical assistance and services under the conditions and procedures applicable to Bulgarian citizens, with the exception of medical assistance provided under Regulation (EEC) No. 1408/71 on the application of social security schemes to employed persons, to self-employed persons and to members of their families moving within the EU (amended, St.G.№32/22 enforced on 26 April 2022.);
- ❖ to return freely to their country of origin.

⁷⁰ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁷¹ Registration card of a foreigner granted temporary protection in the Republic of Bulgaria, issued on the basis of Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

⁷² State Agency for Refugees, Удължаване на срока на временната закрила до 04.03.2024г., available in Bulgarian at: <https://bit.ly/3Vunxwn>.

⁷³ Article 39(1) LAR.

Due to the specific national arrangements on temporary protection, it is granted with a single act of the government, which covers all displaced persons as outlined by the Council's decision, who entered or will enter the country's territory and requested or will request protection. National provisions, which were adopted in 2002, do not establish a procedure for a withdrawal of temporary protection due to a transfer in another Member State, as such transfers were not legally possible at the time of the law's adoption.

This is also the reason for which, in practice, every displaced person from Ukraine who accesses the country and claims protection is registered and automatically issued a TP card without any requirement to provide evidence that they have not received protection or are holding a residence permit in another country. After the registration and issuance of the TP card, registration officers record relevant information in the EU common TP data system. Based on this information, if another state had granted a TP and/or issued a residence permit to the individual in question prior the registration in Bulgaria, its respective authorities can initiate withdrawal of the protection or the residence permit.

For those individuals who are granted TP in Bulgaria, but who declared to be willing to transfer to another Member State, the national asylum authority developed a protocol for returning the TP document based on which the status of the individual in the immigration database is altered, passing from TP holder to foreigner residing in the country from this date onward, within the 90-days visa-free regime. A copy of the handover protocol is given to the individual, so it can be used as evidence before the authorities of other Member States that the person is no longer enjoying temporary protection in Bulgaria.

In 2023, the SAR initiated draft amendments⁷⁴ of the national asylum law, which among other envisaged to introduce the right of temporary protection holders to terminate their temporary protection in Bulgaria. However, due to the constitutional crisis in Bulgaria which has seen the country facing seven parliamentary elections over four years made impossible the adoption of any major executive decisions, institutional reforms or legal amendments⁷⁵.

2. Access to asylum and other legal statuses

Article 69 of the national asylum law establishes the right for TP holders to submit an individual asylum application.⁷⁶ However, the asylum procedure is not opened and the application of the TP holder is not examined or decided prior the end of duration of the TP, if such a decision triggering the Temporary Protection Directive is adopted by the EU Council and implemented through a follow-up decision of the national government.⁷⁷

On 10 March 2022, the national government adopted Decision No.144,⁷⁸ which granted a temporary protection to all displaced persons from Ukraine who sought asylum in Bulgaria and which entered into force on the date of its publication on 14 March 2022. The decision was given explicitly a retroactive effect to cover all persons displaced from Ukraine from 24 February 2022.

Hence, until 14 March 2022 all Ukrainian refugees who applied for asylum in Bulgaria were still registered as asylum seekers. From 15 March 2022 onwards, any Ukrainian refugee who entered the country and declared to be seeking protection before the authorities has to be immediately issued a document⁷⁹ certifying their legal status as a person granted a temporary protection in Bulgaria and valid for its duration.⁸⁰

⁷⁴ Law on Asylum and Refugees draft amendments, published for public consultations on 5 January 2024, available in Bulgarian at: <https://bit.ly/49yPqHK>.

⁷⁵ See, 2024 AIDA Update on Bulgaria, Overview of the main changes.

⁷⁶ Article 68(1), item 2 LAR.

⁷⁷ Ibid.

⁷⁸ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁷⁹ Article 41(1), item 4 LAR, see at: <https://bit.ly/3ghv4Mo>.

⁸⁰ 24 February 2023.

In this respect, on 8 April 2022, the asylum authority SAR issued an executive order⁸¹ to instruct its staff on how to proceed with the pending individual international protection applications from persons entitled to temporary protection,⁸² which were opened *after* the publication of the government's Decision No. 144.⁸³ In essence, the instructions were to discontinue these asylum cases, to immediately issue a TP document to the applicant, and to provide information about the right to re-open the individual asylum procedure after the end of the TP. Throughout 2022, 810 asylum seekers from Ukraine discontinued their open asylum procedures opened prior to the enactment of the TP in Bulgaria on 14 March,⁸⁴ in order to be able to avail themselves of more favourable conditions in terms of access to immediate documentation, accommodation and food provision, arranged through the HAP Programme. 501 humanitarian status holders, already granted this type of international protection, opted to retain it.⁸⁵

In 2023, the SAR initiated draft amendments⁸⁶ of the national asylum law, which among other envisaged to introduce the right of temporary protection holders to be able to apply prior its expiration for international protection and granted a subsidiary protection as a minimum in an expedited determination procedure. However, the constitutional crisis in Bulgaria which has seen the country facing seven parliamentary elections over four years made it impossible to adopt of any major executive decisions, institutional reforms or legal amendments.⁸⁷

b. Family reunification

1. Family reunification as provided under the Temporary Protection Directive

The national law envisages⁸⁸ that TP beneficiaries have the right to be reunited with a spouse and their minor and unmarried children, if they also request to benefit from temporary protection in the country, regardless of their nationality. The only distinction and exception from the TPD family definition concerns the unmarried partners in a stable relationship as these are not recognised as family members by the national family law.⁸⁹ The same family reunification procedure⁹⁰ as for beneficiaries of international protection applies.

In practice, as far as Ukrainian nationals do not need a visa to enter the EU in principle, and Bulgaria in particular, no decision has to be issued beforehand, if family members live in another country; instead, they only have to register as temporary protection holders upon arrival in order to be able to receive their TP card; family members obtain the same scope of rights as the original TP beneficiary.

Extended circle of family members can also enjoy reunification in Bulgaria under the TP scheme.⁹¹ In such case the reunification has to be authorized in a special procedure. The asylum authority can authorize the reunification with other close relatives (as, for example, can be considered the parent of one of the spouses), if it is proved that they lived together as part of the household of a TP beneficiary at the time of the events, which triggered the temporary protection enactment by the EU and provided that in the country of origin they were dependent on the TP beneficiary. The additional difficulties that could arise if they are not reunified with the TP beneficiary, have to be assessed on a case-by-case basis. When the location of the family members is unknown, the SAR has to initiate search and tracing in cooperation with UNHCR, Red Cross and other relevant organizations.

⁸¹ State Agency for Refugees, Order №RD05-263 from 8 April 2022, available in Bulgarian, Ukrainian and Russian at: <https://bit.ly/49XU4PL>.

⁸² State Agency for Refugees, Order No.3D05-263 from 8 April 2022, available at: <https://bit.ly/3MOy6UG>.

⁸³ COM №144 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3rVTT33>.

⁸⁴ Source: SAR 2022 statistics.

⁸⁵ Ibid.

⁸⁶ Law on Asylum and Refugees draft amendments, published for public consultations on 5 January 2024, available in Bulgarian at: <https://bit.ly/49yPqHK>.

⁸⁷ See, 2024 AIDA Update on Bulgaria, Overview of the main changes.

⁸⁸ Article 39a(1) LAR.

⁸⁹ Article 1 Family Code.

⁹⁰ Article 34 LAR.

⁹¹ Article 39a(2) LAR.

2. Family reunification beyond the Temporary Protection Directive

The general immigration law arranges a family reunification procedure for third country nationals married before or after they have obtained their Bulgarian residence permit.⁹² This permit should have been granted with a minimum one-year duration. Material conditions such as accommodation, income and health insurance do apply. However, as the TP cards are not recognised as identity documents in the general law on Bulgarian identity documents,⁹³ but only in national asylum law,⁹⁴ these were not considered as regular residence permits/documents under the general immigration legislation, therefore the family reunification procedure within its scope is not accessible for temporary protection holders.

In 2023, the SAR initiated draft amendments⁹⁵ of the national asylum law, which among other envisaged to include TP cards among regular identity documents. If adopted, it will allow the TP holders to use the general immigration family reunification procedures as well. However, the constitutional crisis in Bulgaria, which has seen the country facing seven parliamentary elections over four years, has so far made it impossible to adopt any major executive decisions, institutional reforms or legal amendments.⁹⁶

c. Movement and mobility

The beneficiaries of temporary protection enjoy unlimited freedom of movement within the territory of the country, including more liberal approach with regard to their address registration beyond the normal deadlines established by the law.⁹⁷ The address registration is necessary to access to social assistance, services and support, which are provided depending on the region and municipality in which the applicant resides.

National arrangements provide for an immediate and automatic issuance of a temporary protection document upon registration (see [Residence permit](#)). No additional permits or identification documents are needed or requested for the TP beneficiary to be able to enjoy the rights and entitlements within the scope of temporary protection. Following the specific national arrangements of the temporary protection, which is granted to all beneficiaries with a general administrative decision (see [General](#)), discontinuation or withdrawal of the TP is not legally possible, unless the latter is implemented on the basis of exclusion (Article 1F) clauses, or a threat to the national security or public order.

Therefore, Ukrainian refugees who have applied and benefit from TP in Bulgaria do not face any legal or practical impediments to re-accessing the country as TP holders, if they have travelled back to Ukraine for shorter or longer period of time, regardless of its the duration. It means that TP status remains active as long as TP regime is valid, regardless of the period of absence from the country.

⁹² § 1a Additional clauses, Law on Foreigners in Republic of Bulgaria (LARB); Article 12 LARB Regulations.

⁹³ Article 14 Law on Bulgarian identity documents.

⁹⁴ Article 40 LAR.

⁹⁵ Law on Asylum and Refugees draft amendments, published for public consultations on 5 January 2024, available in Bulgarian at: <https://bit.ly/49yPqHK>.

⁹⁶ See, 2024 AIDA Update on Bulgaria, Overview of the main changes.

⁹⁷ Article 6(1) LARB Regulations – at the border on entry; Article 28(3) LARB in conjunctions with Article 9(2) LARB Regulations – in 3 days after settling in a private accommodation.

d. Housing

Indicators: Housing

1. For how long are temporary protection beneficiaries entitled to stay in reception centres?	Not applicable
2. Number of beneficiaries staying in reception centres as of 12/2024	Not applicable
3. Number of beneficiaries staying in private accommodation as of 12/2024	54,903 ⁹⁸

According to national law, the responsibility to organise the provision of the temporary protection and all related arrangements lies directly with the Bulgarian government, assisted by a special TP task force.⁹⁹

Initially, after the outbreak of war and the first arrivals of people displaced from Ukraine at the end of February 2022, accommodation for displaced persons was provided privately, mostly by hotels and guest houses, predominantly in the North-Eastern region and along the Black Sea coast, as most were empty off the touristic season. On 10 March 2022, the government adopted a Humanitarian Aid Programme for the displaced persons from Ukraine (HAP Programme),¹⁰⁰ which retroactively funded accommodation and food provision for all Ukrainian TP holders hosted in officially licensed resort, hotel and guest-type facilities; the validity of the measure initially extended only until 31 May 2022.¹⁰¹

On 20 May 2022, facing the end of the approved HAP Programme period, the government adopted a decision to relocate TP holders to government or municipal resort facilities until the end of the temporary protection regime. However, the government and municipal agencies were unable to organise fast enough the necessary logistics and in practice only some of the TP holders were relocated to public reception facilities. The relocation was also opposed by the Ukrainian TP holders, due to a lack of information regarding the locations and conditions of new accommodation facilities, as well as whether these new locations would also provide for access to schools, healthcare and social services. Therefore, on 29 July 2022, the government adopted the decision to extend until 30 September 2022 the HAP Programme.¹⁰²

As previously mentioned, on 1 August 2022 the Bulgarian Parliament was dissolved. The caretaker cabinet, which took over on 2 August was appointed by - and accountable to - President Rumen Radev, known for his anti-refugees¹⁰³ and pro-Russia¹⁰⁴ positions. Although the caretaker cabinet initially extended¹⁰⁵ the HAP Programme under the same conditions until 31 October 2022, later it fully abolished it. In its place, the caretaker cabinet adopted a new scheme,¹⁰⁶ which was met by widespread criticism for having effect only until 15 November 2022. Other major flaws concern the requirement that all TP holders have to be relocated from the hotels to government/municipal resort facilities, which are not only highly unsuitable for this purpose, but also utterly insufficient as capacity; the exclusion from any accommodation arrangements all the newly arriving after 31 October Ukrainian refugees; as well as the refusal to provide from this date onward any nutrition to any of the TP holders - newly arriving or already in Bulgaria, including the vulnerable categories of individuals.

Following said criticism, on 16 November 2022 the caretaker cabinet of the pro-Russian president Rumen Radev adopted a new decision which partially reinstated the HAP Programme,¹⁰⁷ allowing the TP holders

⁹⁸ As of 31 December 2024, out of 60,864 TP holders who remained in Bulgaria 5,961 BTPs were provided state sponsored accommodation source: ukraine.gov.bg

⁹⁹ Articles 80 – 81 LAR.

¹⁰⁰ COM №145 from 10 March 2022, available in Bulgarian at: <https://bit.ly/3H2ra5w>.

¹⁰¹ Ministry of Tourism's unified registration portal for hospitality services, available in Bulgarian at: <https://bit.ly/3FdNp7b>.

¹⁰² COM №535 from 29 July 2022.

¹⁰³ Dariknews, Дебатът на годината: Радев vs Герджиков, 18 November 2021, available in Bulgarian at: <https://bit.ly/3EHRv7C>.

¹⁰⁴ Radio Free Europe, Bulgarian President Did not Sign Document Backing Ukraine Because of Wording on NATO Membership, available at: <https://bit.ly/3rXoA8g>.

¹⁰⁵ COM №665 from 15 September 2022.

¹⁰⁶ COM №856 from 31 October 2022.

¹⁰⁷ COM №909 from 16 November 2022.

already accommodated in hotels and licensed guest houses to remain there until the end of the temporary protection regime, and allowed for the provision of government-funded accommodation to newly arriving Ukrainian refugees, although only in the government/municipal resort facilities with available places. From 16 November 2022 onwards however, the government revoked all measures on food assistance to TP beneficiaries. None of the following amendments of the HAP Programme changed this situation. None either provided for any additional integration measures or other tailored support.

Another highly criticized measure was the decision of the TP Task Force of the caretaker cabinet to dedicate the detention centre of Elhovo, built with EU funding and designed for detention of irregular migrants entering from Türkiye, to be used as an initial reception and internal relocation hub for all arrivals from Ukraine that took place after the end of October 2022. This centre consists of containers, men and women have to share common bathrooms with no other services, amenities or utilities and food or healthcare assistance are not provided. On 4 November 2022, a group of 25 newly arrived Ukrainian refugees were accommodated in the Elhovo centre with no food, medical aid, social assistance or information provided.¹⁰⁸ The group grew to count 31 individuals who, after spending in three weeks without undergoing any identification process or receiving information about their future relocation and more permanent accommodation, opted to leave Bulgaria and seek refuge in Romania. Since then,¹⁰⁹ 1,482 displaced persons from Ukraine passed through the Elhovo center for an average period of 3 to 5 days.¹¹⁰

Reception conditions, provided in reception-and-registration centres of the asylum authority, State Agency for Refugees (SAR) are accessible under the national legal arrangements¹¹¹ only to persons seeking international protection. The beneficiaries of the temporary protection as well as the beneficiaries of the international protection do not have access to them.

Forms of reception conditions

The Humanitarian Aid Programme, adopted and applied until 15 November 2022 envisaged provision of food and accommodation. The types of assistance such as vouchers, different financial allowances have been made accessible by the law¹¹² to TP holders under the rules and conditions of the general social welfare system.

Private accommodation in hosting facilities not licensed for hospitality services was instead not funded by the State at any of the stages of the Humanitarian Aid Programme. This decision was also taken as a preventive measure against eventual exploitation or abuse. The national TP portal ukraine.gov.bg provided information and helplines in case of risks of trafficking or other exploitation as well as some basic advice for their prevention.

e. Employment and education

1. Access to the labour market

TP beneficiaries are entitled to equal treatment to nationals regarding employment, with no exceptions.

According to the law,¹¹³ persons granted temporary protection have the right to work and vocational training. It is sufficient that they have been issued a TP card; no additional permits or certificates are required in order for beneficiaries of temporary protection to be employed, to practice a profession or to

¹⁰⁸ Bulgarian Helsinki Committee, Who accommodated Ukrainian refugees in Elhovo detention center?, available in Bulgarian at: <https://bit.ly/3VslOUu>.

¹⁰⁹ From 4 November 2022 until 1 March 2024.

¹¹⁰ Source: Elhovo Regional Security Police Directorate, Migration department.

¹¹¹ Article 29 LAR.

¹¹² Article 39 (1), item 4 LAR, Article 2(6) Law on Social Assistance.

¹¹³ Article 39(1), item 2 LAR.

carry out an independent commercial or business activity in Bulgaria, other than the usual legalization of university diplomas¹¹⁴ implemented locally by a special national administration.¹¹⁵

Notwithstanding, as an additional guarantee, the Law on Labour Migration and Labour Mobility was amended in June 2022 (SG 41/03.06.2022). According to the amendment, permission to access the labour market is no longer required for third-country national workers for the period they enjoy temporary protection.

Beneficiaries of temporary protection accommodated at state expense in resort centres and (see [Housing](#)) who were employed, have the right to have their accommodation covered by the State for one additional month from the date on which they actually started. At the end of the first month and after receipt of the first salary, working TP beneficiaries have the right to remain in the place of accommodation, if they wish, but they have to start paying the expenses for their accommodation. Their family members however (spouses, children), as well as relatives with whom they are accommodated together in a common room and who are not working, have the right to continue benefiting from the accommodation at state expense.

For the beneficiaries of temporary protection, who are not accommodated at state expense, and who have found and started work, the government adopted additional material incentives. From 6 June 2022, working TP beneficiaries who secured their own accommodation were entitled to financial assistance of BGN 365 monthly for a period of three months, to cover rent and utility costs (electricity, heating, water, Internet access, etc.). The government provided an additional financial incentive for employers who hired displaced persons from Ukraine, which is still in place. If an employer hired a beneficiary of temporary protection, who was already registered at the Labor Bureau as unemployed, the employer would be entitled to receive as assistance a part of the salary to the amount of BGN 933,00 monthly (the national minimum wage) for the period of the subsidized employment, as well as an amount for social and health insurance payable by the employer, which are to be covered by the national budget. These incentives were funded under the EU Solidarity – Human Resources Development Programme.¹¹⁶ This programme ended on 25 July 2023 and has not been renewed ever since.

The respective national Employment Agency stated to be unable to provide information on the number of temporary protection beneficiaries who accessed the labour market in 2024.¹¹⁷ The only information available is the number of TP beneficiaries who found employment through governments employment services and schemes, who in 2022 were 2,198; 1,484 in 2023, and 272 in 2024.

2. Access to education

Access to education is guaranteed for TP beneficiaries under the general national legislation.¹¹⁸ In Bulgaria, compulsory education in state and municipal educational institutions - kindergartens and schools - is free of charge and therefore completely accessible to all children. Education is compulsory for all children from 4 to 7 years old (kindergarten) and from 7 to 16 years old (from 1st to 7th grade), regardless of their citizenship or residence permit.

Education in state and municipal schools is also free for children aged 16 to 18 who are Bulgarian citizens, citizens of another EU country, but also children nationals of third countries who have a short-term, long-term or permanent residence permit, have been accepted in Bulgaria under acts of the government, an international treaty, or have sought or received asylum or international protection. Although they are not foreigners seeking or granted international protection, persons displaced by the war in Ukraine received temporary protection, introduced in Bulgaria by an act of the government.

¹¹⁴ The Hague Convention from 5 October 1961 (Apostille Convention), ratified by Ukraine.

¹¹⁵ National Center for Information and Documentation (НАЦИД), available at: <https://nacid.bg/en/>.

¹¹⁶ National Employment Agency portal, see at: <https://bit.ly/3OWpixh>.

¹¹⁷ Employment Agency, reg. No. ПД-08-1915 from 27 December 2024.

¹¹⁸ Article 9 Law on Pre-school and School Education (LPSE).

Therefore, not only compulsory school education from grades I to VII, but also optional school education from grades VIII to XII is free for children who have received temporary protection until completing secondary education. The right to free education means that no fees are paid for the education and no fees are paid for taking the state matriculation exams or such exams for the acquisition of a professional qualification and secondary special education.

Initially, the Ministry of Education,¹¹⁹ the overall small number of children with temporary protection enrolled in Bulgarian schools and kindergartens is due to the resumption of distance learning organised by the schools in Ukraine, as well as the requirement of the Ministry of Health to unify the immunization calendars between the two countries. Therefore, the two main obstacles for Ukrainian children to make use of the local education system were stated to be the national differences between vaccination schedules¹²⁰ and school curricula. Especially the latter motivated many parents to keep their children enrolled in the largely available and accessible Ukrainian online education forms, in order to avoid any delays in their educational path.

Notwithstanding, the number of children enrolled in Bulgarian schools has been gradually increasing. During the second semester of the 2021/2022 school year, namely February-June, kindergartens admitted 84 children with temporary protection whereas 439 pupils with temporary protection were enrolled in the schools. In the second half of the year for the 2022/2023 academic year 512 children enrolled in pre-school groups distributed among 220 kindergartens and 1,226 students in schools distributed among 431 schools. In 2022/2023 school year, the kindergartens admitted 737 children with temporary protection whereas 2,035 pupils with temporary protection were enrolled in the schools. Out of them 291 were first graders. In 2023/2024, the kindergartens admitted 882 children with temporary protection whereas 2,886 pupils with temporary protection were enrolled in the schools, of whom 381 children were first graders. In 2024/2025, the kindergartens admitted 1,247 children with temporary protection of whom 445 children with first admission, whereas 4,797 pupils were enrolled in the schools, of whom 1,993 were first admissions.

The Bulgarian school system in general suffers significant deficiencies in providing alternative forms of education to children with special needs.¹²¹ Where such forms were available however, Ukrainian children did not have obstacles to access them.

The law provides for access to education and vocational training for all TP beneficiaries without any conditions or criteria to access it, or limitations based on age.¹²²

From 2022 to 2023 the access to university education was not facilitated for TP beneficiaries. Universities in Bulgaria enjoy academic autonomy guaranteed by law. This means that universities themselves decide the conditions for the admission of students, tuition fees, the organization of the educational process, the certification of teachers and the awarding of an academic degree, as well as all other issues of the management of the specific higher education institution. By law, the only foreigners who have received some kind of protection in Bulgaria, who are equal in rights to Bulgarian nationals, are only foreigners with refugee status. Except the American University in Blagoevgrad there is no information that any other of the local universities has offered scholarship or other incentives to TP beneficiaries. On 25 July 2024, however, the government enacted a decree¹²³ which made the access to university education of students with temporary protection under the same rules and conditions as for the Bulgarian nationals. It also adopted 400 fully subsidized scholarships for the completion of the mandatory Bulgarian language course prior commencing the studying of subject under the respective university curricula.

Obstacles arose only with respect to medical professions. In order to acquire the right to practice their profession in Bulgaria, doctors or nurses with temporary protection had to take a Bulgarian language

¹¹⁹ Ministry of Education, exh. N 1104-6 from 5 January 2023.

¹²⁰ Ministry of Health, Mandatory vaccination schedule, available in Bulgarian at: <https://bit.ly/3OT1g6f>.

¹²¹ UNICEF, Обучение на деца със специални образователни потребности в дигитална среда, published on 18 June 2020, available at: <https://uni.cf/3JJrJlv>.

¹²² Article 39(1), item 2 LAR.

¹²³ COM №264 from 25 July 2025.

exam focused on the professional terminology. Such exams were organized and conducted by the Center for Assessment in Preschool and School Education.¹²⁴ The process for recognizing the medical qualifications of people fleeing the war in Ukraine remains cumbersome despite shortage of qualified medical staff in Bulgaria, particularly in rural areas, and the EC Recommendations¹²⁵ in that regard.

In general, requirements related to age are not envisaged with respect to vocational trainings. In Bulgaria the language barrier was not a significant obstacle neither for finding employment, not for vocational training due to the shared Slavic language roots.

F. Social welfare

Access to social welfare system and different types of social assistance available is regulated by the law and is provided to all TP beneficiaries¹²⁶ under the same conditions and on the same level as for nationals.¹²⁷ It should be noted, however, that the different types of social, but especially financial assistance provided by the Bulgarian social welfare system are scarce.

The national authority responsible for granting social assistance is the Agency for Social Assistance (ASA)¹²⁸ under the Ministry of Labour and Social Policy; the provision of social welfare and assistance is geographically distributed and therefore tied to the requirement that the applicant resides in the municipality where they have submitted the application for assistance. Regarding TP beneficiaries, this requirement was considered fulfilled with they had made an address registration with the police.

In September 2022 the ASA began the implementation¹²⁹ of EU funded project¹³⁰ for distribution of 40,000 vouchers with a nominal value of BGN100 (EUR 51,24) for meeting initial needs for food, clothing, school supplies, hygiene materials and other essential products of the TP holders. As of the end of 2023 altogether 35,566 TP holders received such support with priority given to children and adults, taking care of children. In total 39,923 vouchers were distributed, with another 87,600 social inclusion support rendered as an additional measure. The project ended on 28 February 2023.

In 2022, a total of 50,080 applications for one-time assistance (BGN 375,00) were submitted by temporary protection holders. Out of them, 49,128 applications were granted assistance, positively affecting 85,088 beneficiaries. In 2023, a total of 2,641 applications for one-time assistance (BGN 375,00) were submitted by temporary protection holders. Out of them, 2,440 applications were granted assistance, positively affecting 3,638 beneficiaries. In 2024, just 21 temporary protection holders for one-time assistance (BGN 375,00) were granted such assistance. During the same period other types of social assistance was provided to 271 temporary protection holders.

The Social Assistance Agency¹³¹ does not carry out a vulnerability assessment before the application for provision in 2024 of assistance. If a vulnerability or special needs are stated the ASA refers these applicants, including those granted temporary protection, to an appropriate licensed service or care provider based on a preliminary needs assessment.

Since the beginning of the war in 2022, a total of 33 cases was referred by the ASA to specialized service providers, of whom 15 cases to different types of crisis centers, 1 case to a social rehabilitation center,

¹²⁴ Center for Assessment in Preschool and School Education, Exam requirements and schedule, available in Bulgarian at: <https://bit.ly/3H5MEyC>.

¹²⁵ European Commission, Recommendation (EU) 2022/554 of 5 April 2022 on the recognition of qualifications for people fleeing Russia's invasion of Ukraine, available at: <https://bit.ly/3IKXWYs>.

¹²⁶ Article 39(1), item 3 LAR.

¹²⁷ Article 2 (6) Law on Social Assistance.

¹²⁸ Агенция за социално подпомагане, available in Bulgarian at: www.asp.government.bg.

¹²⁹ Agency for Social Assistance, reg. N 63-00-123#1 from 4 January 2024.

¹³⁰ ASA, Project No. BG05FMOP001-6.001 "Provision of vouchers to provide food and essential goods for displaced persons from Ukraine", funded by EU Operational Programme for food and/or basic material assistance under the Fund for European Aid to the Most Deprived.

¹³¹ Agency for Social Assistance, reg. N 92-00-0358#1 from 5 January 2023.

10 cases to community support centers and 4 cases to interim protection facilities, 1 case to dementia care centers, 1 case to children with multiple disabilities care center and 1 case for same type of a care center for adults.¹³²

In 2022, 16 TP holders with disabilities were provided an individual assessment under the requirements of the Disabilities Act; 14 were later granted monthly financial allowance, 2 were granted financial aid to purchase or repair specialized equipment or device and 2 were appointed a personal assistant. In 2023 these were 97 TP holders, of whom 80 individuals were rendered monthly financial allowance and 16 were appointed a personal assistant. In 2024, 52 individuals were rendered monthly financial allowance and 17 were appointed a personal assistant.¹³³

Special protective measures were also applied with respect to the identified unaccompanied children. Since 24 February 2022 until 31 December 2024 in total, 195 children with temporary protection were identified as unaccompanied by the ASA offices. Altogether 17 of them were referred to different types of protected facilities, namely 2 children to the Central Children's Hospital, 2 children to a crisis center and the rest 53 children appointed caregivers among the accompanying relatives.¹³⁴

Since 2018, the Bulgarian Helsinki Committee has been litigating against the unlawful refusal of child care support to the beneficiaries of subsidiary protection. In 2022 the ASA applied same approach toward the child support to the beneficiaries of temporary protection. Despite the unanimous jurisprudence of the national courts proclaiming the practice unlawful and discriminatory¹³⁵ in more than 400 positive court decisions¹³⁶ ever since, the Agency for Social Assistance continued to maintain it until the date of this report.

G. Health care

Access to health care for the beneficiaries of temporary protection was initially limited by law to emergency care only. The law was urgently amended in April 2022 to entitle TP beneficiaries the same level of access to health care as nationals.¹³⁷

Therefore, since April 2022 the TP beneficiaries enjoy the same level of health care as Bulgarian nationals.

In the country, the health care system provides an extended package of medical of services and treatments, guaranteed and paid for through the budget of the National Health Insurance Fund (NHIF). In order to have access to this free of charge health care package, all persons who have reached the age of majority are required to pay a monthly health insurance fee in the amount of 8% of their salary or if unemployed, the half of the national minimum wage, i.e. minimum health care fee of BGN 37,32 monthly in 2024. For children under 18 years of age and retired persons, as well as for some other categories, e.g. military personnel, monthly health fees are covered at the state expense.

In May 2022, the government adopted a decree¹³⁸ with which it undertook the obligation to pay the health insurance fee for the entire duration of the temporary protection of certain categories of TP beneficiaries (children below 18 years of age and elderly people, over 63 years of age). For all the remaining TP beneficiaries, i.e. those from 18 to 63 years of age, the government took responsibility for paying their health insurance fees for the first three months of the temporary protection. After these first three months,

¹³² Ibid.

¹³³ Agency for Social Assistance, reg. N ПД04-1103 from 18 December 2024.

¹³⁴ Ibid.

¹³⁵ First decision №6608 from 13 November 2018, Administrative Court Sofia-City, 61st chamber, case №5349/2018.

¹³⁶ Bulgarian Helsinki Committee, "БХК настоява МТСП да прекрати институционалната дискриминация срещу украинските бежанци у нас", 25 October 2025, available in Bulgarian [here](#).

¹³⁷ State Gazette No. 32/22 from 26 April 2022, enforced on the same date.

¹³⁸ COM №69 from 5 May 2022, State Gazette No.35 from 10 May 2022, enforced on the same date.

TP beneficiaries become responsible for the payment of the health insurance fees. If in the meantime they managed to find a job and employment, the employer will have the obligation to cover the monthly health care fee.

The main obstacle for the TP beneficiaries to access health care in Bulgaria was the overall lack of GPs, which resulted in difficulties for those in need to register as patients in a practice.¹³⁹

¹³⁹ news.bg, „Личните лекари изчезват до 5 години, недостигът е 73%“, published on 22 March 2022, available in Bulgarian at: <https://bit.ly/3lQhByl>; also, National Association of General Practitioners, „Личните лекари в България се топят“, published on 29 January 2023, available in Bulgarian at: <https://bit.ly/40GKhso>.