

# Bulgaria: Information for stateless people and those at risk of statelessness fleeing Ukraine



European  
Network on  
Statelessness

ENS Focal Point: [Foundation for Access to Rights \(FAR\)](#)

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*This briefing provides country-specific information for stateless people and those at risk of statelessness fleeing Ukraine. It is intended as a source of information for refugee response actors and affected individuals. The focus is on stateless people and people at risk of statelessness, including those who are undocumented. Links to more general information for refugees from Ukraine are provided throughout. We will endeavour to keep this information updated. Please contact [Ukraine.crisis@statelessness.eu](mailto:Ukraine.crisis@statelessness.eu) if you have relevant updates. Unless otherwise shown, the source of information provided is the ENS Focal Point.*

## 1. ENTRY REQUIREMENTS & REGISTRATION

Most people fleeing Ukraine enter Bulgaria from Romania using the Durankulak border crossing, where they can also apply for temporary protection. Bulgarian Red Cross staff are present to support arrivals. People fleeing the war in Ukraine may register at registration points (e.g., police stations, border crossings, and Migration Directorate offices) and receive temporary protection. The [European Commission](#) confirms that a lack of travel documents or medical documents (certificate of vaccination, COVID-19 test) should not be an obstacle to entering the EU throughout the Ukraine crisis.

Stateless people and those at risk of statelessness may enter Bulgaria upon application for temporary protection, if eligible. People not eligible for temporary protection will be subject to the general requirements under the Law on Foreigners, and may apply for international protection or [statelessness status](#) (see Section 2). For more information about entry and registration, including on registration points, see the Government's portal [Bulgaria for Ukraine](#) and FAQs in [BG/UA/EN/RU](#).

<b>Documents required</b>	<ul style="list-style-type: none"><li>• <u>Adults</u>: passport, identity card, driver's license, birth certificate, etc.</li><li>• <u>Children</u>: similar documents, any other document proving the identity of the child</li><li>• <u>Recognised stateless persons</u>: if status has been recognised by an EU Member State, travel document issued by an EU Member State; if status has been recognised by a non-EU Member State (including Ukraine), travel document and visa, although visa not required if the person applies for international protection</li><li>• <u>Other stateless persons and undocumented persons</u>: <a href="#">people fleeing Ukraine may enter Bulgaria</a> with other documents (e.g. expired passport, birth certificate, other documents that indicate identity including membership cards, employment records, or bank cards); or without any documents (exceptionally and after an inspection by Border Police officers)</li></ul>
<b>Entry and registration</b>	<ul style="list-style-type: none"><li>• <u>Legal obligation</u> to register address at local police station within 3 days, unless the person applies for temporary or international protection</li><li>• <u>Persons eligible for temporary protection</u>: may be asked to apply for temporary protection at the border to access government-provided housing</li><li>• <u>Persons not eligible for temporary protection</u>: must apply for international protection at the border</li><li>• <u>Unaccompanied children</u>: allowed entry regardless of documents; adults accompanying the child who are not parent or guardian are verified and must submit a declaration of care to the Child Protection Department upon arrival; children may register for temporary protection.</li></ul>
<b>Documents issued</b>	<ul style="list-style-type: none"><li>• Registration cards for beneficiaries of temporary protection</li><li>• Asylum seekers: <a href="#">registration card for a person seeking international protection</a></li></ul>
<b>Entry status</b>	<ul style="list-style-type: none"><li>• Visitor, beneficiary of temporary protection, asylum seeker</li></ul>

## 2. ROUTES TO INTERNATIONAL PROTECTION

Bulgaria offers three routes to protection: refugee status, humanitarian status, and temporary protection in accordance with EU rules and its implementation in Bulgaria. These protection routes are available to stateless people and those at risk of statelessness depending on their circumstances and are summarised in the table below.

	Refugee Status & Humanitarian Status	Temporary Protection
<b>What is it?</b>	<p><u>Refugee Status</u>: Protection under 1951 Geneva Convention Relating to the Status of Refugees</p> <p><u>Humanitarian Status</u>: Protection for persons who do not meet 1951 Geneva Convention definition but would be subject to serious risk upon return, including due to a military conflict</p>	<p><a href="#">Temporary Protection</a> for eligible displaced persons from Ukraine currently valid until 4 March 2023</p>
<b>Can stateless and/or undocumented persons apply?</b>	<p>Yes, but only if they are not eligible for temporary protection</p>	<p>Yes, if they meet the eligibility criteria (i.e., beneficiary of international protection or equivalent national protection in Ukraine before 24 February 2022 and family members; or permanent residence in Ukraine and cannot return to country of origin); unclear if equivalent national protection in Ukraine includes statelessness status recognised in Ukraine</p>
<b>Where to apply?</b>	<p>State Agency for Refugees (SAR)</p>	<p>Request at the border police, SAR, or other bodies of the Ministry of the Interior (migration police); registration in person at the nearest Regional Directorate of the Ministry of the Interior (ODMVR), Sofia Directorate of the Interior (SRD), or in one of the Registration and Reception Centers (ROC) (see <a href="#">list of registration places</a> and <a href="#">map</a>)</p>
<b>Procedure &amp; rights</b>	<p>Interview; procedure lasts 6-21 months; applicant's passport or travel documents held by the authorities pending the application; travel not allowed; right to health insurance; right to work if no decision on the application within three months</p>	<p>Oral request; registration in person; applicant provides information about identity and family ties and is photographed; quick procedure (5-15 minutes); temporary protection granted immediately</p>
<b>Rights upon recognition</b>	<p><u>Refugee status</u>: unlimited right to reside; residence card for five years (renewable); rights on same basis as Bulgarian nationals including right to work (except for voting rights and right to occupy certain public positions); travel documents</p> <p><u>Humanitarian status</u>: unlimited right to reside; residence card for three years (renewable); rights on same basis as permanent residence holders in Bulgaria,</p>	<p>Right to reside in Bulgaria until 4 March 2023 (renewable for up to three years but may terminate earlier if peace restored in Ukraine); <a href="#">registration card</a> containing photo, personal data, and personal number (ЛНЧ); right to receive assistance for accommodation and meals for up to three months; right to health insurance; right to work without a work permit; beneficiaries of temporary protection <a href="#">may</a></p>

	including right to work; health insurance; travel documents	<a href="#">apply</a> for refugee status or humanitarian status
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For more information, see:

- [Bulgarian State Agency for Refugees](#)
- Bulgarian Government website with [information for persons fleeing from Ukraine](#)
- CMS, [Bulgaria Immigration and Travel Requirements for Refugees from Ukraine](#)
- Foundation for Access to Rights - FAR, [Application for international protection](#) and [Temporary protection](#)
- European Council on Refugees and Exiles (ECRE), [Information Sheet](#)
- EU Asylum Agency, [Who is Who in International Protection, Temporary Protection overview](#)
- KIND & Child Circle, [Note on unaccompanied children fleeing Ukraine](#)
- Right to Protection, [Who are stateless persons who fled Ukraine after the Russian invasion on 24 of February, 2022](#)

### 3. STATELESSNESS DETERMINATION AND PROTECTION STATUS

For stateless people, it is important to determine both a claim for international protection and their statelessness. Each application should be assessed and both types of status should be explicitly recognised so that even if international protection ceases, the person remains entitled to protection as a stateless person. Statelessness determination should be conducted either in parallel with or following the refugee status determination, with due regard to the primacy of the asylum claim and the principle of confidentiality for refugees in statelessness determination procedures. For more information, see: [ENS briefing on statelessness determination & protection in Europe](#).

Bulgaria has a dedicated statelessness determination procedure established in law. The procedure is summarised in the table below. [Foundation for Access to Rights \(FAR\)](#) provides free legal aid to applicants for statelessness status under a partnership agreement with UNHCR. For more information, see [FAR – Stateless Persons in Bulgaria](#) and [ENS – Statelessness Index Bulgaria](#).

	Statelessness Status
<b>What is it?</b>	Protection under the 1954 Convention Relating to the Status of Stateless Persons (although applications may be refused on certain grounds)
<b>Can stateless and/or undocumented persons apply?</b>	Yes
<b>Where to apply?</b>	Before the Director of the Migration Directorate at the Ministry of Interior; or before the Regional Directorates of the Ministry of Interior
<b>Procedure &amp; rights</b>	Written application in Bulgarian (or translated into Bulgarian by a certified translator) on a specific form; application cannot be initiated ex-officio; no fee; no lawful stay requirement; no time limit to apply, but in practice access is limited by the risk of detention; free legal assistance is provided by NGOs (including by <a href="#">FAR</a> ); some State-funded legal aid provided for certain aspects of the process; right to an interview; right to an interpreter but costs borne by applicant; procedure lasts six to eight months; decision in writing and reasoned (but in practice there are cases of ‘silent rejection’); right to appeal before the court within 14 days of the notification; right to appeal to the Supreme Court; no automatic right to stay in Bulgaria during the procedure; no right to work and no support available unless the person has another form of authorised stay; detention possible for up to 18 months for removal purposes or for up to 30 days for identification purposes; no travel restrictions during the procedure if applicant has a valid travel document; SDP paused if application for

	international protection is made and resumed if international protection is refused
<b>Rights upon recognition</b>	No automatic right to reside; possibility to apply for a one-year renewable residence permit if general requirements met, including paying a fee of 500 BGN (250 EUR) and providing proof of subsistence, accommodation and medical insurance; residence permit protects from detention but does not grant access to other rights (e.g. right to work or access healthcare); access to education only for people who hold a residence permit; right to apply for permanent residence after five years of continuous residence; holders of a long-term or permanent residence permit are issued travel documents (for three months to two years), and may apply for naturalisation after three years (subject to fee)

#### 4. REQUIREMENTS FOR ONWARD TRAVEL TO THIRD COUNTRIES

Asylum seekers may not leave Bulgaria during the international protection procedure. Stateless people with a travel document may travel abroad. Refugees and beneficiaries of humanitarian status with a travel document may also travel abroad, but not to the country of persecution. Beneficiaries of temporary protection may travel to other EU Member States for 90 days within a 180-day period.

#### 5. OTHER RELEVANT INFORMATION

Health insurance for beneficiaries of temporary protection is covered by the state budget during the first 90 days. For children under 18 years, women over 63 years, or men over 65 years, health insurance is covered by the state budget for the duration of temporary protection.

#### 6. ORGANISATIONS ASSISTING STATELESS PEOPLE

<b>Foundation for Access to Rights (FAR)</b> <a href="http://farbg.eu/">http://farbg.eu/</a> <a href="http://www.statelessness.bg/">www.statelessness.bg</a> / <a href="http://www.migrantlife.bg/">www.migrantlife.bg</a> <a href="mailto:office@farbg.eu">office@farbg.eu</a>	<b>UNHCR Bulgaria</b> <a href="https://www.unhcr.org/bg/91-bgkavvo-pravim-niezakrila-na-licata-bez-grazhdanstvo-html.html">https://www.unhcr.org/bg/91-bgkavvo-pravim-niezakrila-na-licata-bez-grazhdanstvo-html.html</a>
<b>State Agency for Refugees (SAR)</b> <a href="https://aref.government.bg/bg">https://aref.government.bg/bg</a> Hotline: +359 876 388 427 and +359 876 388 437	<b>Bulgaria for Ukraine</b> , Government’s portal <a href="https://ukraine.gov.bg/">https://ukraine.gov.bg/</a> 029055555 and +380322465075
<b>Bulgarian Helsinki Committee</b> <a href="https://www.bghelsinki.org/en/">https://www.bghelsinki.org/en/</a> Legal protection of refugees and migrants: 029813318 and 029802049	