

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 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 State Agency for Refugees (SAR) 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). There are [reports](#) of stateless people and third-country nationals not holding a valid passport or entry visa being refused entry when arriving at the Southern border with Turkey, which is more restrictive. There is a risk of detention for some refugees from Ukraine, including undocumented stateless people, who cannot provide any proof that they resided in Ukraine. For more information about entry and registration, including on registration points, see [Foundation for Access to Rights – FAR’s webpage](#) in [BG/EN/UA/RU](#).

Documents required	<ul style="list-style-type: none">• <u>Adults</u>: passport, identity card, driver's license, birth certificate, etc.• <u>Children</u>: similar documents, any other document proving the identity of the child• <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• <u>Other stateless persons and undocumented persons</u>: people fleeing Ukraine may enter Bulgaria 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, however, this is very unlikely to be accepted)
Entry and registration	<ul style="list-style-type: none">• <u>Legal obligation</u> to register address at local police station within 3 days. If accommodated under the State humanitarian programme, the accommodation provider will share this information with the authorities• <u>Persons eligible for temporary protection</u>: may be asked to apply for temporary protection at the border to access government-provided housing• <u>Persons not eligible for temporary protection</u>: must apply for international protection at the border according to the law. In practice, it is highly unlikely that they will be able to apply at the border and might be pushed back.• <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.
Documents issued	<ul style="list-style-type: none"> Registration cards for beneficiaries of temporary protection Asylum seekers: registration card for a person seeking international protection
Entry status	<ul style="list-style-type: none"> Visitor, beneficiary of temporary protection, asylum seeker

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
What is it?	<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>Temporary Protection for eligible displaced persons from Ukraine currently valid until 4 March 2025</p>
Can stateless and/or undocumented persons apply?	Yes, but only if they are not eligible for temporary protection	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 or temporary residence in Ukraine and cannot return to country of origin); unclear if equivalent national protection in Ukraine includes statelessness status recognised in Ukraine
Where to apply?	State Agency for Refugees (SAR)	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 list of registration places)
Procedure & rights	Application in person; Fingerprints taken, 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 (pending amendments would shorten this timeline to one month)	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. Temporary protection can also be granted automatically, i.e. without application and registration of the beneficiary.
Rights upon recognition	<u>Refugee status:</u> unlimited right to reside; residence card for five years (renewable); rights on same basis as Bulgarian nationals	Right to reside in Bulgaria until 4 March 2025; registration card containing photo, personal data, and personal number

	<p>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, including right to work (except for voting rights and right to occupy certain public positions); health insurance; travel documents</p>	<p>(ЛНЧ); right to health insurance; right to work without a work permit; beneficiaries of temporary protection may apply for refugee status or humanitarian status, but the application will not be examined or decided before the end of temporary protection. Pending amendments, not yet in force, would allow application for humanitarian status only.</p>
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For more information, see:

- [Bulgarian State Agency for Refugees](#)
- Bulgarian Government website with [information for persons fleeing from Ukraine](#)
- [Asylum and Refugees Act \(ARA\)](#)
- CMS, [Bulgaria Immigration and Travel Requirements for Refugees from Ukraine](#)
- Foundation for Access to Rights - FAR, [Application for international protection](#) and [Temporary protection](#)
- [European Commission, Communication, Temporary protection for those fleeing Russia’s war of aggression against Ukraine one year on \(March 2023\)](#)
- EU Asylum Agency, [Who is Who in International Protection, Temporary Protection overview](#)
- European Council on Refugees and Exiles, [Information Sheet](#)
- [EU Asylum Agency, Providing Temporary Protection to Displaced Persons from Ukraine: A Year in Review \(March 2023\)](#)
- [Fundamental Rights Agency, Report on Fleeing Ukraine - Fleeing Ukraine: Displaced people’s experiences in the EU](#)
- [Fundamental Rights Agency, Fundamental Rights Implications for the EU of the War in Ukraine](#)
- European Council on Refugees and Exiles (ECRE), [Updated Information Sheet on Measures in response to the Arrival of Displaced People Fleeing the War in Ukraine \(March 2023\)](#)
- [UNHCR Regional Refugee Response Plan \(January-December 2023\)](#)
- Asylum Information Database (AIDA) country report on Bulgaria, [annex on Temporary Protection](#)
- 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](#)
- [Anti-Discrimination Centre Memorial, The situation of Ukrainian children in European countries after 24 February 2022](#)
- [Caritas Europa, Europe's welcome of refugees from Ukraine and lessons learnt](#)

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
What is it?	Protection under the 1954 Convention Relating to the Status of Stateless Persons (although applications may be refused on certain grounds)
Can stateless and/or undocumented persons apply?	Yes
Where to apply?	Before the Director of the Migration Directorate at the Ministry of Interior; or before the Regional Directorates of the Ministry of Interior
Procedure & rights	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 FAR); 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 and 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 or revoked
Rights upon recognition	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 health insurance); 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 permanent residence permit have access to the health insurance system; can work without a permit; 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 and may also return to Ukraine.

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

<p>Foundation for Access to Rights (FAR) http://farbg.eu/ www.statelessness.bg / www.refugeelight.bg office@farbg.eu Legal protection of refugees, migrants and stateless people +359 882873238 and +359 884334283;</p>	<p>UNHCR Bulgaria https://www.unhcr.org/bg/%d0%bb%d0%b8%d0%bf%d1%81%d0%b0-%d0%bd%d0%b0-%d0%b3%d1%80%d0%b0%d0%b6%d0%b4%d0%b0%d0%bd%d1%81%d1%82%d0%b2%d0%be</p>
<p>State Agency for Refugees (SAR) https://aref.government.bg/bg + 3592 808 09 23, + 3592 808 09 24, + 3592 808 09 25</p>	<p>Bulgaria for Ukraine, Government's portal https://ukraine.gov.bg/ 029055555 and +380322465075</p>
<p>Bulgarian Helsinki Committee https://www.bghelsinki.org/en/ Legal protection of refugees and migrants: 003598888 19 745 (hotline), 0035929813318 and 0035929802049</p>	