



FROM TEMPORALITY TO UNCERTAINTY: THE STATE OF PLAY OF TEMPORARY PROTECTION TRANSITION IN EUROPE FOR PEOPLE DISPLACED FROM UKRAINE



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EXECUTIVE SUMMARY

More than four years after Russia's full-scale invasion of Ukraine, Europe is entering a new phase of its response to the resulting displacement. While temporary protection continues to provide an essential legal framework for millions of displaced people, attention is increasingly shifting towards what should follow. Across the Central European Initiative region,[1] governments are beginning to consider longer-term legal solutions, yet transition planning remains uneven, fragmented and, in many cases, still at an early stage or absent.

Based on a comparative analysis of legal and policy frameworks, key informant interviews and consultations with civil society organisations, this paper examines how selected countries are preparing for transition beyond temporary protection. It finds that existing approaches rely heavily on ordinary migration systems and standard residence permits, with only a limited number of countries introducing dedicated transition mechanisms. Where such mechanisms exist, they mostly prioritise labour market participation and economic self-sufficiency, creating barriers for many people and leaving some of the most vulnerable groups at risk of exclusion.

The paper identifies common challenges across the region, including limited coordination, insufficient data and evidence for planning, legal and administrative barriers, shrinking support services and weak links between transition planning, return and Ukraine's recovery. It concludes that the current state of play risks generating prolonged uncertainty for people displaced from Ukraine.

An effective transition requires a predictable and inclusive approach that preserves legal certainty, safeguards rights and expands durable solutions for people displaced from Ukraine. The paper sets out key considerations for policy, advocacy and response to support an effective transition.

Following this "state of play" paper, detailed recommendations will be developed following a convening of experts within the project Working Group[2] and a joint workshop in October 2026.

INTRODUCTION

Russia's full-scale invasion of Ukraine in February 2022 triggered the fastest growing and largest displacement in Europe since World War II. In response, in March 2022, the EU activated the Temporary Protection Directive (TPD)[3] for the first time in its history. The TPD established a collective protection regime allowing people fleeing Ukraine to access legal stay, employment, education, healthcare and basic services without entering asylum systems.

While often referred to as "a special protection regime for Ukrainians", the Implementing Decision of the Council of the EU[4] covers not only Ukrainian nationals and their family members, but also stateless persons and third-country nationals (TCNs) who benefited from international protection or equivalent national protection in Ukraine, as well as certain other stateless persons and TCNs who were legally residing in Ukraine. The activation of the TPD became a landmark example of coordinated European solidarity, supported by EU institutions, national governments, local authorities, civil society, diaspora and host communities. Non-EU countries in the wider Central European region followed a similar approach, introducing or extending analogous national protection regimes for people displaced from Ukraine. As of mid-2026, close to 5.4 million people displaced from Ukraine were residing, [5] with over 4.4 million benefiting from temporary protection, in the EU.[6]

As of summer 2026, the humanitarian situation in Ukraine remains severe, with an estimated 10.8 million people in need of humanitarian assistance.

Intensifying hostilities have driven a sharp rise in civilian harm, with civilian casualties in the first half of 2026 already 37% higher than during the same period in 2025.[7]

Extensive destruction of housing and critical infrastructure further constrains prospects for sustainable return. According to the latest Rapid Damage and Needs Assessment, approximately 14% of Ukraine's housing stock has been damaged or destroyed, affecting more than 3 million households, while direct damage to the energy sector has reached approximately US\$24.8 billion.[8] According to the IRC Ukraine's Protection Monitoring reports, humanitarian access is shrinking while needs continue to expand. Continued attacks on housing, energy systems and essential services, particularly in frontline and heavily affected areas, continue to generate new displacement and undermine access to adequate housing and basic services, increasing the risk that returns may be premature or unsustainable.

At the same time, temporary protection was designed as an emergency measure, not as a long-term solution. As the war continues, reliance on repeated extensions has exposed the limitations of a temporary framework for responding to lasting displacement. Continued uncertainty over the future of the temporary protection regime – including whether it will be extended again, for how long, and what will follow – undermines displaced people's ability to make long-term decisions on employment, housing and integration, while also limiting governments' capacity to plan and invest accordingly.

INTRODUCTION

In September 2025, the Council adopted a Recommendation addressing pathways to alternative residence statuses, "paving the way for gradual return" and encouraging greater coordination among Member States. [9] This signalled a broader shift in policy focus from immediate protection towards longer-term solutions. However, nearly a year after the adoption of the Recommendation, progress on transition planning remains limited across most Member States.

Discussions on transition are also emerging in non-EU countries in the region, which continue to align with EU policy direction and take a "wait-and-see" approach, whereby governments monitor developments in the EU countries to inform their national transition strategies. This dynamic contributes to delays in planning and reinforces uncertainty for beneficiaries across the wider region.

There is a growing need for evidence-based and coordinated approaches to transition policies that protect the rights of displaced people while providing greater legal certainty for governments, service providers and host communities.

This paper – developed within the project supported by the Central European Initiative (CEI) – seeks to inform these discussions by examining how transition planning is evolving across CEI countries.[10] Drawing on comparative legal and policy analysis, Key Informant Interviews (KIs) with experts and consultations with civil society across the region, it analyses current policy approaches, identifies emerging challenges and good practices, and highlights implications for people displaced from Ukraine.

The paper aims to support evidence-based advocacy and policymaking for rights-based, coordinated and predictable transition strategies that provide for continued protection and support durable solutions.

METHODOLOGY

This paper is based on desk research, programmatic evidence and stakeholder consultations to provide a comprehensive "state-of-play" analysis across selected CEI countries.

The paper draws on analysis of legal and policy frameworks governing temporary protection and transition pathways across the CEI region, complemented by programmatic evidence from IRC and civil society organisations (CSOs).

Geographically, the paper covers a wider CEI region, including Albania, Austria, Bosnia and Herzegovina, Bulgaria, Croatia, Czechia, Hungary, Italy, Moldova, Montenegro, North Macedonia, Poland, Romania, Serbia, Slovakia, and Slovenia.

It also covers the current returns context and policy in Ukraine. The paper incorporates insights from 14 Klls: it draws primarily on civil society evidence and expertise (11 experts), with limited institutional and government input (3 experts) and no migration authority or security sector perspectives.

The paper also includes feedback from CSOs participating in the CEI Working Group, aiming to capture country-level perspectives and reflect operational and individual realities.



Pic. CEI Member States. Source: Released under CreativeCommons Attribution ShareAlike, WikimediaCommons

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LEGAL AND POLICY FRAMEWORKS FOR TEMPORARY PROTECTION

In the EU, the response to displacement from Ukraine is grounded in the TPD. Adopted in 2001 but never previously used, the TPD was activated in March 2022 in response to the unprecedented scale and speed of displacement triggered by Russia's full-scale invasion of Ukraine. The TPD provided immediate and collective protection to displaced persons, while helping reduce pressure on national migration systems. Since its activation, the TPD has been extended several times through 4 March 2027, [11] and is now prolonged until March 2028.

While repeated extensions demonstrate the ongoing need for protection, they also reveal a mismatch between a temporary protection status and an increasingly lasting displacement due to an ongoing war and humanitarian crisis in Ukraine.



The TPD is a very good instrument. But everything was done as an emergency, without a vision for what would happen afterwards. I think they [the EU Member States] are extending and extending temporary protection because they actually don't know how they will make the transition.

(NGO expert, May 2026)

However, there are important differences in how the TPD extensions are implemented. Some countries apply automatic extensions (for example, Romania, Hungary, Poland, Slovakia), while all others require an extension to be individually requested.

Across all countries analysed, the formal eligibility categories are broadly aligned with the scope of the TPD, covering Ukrainian citizens, certain groups of TCNs and stateless persons who held international protection, complementary protection or permanent residence in Ukraine, as well as their family members.

Yet, this is not always the case in practice. In Poland, for example, the temporary protection regime primarily covers Ukrainian nationals, while TCNs follow a distinct, more narrowly defined process requiring proof of permanent residence in Ukraine and an inability to return safely to their country of origin.[12] As a result, groups such as international students, temporary workers, and asylum seekers who resided in Ukraine before the full-scale invasion are excluded from special support measures.

In 2025, the European Commission proposed both the extension of temporary protection and a coordinated approach to transition, followed by the adoption of a Council Recommendation outlining key principles for managing the transition phase. The Recommendation encourages Member States to facilitate pathways to alternative residence statuses, primarily through access to national permits and to prepare for gradual voluntary returns to Ukraine. It emphasises the importance of coordination across Member States to avoid fragmented approaches, calls for strengthened information provision to beneficiaries of temporary protection, and introduces the role of the Special Envoy for Ukrainians in the EU.[13]

These developments reflected an increasing recognition that temporary protection is not sufficient as the EU's long-term policy response to displacement from Ukraine.

On 15 July 2026, EU Member States agreed to extend temporary protection for people fleeing Ukraine until 4 March 2028 and stated that temporary protection should be granted only to persons complying with their military obligations under Ukrainian law. Reportedly, this measure has come as "a coordinated effort between the EU and the Ukrainian government".[14]

Yet, the implementation of this new restriction raises serious legal, human rights and practical concerns, representing a fundamental departure from the logic and spirit of the TPD as a collective protection instrument designed to provide fast access to protection through objective, group-based eligibility rather than individualised assessments. It risks undermining the principles of family unity, equal treatment and non-discrimination, while setting a significant precedent for the future of the temporary protection regime.[15]

Across the wider Central European region, non-EU countries have largely mirrored the EU's approach by adopting analogous national temporary protection regimes or similar forms of temporary stay for people fleeing Ukraine. These frameworks typically provide access to basic rights, including legal stay, access to employment, education and services. Non-EU CEI countries have also followed the EU in extending these regimes, often aligning the duration of protection with EU timelines.[16]

Across all countries analysed, the formal eligibility categories are broadly aligned with the scope of the TPD, covering Ukrainian citizens, certain groups of TCNs and stateless persons who held international protection, complementary protection or permanent residence in Ukraine, as well as their family members.

This clearly demonstrates the influence of EU policy frameworks on neighbouring countries. However, as in the EU, non-EU countries have made limited progress in their post-temporary protection planning. Moreover, as mentioned during several KILs, non-EU countries may face additional structural constraints, including more limited administrative capacity, access to EU-level funding and coordination mechanisms.

In Ukraine, following the elimination of Ukraine's Ministry of National Unity, which had been responsible for the return agenda, including the establishment of "Unity Hubs" intended to serve as "one-stop shops" for Ukrainians abroad seeking information and assistance on both local integration in host countries and return to Ukraine, responsibility for return policy and returnees was assigned to the Ministry of Social Policy, Family and Unity. However, following the latest ministerial reorganisation, it remains unclear where this mandate will ultimately sit. In June 2026, the Cabinet of Ministers of Ukraine prepared an Action Plan for 2026–2027 to address challenges related to the possible end of temporary protection in the EU.[17] The Plan envisages an ambitious set of measures, including coordination with EU Member States, support for Ukrainians abroad, strengthening communities' capacity to receive returnees, and facilitating voluntary return and reintegration.

However, its feasibility within the proposed timeframe remains uncertain. Implementation is explicitly dependent on available state and local budgets and international assistance, at a time of significant fiscal constraints and growing social needs. Moreover, as continued attacks on civilians and civilian infrastructure remain a major concern, while the Plan provides limited clarity on safeguards to ensure that return remains genuinely safe and voluntary if temporary protection arrangements are phased out.

The Plan also focuses on Ukrainian nationals, with little indication of how TCNs who previously resided in Ukraine and are currently covered by temporary protection would be supported if these arrangements end. Without dedicated safeguards or pathways, some TCNs may risk falling outside both EU temporary protection and meaningful protection or durable-status arrangements in Ukraine.

The KIs stressed that Ukraine's preparedness for return should not be assessed solely at the national level, as successful reintegration depends on whether local communities have housing, employment opportunities, healthcare, education, social services, transportation infrastructure, and public safety conditions. Several KIs noted that local political narratives in Ukraine often focus on attracting returnees and stimulating population growth without systematically assessing whether such conditions are in place, while most communities continue to face significant shortages in accommodation capacity and essential services.

At the same time, KIs suggested that at the central level, the current Ukrainian government messaging is generally not focused on promoting large-scale returns in the near term. Rather, efforts appear to prioritise maintaining connections with Ukrainians abroad, strengthening engagement with the diaspora, and exploring economic incentives that may encourage future voluntary return, particularly among younger Ukrainians.

Several KIs observed that discussions around return are often more prominent in host countries than in Ukraine itself. Some experts expressed concern that, as host countries increasingly seek long-term solutions and reduce support measures linked to temporary protection, there may be growing pressure for return before conditions in Ukraine allow for safe, voluntary, and sustainable return and reintegration.

STATE OF PLAY: PROGRESS AND GAPS ON TRANSITION MECHANISMS

This analysis shows that transition planning remains significantly underdeveloped. As of August 2026, within this paper's geography, only a few countries have introduced dedicated transition mechanisms: either by giving temporary protection beneficiaries access to pre-existing national permits or by introducing special permits.

In **Italy**, beneficiaries of temporary protection with formal employment can transition into 1-year (for temporary work contracts) or 2-year (for permanent work contracts and entrepreneurs) work permits.[18] Compared to standard employment transition schemes, the Italian approach is generally described by Klls as relatively accessible, as it does not impose dedicated language requirements or high income thresholds. However, Klls highlighted that access in practice remains dependent on formal employment and is shaped by significant administrative complexity. Interviewees pointed to considerable variation in implementation across local authorities, lengthy processing times, and uncertainty regarding documentation requirements.

Stakeholders also noted that individuals who meet the necessary conditions at the time of application may subsequently lose eligibility if their circumstances change before authorities process their request. Moreover, while the permit offers an important route towards legal stability, it remains largely inaccessible to people working in informal sectors, those unable to participate in the labour market due to disability, age, health conditions or caregiving responsibilities, and others facing barriers to securing formal employment.

Following a similar approach, **Slovakia** amended its Act on the Residence of Foreign Nationals, allowing a transition from temporary protection to other residence statuses (the duration of the permit varies depending on the purpose).[19] While temporary protection remains in force, beneficiaries who have an eligible ground (employment, business, study, research, special activities or family reunification) for at least six months may apply for temporary residence through a simplified procedure.

The mechanism does not provide for automatic conversion: applicants must continue to meet the relevant eligibility requirements, provide supporting documentation and pay a standard application fee (e.g., EUR 250 for employment-based permit). Importantly, the amendment also establishes a one-year transitional period following the eventual termination of temporary protection, during which existing beneficiaries will continue to be treated as temporary protection holders and their residence documents will remain valid, providing additional time to secure another legal status. Those who have not obtained another basis for lawful stay by the end of this period will be required to leave Slovakia.

Since 1 October 2024, **Austria** allows beneficiaries of temporary protection to apply for the Red-White-Red Card Plus (Rot-Weiß-Rot – Karte plus, RWR+) – a pre-existing residence and work permit initially valid for one year, extendable up to three years once additional integration conditions (including A2-level German and two years' residence) are met.[20]

Like in Italy and Slovakia, Austria's pathway focuses on labour-market self-sufficiency as the main prerequisite to an alternative residence permit. To qualify, applicants must have lived in Austria for at least two years and, during the preceding two years, have been fully insured through employment or insured as a self-employed person for at least 12 months. They should meet an income threshold (in 2026, EUR 1,308.39 per month for a single person, EUR 2,064.12 for a married or registered couple, plus EUR 201.88 for each child), as well as demonstrate German-language proficiency at A1 level. They should also pay an application fee of EUR 218 per each applicant.

Czechia introduced a special five-year residence permit,[21] but its scope remains narrow. Eligibility is limited to Ukrainian citizens who have resided in the country under temporary protection for at least two years, are employed, have an annual income of at least CZK 440,000 (approx. EUR 17,500) for a single applicant (increased by CZK 110,000 for each additional jointly registered household member) and health insurance, and whose children fulfil school attendance requirements. The application fee is CZK 2,500 (approx. EUR 100) per adult, and CZK 1,000 for children under 15.

Evidence from the first round of applications[22] suggests that these conditions significantly limit accessibility: while approximately 80,000 people expressed interest in the scheme, only around 15,000 met all eligibility criteria.

Around 35% [23] meet basic conditions related to length of stay, social benefits, or health insurance, while a further 45% did not meet the required household income threshold. The low proportion of successful applicants suggests that pathways built primarily around high indicators of socioeconomic self-sufficiency may disproportionately benefit those already well integrated, while excluding individuals facing greater barriers to labour market participation.

The authorities have presented this mechanism as a pilot, with the transition expected to take place in phases. However, to date, no decision has been made to revise the eligibility criteria.[24]

Poland introduced the CUKR residence permit, allowing Ukrainian citizens who held uninterrupted temporary protection (UKR) status as of 4 June 2025 and for at least 365 days to obtain a three-year residence permit valid beyond 2027. [25] While Poland's CUKR permit represents one of the more accessible examples of transition pathways currently available in the EU, important gaps remain. The mechanism is limited to Ukrainian nationals, excluding TCNs and stateless persons benefiting from temporary protection, and is processed primarily through a digital application system, which may present additional challenges for applicants with more limited digital access, such as some older persons.

Moreover, while providing legal certainty beyond temporary protection, it does not in itself constitute a comprehensive solution for all categories of beneficiaries or address the situation of future arrivals should displacement continue.

Beyond these few dedicated schemes, transition into standard migration pathways in the EU host countries – including asylum, family reunification, and work- or study-based permits – is often formally possible but frequently inaccessible in practice due to strict eligibility criteria, administrative complexity, documentation requirements, and limited information. Several interviewees noted that the uptake of such permits among people displaced from Ukraine appears very limited in practice, and the existence of these pathways does not provide a realistic transition option for most beneficiaries.

For example, in **Slovenia**, on paper, beneficiaries of temporary protection can transition to residence permits available under the general immigration framework, including through employment, study and family reunification. However, practical access depends on an individual's ability to satisfy the requirements of the relevant residence category.

For labour-based permits, income and financial self-sufficiency requirements present particular barriers for low-paid workers and single-income households with dependent family members, while standard family reunification rules may not accommodate all extended or multi-generational family relationships. In some countries, additional restrictions apply; for example, some municipalities in Italy suspended examination of asylum applications lodged by beneficiaries of temporary protection for the duration of the temporary protection regime. Kils also consistently highlighted that standard EU labour migration pathways, including EU Blue Cards and Single Permits, remain inaccessible for many beneficiaries of temporary protection despite the 2025 Council's Recommendation to make them accessible.

In non-EU host countries, beneficiaries are similarly expected to transition through existing migration frameworks, but access remains a significant gap. For example, in **Moldova**, beneficiaries of temporary protection can be granted another form of residency. Yet, as ECRE notes, Moldova's general residence permits – including family, work, study and humanitarian residence – are constrained by documentation and economic requirements.[26]

In **Serbia**, discussions on transition have started among state institutions and civil society. A multi-stakeholder meeting held in March 2026 identified residence based on employment, education, or humanitarian grounds as possible transition options.

However, these pathways remain affected by administrative requirements, high fees and limited accessibility for persons who are not economically active. Stakeholders consulted also highlighted gaps in access to healthcare, education, housing, legal information and support for beneficiaries living at private addresses, as well as heightened risks of labour exploitation and trafficking.[27]

In **North Macedonia**, the special temporary protection regime for Ukrainian citizens was activated in August 2023 under the Law on International and Temporary Protection,[28] initially for one year, with annual extensions since and no indication of a planned permanent solution. Some people who fled Ukraine instead obtained temporary residence on humanitarian grounds, which is a separate, pre-existing legal channel used before, and alongside, the temporary protection regime. People with residence on humanitarian grounds gained a legal right to stay but no adequate access to any rights, including employment.[ii]Stakeholders consulted stressed that "all Ukrainians in North Macedonia are struggling to find their own way." As of September 2026, as reported by them, 531 Ukrainians had regulated temporary stay on grounds other than humanitarian residence or temporary protection; 364 had regulated their temporary stay on humanitarian grounds; 43 held temporary protection. Only 21 individuals had regulated permanent.

In other countries, available information points primarily to continued extensions of temporary protection (mostly still until March 2027), with no clearly established transition pathways beyond ordinary migration routes.

As a general trend, multiple KIs pointed to a growing policy preference across host countries for retaining economically active Ukrainians while offering fewer solutions for those unable to participate in the formal labour market due to age, disability, health conditions, caregiving responsibilities, or other vulnerabilities.

According to the 2025 Council Recommendation, the Commission, in close cooperation with interested Member States and the Ukrainian authorities, is expected to deliver a Voluntary Return and Recovery Programme Pilot aimed at supporting those who wish to return with jobs, housing, and education in Ukraine. As of August 2026, the details have not yet been publicly released. Several KIs emphasised that return and reintegration should be approached as a shared responsibility between Ukraine and host countries, requiring stronger cross-border coordination and continuity of support.

At the same time, KIs described a broader "cooling down" of the response characterised by reduced support measures, shifting political narratives, and renewed emphasis on the temporary nature of protection. Moreover, in some European countries, return to Ukraine is increasingly framed not only through the lens of protection and durable solutions, but also in relation to Ukraine's recovery, labour market needs, demographic challenges, and, in some cases, military considerations.[30]

Several interviewees warned against "de facto forced returns", whereby return remains formally voluntary but is increasingly shaped by reductions in accommodation, healthcare, legal certainty, or other forms of support in host countries. In such circumstances, people may return not because they are willing to do so and conditions in Ukraine support sustainable reintegration, but because viable alternatives no longer exist.



Our clients in reception facilities tell us: "If I don't have the document anymore, if I don't have the reception system housing anymore, I'll go back to Ukraine." They would return to Ukraine only because they have no other choice.

(NGO expert, May 2026)

AT RISK OF EXCLUSION: CONSIDERING VULNERABLE POPULATIONS IN TRANSITION MECHANISMS

A consistent finding across the KIs was that transition planning must account for the diverse circumstances and profiles of people displaced from Ukraine. A "one-size-fits-all" approach will not ensure equitable outcomes, as beneficiaries of temporary protection differ considerably in their legal, economic, social and family situations. Several groups were consistently identified by KIs as facing heightened risks of exclusion from future legal pathways or of encountering disproportionate barriers during the transition. While the groups outlined below were most frequently identified, many individuals experience multiple, intersecting forms of vulnerability that require tailored and inclusive transition measures.

● TCNs and stateless persons

Refugees recognised in Ukraine, beneficiaries of complementary protection, stateless persons, and other TCNs remain largely overlooked in transition planning despite facing additional barriers, including documentation gaps, inconsistent recognition of Ukrainian-issued protection documents, and limited access to alternative legal pathways. For example, in both Poland and Czechia, dedicated transition mechanisms are only available to Ukrainian nationals.

● Older persons

Older persons were repeatedly identified as being at particular risk due to a combination of factors, including lower labour market participation, health and care needs, digital exclusion, and difficulties navigating increasingly complex administrative procedures.

● Persons with disabilities, chronic illnesses, and other long-term health conditions.

Several KIs stressed that current transition discussions largely focus on economically active beneficiaries, overlooking the needs of people who are unable to work due to disability, chronic illness, or significant care needs. Interviewees also raised concerns regarding continuity of healthcare and access to medication and treatment for people living with HIV/AIDS and other chronic conditions, psychosocial disabilities, severe mental health conditions, and palliative care needs, warning that as the host country's support is shrinking, some individuals may feel pressured to return.

● Residents of occupied territories.

Despite facing some of the greatest obstacles to return, people originating from occupied territories are rarely identified as a distinct group in transition discussions. Interviewees highlighted that they may face heightened documentation challenges, difficulties obtaining or renewing identity documents, and particular protection risks in the event of premature return. For many, return to their places of origin remains impossible due to occupation, insecurity, destruction of housing and infrastructure, or the risk of persecution. Thus, upon return to Ukraine, they become IDPs, yet they are effectively excluded from the national compensation mechanism for damaged or destroyed housing, which significantly limits their ability to reintegrate.

Klls also highlighted the situation of people from heavily conflict-affected areas, who face challenges in obtaining documentation, securing housing, and accessing tailored support elsewhere in Ukraine.

● **Unaccompanied children and youth ageing out of child protection systems.**

Interviewees raised concerns regarding unaccompanied children, particularly as they approach adulthood. According to Klls, few dedicated discussions have taken place regarding their long-term residence status, transition pathways, access to education, and support once they reach adulthood.

● **Large families and people with caregiving responsibilities.**

Several interviewees noted that labour market-based transition pathways may be particularly difficult to access for individuals caring for children, family members with disabilities, or elderly relatives. As a result, caregiving responsibilities may create additional barriers to securing labour-based residence permits under existing transition models.

● **Students and young adults enrolled in higher education.**

Klls highlighted that students benefiting from temporary protection often enjoy reduced or waived tuition fees, access to scholarships, and other educational support measures that may not be available under standard student residence permits. In the absence of dedicated transition arrangements, many may be required to switch to student visas with significantly higher financial requirements and tuition costs, potentially disrupting ongoing studies and undermining educational investments made over the past several years.



No person who has already been granted temporary protection should be left without a solution after temporary protection ends.

NGO expert, May 2026

BARRIERS AND IMPACTS

KIIs identified a range of barriers that may affect the implementation of transition policies and their impact on people displaced from Ukraine. These challenges span legal, administrative, economic and social dimensions and are likely to affect different groups in different ways.

● Limited evidence for planning.

According to KIIs, significant gaps remain in the collection, publication, and sharing of data on beneficiaries of temporary protection. While Eurostat regularly publishes statistics on temporary protection beneficiaries based on reports from Member States, publicly available data is limited to overall numbers, with disaggregation by citizenship, age, and gender. Even at this basic level, data is often fragmented: for example, there is no reliable data on the number of stateless persons, third-country nationals who benefited from international protection or equivalent national protection in Ukraine, or other eligible third-country nationals benefiting from temporary protection. According to Eurostat, most children benefiting from temporary protection in France do not appear to be reflected in official statistics; in some countries, unaccompanied children are assigned a temporary adult representative as part of registration procedures ahead of applying for temporary protection, a step that can result in undercounting in unaccompanied-minor statistics; while in several countries, delays in registration and status renewal create discrepancies between actual and officially recorded beneficiary numbers. In Italy, for example, a dedicated database was discontinued with no notice in May 2025.[31] In non-EU host countries, there is no analogue to Eurostat, and data often must be individually requested from relevant national authorities.

KIIs emphasised that both host governments and Ukrainian authorities lack a comprehensive demographic picture of displaced populations, limiting their ability to prepare for future return and reintegration. CSOs face similar challenges in designing evidence-based programmes and reaching groups at heightened risk. Almost every KII highlighted the need for more detailed and disaggregated data on beneficiaries' profiles, needs, vulnerabilities, family composition, educational and/or employment status, and intentions as a prerequisite for effective post-temporary protection planning. Several KIIs also highlighted the potential value of conducting surveys among beneficiaries of temporary protection; however, KIIs noted that implementing such exercises remains challenging due to data protection considerations, limited access to beneficiaries, and funding constraints.

● Need for stronger leadership and coordination.

Several KIIs expressed concern that, despite adopting the 2025 Council Recommendation on transition out of temporary protection, EU institutions should be playing a stronger coordinating and strategic role in shaping post-temporary protection solutions. Stakeholders noted that responsibility for developing transition pathways has been left to Member States, with limited guidance from the European Commission, and already resulting in increasingly fragmented approaches across Europe. Some KIIs described the current approach as one in which "the EU acknowledges the need for transition but leaves it to Member States to determine how it should happen in practice".

Klls also reflected mixed views regarding the role of the Special Envoy for Ukrainians in the EU. While stakeholders welcomed the appointment as recognition of the need for continued engagement with displaced Ukrainians, several Klls emphasised that the Special Envoy should play a more proactive and stronger role in safeguarding the rights-based foundations of temporary protection and coordinating the transition. Moreover, several interviewees noted that discussions on transition rarely consider Ukraine's future EU accession process and the implications it may have for mobility patterns and residence rights.

● **Lack of dedicated and inclusive transition pathways.**

Few countries have introduced dedicated transition mechanisms beyond temporary protection, and those that exist remain limited in scope and accessibility. All Klls highlighted that existing transition planning – where it exists – fails to adequately take into account the profiles and needs of those most at risk of being left behind. As one Kll participant noted, the dedicated mechanisms introduced so far combine notable progress with remaining gaps, underscoring the importance of continued monitoring of how accessible, predictable and inclusive they are in practice". Without further reforms, the transition out of temporary protection is likely to depend largely on existing migration pathways that were neither designed nor adapted to provide durable solutions for large-scale forced displacement.

● **Administrative and legal complexity.**

Existing transition pathways – both special and standard ones – involve complex procedures and strict eligibility criteria, making them difficult to navigate even for well-informed applicants and CSOs supporting them. Klls highlighted documentation requirements as a significant obstacle.

While temporary protection generally requires minimum documentation, national migration statuses require educational certificates, civil status documents, proof of qualifications, updated identity and/or travel documents, or other documents that displaced persons may not possess, and involve administrative fees. According to Klls, this challenge is particularly acute for beneficiaries of temporary protection who experienced multiple episodes of displacement in Ukraine and abroad, as well as for people originating from currently occupied territories of Ukraine. Klls highlighted that increasing digitalisation of migration procedures creates additional barriers for some groups, and in particular – older persons.

● **Housing insecurity.**

Several Klls highlighted housing as an often-overlooked obstacle to transition. Beneficiaries may lose eligibility for reception support once they secure employment, while simultaneously encountering significant barriers in accessing private rental markets due to temporary residence documentation, income requirements, and discrimination. In such circumstances, people risk falling into a gap between reception and independent living. For example, Italy's experience illustrates the challenges of relying on emergency structures to respond to protracted displacement. Initial reception mainly relied on repurposed hotels, under the assumption that displacement would not last long. As displacement became prolonged, however, both institutions and beneficiaries struggled to adapt to a longer-term reality. Interviewees noted that many people remained in reception structures for years after obtaining temporary protection, despite these systems never being designed for extended stays. As noted by Klls, in Italy, as in other countries, uncertainty surrounding the length of residence permits also affects landlords' willingness to offer longer-term rental agreements.

● Labour-market conditionality and the risk of "instrumentalisation" of transition policies.

Existing transition pathways – including standard labour migration routes and dedicated schemes such as those introduced in Czechia and Italy – are built around formal employment, minimum income thresholds, qualification requirements, or other labour market-related criteria. While such conditionality is a common feature of ordinary labour-migration and residence pathways more broadly (and not something specifically applied for people displaced from Ukraine), it is not adapted for forced displacement situation and does not reflect the reality and profiles of the population eligible for temporary protection. These conditions exclude individuals working in informal or low-wage sectors, as well as those unable to work full-time due to caregiving responsibilities, disability, age, health conditions or other vulnerabilities. Multiple KIs pointed to a growing policy preference among host countries for retaining economically active beneficiaries while offering fewer solutions for those unable to participate in the labour market. As a result, current transition approaches risk reinforcing inequalities between different categories of beneficiaries and leaving some of the most vulnerable groups without viable options beyond temporary protection.



There is this very 'instrumentalist approach' that Ukrainians should contribute to labour market gaps in Europe to 'deserve' a stay, which does not really reflect the reality of the displaced Ukrainian population.

NGO expert, May 2026

● People who transition risk becoming "invisible" while continuing to face barriers to exercising their rights and returning to Ukraine.

Several KIs warned that transition may itself produce new forms of invisibility. Beneficiaries who move into other residence categories cease to appear in temporary protection statistics. Without mechanisms to monitor outcomes following transition, host countries and Ukrainian authorities risk losing sight of the needs of displaced populations.

● Information gaps and uncertainty.

A recurring theme across KIs was the growing "information void" surrounding the future of temporary protection. While information on rights and entitlements under temporary protection was widely available during the initial phase of the response, beneficiaries now face considerable uncertainty regarding future residence status, available transition pathways, eligibility requirements, and timelines. Stakeholders consulted emphasised that information and legal assistance do not often reach beneficiaries of temporary protection living at private addresses, and who remain outside existing institutional and support networks. Interviewees noted that this information gap often reflects the absence of political decisions rather than communication failures alone. Several KIs observed that even legal practitioners and CSOs struggle to identify reliable information on future arrangements, highlighting the extent to which transition planning remains unresolved. This uncertainty is already affecting people's ability to make long-term decisions regarding employment, housing, education, family life, and future plans. Moreover, the lack of information about the future of temporary protection has created space for misinformation and speculation, further undermining beneficiaries' ability to make informed decisions about their future.



● **Shrinking support capacity and funding.**

CSOs have played a critical role in supporting beneficiaries of temporary protection through legal counselling, information provision, case management, integration support, and advocacy. However, KIs reported declining funding and the closure of programmes initially established to support people displaced from Ukraine, resulting in reduced information provision and integration support at a time when transition-related needs are increasing.

● **Insufficient coordination between transition, return, recovery, and humanitarian planning.**

KIs highlighted limited coordination between Ukraine, host countries, EU institutions, humanitarian actors, development actors, and recovery stakeholders. Discussions on temporary protection, transition pathways, return, reintegration, and recovery often take place in parallel rather than as part of a coherent long-term strategy. This fragmentation limits preparedness on both sides: host countries struggle to plan sustainable transition pathways, while Ukrainian authorities lack sufficient information and coordination mechanisms to prepare for future return and reintegration. Stronger coordination between displacement and recovery policies will be essential to ensure that future solutions are sustainable and responsive to the needs of displaced populations.

CONSIDERATIONS FOR POLICY, ADVOCACY AND PRACTICE

The analysis highlights several cross-cutting considerations which should inform policy thinking and advocacy around temporary protection transition moving forward, including the joint development of recommendations by the CEI Working Group.

The need for dedicated, inclusive and accessible transition pathways.

Across both EU and non-EU CEI countries, the reliance on standard migration systems has proven insufficient to meet the needs of a diverse displaced population. Existing pathways – including those few specially designed ones – are complex, restrictive, and not adapted to the realities of people displaced from Ukraine, particularly those who face barriers to labour market participation or whose circumstances make standard migration pathways difficult to access. Greater attention is therefore needed to how transition mechanisms can ensure continuity of protection and legal certainty over time. Transition approaches should be inclusive and responsive to diverse needs, recognising that displaced people have different legal, social, economic and protection profiles.

While current systems favour those who are economically active or highly skilled, people with care responsibilities, disabilities, health conditions, documentation barriers, or other protection-related vulnerabilities – as well as certain non-Ukrainian beneficiaries of temporary protection – may face disproportionate barriers to securing alternative residence status and remain at greater risk of exclusion.

The importance of stronger coordination across countries, particularly between EU and non-EU contexts, and at the national level.

While non-EU CEI countries have largely aligned with EU approaches in extending protection, differences in legal frameworks, administrative capacity, and available pathways contribute to serious fragmentation across the region moving forward. This lack of coherence risks creating unequal access to rights and increasing incentives for secondary movements. Many KILs suggested that the European Commission and Special Envoy for Ukrainians in the EU should play a stronger role in providing guidance, facilitating peer exchange, disseminating lessons learned, encouraging national transition strategies, and ensuring that transition planning remains high on the EU agenda. Stakeholders consulted also emphasised the role of local and municipal authorities, both in implementing temporary protection and transition measures in host countries, and in return planning and reintegration support in Ukraine. National transition strategies should therefore clearly define responsibilities and coordination mechanisms and provide adequate resources for implementation at the local level.

Urgent need for information provision and legal assistance.

Across countries, displaced people often face significant challenges in understanding their rights, obligations, and available pathways. Strengthening communication – both in terms of content and accessibility – is essential to enable informed decision-making and reduce uncertainty. This should include accessible formats, targeted outreach to groups facing additional barriers, and communication in languages and formats that are understandable and accessible to diverse audiences.



This includes not only official communication from authorities but also the role of trusted intermediaries like CSOs and diasporas. Specialised legal assistance is often missing but is crucial to support people in navigating administrative and procedural challenges to access alternative migration pathways.

The role of civil society – who are often at the forefront of providing legal assistance, information, and integration support – remains critical.

According to KIs, CSOs – and especially organisations led by displaced people – play an important role in identifying protection gaps, supporting community integration, facilitating dialogue with displaced populations, and translating complex legal developments into practical guidance. They are also often well placed to reach vulnerable and marginalised groups who may face additional barriers in accessing official information and services. However, many CSOs face limited funding and capacity, reducing their ability to provide legal assistance and support individuals in navigating complex systems.

Return planning should be integrated into broader Ukraine recovery and social protection planning.

KIs recommended that returnees should not be treated as a completely separate category from other displaced people within Ukraine. Instead, they are likely to rely on the same housing, healthcare, social protection, and integration systems already overstretched supporting internally displaced persons and other vulnerable groups.

CONCLUSION: FROM TEMPORALITY TO UNCERTAINTY?

Temporary protection has provided an essential and effective response to displacement from Ukraine, illustrative of how collective protection and emergency mechanisms can function in an efficient and humane way in times of crisis.

However, as the regime approaches the end of its extended timeline, the absence of clear and inclusive transition planning has become urgent. Displaced people risk remaining in prolonged legal uncertainty, with the most vulnerable groups – particularly those unable to access standard migration pathways and residence permits – being disproportionately affected. In addition to its legal, administrative and socioeconomic impacts, prolonged uncertainty may have important mental health and psychosocial consequences, contributing to stress, anxiety and reduced well-being among people displaced from Ukraine.

For host countries, the lack of clarity and preparedness may lead to inefficiencies in integration systems and increased pressure on asylum and social support structures. While return can also be a durable solution in the future, the absence of dedicated voluntary returns programmes in host countries and return policies in Ukraine, combined with the ongoing humanitarian situation and war, means that conditions for safe, voluntary, and sustainable returns remain absent.

Only through proactive and coordinated transition planning can temporary protection evolve into durable solutions, rather than a source of prolonged uncertainty.

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