

Submission by the United Nations High Commissioner for Refugees
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REPUBLIC OF MOLDOVA

I. BACKGROUND INFORMATION

The Republic of Moldova (hereinafter referred to as Moldova) is a State Party to the *1951 Convention relating to the Status of Refugees* and its *1967 Protocol* (hereinafter collectively referred to as “the *1951 Convention*”), having acceded to both instruments in 2001, with entry into force in 2002. Moldova also acceded to the *1954 Convention relating to the Status of Stateless Persons* and the *1961 Convention on the Reduction of Statelessness* in 2012.

Moldova has further demonstrated its political commitment to preventing and reducing statelessness by joining the Global Alliance to End Statelessness, launched in 2023. A dedicated Statelessness Determination Procedure (SDP) is also in place since 2011, implemented by the General Inspectorate for Migration (IGM).¹

Following the full-scale invasion of Ukraine by the Russian Federation in February 2022, Moldova declared a state of emergency.² During this period, the Commission for Exceptional Situations adopted a series of decisions temporarily derogating from the ordinary legal framework to facilitate the expedited entry, transit, and protection of persons displaced from Ukraine. Since February 2022, the Border Police has recorded over 9 million crossings of Ukrainian nationals, reflecting the scale of regional displacement. Moldova continues to host persons benefiting from temporary protection (TP), as well as asylum-seekers and beneficiaries of international protection³ from diverse countries of origin.

As of 31 March 2026, Moldova hosted 616 asylum-seekers, primarily originating from the Russian Federation, Ukraine and Bangladesh. In addition, 740 people were granted international protection, originating predominantly from Syria, Ukraine and Türkiye.

The largest group of forcibly displaced people in Moldova remains TP beneficiaries. As of 26 May 2026, Moldova was hosting over 53,000 persons under TP.

¹ Initially implemented under the Law No. 200 of 2010 on the Regime of Foreigners in the Republic of Moldova, 16 July 2010, available at: https://www.legis.md/cautare/getResults?doc_id=151193&lang=ro#, the SDP procedure is now incorporated in the frame of the new Law that will repeal the Law No. 200/2010 as of 1 June 2027, the Law No. 66/2026 on the admission, stay and supervision of foreigners, adopted on 30 April 2026, available at: <https://parlament.md/preview?id=a844af1c-45f6-4e8e-9c95-7716a9d767b0&url=https://ep-sp.parlament.md/materials/639066168020788489/Documents/20260514081441.docx&method=GetDocumentContent>.

² Parliament Decision No. 361/2023 on the extension of the state of emergency, 24 November 2023, available at: https://www.legis.md/cautare/getResults?doc_id=140197&lang=ro. The state of emergency was repeatedly extended until 31 December 2023.

³ International Protection covers both the refugee status and the humanitarian protection status, as defined in Articles 17 and 19 of the Law on Asylum, Article 3 of the Law No. 270 of 2008 on Asylum in the Republic of Moldova, 18 December 2008, available at: https://www.legis.md/cautare/getResults?doc_id=146838&lang=ro. As of 31 March 2026, there were 209 individuals granted refugee status and 531 granted humanitarian protection.

As of early 2026, Moldova hosted 1,806 recognized stateless people, while 2,634 individuals were identified as being of undetermined nationality.⁴

UNHCR supports the Government of Moldova in strengthening asylum and statelessness systems, providing protection and assistance to forcibly displaced and stateless people.

II. ACHIEVEMENTS AND POSITIVE DEVELOPMENTS

Since 2022 Moldova has demonstrated progress in fulfilling its international human rights obligations towards forcibly displaced and stateless people.

The most important development has been the activation and implementation of TP for people fleeing Ukraine. In March 2023, the Government operationalized the TP mechanism provided for under the Law on Asylum No. 270/2008⁵ through its Decision No. 21/2023 on granting temporary protection⁶. This measure granted beneficiaries lawful stay, access to employment, education, emergency healthcare and basic services. Following several extensions, the TP regime is currently valid until 1 March 2027.⁷

In parallel, Moldova has advanced legislative reforms in the context of its European Union accession process, with the aim of aligning national legislation with the EU acquis in the areas of asylum and migration. Amendments to the Law No. 270/2008 and related implementing legislation have reinforced provisions concerning reception conditions, asylum procedures, refugee status determination, and the identification and support of people with specific needs, in line with relevant EU standards. Recent developments also include draft amendments to the Law No. 274/2011 on the integration of foreigners⁸ providing clarification on access and the scope of integration measures for foreigners, including stateless persons and beneficiaries of international protection.⁹

In addition, Moldova strengthened its policy framework through the adoption of the National Programme on Human Rights for 2024–2027¹⁰, and the National Programme on the Phased

⁴ Furthermore, 161 applications for statelessness determination remained pending before the national authorities, indicating the continued relevance of protection mechanisms in this area.

⁵ Op.cit.

⁶ Government Decision No. 21 of 2023 on granting temporary protection to displaced persons from Ukraine, 18 January 2023, available at: https://www.legis.md/cautare/getResults?doc_id=152810&lang=ro.

⁷ UN High Commissioner for Refugees (UNHCR), UNHCR's comments on the draft Government Decision on the amendment of the Government Decision 21/2023 granting Temporary Protection to displaced individuals from Ukraine, 22 December 2025, <https://www.refworld.org/legal/natlegcomments/unhcr/2025/151275> [accessed 01 June 2026]

⁸ Law No. 274 of 2011 on the Integration of Foreigners in the Republic of Moldova, 27 December 2011, available at: https://www.legis.md/cautare/getResults?doc_id=123025&lang=ro.

⁹ New amendments are currently being considered. See United Nations High Commissioner for Refugees, Moldova: UNHCR's comments on the Draft Law Amending Certain Normative Acts Related to the Integration of Foreigners in the Republic of Moldova, UN High Commissioner for Refugees (UNHCR), 19 May 2026, <https://www.refworld.org/legal/natlegcomments/unhcr/2026/151499> [accessed 01 June 2026]

¹⁰ Government Decision No. 164 of 2024 on the approval of the National Human Rights Programme for 2024–2027, 6 March 2024, available at: https://www.legis.md/cautare/getResults?doc_id=142723&lang=ro.

Integration of Foreigners in Moldova for 2025–2027¹¹ (hereinafter referred to as “the Integration Programme”).

III. KEY RECOMMENDATIONS FOR FURTHER IMPROVEMENT

Issue 1: Access to asylum and functioning of the asylum system

Moldova has an asylum system regulated by Law No. 270/2008, administered by the IGM and subject to judicial oversight by national courts. While the legal framework is broadly aligned with international standards, challenges affecting the quality, consistency and effectiveness of asylum procedures raise concerns regarding procedural fairness and the risk of erroneous decisions.

Moldova continues to process asylum claims from applicants of diverse nationalities fleeing armed conflict, political persecution and serious human rights violations. However, the functioning of the asylum system remains under strain due to a lack of sufficient institutional capacity and expertise among decision makers.

The examination of asylum applications and the quality of refugee status determination decisions at both IGM and court levels require further improvement. UNHCR observations indicate that, in some cases, decisions lack sufficiently individualized reasoning based on the country of origin and particular profile of the individual. Understaffing and the high turnover of staff at the IGM further exacerbate the issue.

Access to quality interpretation and translation services remains a critical challenge throughout the asylum procedure. In practice, the availability of qualified interpreters is limited, particularly for less common languages, which may affect applicants’ ability to effectively present their claims and understand procedural steps and decisions. Concerns also persist regarding the consistency and quality of interpretation during interviews and court proceedings, with potential implications for the fairness and accuracy of the asylum process.

UNHCR monitoring indicates shortcomings regarding the assessment of asylum claims from LGBTIQ+ persons. UNHCR has observed high rejection rates for such claims, without adequate and tailored reasoning, at IGM and court levels, with only very limited exceptions, which may raise concerns of discrimination.

Recommendations:

- Strengthen the quality, consistency and fairness of asylum adjudication at both administrative and judicial levels by ensuring individualized, well-reasoned decisions based on up-to-date country of origin information and protection-sensitive analysis, and by preventing discrimination, including on grounds of sexual orientation, gender identity or nationality.
- Increase staffing, resources and retention measures within the IGM and the judiciary to reduce delays and ensure timely and fair access to asylum.

¹¹ Government Decision No. 285 of 2025 on the approval of the National Programme on the Phased Integration of Foreigners, including displaced persons, in the Republic of Moldova for 2025–2027, 14 May 2025, available at: https://www.legis.md/cautare/getResults?doc_id=148656&lang=ro.

- Ensure the availability of qualified interpretation and translation services throughout the asylum procedure, including for less common languages, and establish quality assurance mechanisms to guarantee accurate and reliable communication during interviews and court proceedings.

Issue 2: Statelessness determination and safeguards in the context of the new Citizenship Law

While Moldova has strengthened its commitment to addressing statelessness, challenges remain. As of early 2026, over 1,800 people were recognised as stateless and more than 2,600 individuals were recorded as being of undetermined nationality, many of whom continue to face barriers in accessing documentation, rights and durable solutions.

The number of individuals granted stateless status through the Statelessness Determination Procedure (SDP) has remained largely stable over the past five years. The limited reduction in the overall stateless population suggests that progress toward durable solutions has been slow. In particular, further efforts are needed to facilitate naturalization of recognized stateless persons, including through expedited naturalization procedures and reduced fees and associated costs.

Moreover, the Law on Citizenship No. 253/2025¹², in force since December 2025, introduced new requirements for the acquisition and recognition of Moldovan citizenship, including knowledge of the Romanian language and the Constitution. A subsequent amendment extended the categories of persons exempted from the Romanian language and Constitution examination to include persons born and permanently residing in the territory of the Republic of Moldova, who request the acquisition of citizenship through recognition or its re-acquisition, if they would otherwise become stateless. Nevertheless, persons with long-term but undocumented residence in Moldova are likely to face difficulties benefitting from this exemption. This particularly impacts those affected by State succession following the dissolution of the Soviet Union, including residents of the Left Bank of the Nistru river, who may face continued challenges in meeting documentation-related requirements.¹³

Recommendations:

- Adopt measures to facilitate the naturalization and integration of stateless persons, including by expediting naturalization proceedings, reducing administrative fees and related costs, and considering a reduction of the residence period required for naturalization.
- Ensure that the implementation of Law No. 253/2025 does not create disproportionate barriers to the acquisition of nationality for stateless persons, persons with undetermined nationality, and individuals at risk of statelessness, including through accessible exemptions and tailored support measures where appropriate.
- Strengthen outreach and awareness raising activities on the risks of statelessness, recent legislative developments and available support measures for individuals in

¹² Law on Citizenship No. 253/2025, 29 September 2025, available at: https://www.legis.md/cautare/getResults?doc_id=150886&lang=ro#.

¹³ See amendments to the Law on Citizenship of the Republic of Moldova No. 253 of 2025, adopted on 14 May 2026, available at: <https://parlament.md/preview?id=6ee42dda-44fd-437c-845d-727d72b28fe6&url=https://ep-sp.parlament.md/materials/639062712020082997/Documents/20260521163927.docx&method=GetDocumentContent>.

vulnerable situations. These activities should include the population of the Left Bank of the Nistru River, where residents face increased challenges in accessing information on options and services available.

Issue 3: Access to health care for refugees, TP beneficiaries and asylum-seekers

Access to health care remains a significant challenge for asylum-seekers, beneficiaries of international protection and TP beneficiaries in Moldova. While the national legal framework provides certain guarantees regarding access to health care and mandatory health insurance, gaps persist in practice.

Beneficiaries of TP are not included among the categories entitled to state-funded health insurance under the Law No. 1585/1998 on Mandatory Health Insurance¹⁴. In practice, TP holders can access mandatory health insurance only through formal employment and are not permitted to purchase state-funded health insurance individually. As a result, many TP beneficiaries, including children, older people and people with disabilities, remain without effective access to comprehensive health coverage and may face significant out-of-pocket medical expenses, limiting access to necessary treatment and specialized care.

Asylum-seekers face similar challenges in practice. While formally employed asylum-seekers may access the mandatory health insurance system, unemployed asylum-seekers are neither covered by state-funded health insurance nor permitted to purchase it individually. Although the Law No. 270/2008 guarantees asylum-seeking children access to medical assistance under the same conditions as Moldovan children, their insurance coverage was reportedly deactivated in the National Health Insurance Company (CNAM) system beginning in 2026. This has created risks of inconsistent access to health services in practice, particularly where service providers rely on CNAM insurance status verification. As a result, asylum-seeking children remain effectively limited to primary and pre-hospital emergency care, with limited access to specialized treatment.

Beneficiaries of international protection may access health insurance through employment or individual purchase. However, beginning in 2026, vulnerable categories of persons, including children, older people, people with disabilities and parents with four or more children, lost access to state-funded health insurance coverage following changes in CNAM practice. This has created additional financial barriers to health care and raised concerns regarding equal treatment and non-discriminatory access to mandatory health insurance and may raise concerns regarding consistency with Moldova's obligations under the *1951 Convention*, the *Convention on the Rights of the Child*¹⁵ and the *Convention on the Rights of Persons with Disabilities*¹⁶.

Recommendations:

¹⁴ Law No. 1585 of 1998 on Mandatory Health Insurance, 27 February 1998, available at: https://www.legis.md/cautare/getResults?doc_id=151186&lang=ro#

¹⁵ Parliament Decision No. 408/1990 on the accession of Moldova to the *Convention on the Rights of the Child*, ratified by Moldova on 12 December 1990 and entered force on 25 February 1993, available at: https://www.legis.md/cautare/getResults?doc_id=119168&lang=ro.

¹⁶ Law No. 166/2010 on the ratification of the *Convention on the Rights of Persons with Disabilities*, ratified by Moldova on 9 July 2010 and entered force on 20 August 2010, available at: https://www.legis.md/cautare/getResults?doc_id=24019&lang=ro.

- Ensure equal and non-discriminatory access to mandatory health insurance for beneficiaries of international protection, asylum-seekers and beneficiaries of temporary protection, including vulnerable categories of people such as children, older persons and persons with disabilities.
- Restore and maintain state-funded health insurance coverage for vulnerable beneficiaries of international protection, in line with national legislation and international human rights obligations.
- Ensure effective access to comprehensive health care for asylum-seeking children on an equal basis with Moldovan children, in accordance with the Law on Asylum and international human rights standards.
- Enable beneficiaries of temporary protection and unemployed asylum-seekers to access mandatory health insurance, including through individual enrolment or alternative coverage mechanisms beyond emergency and primary care.
- Strengthen coordination among relevant authorities to ensure consistent and predictable implementation of health care entitlements in practice.

Issue 4: Access to social protection rights for refugees, TP beneficiaries and asylum-seekers

Despite existing legal provisions, access to social protection in practice remains limited for beneficiaries of international protection, TP beneficiaries and asylum-seekers, due to systemic and administrative barriers, eligibility criteria not reflecting displacement-related vulnerabilities and underfunding, particularly affecting persons in vulnerable situations.

TP beneficiaries are excluded from “Ajutor Social”, the main poverty-targeted social assistance programme, and are generally not eligible for contributory social security benefits, such as disability allowances, survivor pensions, or old-age benefits, unless they meet specific requirements related to permanent residence or prior contribution history.

In many cases, individuals continue to rely on humanitarian assistance to meet their basic needs, highlighting gaps in the adequacy and accessibility of state-provided social protection mechanisms. Discrepancies between legal entitlements and their practical implementation raise concerns regarding equal and non-discriminatory access to essential social support.

Gender-based violence (GBV) in Moldova remains widespread, including among TP beneficiaries. While the Government has taken steps to strengthen national systems and ensure access to services, including the national hotline for GBV and trafficking survivors, significant gaps persist in service provision and prevention. The reduction of safe spaces and support services, alongside limited institutional capacity, continues to restrict access to protection and assistance for women survivors and those at risk of GBV, while increasing reliance on civil society actors.

Forcibly displaced women¹⁷ also face heightened GBV risks due to economic insecurity, limited community support, and weak social networks. These factors are further compounded

¹⁷ UNHCR uses this term in this context to be inclusive of different forms legal status in Moldova: TP beneficiaries, beneficiaries of international protection and asylum-seekers.

by limited access to affordable childcare and child support services, contributing to increased caregiving burdens and economic dependency. In the area of employment, structural barriers such as informal work opportunities, skills mismatches and challenges related to self-employment and business registration continue to limit women's labour market participation and increase exposure to GBV, exploitation and trafficking risks.

Recommendations:

- Ensure effective and non-discriminatory access to social protection rights for all categories of forcibly displaced people, including those in vulnerable situations, by simplifying administrative procedures and removing legal and practical barriers that hinder access to social assistance at both national and local level.
- Strengthen the adequacy, coverage, and accessibility of social protection measures to reduce reliance on humanitarian assistance for basic needs.
- Improve coordination between national and local authorities to ensure consistent and effective implementation of social protection measures and care services across the country.
- Ensure the safe referral of GBV survivors across all categories of forcibly displaced people to safe spaces, services and assistance, including by strengthening national and local service capacity and ensuring sustainable support for assistance mechanisms that contribute to reducing GBV risks.

Issue 5: Access to integration measures and employment

While Law No. 274/2011 provides for integration measures such as language training and employment support for beneficiaries of international protection, the implementation of these measures remains limited. In particular, the implementation of the Integration Programme remains constrained by limited dedicated resources, affecting the availability, continuity and quality of integration services. As a result, many beneficiaries continue to rely on humanitarian actors rather than sustainable, state-led support systems.

Although access to the labour market is formally granted to beneficiaries of international protection, TP beneficiaries and asylum-seekers, significant barriers persist. These include language constraints, limited recognition of labour qualifications and restricted access to active labour market programmes. At the same time, UNHCR welcomes the Government's clear intention to address this gap for TP beneficiaries, including through the ongoing legislative process to expand access to Active Labour Market Measures. While the amendments have not yet been adopted, this represents an important step toward more structured labour market activation and self-reliance.

In addition, asylum-seekers are issued temporary identity documents with a validity of 30 days, subject to monthly extensions. This short validity period creates practical obstacles to employment, as employers are often reluctant to hire individuals without longer-term documentation.

Furthermore, the same documentation constraints hinder access to basic financial services, as banks frequently refuse to open bank accounts for asylum-seekers on the grounds of insufficiently stable or valid identification documents. These barriers significantly undermine

access to lawful employment and effective socio-economic integration. In addition, limited access to loans, micro-credits, business development services and state-supported business programmes, particularly for temporary protection holders, restricts the ability of forcibly displaced persons to establish and sustain businesses, due to persistent legal, administrative, and practical barriers.

Recommendations:

- Ensure adequate and sustainable budgetary allocations for the effective implementation of the National Programme on the Phased Integration of Foreigners for 2025–2027.
- Strengthen state-led integration services, including language training, vocational education and employment support, to reduce reliance on humanitarian assistance.
- Extend the validity period of identity documents issued to asylum-seekers or introduce more stable documentation, to facilitate access to employment and essential services.
- Adopt clear regulatory guidance for employers and financial institutions to prevent unjustified refusals to hire asylum-seekers or provide basic banking services.
- Facilitate recognition of foreign qualifications and expand access to active labour market programmes for all categories of forcibly displaced people.
- Ensure that forcibly displaced persons are explicitly eligible for, and can effectively access, national and local state-funded business development and support schemes for small and medium enterprises.
- Expand access to financial inclusion measures, including bank accounts, micro-credit, loans, and business development services, and address legal and administrative barriers that limit refugee entrepreneurship, particularly for temporary protection holders.