



Application of the Temporary Protection Directive (Scope and Registration)

EMN INFORM

July 2022



1. BACKGROUND AND CONTEXT

This inform provides information related to the implementation of the Temporary Protection Directive (TPD),¹ triggered in response to the refugee crisis caused by Russia's invasion of Ukraine on 24 February 2022. According to UNHCR, as of 4 May 2022, over 5,7 million Ukrainians (mainly women and children) have left Ukraine

in search of safety, primarily arriving in neighbouring EU and third countries (including Moldova).² This inform relates to the **scope of the Temporary Protection Directive**, as well as **registration of persons fleeing the war in Ukraine**. The analysis in this inform is based on contributions provided by 26 Member States.³



2. SCOPE OF THE TEMPORARY PROTECTION DIRECTIVE

2.1. Extending temporary protection to additional categories

Article 2(1) of Council Decision 2022/382 outlines three categories of persons to whom temporary protection applies. These encompass the vast majority of persons who have been displaced on or after 24 February 2022, namely: Ukrainian nationals residing in Ukraine on or before 24 February 2022; stateless persons and nationals of third countries other than Ukraine, who benefitted from international protection or equivalent national protection in Ukraine before 24 February 2022; and, family members of the above-mentioned groups.

Article 2(2) of the Council Decision outlines categories which also *shall benefit* from protection. It states that "Member States shall apply either this Decision or adequate protection under their national law, in respect of stateless persons, and nationals of third countries

other than Ukraine, who can prove that they were legally residing in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit issued in accordance with Ukrainian law, and who are unable to return in safe and durable conditions to their country [of origin] or region [within the country] of origin".

Finally, in accordance with Article 7 of Directive 2001/55/EC, Member States *may* also apply the Council Decision to other persons, including to stateless persons and to nationals of third countries other than Ukraine, who were residing legally in Ukraine and who are unable to return in safe and durable conditions to their country or region of origin (Article 2(3) of the Council Decision).

With regard to Article 2(2) of the Council Decision, only two Member States reported applying "adequate protection",⁴ which consisted of allowing stateless persons or third-country nationals to apply for international

1 Decision 2022/382 of 4 March 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2022.071.01.0001.01.ENG&toc=O-J%3AL%3A2022%3A071%3ATOC, last accessed 29 March 2022.

2 Data available at: <https://data2.unhcr.org/en/situations/ukraine>, last accessed 5 May 2022.

3 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO (provided information only on registration), SE, SI, SK.

4 AT, EL.

protection as prescribed in relevant national legislation. The Czech Republic reported that it had briefly applied an “adequate protection” regime whereby persons fleeing the conflict in Ukraine were granted special long-term visas (which afforded the same level of protection of the temporary protection scheme foreseen by the Council’s Decision), though it now applies protection under the Council Decision.⁵

Only Croatia, Finland, the Netherlands, Portugal, and Spain reported extending protection to the “other persons” category under Article 2(3).

A few Member States specifically reported extending protection to persons who had only *temporarily* left Ukraine (e.g., on business or leisure travel) before the outbreak of the conflict, and who were unable to return to Ukraine.⁶ Spain expressly reported extending protection to persons with a valid short-term residence permit from Ukraine, who were unable to return to their country of origin. The Czech Republic reported extending protection to Ukrainian nationals who left Ukraine before 24 February 2022 and who are *not* holders of long-term visas or long-term residence permits issued by the Czech Republic or other Member States (i.e., those who stayed in the territory of the Czech Republic on the basis of visa-free regime or were in possession of short-term visas). In Finland and Slovakia, Ukrainian nationals may request temporary protection regardless of their date of departure from Ukraine. In the Netherlands, the scope of the Directive was extended to displaced persons who left Ukraine on or after 27 November 2021, due to increasing tensions in Ukraine. For third-country nationals not from Ukraine, it is not necessary to verify whether they left Ukraine before 27 November 2021, but they must demonstrate that they had a valid residence permit for Ukraine on 23 February 2022. On this basis, the Netherlands reported it can be initially assumed that the person was in Ukraine on that date, or at least that the third-country national had not left Ukraine before 27 November 2021. However, if it later transpires that the third-country national has been outside Ukraine for a longer period of time, the temporary protection will be ended.

2.2. Applying national temporary protection schemes that complement temporary protection under the Directive and Council Implementing Decision

Member States may have national temporary protection schemes that complement temporary protection under the Temporary Protection Directive. In total, 23 Member States reported applying temporary protection exclusively under the Directive.⁷ Austria and Lithuania reported applying a national protection scheme.

Under the national protection scheme of Lithuania, temporary residence permits for up to one year may be granted to foreigners who are unable to leave Lithuania due to humanitarian reasons or for reasons connected to the risk of harm that the regime in their home country may cause to them. The range of rights afforded to beneficiaries of the national Lithuanian protection scheme⁸ is wide and, among others, includes: the possibility to work without the need to apply for a work permit; social benefits, and access to basic healthcare, including free COVID-19 vaccination. Austria, under its Asylum Act, has similarly been granting temporary residence permits for displaced persons from Ukraine since 11 March 2022.

2.3. Measures applied to Ukrainian nationals already present on the territory of a Member State prior to the invasion of Ukraine⁹

The situation in respect of Ukrainian nationals already present on the territory of a Member State prior to 24 February 2022 differs widely across Member States. Most Member States have put in place specific measures, with three Member States reporting that their existing legal framework already regulated such cases.¹⁰

Several Member States reported that Ukrainian nationals legally residing in their territory could remain after their visa, or other legal basis for stay, expired.¹¹ Estonia further specified that there was no need for them to specifically apply for an extension of the documents granting the legal stay.¹² Others specified that individuals

5 Between 25 February 2022 and 22 March 2022, CZ applied “adequate protection”.

6 CZ, ES (only if they were in Spain before 24 February 2022), LT (only if they left Ukraine after 24 January 2022), LV, PL.

7 BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LU, LV, MT, NL, PL, PT, SI, SE, SK (starting on 1 March 2022 temporary protection was part of a national protection scheme, but after the adoption of the Council Decision, temporary protection status is exclusively under the Temporary Protection Directive).

8 Temporary residence permits on humanitarian grounds were issued to Ukrainian nationals prior to the implementation of the Council Decision (EU) 2022/382. Since 16 March 2022, most Ukrainian nationals fleeing Ukraine can get a temporary residence permit on the grounds of temporary protection, while temporary residence permits on humanitarian grounds may be issued to, inter alia, those Ukrainian nationals who do not have a valid passport.

9 See also section 2.1.

10 HU, LU, SE.

11 AT, CY (follow the standard procedures for obtaining a residence permit of a category other than temporary protection, provided that the criteria for such a permit are fulfilled), EE (extension is granted until the revocation of the decision), EL (in response to COVID, a Ministerial Decision extended the legality of all third country national's residence permits which expired on 31.3.2022 until 30.6.2022), FR (based on an individual assessment of their situation), HR (Ukrainian nationals and their family members who fled Ukraine not long before 24 February 2022 due to the security situation and cannot return to their country as a result of the armed conflict will also be granted temporary protection. Other Ukrainian nationals who had residence permit in line with Aliens Act in Croatia; can apply for renewal, if criteria is fulfilled; or apply to reside for any other reasons in line with Aliens Act.), IE (Ukrainian nationals who arrived before 24 February on 90 day visa (e.g. holiday/business) can remain to have TP. Ukrainian nationals with existing Irish residence permissions, in the event that they are not extended or renewed, are permitted to avail of TP as appropriate), IT (Ukrainian citizens regularly residing on Italian territory before 24 February, who do not meet the requirements for the renewal of their residence permit, can in any case apply for international protection), LT (90-day free visa regime, starting upon expiry of temporary residence permit or other legal basis for stay), LU (applying for international protection remains a possibility; and, specific conditions apply to salaried workers), NL (leniency is applied to Ukrainian nationals applying for a residence permit or an extension. Their personal situation will be taken into account when assessing the application. Furthermore, Ukrainians who can demonstrate that they arrived in the Netherlands before 27 November 2021, will also be under the protection of the directive), PL (for visas and temporary residence permits, until 31.12.2022; for other permits, permission to enter Poland for humanitarian reasons, short-term visas and 30-days period for leaving Poland, up to 18 months), PT (the requirements for extension of permits must be met, though the legal framework provides for the necessary flexible solutions to ensure that the persons concerned will not fall in an irregular situation), SK (extension of the residence is granted until two months from the withdrawal of the declared state of emergency. In case of legal entry, e.g. with visa/within visa free regime and without granted residence, one is authorised to stay in until one month after the withdrawal of the declared state of emergency).

12 EE.

could apply for an extension of their current permit, request temporary protection, or apply for asylum.¹³ The measures taken by Bulgaria, Malta, and Slovenia are in contrast to this, in that Ukrainians already residing in their territory before the Russian attack may not benefit from temporary protection, but only from international protection. To make it easier for those who were already in Sweden at the time of the invasion, the Swedish Government in the beginning of April adopted an amendment to the relevant ordinance. The amendment, which entered into force on 26 April 2022, entails that those who travelled to and stayed in Sweden between 30 October 2021 and 23 February 2022 are also included in the group of people who are entitled to residence permits with temporary protection, provided that they meet the requirements, e.g., being a Ukrainian citizen and resident in Ukraine.

With regard to Ukrainian nationals in an irregular situation, a few Member States reported that they stipulated that such individuals would be given a legal basis for temporary stay and that any return decision was thereby postponed or invalidated.¹⁴ Belgium reported that no specific provisions were in place for Ukrainian nationals in an irregular situation, but they could request temporary protection. Finland and Latvia put individuals in an irregular situation on par with those with valid permits,

by allowing the possibility to apply for an extension of an expired permit, request temporary protection, or apply for asylum.¹⁵ Measures taken by Italy foresee, on the other hand, that persons in an irregular situation may apply for international protection, and are therefore not being subject to possible repatriation.

2.4. Providing information on temporary protection to beneficiaries and potential beneficiaries

In line with Article 9 of the Temporary Protection Directive, Member States shall provide persons enjoying temporary protection with a document, in a language likely to be understood by them, in which the provisions relating to temporary protection and which are relevant to them are clearly set out. All responding Member States reported taking steps to provide beneficiaries with information.

The table below illustrates the typology of the informative material distributed. It should be stressed that the absence of a marker ■ does not preclude that such format is not being used in a given Member State, but rather reflects that they did not list it in their response.

FORMAT/ Member State	AT	BE	BG	CY	CZ	DE	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	SE	SI	SK	
Printed - handed out (leaflet, booklet, etc.)	■	■			■		■		■	■	■	■		■	■		■	■	■		■		■	■	■	
Printed - posted (posters, notice boards)						■															■	■				
Online - official institutional websites	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	
Online - media and social media platforms						■	■			■	■						■			■	■		■		■	
TV /radio					■																	■				
Hotline (phone and email)	■		■	■	■		■		■			■				■	■	■		■	■			■	■	
Helpdesk										■	■		■					■			■			■	■	
RESPONSIBLE FOR DISPENSING INFORMATION																										
Police/ border guards / migration services				■			■		■	■	■	■				■		■		■	■		■		■	
NGOs and international organisations			■		■		■		■		■					■		■		■			■		■	
LOCATION																										
Border area			■				■			■		■					■				■	■			■	
Train/ bus station, airport, harbour						■				■	■			■						■	■		■		■	

The main medium used for communicating information relating to temporary protection and other information of interest, are official institutional websites. This is followed by printed materials in the form of leaflets/brochures, and hotlines (that usually provide a 24h service).

The information that is distributed relates to protection matters and outlines the available assistance framework, including where to find additional information. More than half of the responding Member States reported providing services to inform beneficiaries of temporary protection in

¹³ BE, CZ (persons who have been illegally staying in the territory of the Czech Republic prior to 24 February 2022 and are not entitled to temporary protection have to apply for a visa for a stay of over 90 days to remain in the territory) DE, FI, FR, LV, SK.

¹⁴ DE, EE, EL (all forced returns have been suspended due to the closure of airspace over Ukraine), ES (the return decision is postponed if the person concerned applies for temporary protection), FR (in case of a removal order, they can be placed under a 6-month house arrest decision renewable once), LT (until further notice, and with option to request temporary protection), LU, PL, PT (the legal framework provides for the possibility to issue a residence permit for humanitarian reasons).

¹⁵ FI, LV.

different languages (usually comprising English, Russian, Ukrainian, and the national state language).¹⁶

A few Member States reported using non-governmental online outlets like social media platforms, and only the Czech Republic reported using television (reportedly, interpreted in Ukrainian language) and setting up a Radio channel (Radio Ukraine) to assist those fleeing the conflict

in Ukraine. Portugal reported airing radio spots. In Germany, information is also displayed via info-screens on trains and in selected rest stops along the highway; and, persons using the free SIM cards of a specific company, or using that company's network with a Ukrainian phone number, receive a text pointing them towards an online information portal.



3. REGISTRATION AND DOCUMENTATION

3.1. Initial registration upon arrival, including at the border

Initial registration at borders of adults

Seven Member States¹⁷ indicated that they use their national border control systems to establish the identity of arriving persons. Border guards stamp the passports of those arriving, confirming initial registration. In Croatia, personal data as well as the address of residence in Croatia are collected during border checks and persons fleeing Ukraine are registered in the national border control system (NBMIS).

Regarding other registration procedures and certificates issued at the borders, in Croatia, an Entry Permission Decision (paper form) is issued to persons who arrive without valid travel documents. Ukrainian citizens arriving in Greece without travel documents (including expired passports) may enter only from the Passport Control Department in Promahon where they are issued a document by staff of the Ukrainian Embassy in Greece.¹⁸ Hungary reported that it has a registration procedure (within their NHERR system) for those persons who do not meet the necessary entry conditions but did not specify whether this applies to all persons arriving from Ukraine or only certain categories. Following their registration in NHERR, a Certificate of Temporary Residence (valid for 30 days) is issued by the Hungarian Police. In Romania, if a person has no travel documents or national ID, they are referred to the General Inspectorate for Immigration where they apply for asylum and enter the asylum procedure. A Slovak information system for migration and international protection (IS MIGRA) is used for the registration of non-Ukrainian third country nationals, as well as Ukrainians over 18-years of age without valid travel documents.

The initial registration of temporary protection can take place at the border (both external and internal),¹⁹ but it can also take place at other (reception) centres in the given country, or seekers of temporary protection have the option to decide to register at a later stage if they choose to travel to another Member State.

As a form of initial registration, ten Member States report issuing first a temporary certificate confirming the

request temporary protection, before a residence permit is confirmed and issued.²⁰ Additional documents are usually issued upon confirmation that temporary protection is granted. In Ireland, the initial temporary protection permission letter grants temporary protection to the holder. Similarly, in the Netherlands, a passport sticker serves as proof that the person is involved in asylum procedures and is not an illegal resident. If they do not have an identity document, they will instead receive a document showing they have applied for asylum. For other Member States, there is only one process of registration for temporary protection (see section 3.2 below).

Initial registration at the border of unaccompanied and separated minors

A few Member States reported operating specific processes to register separately minors who travel without their parents, including those who travel with another adult, when arriving at the borders. In most cases, they are registered in the same systems as the adults, with additional information being collected on the adults they may travel with, and relevant documents are requested if the accompanying adults are not their parents (to establish whether and what kind of relationship the minors have with that adult). Three Member States²¹ reported collecting information on the child's subsequent point of destination at the borders (in Cyprus this information is collected for all Ukrainian nationals).

Regarding specific procedures related to the registration of unaccompanied minors, at the borders, Greece established a National Emergency Response Mechanism (NERM)²² together with UNHCR and implementing partners for the protection of unaccompanied minors, which has been activated in response to the Ukrainian crisis. Identification and initial registration of unaccompanied and/or separated minors is conducted by the Passport Control Department of Hellenic Police at border locations, in cooperation with the Ukrainian consular office. The police fill in a Notification Form, which is communicated to NERM, which provides support to separated children (accompanied by adults other than their parents) who arrive in Greece. Cases identified through NERM are referred for a legal assessment of the case and the accompanying adult is appointed as caretaker or legal representative of the accompanied minor. The

16 AT, BE, BG, CY, CZ, EL, ES, FI, FR, HR, IE, IT, LT, LV, MT, NL, PL, PT, SE, SK.

17 EL, HR, HU, PL, RO and SK. It should be noted that Estonia temporarily restored Schengen border controls on 3 March 2022 (Regulation no.19 of the Government) and registers people arriving at its border with Latvia.

18 In the case of minors with no travel documents, a certificate of marital status or a birth certificate must be shown to the authorities and if neither is available, a solemn declaration but be completed and submitted.

19 e.g., in BG, DE, FI, IE (Dublin airport from 9 March 2022 or Rosslare Port from 31 March 2022), MT, PT.

20 BE, DE, EE, EL (confirmation of having submitted an online request for an appointment to register), ES, FI, IT, LT, MT, SI.

21 CY, HR, RO.

22 Created by the Special Secretariat for the Protection of Unaccompanied Minors of the Ministry of Migration and Asylum.

Greek Public Prosecutor for Minors acts as a temporary guardian and is the competent authority to decide on the best interest of the child.

In Romania, as of 18 March 2022, different services cooperated²³ to manage the entry, registration, transit and stay as well as ensuring the protection of the rights of unaccompanied minors. The process is managed by the General Directorate of Social Assistance and Child Protection, which has representatives at border crossing points, and who is also responsible for registering unaccompanied minors and, where relevant, the adults travelling with them, in a database.

Croatia and the Slovak Republic reported that they register unaccompanied minors in the same system as adults at the borders and the competent social welfare contact point is called in such cases. If the minor travels with another person (e.g., grandmother or sibling who is not their legal representative), the travel documents of this person are registered in the record of the minor, and the status of the person and their relationship to the minor are established. Furthermore, in the Slovak Republic, minors who are third country nationals (other than Ukrainian nationals) are also registered in the Slovak MIGRA system (a national information system for migration and international protection).

Finland specified that the same laws and procedures are applied in the case of unaccompanied minors coming from Ukraine as to any unaccompanied minors seeking international protection. In Finland, the aim is to register the child's data as comprehensively as possible. If the child arrives with someone other than their parent, or the parenthood cannot be immediately established, they will be treated as unaccompanied minors, e.g. a guardian will be appointed to them, and the most suitable form of accommodation will be considered – be it in a reception centre for unaccompanied minors or remaining with the adult they travelled with, if it is in the best interest of the child.

Malta and Portugal have so far not recorded any cases of unaccompanied minors but reported that they would in such a case also collect the same information as for an adult.

3.2. Registration for residence as beneficiaries of temporary protection

The Temporary Protection Directive foresees harmonised rights for the beneficiaries of temporary protection, including a residence permit for the entire duration of the protection (which can last from one to two years). Member States reported issuing resident permits via their asylum/migration authorities, police/border control authorities or local municipal authorities.

Registration of adults for residence as beneficiaries of temporary protection

■ *Type of system used for registration and authority which issues residence permits*

In the majority of cases, the residence permits are issued by asylum or migration authorities²⁴, by the police/border authority²⁵ or a mix of the two.²⁶ In other three Member States, it is the local authority (municipality of the place of residence) which is responsible for this²⁷ – or the local police.²⁸ In Belgium, the initial registration is done with the immigration authority, but this is followed by a registration with a local authority of residence, which issues an electronic card. In the Netherlands, the initial registration is done by the municipality, after which the registration is automatically communicated to the immigration authority. The immigration authority will proceed with the process of temporary protection whereby, formally, an asylum application is signed by the beneficiaries. Furthermore, in Poland, beneficiaries register with the local municipality but are then directed to an online system through which they access an electronic ID card.²⁹ Hungary reported the launch of a new system (NOVA) for the registration of persons displaced, as a result of the Ukraine crisis.

Only Poland specified having two different forms of registrations for refugees coming from Ukraine. One scheme is for Ukrainian nationals, their spouses and immediate family members of Ukrainian nationals holding a Pole's Card, who can apply for a Polish National Identification Number (PESEL number) at any municipality, by presenting a filled-in request form and a photograph confirming their status. The number confirms their identity with the same effect as having an ID Card or passport and provides access to a range of services. A second scheme covers third country nationals benefitting from international protection in Ukraine and other forms of protection and their family members, as well as permanent residents in Ukraine who cannot come back to their countries of origin in safe and durable conditions. These persons, upon request, may receive a paper certificate confirming their status issued by the Office for Foreigners. Other Member States confirmed that the same registration documents are issued during the initial registration to all persons entitled to temporary protection in accordance with the Council Decision.

■ *Type of certificate issued upon giving temporary protection*

Twelve Member States reported issuing a temporary certificate confirming the request for temporary protection.³⁰ These can already confer at least some degree of protection to the holder of such a certificate. Three countries reported providing beneficiaries of temporary protection with visa-stamps (CZ and LU) or passport stickers (NL), which function as confirmation of

23 Joint Order of the Minister of Family, Youth and Equal Opportunities; the Minister of Internal Affairs; the Minister of National Education and the Minister of Health and Minister of Development.

24 AT, BG, CY, EL, FI, FR, HR, LT, LV, LU, MT, NL, RO, SE.

25 ES, HU, SK.

26 CZ, EE, IE, PT.

27 DE, SI.

28 HR, IT.

29 For more information, please see: <https://www.gov.pl/web/mobywatel/ua>, last accessed 22 June 2022.

30 BE, CY, DE, EE, EL (confirmation of an online request allows access to emergency hospital treatment), ES, FI, IT, LT, MT, PT, SI. This is also possible in theory in CZ, but in practice most temporary protections are issued on the spot.

temporary protection status.³¹ In the case of Latvia, if the beneficiary of temporary protection does not have a travel document, they will be issued a residence permit instead. Five Member States³² issue residence permits/authorisations either in the form of a letter or a certificate. Most of them³³ issue/will issue residence permit cards or identity cards. Bulgaria issues a registration card to a foreigner who is granted temporary protection. Luxembourg issues a temporary protection certificate, which grants the right to stay but not to reside. In Ireland, a further registration process (which applies to all third country nationals acquiring residence permission in Ireland) will be rolled out in the next phase. Persons will receive the Irish Residence Permit card at this next phase, while they currently receive a temporary protection permission letter confirming temporary protection status.

Registration of unaccompanied and separated minors for residence as beneficiaries of temporary protection³⁴

In the majority of Member States,³⁵ unaccompanied minors are registered in the same system used for the registration of adults when requesting temporary protection in a Member State. Usually, they record the same information on unaccompanied minors as for adults, together with information on the accompanying adult and their relationship to the child, where relevant.

3.3. Use of territorial distribution in registration

Two Member States³⁶ indicated using territorial distribution to ensure access to accommodation but no Member States reported using it to facilitate faster registration of beneficiaries.

Half the Member States³⁷ specified that those entitled to temporary protection could choose to request this in different registration centres or police stations across the territories of those states, depending on where they chose to reside. Austria reported on the setting-up of mobile registration buses. In the Czech Republic, Regional Assistance Centres for Help and Assistance to Ukraine (KACPU) were established. These centres work in all regions and serve as a one stop shop, i.e., provide complete initial assistance. Croatia also operates mobile teams in larger accommodation facilities to provide support to applicants. In Cyprus and Italy, seekers of temporary protection go to a service office that is tied to their district of residence. In Germany, the registration takes place locally with the competent authorities or at central points of arrival (hubs) which help relieve pressure from local authorities and which are serviced by chartered trains and buses. In Croatia and Cyprus, also an online request for temporary protection is possible. In Sweden Ukrainian citizens who have a valid passport or other identity documents can request protection, for themselves and their family members who are in Sweden, via a new e-service on the website of the Swedish Migration Agency. This as an alternative to visiting the office of the Migration Agency to register the request.

³¹ CZ, LV, NL.

³² FI, IE (temporary protection permission letter), LT, MT, SK.

³³ AT, BE, CY, DE, EE, EL, ES, FI, FR, HR (hard- paper card), IE, IT, LT, MT, SE, SI.

³⁴ Includes children who could be accompanied by a person other than their parent/ legal guardian.

³⁵ AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IE, IT, LT, LU, LV, MT, PL, PT, RO, SE, SI, SK. In the Netherlands and Austria it was not yet possible to provide full information on what additional data is registered for unaccompanied minors.

³⁶ CZ, FR.

³⁷ BG, CY, CZ, EE, EL, ES, FI, HR, LV, NL, PL, PT, RO, SK, SI.

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Georgia https://migration.commission.ge/index.php?article_id=1&clang=1

Republic of Moldova <http://bma.gov.md/en>