RISK ASSESSMENT

The Transition Gap After Temporary Protection

A High-Risk Exposure Window for Displaced Vulnerable Ukrainians in Bulgaria

>89 000	4 Mar 2027	62%	~75%
displaced Ukrainians in Bulgaria under TP	TP termination deadline	expect no viable alternatives after TP	women and children among TP holders

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Bulgaria | April 2026

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EXECUTIVE SUMMARY

The confirmed end of the EU Temporary Protection (TP) regime for displaced persons from Ukraine on 4 March 2027 is generating a rapidly emerging transition risk environment in Bulgaria. While discussions at EU level point toward a coordinated exit strategy, including potential pathways to national residence statuses, the situation in Bulgaria reveals a widening structural gap between:

- the formal availability of migration pathways, and
- the actual accessibility of these pathways for displaced populations at scale

This discrepancy constitutes a high-risk exposure window, hereafter defined as the “Transition Gap.”

Core Risk Dynamics

For a significant proportion of displaced Ukrainians — particularly women, families with children, economically active individuals in non-standard or informal employment, and persons in precarious socioeconomic or legal situations — the absence of a structured and accessible transition framework may result in:

- loss of legal continuity of stay and housing stability
- barriers in documentation and registration processes
- erosion or total loss of trust in institutions
- interruption of healthcare access
- disruption of education continuity
- reduced access to justice, employment, and social support systems

These disruptions collectively increase exposure to:

- labour exploitation
- gender-based violence (GBV)
- trafficking in human beings (THB)
- sexual exploitation, including survival sex and coercive dependency
- increased barriers to help-seeking and early identification
- higher risks of criminalisation
- additional pressure on security and justice systems

Nature of the Risk

> **The primary protection risk is not only whether Temporary Protection ends, but how it ends. If the termination of TP occurs without a functional transition architecture, it will not represent a neutral administrative change. Instead, it will create a foreseeable protection vacuum, where large numbers of individuals may lose effective access to rights before securing any durable legal status.**

In this scenario, a significant population may remain physically present in the country while becoming progressively excluded from systems necessary for a lawful, safe, and dignified life.

Impact on Children and Families

For families with children, the end of Temporary Protection is not solely a migration policy issue. It directly affects child safety, continuity of education, and psychosocial stability. Disruptions in legal status risk triggering cascading effects across multiple life domains simultaneously.

Systemic Dimension

In under-resourced frontier contexts such as Bulgaria, the central risk is not limited to the formal loss of rights, but to the collapse of continuity — including residence, income, healthcare, schooling, institutional contact, and referral and protection pathways. The existence of formal legal alternatives does not guarantee effective protection. Where such pathways are structurally inaccessible, the end of Temporary

Protection is likely to produce administrative exclusion at scale, escalation of vulnerability, and a shift from managed transition to systemic protection failure.

Conclusion

This risk assessment identifies the “Transition Gap” as a distinct and critical protection risk category and calls for urgent, coordinated action by DG HOME, Bulgarian national authorities, and international and civil society protection actors to ensure that the end of Temporary Protection does not result in large-scale exclusion, protection breakdown, and increased exposure to exploitation and harm.

1. CONTEXT: FROM TEMPORARY PROTECTION TO SYSTEMIC UNCERTAINTY

Temporary Protection (TP) for displaced persons from Ukraine is not merely a national immigration arrangement. It is an EU legal protection framework, activated under Council Implementing Decision (EU) 2022/382 and grounded in the Temporary Protection Directive. Its function extends beyond the regularisation of stay. TP provides legal certainty, continuity of rights, and predictability of status for persons displaced by war.

Role of Temporary Protection in Practice

In Bulgaria, TP has operated as the primary legal and operational framework enabling displaced Ukrainians to access lawful stay, labour market participation, healthcare services, education systems, family unity and continuity, minimum socio-economic integration, and institutional visibility and system contact. For a population composed predominantly (up to 75%) of women and children, this continuity has had direct protection value, functioning as a stabilising mechanism across multiple life domains.

Transition as a Structural Risk Moment

The transition out of Temporary Protection is not a technical administrative adjustment, but a critical protection threshold. It raises a central question: Will the legal system preserve continuity of protection, or will it produce a rupture? As the TP regime approaches its endpoint, this transition is currently under-defined, under-governed, and not operationalised at scale, creating a systemic risk of a transition gap during which individuals may lose functional access to rights before securing alternative legal status.

Risk Exposure During the Transition Gap

During this period, affected individuals may experience simultaneous and mutually reinforcing disruptions across key domains:

1. Legal Certainty and Status

- uncertainty regarding lawful stay
- inability to initiate or complete residence procedures from within Bulgaria
- risk of falling into irregular or semi-regular status
- increased skepticism about contact with authorities

2. Employment and Income

- loss or interruption of work authorisation
- inability to maintain lawful employment
- dependence on specific employers or intermediaries
- interruption of income streams
- increased pressure to accept undeclared or exploitative work

3. Housing Stability

- inability to sustain rental payments
- risk of eviction or informal displacement
- dependence on acquaintances, partners, or unsafe arrangements
- heightened risk of homelessness, including hidden homelessness

4. Access to Healthcare

- interruption of health insurance or entitlement pathways
- delayed or foregone treatment due to cost, bureaucracy, or legal uncertainty
- reduced access to reproductive healthcare, chronic disease management, trauma-informed care, and mental health services
- decreased likelihood of detecting violence or abuse through health systems

5. Access to Education

- uncertainty regarding continued access to school and university pathways
- exclusion from preferential or equal-access conditions linked to TP
- increased risk of educational discontinuity
- pressure on families to adopt harmful coping strategies to sustain education

6. Access to Justice and Protection

- reduced willingness to report violence or exploitation
- fear that reporting may negatively affect legal status
- barriers in accessing police, courts, and administrative remedies
- weakening of referral pathways for survivors of domestic violence, trafficking, and labour exploitation

7. Institutional Visibility

- reduced interaction with formal systems (education, healthcare, labour institutions, municipal services)
- increased reliance on informal networks, intermediaries, and unverified information channels
- reduced opportunities for early identification of abuse, coercion, and trafficking risks

EU-Level vs National-Level Transition Framing

At EU level, transition is conceptually framed as movement into national residence statuses, return support where applicable, and access to individual asylum procedures. However, at national level in Bulgaria, there is currently no clearly

articulated transition model, no accessible in-country pathway at scale, and no mechanism ensuring continuity of rights during transition.

Structural Implication

In the absence of a rights-preserving, in-country transition framework, the burden of legal transition is effectively shifted onto displaced individuals. This burden is not distributed evenly. It disproportionately affects those in precarious employment, women and single-headed households, individuals with limited administrative capacity, and persons already facing structural vulnerability. As a result, the transition risks becoming not a managed legal process, but a filtering mechanism that amplifies pre-existing vulnerabilities.

2. LEGAL AND POLICY FRAMING

Normative Positioning

The transition out of Temporary Protection must be assessed within a fundamental rights and victim protection framework, rather than treated solely as a matter of migration administration. This is not only a question of status regularisation, but of continuity of rights, access to protection, and prevention of harm, particularly in contexts of heightened vulnerability.

Relevant EU Legal and Policy Framework

The transition engages a set of binding and interpretative EU instruments, including:

- Temporary Protection Directive and Council Implementing Decision (EU) 2022/382 — establishing the legal basis for protection, rights, and coordinated EU response
- EU Charter of Fundamental Rights — including protections related to human dignity, equality and non-discrimination, rights of the child, access to healthcare, and right to an effective remedy
- Directive (EU) 2024/1712 (revised EU Anti-Trafficking framework) — explicitly recognising that poverty, armed conflict, displacement, inequality, GBV, humanitarian crises, and lack of viable employment and social support increase vulnerability to trafficking, with specific emphasis on heightened risks for women and children
- Victims' Rights Directive — requiring non-discriminatory access to information and services, access to interpretation and complaint mechanisms, availability of support and protection regardless of residence status, and application of child-sensitive approaches

Analytical Conclusion

Any transition framework that predictably results in increased dependency, reduced institutional visibility, barriers to accessing services, or diminished ability to seek help or protection must be understood as a protection failure with EU-law implications — not merely an administrative gap. The key issue is not only whether alternative migration pathways formally exist, but whether they ensure continuity of fundamental rights, effective access to protection mechanisms, non-discriminatory access to services, and prevention of exploitation and victimisation risks.

3. WHY BULGARIA REQUIRES SPECIAL ATTENTION

Structural Context

Bulgaria should not be treated as a generic host country case. It represents a lower-income EU frontier context characterised by comparatively lower wage levels, weaker household resilience buffers, limited availability of affordable housing, significant administrative fragmentation, uneven access to services, and lower institutional absorption capacity compared to larger Western EU Member States.

Population Distribution and Territorial Risk

Bulgaria hosts a meaningful and territorially concentrated population of displaced Ukrainians. According to available data[1]:

- Burgas: approx. 30,870 TP beneficiaries (36.84%)
- Varna: approx. 18,625 (22.71%)
- Sofia-City: approx. 12,191 (14.54%)
- Plovdiv: approx. 5,330 (6.56%)
- Total (dataset): 83,675

Transition failure will be geographically concentrated in coastal regions and urban labour and housing markets, creating the risk of localised system stress rather than evenly distributed pressure.

System Interdependence

legal status → employment → income → housing + services → stability

For displaced Ukrainians in Bulgaria, lawful stay is embedded in a chain of interdependent systems. When legal continuity becomes uncertain, this chain does not fail in isolation. It risks simultaneous disruption across multiple systems, amplifying vulnerability.

Embedded Population Profile

A significant proportion of displaced Ukrainians in Bulgaria are no longer in a purely temporary situation. Despite limited structural integration support, many have developed practical embeddedness: participation in the labour market, private rental arrangements, small businesses, university enrolment, and children in schools and preschools. A poorly designed transition would therefore affect individuals with established socio-economic and administrative ties to the host country.

Additional Structural Risk Factors

Financial access — bank accounts, formal salary payments, contract-based transactions — is often contingent on documentation continuity and recognised legal status. Disruption may result in exclusion from formal financial systems and increased reliance on informal intermediaries. Housing continuity is similarly fragile: lawful stay functions as an implicit condition for maintaining rental agreements. Status disruption creates a direct pathway from administrative uncertainty to housing insecurity and exploitation risk.

Analytical Conclusion

Without a coordinated and scalable transition framework, the end of Temporary Protection is likely to result in clustered vulnerability, multi-system disruption, and localised protection breakdown rather than a managed and rights-preserving transition.

4. CORE PROBLEM: FORMAL PATHWAYS ≠ REAL ACCESS

Problem Framing

In practice, the proposed post-TP pathways in Bulgaria function less as continuity mechanisms and more as selective migration channels. While multiple legal options formally exist — employment-based residence, study permits, business pathways, EU Blue Card, family reunification — they are not realistically accessible to the majority of TP beneficiaries and do not collectively constitute a safe, inclusive, or scalable transition architecture. This distinction is critical from a protection, GBV, and anti-trafficking perspective.

Structural Mismatch: Legal Design vs Displacement Reality

Existing legal pathways assume stable and continuous documentation, employer sponsorship capacity, financial thresholds and guarantees, administrative literacy, tolerance for long processing timelines, ability to travel for consular processing, and access to paid legal or migration assistance. For a large share of displaced persons, these conditions are partially or entirely unmet, rendering formal pathways functionally inaccessible.

Pathway Analysis

Pathway	Main barriers	Immediate vulnerability	GBV / THB exposure
Humanitarian status	Uncertainty; high refusal risk Risk of prolonged limbo	Status insecurity; income/work disruption No healthcare or education access	Dependence; survival coping; invisibility
Visa D employment route	Employer sponsorship required Consular application outside Bulgaria	Income interruption; employer dependency	Labour exploitation; document control Wage abuse; inability to change jobs
Digital nomad / EU Blue Card	Narrow income and professional profile only	Excludes the majority of displaced persons	Irregularity; digital-facilitated trafficking risk
Representative office	Costly; grey intermediary schemes	Financial loss; scam exposure	Fraud; economic exploitation; document abuse
Pensioner route	Income and subsistence thresholds	Excludes low-income older persons	Dependency; poverty; unsafe accommodation
Student route	High tuition; life-stage mismatch; family incompatibility	Excludes adults with children and dependants	Status loss; informal work; harmful coping

Pathway	Main barriers	Immediate vulnerability	GBV / THB exposure
Family formation / marriage	Full dependency on intimate partner	Coercive dependency; lack of alternatives	GBV; intimate partner violence; trafficking manipulation Reproductive coercion and control

The risks are not gender-neutral. Women with children, single mothers, survivors of prior abuse, women in low-paid or informal employment, older women with limited resources, and those lacking strong social networks are likely to face disproportionate harm during any poorly designed transition.

From Administrative Gap to Protection Risk

The absence of accessible and rights-preserving transition pathways does not merely create uncertainty. It actively produces vulnerability. Legal continuity functions as the enabling condition for employment, housing, healthcare, education, access to justice, banking, and the practical ability to leave harmful or coercive situations. When continuity breaks, vulnerability cascades across all interconnected systems.

Gendered Impact and Dependency Risks

For women and girls, legal uncertainty significantly increases exposure to reduced ability to leave abusive or controlling relationships, increased reliance on partners or hosts, economic coercion linked to employment instability, and inability or reluctance to report violence. In such contexts, legal insecurity can function as a mechanism reinforcing coercive control.

Anti-Trafficking Perspective

From an anti-trafficking standpoint, the described conditions correspond to well-established structural risk environments: legal uncertainty, labour market instability, housing precarity, debt pressure, and reduced institutional visibility. These factors increase vulnerability to trafficking in human beings, labour exploitation, sexual exploitation, and coercive dependency arrangements.

> **When legal status becomes uncertain, exit options weaken. When exit options weaken, exposure to abuse and exploitation increases.**

Transition planning cannot be assessed solely on the existence of legal pathways. The critical question is whether these pathways are accessible, timely, and realistic at scale, and capable of preventing individuals from being pushed into harmful dependency structures before securing legal continuity. Where this condition is not met, resulting harms are foreseeable outcomes of under-designed transition policy.

5. THE TRANSITION GAP: A PROTECTION RISK FRAMEWORK

Definition

The Transition Gap refers to the period during which individuals exit Temporary Protection but are unable to effectively access or secure another lawful and functional residence status. This is not an administrative inconvenience. It

constitutes a multi-dimensional protection risk environment in which transition does not automatically reduce risk — it may instead reduce institutional visibility while increasing vulnerability.

Multi-Sector Exposure

During the Transition Gap, individuals may remain physically present in Bulgaria without stable legal continuity, while still needing to work and generate income, pay rent and maintain housing, keep children in school, access healthcare and maintain insurance, renew documentation, report violence or abuse, pursue unpaid wages, and maintain basic survival conditions. The absence of legal continuity does not suspend these needs. It forces them into increasingly constrained and informal conditions.

Continuity Collapse as Core Risk

In under-resourced frontier contexts such as Bulgaria, the central risk is the collapse of continuity — including continuity of residence, income, healthcare access, schooling, institutional contact, and referral and protection pathways. When these systems are disrupted simultaneously, the result is not isolated vulnerability, but systemic exposure.

Silent De-Regularisation

> **The dominant risk is not immediate deportation. The more probable and more dangerous scenario is silent de-regularisation — a process in which individuals remain physically present but progressively lose lawful, institutional, and functional access to protection systems.**

This process is gradual, often invisible in official data, and difficult to detect through standard monitoring mechanisms. Yet it produces significant protection consequences, including reduced help-seeking behaviour, increased dependency on informal or coercive structures, and diminished access to justice and remedies.

Analytical Conclusion

The Transition Gap must therefore be understood not as a transitional phase, but as a distinct protection risk category. It represents a convergence of legal uncertainty, institutional disengagement, and socio-economic pressure, which together create conditions in which vulnerability escalates, exploitation risks increase, and protection systems lose effectiveness.

6. TRANSITION GAP AS A HIGH-RISK EXPOSURE WINDOW

Emerging Survival Hierarchies

Community-level evidence indicates that displaced persons are already informally constructing hierarchies of survival probability in anticipation of transition. Those perceived as having higher chances of maintaining stability include employed individuals, entrepreneurs and self-employed, families with children enrolled in schools, and long-term residents. This simultaneously creates anticipated exclusion for women in informal work, primary caregivers, survivors of violence, precarious households, and individuals with weak institutional access — shifting the burden from institutional protection frameworks to individual coping capacity.

Priority High-Risk Groups

The Transition Gap disproportionately affects:

- single mothers; mothers with three or more children
- survivors of domestic violence and women exposed to economic abuse
- individuals in informal or low-paid employment
- persons with disabilities, chronic illness, or mental health conditions
- elderly women in care dependency; Roma and other marginalised displaced women (where evidenced)
- women with limited Bulgarian and/or English proficiency; individuals without strong social support networks
- adolescents and girls in high-stress households
- persons at risk of losing housing; individuals with existing debt burdens
- stateless or documentation-insecure persons

Legal Continuity as a Functional Condition

For many displaced Ukrainian women, lawful stay is not an abstract legal status. It is the operational condition that makes school possible, rent possible, work possible, and healthcare possible. Accordingly, vulnerability does not begin at the point of irregularity — it begins at the point of uncertainty regarding legal continuity.

Legal and Mobility Dimension

An additional structural risk derives from the 90-day visa-free stay regime applicable to Ukrainian citizens within the EU. In the absence of a transition framework, this may result in large numbers of individuals remaining temporarily lawful but without stable residence status, cycles of short-term legality followed by uncertainty, and conditions for mass silent de-regularisation, reduced institutional oversight, and increased exposure to exploitation.

Analytical Conclusion

> **The absence of structured transition is not neutral. It constitutes a prevention failure zone where risks related to GBV, trafficking, and labour exploitation are likely to increase due to loss of legal status continuity, income stability, housing security, and safe mobility options.**

7. FUNCTIONAL ILLEGALITY AND ADMINISTRATIVE EXCLUSION

Core Risk: Functional Illegality

A central risk within the Transition Gap is functional illegality — a condition in which individuals remain physically present but lose the practical ability to work lawfully, rent or maintain housing, access banking and financial systems, use public services, and sustain basic administrative functioning. A person does not need to be formally irregular to become effectively excluded.

System Chain Breakdown

legal status → employment → income → housing → services → stability

When legal status continuity is disrupted, the chain does not fail at a single point. It destabilises across all linked systems simultaneously.

Cascade of Risk Across Key Domains

1. Housing Disruption

Loss of ability to sustain rental arrangements leads to urgent need for shelter, acceptance of unsafe or transactional accommodation, and exposure to sexual exploitation, coercive control, and homelessness-related violence.

2. Employment and Income Shock

Interruption of employment continuity, employer dependency, transition into undeclared or informal labour, and debt accumulation creates conditions for labour exploitation, wage theft, and reduced ability to exit abusive work situations.

3. Healthcare Disruption

Interruption of healthcare access leaves untreated trauma, reproductive health needs, and mental health conditions unaddressed, leading to reduced help-seeking, lower reporting of violence, and weakened early detection mechanisms.

4. Loss of Legal Certainty

Fear of irregularity and reluctance to approach authorities drives reliance on informal intermediaries and dependency on partners, employers, or landlords — increasing exposure to GBV, labour exploitation, and trafficking in human beings.

Analytical Conclusion

Functional illegality should be understood as a system-level exclusion process rather than a formal legal status. Administrative gaps translate directly into protection failures, increased invisibility, and elevated exploitation risks.

8. CHILDREN, EDUCATION CONTINUITY, AND BEST INTERESTS

Children as a Priority Risk Group

Children represent one of the most critical and vulnerable groups within the Transition Gap. Legal uncertainty directly affects continuity of education, developmental stability, psychosocial wellbeing, family cohesion, and exposure to and witnessing of violence. For many children, the transition may amount to a second displacement — administrative rather than physical.

Continuity as a Protection Imperative

School continuity is not only an integration indicator — it is a core child protection indicator, providing routine and predictability, social anchoring, and developmental stability. For families with children, the end of Temporary Protection is a question of whether transition will preserve or disrupt the continuity on which child safety, education, and psychosocial stability depend.

Multi-Domain Disruption Risk

A poorly designed transition may trigger simultaneous disruption across residence status, school enrolment and attendance, access to documentation, healthcare continuity, housing stability, and parental employment. These disruptions are interdependent and may compound rapidly, particularly in vulnerable households.

Structural Vulnerability in the Bulgarian Context

These risks are particularly acute in Bulgaria, where educational integration of displaced Ukrainian children remains partial and uneven, often dependent on parental coping capacity rather than systemic support. Even minor disruptions in legal certainty may produce disproportionate consequences for school continuity, retention, and effective inclusion.

Chilling Effect on Family Decision-Making

The absence of clear post-TP pathways creates an immediate chilling effect: families are already deciding whether to keep children in Bulgarian schools, continue university pathways, renew rental arrangements, and invest in medium-term settlement — before any formal status change occurs.

Legal and Policy Obligations

Under Article 24 of the EU Charter of Fundamental Rights, the best interests of the child must function as an operational decision-making principle. Transition measures must prioritise continuity for children already embedded in host-country systems, prevent foreseeable and avoidable harm, and ensure proportionality and administrative reasonableness.

Required Safeguards

- continuity of documentation during status transition
- guarantees of uninterrupted school enrolment
- non-disruptive access to healthcare
- family-based pathways ensuring alignment of legal status between children and caregivers

9. REDUCED ACCESS TO JUSTICE AND RIGHTS IMPLICATIONS

Restricted Access to Remedies During Transition

Individuals in precarious legal transition are significantly less likely to report labour exploitation or abuse, pursue claims for unpaid wages, report domestic or gender-based violence, challenge exploitative arrangements, seek legal aid, or interact with police or public authorities. This results in systematic underreporting and reduced enforceability of rights, even where formal protections remain in place.

Legal Continuity as a Rights-Enabling Condition

Legal continuity must be understood not as a formal status issue, but as a rights-enabling condition. Where legal status becomes uncertain, individuals are less able to invoke rights, access to remedies becomes constrained, and enforcement mechanisms lose effectiveness. Formally guaranteed rights risk becoming non-operational in practice.

Child Rights and EU Legal Standards

Any post-TP transition framework affecting children must be assessed against Article 24 of the EU Charter of Fundamental Rights, which requires the best interests of the child to be a primary consideration, provision of care and protection, and preservation of conditions necessary for social and developmental continuity. Transition arrangements that create avoidable discontinuity may raise proportionality concerns and fundamental rights compliance issues.

Analytical Conclusion

A transition framework that fails to preserve practical access to justice and remedies risks producing exclusion from legal protection systems, reduced accountability for abuse and exploitation, and systemic under-identification of victims. These effects represent substantive protection failures arising from formally administrative transition design.

10. PROTECTION RISKS: GBV, TRAFFICKING, AND EXPLOITATION

Transition Gap as a Frontline Risk Environment

From an anti-trafficking and exploitation-prevention perspective, the Transition Gap is not a peripheral concern — it constitutes a frontline risk environment. Periods of legal uncertainty are consistently associated with increased exposure to labour exploitation, deceptive recruitment, coercive dependency, and survival-based informal arrangements. Where large numbers of displaced persons simultaneously face uncertainty regarding status, employment, and housing, the probability of exploitation increases structurally, not incidentally.

Core Risk Mechanism

legal instability → increased dependency → reduced exit options → higher exploitation exposure

Key Risk Dynamics

Labour and economic exploitation

- informal or undeclared labour; unsafe working conditions
- wage theft, non-payment, and debt bondage
- dependency on a single employer; inability to change jobs

Housing-related risks

- unsafe or informal accommodation arrangements
- hidden homelessness and couch-surfing
- transactional and dependency-based housing arrangements

Children are particularly vulnerable to housing instability, which amplifies broader protection risks.

Gender-specific risk patterns

For women, the Transition Gap significantly increases exposure to reduced ability to leave abusive relationships, heightened economic dependency, tolerance of abuse due to legal insecurity, exposure to coercive or exploitative proposals including accommodation in exchange for sexual access, and abuse of vulnerability through control over documentation, housing, income, transport, and institutional access. Single mothers face compounded pressures: care responsibilities, economic vulnerability, and legal insecurity simultaneously.

Trafficking Risk Environment

From a trafficking perspective, the Transition Gap produces reinforcing conditions: reduced institutional visibility, increased informalisation of economic and social life, weakened early detection mechanisms, more difficult intervention and victim identification, and increased opportunities for exploitation networks. These dynamics are especially acute for single women, women with children, survivors of prior violence, economically dependent women, and persons already in informal or exploitative arrangements.

Analytical Conclusion

> **Where legal continuity is weak and exit options are limited, dependency rises, control mechanisms strengthen, and abuse and exploitation become easier to sustain. Vulnerability in this context is not incidental — it is structurally produced.**

The Transition Gap must therefore be treated as a primary risk environment for GBV, trafficking, and exploitation, requiring proactive prevention measures embedded within transition design.

11. HEALTHCARE AND INSURANCE CLIFF

Continuity Breakdown in Healthcare Access

Temporary Protection is, in practice, closely linked to administrative access pathways that enable displaced persons to obtain healthcare services, health insurance coverage, and entry into public health systems. When this continuity is disrupted, displaced persons may face:

- gaps or loss of health insurance; interruption of ongoing treatment
- delayed or foregone care; inability to cover medical costs
- avoidance of healthcare due to uncertainty regarding entitlements
- loss of access to mental health support, reproductive healthcare, and trauma-informed services

These disruptions are particularly acute for women with reproductive health needs, survivors of violence, children, persons with chronic illnesses, older persons, and households already under financial pressure.

Link to GBV and Trafficking Risks

Healthcare access plays a critical role as an entry point for identification and protection. Disruptions result in reduced likelihood that survivors of violence seek help, physical and psychological consequences of abuse remaining undetected, and

loss of a key institutional channel for early identification and referral. Administrative barriers — unclear procedures, lack of interpretation, digital exclusion — force individuals to rely on intermediaries, creating conditions for fraud, coercion, and economic exploitation.

Analytical Conclusion

The loss of healthcare and insurance continuity represents not only a service-access issue, but a critical protection failure point. Healthcare access functions as both a basic right and a protective infrastructure. Its disruption amplifies vulnerability across health, protection, and socio-economic stability.

12. COMMUNITY EVIDENCE: EARLY WARNING SIGNALS

Overview

Community-level data and discussions from the “Украинцы в Болгарии” Telegram community (12,962 members) provide early warning signals of how the Transition Gap is already being perceived and internalised by affected populations. These insights reflect the real-life interface between legal design and vulnerability production, rather than hypothetical risks.

Key Findings

Widespread legal uncertainty

Many individuals do not know whether Bulgaria will establish any post-TP transition pathways, whether existing legal statuses can be accessed from within the country, whether standard migration routes are realistically available, or whether time spent under TP will count toward future residence.

Perception of a “cliff edge”

A significant proportion of respondents do not perceive transition as a managed process. Instead, they describe it as a sudden drop-off point after which individuals are expected to navigate legal and survival challenges independently, without structured support.

At-risk economic profiles

The strongest transition anxiety appears among self-employed individuals, freelancers, micro-entrepreneurs, persons in hybrid or informal employment, cross-border workers, and small business operators — whose economic activity is not aligned with employer-sponsored migration pathways.

Family and child continuity concerns

There is strong concern about children already enrolled in Bulgarian schools, university students, mixed-status households, and long-term residents who have developed local ties but lack legal certainty.

Political under-prioritisation

Community feedback indicates a widespread perception that the issue is known at policy level, but is not yet politically prioritised, and may only be addressed once it escalates into a crisis.

Quantitative Signal: Community Polling

Anonymous poll, “Украинцы в Болгарии” Telegram channel, 258 votes, April 2026[2]:

- 62% — Yes, Bulgaria can simply offer no alternatives
- 38% — No, the state is obliged to provide transition solutions

This reflects a collapse of confidence in transition preparedness and a fundamental expectation gap between institutions and affected populations.

Visa D as a Structural Barrier

Visa D operates as a protection barrier rather than a solution: it requires travel outside Bulgaria, consular application abroad, in-person submission requirements, significant financial costs, uncertain outcomes, and periods without procedural stability. For displaced persons from a war-affected context, this is not a neutral administrative step. It effectively externalises the burden of transition onto the individual.

Analytical Conclusion

> **The dominant community fear is not deportation. It is the loss of functional life systems: employment, housing, education, healthcare, and administrative stability — a shift from legal status loss to systemic life disruption.**

Community evidence confirms that the Transition Gap is already shaping expectations, influencing behaviour, and generating anticipatory vulnerability. These signals require proactive policy response. Failure to act at this stage increases the likelihood that transition challenges will escalate into protection crises.

13. WHY THIS MATTERS BEYOND BULGARIA: AN EU GOVERNANCE ISSUE

From National Impact to EU-Level Responsibility

Temporary Protection is an EU-level legal framework, activated through a Council Decision and implemented within a harmonised legal architecture. The design of exit mechanisms, transition pathways, and continuity safeguards cannot be treated as purely discretionary national matters, detached from broader EU obligations.

Credibility of the EU Protection Model

The activation of Temporary Protection in 2022 was a necessary and effective emergency response. However, the credibility of this response must also be evaluated based on whether the framework provides realistic, accessible, and rights-consistent pathways for continuity when displacement becomes prolonged and return is not feasible. The absence of coordinated transition mechanisms exposes a structural weakness in the EU protection model: insufficient safeguards for transitioning large populations from emergency status to sustainable legal continuity.

Bulgaria as a Systemic Stress-Test

Risks are particularly acute in lower-capacity frontier Member States such as Bulgaria, where formal legal entitlements often coexist with limited practical accessibility, and even minor legal ambiguities may produce disproportionate real-life consequences. Bulgaria functions as a stress-test case for the EU protection system in implementation-fragile settings — making this an EU-level protection governance challenge, not a localised anomaly.

Rule of Law and Fundamental Rights Dimension

Over several years, displaced Ukrainians have entered labour markets, enrolled children in schools, signed rental agreements, established businesses, begun higher education, and built administrative lives under EU protection. A sudden or poorly designed transition may disrupt family life, children's development and education, socio-economic participation, and access to justice — raising broader compliance concerns under EU law and the Charter of Fundamental Rights. Without minimum common standards for transition, Member States may produce sharply unequal outcomes for similarly situated displaced persons, undermining the coherence of the Temporary Protection regime itself.

Analytical Conclusion

Failure to address the Transition Gap risks undermining the credibility of EU emergency protection tools, generating uneven protection outcomes across Member States, and weakening the Union's ability to respond to future displacement crises.

14. ANALYTICAL FINDING

> **The primary risk is not the end of Temporary Protection itself. The primary risk is unmanaged or under-designed transition.**

Risk Conditions

Transition becomes a risk driver when it is delayed, unclear or poorly communicated, selective in a non-transparent manner, inaccessible to ordinary working households, or administratively too burdensome. Under these conditions, transition ceases to function as a continuity mechanism and instead becomes a filtering and exclusion process.

System-Level Consequences

- legally destabilised but physically present populations
- expansion of informal and undeclared economic activity
- increased exposure to exploitation and abuse
- reduced institutional visibility and increased invisibility of vulnerable groups
- exclusion from essential services; erosion of trust in institutions
- additional pressure and potential overload of public systems

Mechanism of Harm

legal uncertainty → administrative exclusion → socio-economic instability → increased vulnerability

If transition is not timely, accessible, transparent, and operational at scale, it will not function as a bridge to legal continuity. It will function as a mechanism of vulnerability production.

15. RECOMMENDATIONS

Strategic Framing and Objective

For DG HOME, the transition from Temporary Protection should be framed not only as a migration management issue, but as a continuity-of-protection governance challenge. The central policy question is not whether Temporary Protection ends, but whether transition can occur without disruption of lawful, safe, and dignified life. The strategic objective is to ensure that transition does not generate protection gaps, guarantees continuity of rights, services, and institutional access, and includes targeted safeguards against GBV and trafficking in human beings.

Expected Outcomes

- Harmonised, rights-based transition approaches across Member States
- Integration of transition phases into EU protection and anti-trafficking frameworks
- Incentivised implementation of safe transition mechanisms
- Evidence-based policy adaptation and monitoring

A. EU Level: DG HOME / European Commission

1. Recognise transition as a protection issue

- Issue formal guidance on transition from TP to other legal statuses as a high-risk protection phase
- Monitor transition preparedness in lower-capacity frontier host states

2. Define minimum protection-continuity standards

- No interruption of lawful stay or access to employment
- Continued access to healthcare and education during transition
- Preservation of access to GBV protection systems, anti-trafficking mechanisms, and child protection services
- Apply a “continuity-first” principle across all transition measures

3. Integrate transition into EU policy frameworks

- Explicitly include transition-related risks in implementation of Directive (EU) 2024/1712, the EU Anti-Trafficking Strategy, and the EU Gender Equality Strategy
- Require Member States to report on transition-related risk indicators

4. Link EU funding to transition preparedness

- Condition AMIF / ESF+ / CERV funding on in-country transition pathways, continuity safeguards, and GBV- and THB-sensitive procedures
- Prioritise funding for legal aid, interpretation, transition support services, and community-based outreach

5. Strengthen data and monitoring

- Require disaggregated data on transition outcomes, refusals, labour exploitation indicators, and GBV reporting trends post-transition
- Support partnerships with refugee-led organisations for community-based data collection

6. Prioritise high-risk groups

- Promote targeted transition planning for women-headed households, survivors of violence, children and students, self-employed and micro-entrepreneurs, mixed-status families, and persons with care responsibilities

B. Bulgarian Authorities

1. Introduce in-country transition mechanisms (critical priority)

- Allow status conversion without requiring exit and Visa D procedures abroad
- Introduce a bridging status that maintains lawful stay and preserves access to work and services during processing
- Develop simplified pathways for: TP holders present 3+ years, property owners, children in Bulgarian schools, university students, business founders, self-employed and remote workers

2. Ensure continuity of rights during transition

- Guarantee uninterrupted work authorisation, health insurance, education access, and social services
- Introduce automatic temporary extensions of rights during pending applications

3. Develop accessible and realistic legal pathways

- Simplify requirements for employed persons, self-employed individuals, and long-term TP residents
- Recognise actual labour participation (not only formal contracts) and freelance and cross-border economic activity

4. Ensure child-sensitive continuity safeguards

- Guarantee uninterrupted access to schooling and protected transition routes for university students
- Prevent administrative barriers leading to educational discontinuity

5. Introduce gender-responsive safeguards

- Integrate GBV-sensitive screening into transition procedures
- Ensure access to safe accommodation, legal aid, and confidential reporting mechanisms
- Protect single-parent households

6. Prevent exploitation linked to legal dependency

- Decouple residence status from single employer dependency and partner/spouse dependency
- Introduce employer mobility safeguards, independent temporary status options, and protections for victims of exploitation

7. Strengthen labour protection and oversight

- Increase labour inspections in high-risk sectors; monitor undeclared work, wage theft, and excessive working hours
- Ensure complaint mechanisms without risk to legal status

8. Address administrative and information barriers

- Develop a public Transition Roadmap: available statuses, eligibility criteria, in-country options, timelines, rights during processing
- Provide multilingual guidance, interpretation services, and in-person and digital support
- Launch an official multilingual legal orientation campaign no later than 2026

9. Ensure safe access without forced travel

- Remove requirements for travel to Ukraine or third countries for consular submission
- Enable in-country submission and remote or facilitated procedures

10. Recognise duration of stay and integration

- Count time under TP toward residence eligibility and long-term status
- Recognise employment history, tax contributions, children's education, and social integration indicators

11. Include refugee-led organisations

- Engage Ukrainian-led and community-based organisations in policy design, feasibility testing, and identification of implementation gaps

C. Protection Actors

1. Treat transition as a frontline protection issue

- Integrate transition into legal aid, case management, anti-trafficking prevention, GBV response, and child protection programming — now, not in 2027

2. Start early transition preparedness

- Begin before 2027: legal orientation, documentation readiness, pathway mapping, and support for high-risk households

3. Establish early-warning monitoring

- Track documentation failures, school discontinuity, insurance gaps, labour informality, housing displacement, and rising emergency legal support requests

4. Prioritise high-risk groups

- Focus on women, single-parent households, and economically precarious populations; transition instability is not gender-neutral

16. CONCLUSION

The end of Temporary Protection represents a system-level stress test. In Bulgaria, the risk is not only that thousands of displaced Ukrainians may lose a legal status. The risk is that those who spent years rebuilding their lives under conditions of war may enter a grey zone where exploitation grows, rights become theoretical rather

than accessible, reporting declines, children lose continuity, and protection systems fail silently.

Final Policy Message

> **The central task is not simply to end Temporary Protection. It is to ensure that the transition does not become a protection crisis of its own.**

If transition is not structured, accessible, and rights-preserving, it will not function as a legal adjustment. It will function as a driver of vulnerability at scale.

— R.I.W.E. Foundation, Bulgaria | April 2026