



**ICMPD**

International Centre for  
Migration Policy Development

# RESPONDING TO DISPLACEMENT FROM UKRAINE: Options to remain when EU temporary protection ends

Discussion paper

July 2023

## Acknowledgements

This ICMPD discussion paper is a follow up to the ICMPD-IGC joint initiative on “Continuation of and exit strategies from temporary protection and similar arrangements,” which took place between October 2022 and April 2023.

This discussion paper builds on an earlier one, *Responding to displacement from Ukraine: Past, present, and future policies*, which was published in March 2023. It is informed by desk research as well as a number of exchanges and roundtable discussions among Member States and international and non-governmental organisations.

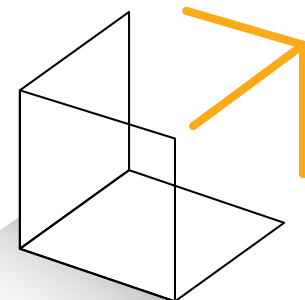
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# Table of Contents

<b>1. INTRODUCTION: DISCUSSING EXIT STRATEGIES</b>	<b>4</b>
<b>2. SURVEYS ON DISPLACEMENT FROM UKRAINE</b>	<b>6</b>
2.1. Overview of selected surveys	6
2.2. Assessment of surveys	8
<b>3. OPTIONS FOR REMAINING WHEN TEMPORARY PROTECTION ENDS</b>	<b>10</b>
3.1. Options for remain	10
3.2. Mainstreaming into the asylum lane	10
3.3. Mainstreaming into non-protection residence permits	12
3.4. A “reconstruction permit”	14
3.5. A special humanitarian protection status	15
3.6. Extension of temporary protection	15
3.7. All options remain open	16
3.8. Transition period	16
<b>4. POTENTIAL LESSONS FROM BREXIT</b>	<b>17</b>
4.1. Brexit and how this may be relevant for the ending of TP	17
4.2. The Brexit instrument: The UK-EU Withdrawal Agreement	17
4.3. Implementation	20
4.4. Lessons learned	21
<b>5. CONCLUSIONS</b>	<b>22</b>
<b>6. ANNEXES</b>	<b>24</b>
6.1. Scenario calculation: Mainstreaming of TPBs into the asylum lane	24
6.2. Scenario calculation: Mainstreaming of TPBs into non-protection residence permits	26

# 1. Introduction: Discussing exit strategies

On 24 February 2022, Russia's invasion of Ukraine provoked the largest and fastest-evolving displacement in Europe since WWII. As in other displacement situations, the vast majority of displaced people sought protection in their direct neighbourhood, which, in the case of Ukraine, is Europe. Of the more than 6.3 million people displaced globally from Ukraine, nearly 6 million are recorded to be in Europe,<sup>1</sup> of which 4 million have registered for temporary protection (TP) in the EU.<sup>2</sup> The majority of those displaced were Ukrainian nationals, mainly women, children, and the elderly, given that Ukrainian men are not allowed to leave Ukraine.

Within just one week, the EU triggered the Temporary Protection Directive (TPD)<sup>3</sup> on 4 March 2022. This directive, declared dead because it had never been used since its inception more than two decades prior, found a remarkable renaissance in such a precarious moment.<sup>4</sup> The two-decade-old TPD set the rules for providing beneficiaries of TP with a status, access to employment, schools, medical care, and other services.

According to the Directive, temporary status is granted 1 year at a time for a maximum of 3 years. TP thus has an end date: March 2025 at the latest. The TPD foresees that “when the temporary protection ends, the general laws on protection and on aliens in the Member States (MS) shall apply.”<sup>5</sup> MS may also extend the rights of TP until the date of return under voluntary return programmes and enforced returns shall respect human dignity for those who are not eligible for admission.<sup>6</sup> The Directive does not address whether the phase-out of TP should follow a concerted approach across EU MS. A joint approach, however, was what was considered the greatest achievement of the TPD: A coordinated, joint, clear commitment that quickly and unbureaucratically granted protection to a large group of people.

To this end, ICMPD, together with the International Governmental Consultations on Migration, Asylum and Refugees (IGC), initiated a platform for their respective MS to initiate discussions on possible exit strategies when TP ends. The initiative, held between November 2022 and March 2023, took the form of a series of exchanges among key receiving countries in Europe and farther afield, as well as selected international organisations. During these exchanges, it soon became apparent that, while receiving countries are still pondering the best way to host displaced persons from Ukraine and to provide access to all services, the clock is ticking on TP and there is already a need to

1 UNHCR Operational Data Portal last updated on 19 June 2023 (accessed on 27.06.2023).

2 Eurostat News Article (2023): 30 April 2023: almost 4 million with EU temporary protection. 9 June 2023.

3 COUNCIL DIRECTIVE 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof.

4 Wagner, M. (2022): The war in Ukraine and the renaissance of temporary protection - why this might be the only way to go. ICMPD.

5 Chapter V, Art 20.

6 Art 21 and 22.

consider what comes next.<sup>7</sup> A first discussion paper from March 2023<sup>8</sup> set the stage for and consequently summarised the discussions, providing an overview of scenarios and reviewing lessons learned from displacement from Bosnia and Herzegovina in the 1990s. More importantly, it set out the plethora of potential policy options once TP ends, including the mainstreaming of temporary protection beneficiaries (TPBs) into the general laws on protection and on immigration and the prospect of returns if the situation in Ukraine allows for it.

The discussions among MS were guided by the belief that a concerted approach would be the preferred approach for hosting states as well as for TPBs and Ukraine. Patchwork responses bear the risks of different standards, generating insecurity among the displaced population, who may feel the need to make uninformed decisions about their future due to perceived better conditions in one host state over the other and a potential chaotic exit from TP. At the same time, it became apparent that a concerted approach needs considerable preparation. Some strategies may require new legal provisions, which require time at the EU and/or national level. Some MS, and even more impactfully, the European Parliament, face elections in June 2024, which will slow down decision-making at the EU level and could well drag beyond the expiration date of the TPD. The window for action is therefore limited and time is of the essence.

The present paper builds on the March 2023 discussion paper. Since then, ICMPD has held additional consultations and various discussion rounds with governmental and non-governmental organisations and expanded its

research to contribute food for thought on ways to exit from TP after it reaches its maximum duration. To this end, the present paper complements the first discussion paper by first exploring the aspirations of Ukrainians who left Ukraine and found TP in EU+ countries (chapter 3). These aspirations are drawn from various national and international surveys of major host countries. Overall, around 25%–50% of displaced Ukrainians declared an aspiration to remain. Based on these numbers, chapter 3 calculates what such a remain aspiration would mean for MS systems in relation to potential follow-up statuses and the capacities of national administrations to process Ukrainians who wish to remain via national asylum or immigration procedures. The potential set-up of a new temporary permit is also discussed in this chapter. Finally, at various consultations, the status transition in the context of Brexit was mentioned as a potential case from which lessons could be drawn for TP exit strategies. Chapter 4 summarises relevant Brexit arrangements such as the Brexit transition scheme, its implementation, and the outreach strategies applied in various EU countries to inform the affected UK population. The aim of the paper is to present and discuss different options, but not to give recommendations as to which option(s) should be chosen.

While in some countries the search for solutions for a post-TP period has already emerged, as of yet there is too little exchange at the EU and/or European level. To trigger and support this discussion, ICMPD has identified and analysed various potential post-TP strategies. TP has so far been a success story, to be also remembered as a good example of European migration policy in a case of large scale arrivals of displaced persons in the future. At the same time, the exit from TP must be organised in a coordinated and joint manner in order for us to truly look back on TP as an effective instrument.

7 Katsiaficas, C., Frelak, J., Wagner, M. (2023): *The clock is ticking for temporary protection: What comes next*. ICMPD.

8 Wagner, M., Frelak, J., Katsiaficas, C., Nozarian, N., Frankenhaeuser, M. (2023): *Discussion Paper: Responding to displacement from Ukraine: Past, present, and future policies*. ICMPD.

## 2. Surveys on displacement from Ukraine

Understanding the intentions and perspectives of Ukrainians under TP is crucial for informed decision-making and effective policy responses. Several surveys and reports shed light on the aspirations and considerations of these individuals.

### 2.1 Overview of selected surveys

UNHCR's "Lives on Hold" reports illustrate the intentions and perspectives of refugees from Ukraine who left their homes due to the war.<sup>9</sup> The latest report, from February 2023, shows that the majority of refugees (77%) want to return home, but only 12% believe they will be able to do so in the three months following the interview.<sup>10</sup> Most still considered the current situation in their places of origin in Ukraine as not conducive to a sustainable return home for the time being. Having no plans or hope of return is more likely among certain groups (smaller households, males, young adults, and/or those with vocational or technical education) and those

with specific displacement patterns (left during the first months of the war, originating from the north of Ukraine, and/or without a spouse or child still in Ukraine). On the other hand, planning to return in the next three months is more likely among older persons, as well as those facing challenges to inclusion in host countries.

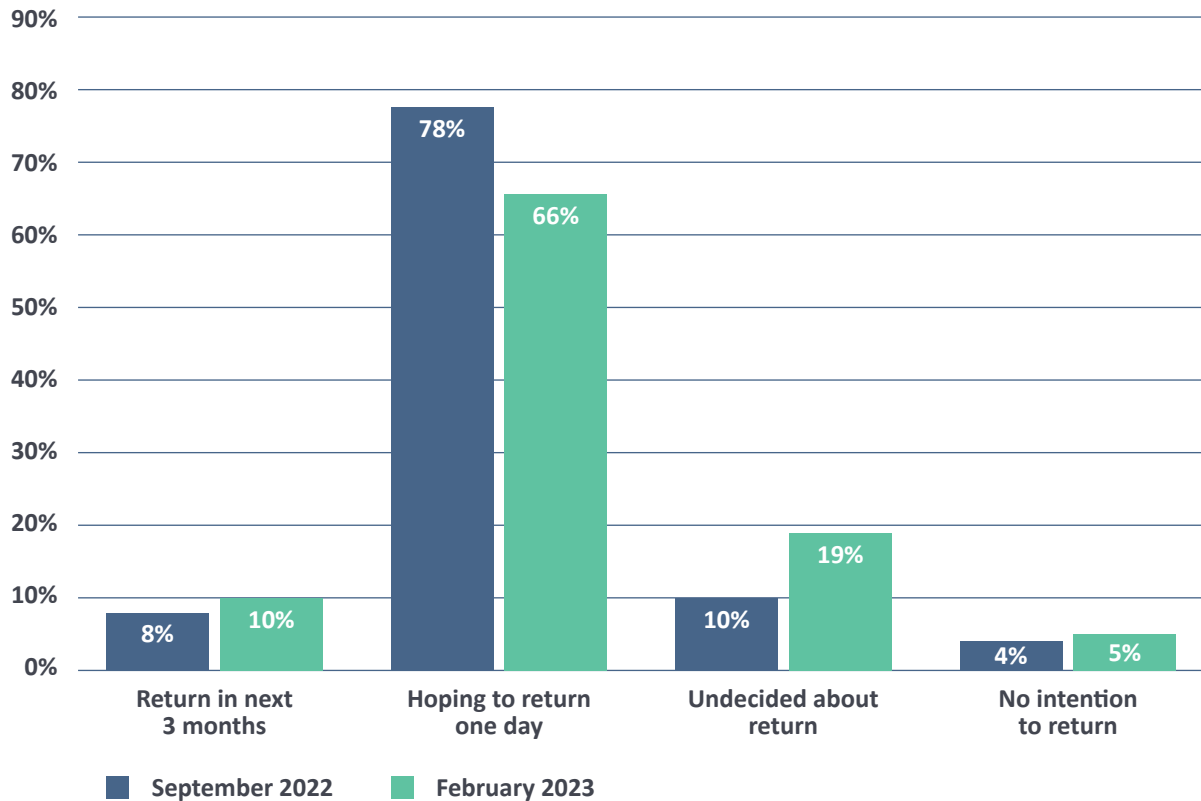
Reasons given for planning to return to Ukraine have remained largely unchanged. Although reuniting with family and returning to their cultural environment remain the most frequently cited reasons, perceptions of improved security conditions and depletion of savings are more frequently reported in the latest report.<sup>11</sup>

The EU **Fundamental Rights Agency** (FRA) conducted a large-scale online survey in August-September 2022 of those fleeing Ukraine. The survey covered displaced people, including many children, in 10 EU MS hosting large numbers of people registered for TP, reaching 14,685 respondents in Bulgaria, Czechia, Estonia, Germany, Hungary, Italy, Poland, Romania, Slovakia, and Spain. The survey showed that, overall, 35% intended to return, 38% intended to remain in the country where they are, 23% were undecided, and 4% intended to move elsewhere (see Figure 2). Among the 10 host countries, those in Germany had the strongest wish to remain (26%) and lowest wish to return (30%), while those surveyed in Romania had the highest wish to return (49%) and the lowest intention to remain (18%).

9 UNHCR (2022): *Lives on Hold: Profiles and Intentions of Refugees from Ukraine #1*; UNHCR (2022): *Lives on Hold: Profiles and Intentions of Refugees from Ukraine #2*; UNHCR (2023a): *Lives on hold: Intentions and perspectives of refugees from Ukraine #3*. Additionally, to the three reports on displaced people outside of Ukraine, UNHCR also issued one report on aspirations of Ukrainians who are displaced within Ukraine. UNHCR (2023b): *Lives on hold: Intentions and perspectives of internally displaced persons in Ukraine*.

10 Intentions surveys among refugees from Ukraine combined phone and web-based surveys, among them a "longitudinal sample" of 887 surveys across selected EU and non-EU MS. The reports cover survey results among displaced Ukrainians in Bulgaria, Czechia, France, Georgia, Germany, Italy, Lithuania, Poland, Republic of Moldova, Romania, Slovakia, Türkiye and "other Europe".

11 UNHCR (2023a): *Lives on hold: Intentions and perspectives of refugees from Ukraine #3*, p. 28.

**Figure 1. Changes in refugees' intentions across data collection rounds**

Source: UNHCR (2023a): *Lives on hold: Intentions and perspectives of refugees from Ukraine #3*

In addition to multi-country surveys, many European host countries also conduct national surveys. Among them, the Polish National Bank conducted two surveys in spring and autumn 2022,<sup>13</sup> with approximately 3,000 and 4,000 Ukrainians residing in Poland respectively, shedding light on the intentions of this population. The more recent survey shows that 15% intended to remain for less than 12 months and return to Ukraine while 14% of TPBs intended to stay for more than one year, but not permanently. The readiness to stay permanently

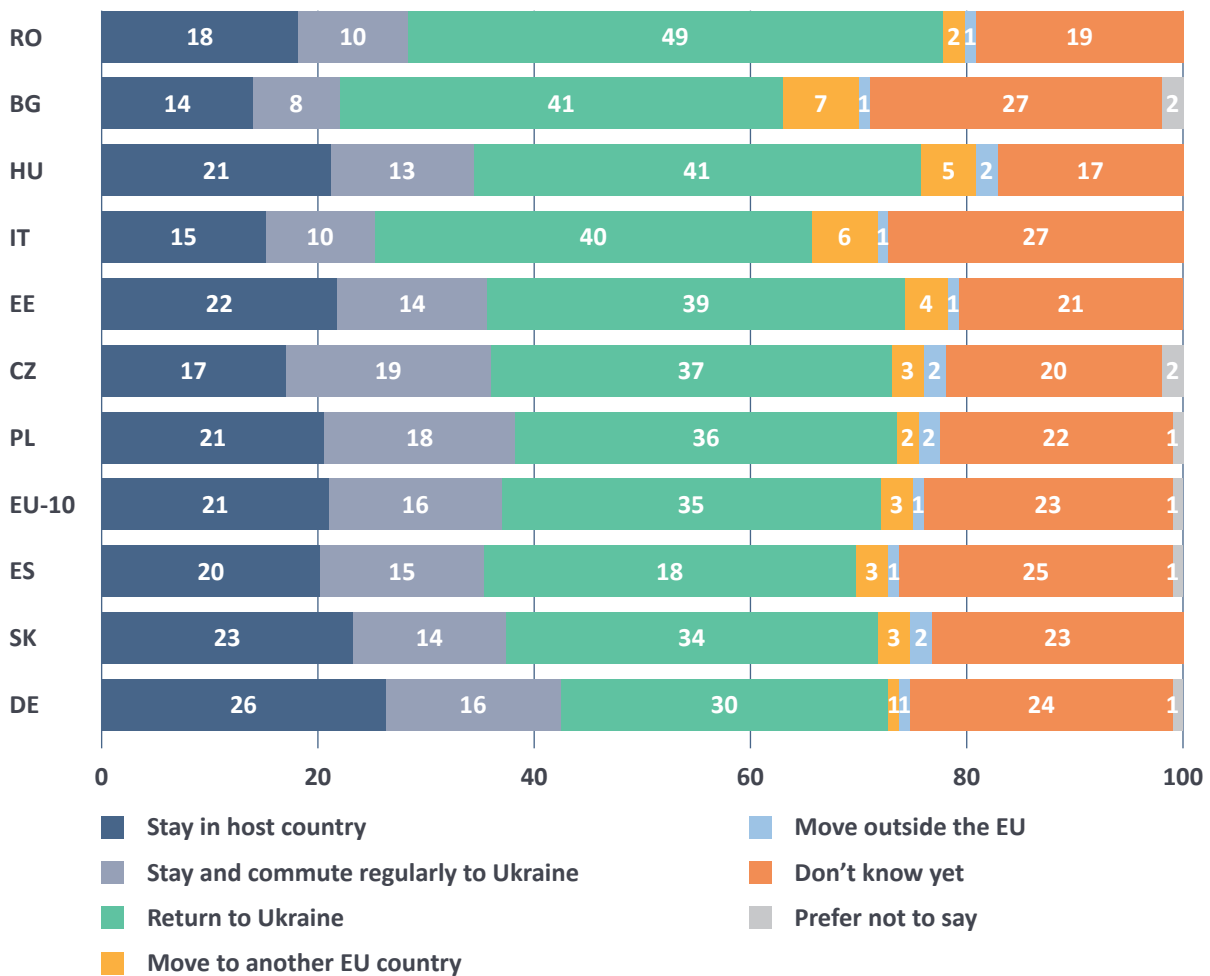
in Poland increased slightly from the previous survey to 19%. However, it is crucial to note that a significant portion of respondents, 49%, remained undecided and did not have specified plans for the future. The surveys also highlighted notable patterns within specific demographics. Women, particularly single women with children, expressed a higher desire to return to Ukraine. Additionally, individuals with higher education, who may face challenges in finding satisfactory employment in their respective professions in Poland, were more inclined to declare a willingness to return to Ukraine within a year. Unsurprisingly, people who already had a job were more likely to consider staying in Poland compared to those still looking for one.<sup>14</sup>

12 UNHCR (2023a): *Lives on hold: Intentions and perspectives of refugees from Ukraine #3*, p. 28.

13 Narodowy Bank Polski (2023): *Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce – wpływ pandemii i wojny na charakter migracji w Polsce. Raport z badania ankietowego*; Narodowy Bank Polski (2022): *Sytuacja życiowa i ekonomiczna uchodźców z Ukrainy w Polsce*.

14 Ibid.

Figure 2. Long-term plans of survey respondents, by country (%)<sup>15</sup>



Source: Fundamental Rights Agency (2023): *Fleeing Ukraine - displaced people's experiences in the EU*

## 2.2 Assessment of surveys

Due to the unpredictable nature of the situation in Ukraine, a significant number of displaced Ukrainians remain undecided and do not have specific plans for the future. Still, studies and surveys conducted across multiple countries have highlighted the influence of various factors on the intentions of displaced Ukrainians to return. These factors include the geographic

distance from Ukraine, the length of time spent in host countries, and individual circumstances such as access to suitable housing and stable employment. The same such factors also influence intentions to remain in TP countries. In addition to overall numbers, the increased or decreased likelihood of certain groups to remain or return should also be considered when devising TP exit strategies. At the same time, it is important to acknowledge that comparing survey outcomes can be challenging due to variations in question phrasing, survey locations, and timing, making direct comparisons difficult.

<sup>15</sup> Fundamental Rights Agency (2023): *Fleeing Ukraine - displaced people's experiences in the EU*, p. 26.



The primary driver for refugees' return will undoubtedly be the end of the war and the elimination of associated safety risks. However, the availability of essential services like electricity, water, healthcare, housing, and livelihood opportunities in Ukraine will also play a crucial role in shaping their decisions, as indicated by UNHCR.<sup>16</sup> Linking reconstruction efforts with TP exit strategies is therefore essential, as well as supporting TPBs with continued access to accurate and up-to-date information about the conditions in their places of origin. Ukrainian authorities will play a decisive role in how long reconstruction will last, with direct consequences on how many TPBs will remain in the host country and for how long, even after the end of TP.

At the same time, it is important to recognize the significance of public perception towards the war and refugees in host countries. While acceptance of displaced Ukrainians in the EU has generally been high, there has been a slight decrease over time, with acceptance levels dropping below 80% in March 2023 from 85% in March 2022.<sup>17</sup> While still at a high level, acceptance was lowest in September 2022, possibly due to the upcoming winter and increasing living costs.

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<sup>16</sup> UNHCR (2023a): Lives on hold: Intentions and perspectives of refugees from Ukraine #3, p. 24.

<sup>17</sup> eupinions. Hoffmann, I & Schmidt, D (2023): Ukraine trends March 2023 - Monitoring Europeans' Support for Ukraine and Ukrainians: Updated Data Every Quarter Since March 2022 (accessed 12.06.2023).

## 3. Options for remaining when temporary protection ends

### 3.1 Options for remain

As previously outlined,<sup>18</sup> EU MS and countries that applied similar TP schemes have, in principle, three options for TPBs to remain when TP ends: They may extend TP or a similar special status for TPBs; they may channel TPBs into the asylum system; or they may bring TPBs into regular migration channels. While the first option would require a new legal framework, the latter two would need to be met with significant administrative efforts, with significant impact in some countries. This section calculates the necessary administrative efforts should either 25% or 50% of TPBs intend to remain and thus move into one of the two administrative procedures. The assumption of a 25% to 50% share remaining aligns with the results of various surveys (see section 3). When considering the additional administrative burden, all of the options below must also take into account that people who will remain will, to a certain extent, bring family members who are still in Ukraine. That, too, will represent a considerable group.

### 3.2 Mainstreaming into the asylum lane

#### 3.2.1 Estimates of potential impacts on national asylum systems

*Scenario 1: 25% or 50% of TPBs move into the asylum procedure.*

Safeguarding the asylum procedure was the main argument for enacting TP. It is mentioned in the EU TPD and its implementing decision, and has been repeatedly brought forward by politicians and practitioners as the major benefit of TP. While it saved the overburdening of the asylum system upon the large-scale arrival of refugees from Ukraine (many of whom fled soon after Russia's February 2022 invasion), this may come back as a major concern once TP ends if beneficiaries subsequently move into the asylum system. In order to calculate what this would mean, the figures below compare the total of annual MS asylum decisions, calculated as an average of the last 6 years (2017-2022), as an indicator of approximately how many applications national asylum systems can process per year. This number is compared to the number of TPBs who might enter the asylum process once TP ends.

Figures 1 and 2 below give a rather drastic picture of the impact that the mainstreaming of 25% or 50% of TPBs would have for EU+ MS. If 25% of TPBs remain and are channelled into the asylum system, this would increase the average yearly number of necessary asylum decisions by a factor of 245 in Slovakia (i.e. the number of required asylum decisions would be 245

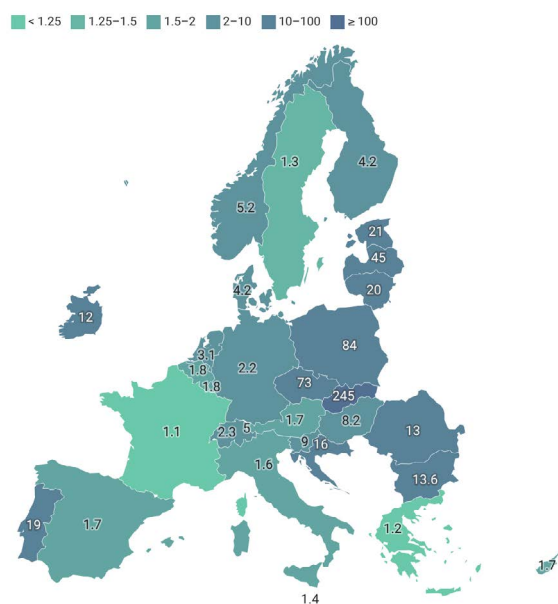
<sup>18</sup> Wagner, M., et al (2023): Discussion Paper: Responding to displacement from Ukraine: Past, present, and future policies. ICMPD.

times the number of asylum decisions in recent years), a factor of 84 in Poland, and a factor of 73 in Czechia (for all calculations see Annex). In other words, without a significant increase in asylum authorities’ capacities, the backlog of asylum decisions in those countries will last several years. For countries where the number of Ukrainians is relatively lower and historic overall asylum numbers are greater, the impact is limited: In Sweden, Greece, and France, the required asylum decisions would increase by

less than 50%, or a factor of 1.3 in Sweden, 1.2 in Greece, and 1.1 in France. EU wide, there would be an increase by a factor of 2.7, meaning that overall EU+ asylum capacities would almost need to triple in order to manage additional applications filed by Ukrainians. If around 50% of TPBs remain and move into the asylum system, this would double the necessary administrative workload EU+ wide and result in 2 million TPBs being processed under asylum procedures.

**Figure 3. 25% remain – impact on EU+ asylum systems**

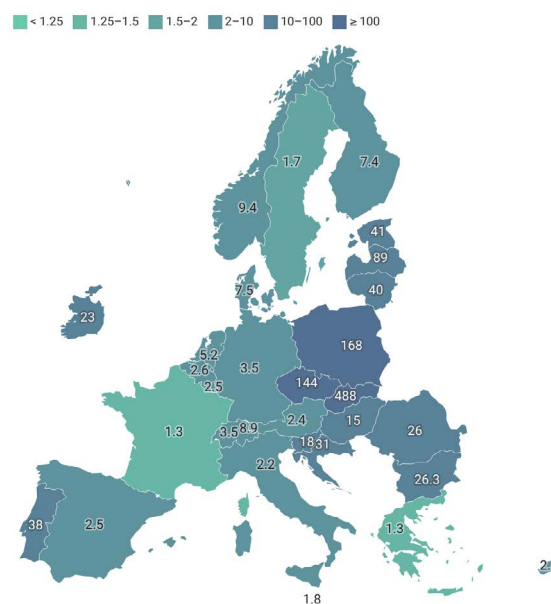
If **25% of Ukrainians** currently registered under temporary protection chose to remain and were to apply for asylum, this would increase the number of **required asylum decisions** by a factor of



Source: Author’s calculations, based on Eurostat data

**Figure 4. 50% remain – impact on EU+ asylum systems**

If **50% of Ukrainians** currently registered under temporary protection chose to remain and were to apply for asylum, this would increase the number of **required asylum decisions** by a factor of



### 3.2.2 Assessment of this option

The adjudication of an asylum application is considerably more rigorous than TP registration and asylum systems in EU MS are not equipped to easily absorb TPBs into national asylum systems. Furthermore, it is unlikely that asylum claims in the EU+ from other regions would fall significantly

and require fewer decisions than the average of 660,000 decisions in the past 6 years. Backlogs of several years duration for administering all claims would be certain in a number of MS. It is therefore understandable that MS would wish to avoid going in this direction.

Additionally, there are legal arguments that may stand against processing displaced Ukrainians via the asylum process. Their prospective qualification as a refugee could fall short due to lack of individual persecution and, even more pertinently, because potential persecution does not emanate from the country of nationality. On the contrary, Ukraine is committed to the protection of its citizens. In addition, the qualification for subsidiary protection may be difficult to argue: While Russia's random shelling across all parts of Ukraine may provide sufficient argument for indiscriminate violence in the sense of Art 15c Qualifications Directive, the outcome of a respective determination is not certain. Indeed, the qualification would require detailed determination, including addressing questions of internal flight alternatives. These are all very time-consuming processes. While scholars,<sup>19</sup> in line with UNHCR,<sup>20</sup> argue that the refugee definition according to the Geneva Refugee Convention would be broad enough to cover people fleeing armed conflicts, EU MS tend to apply a narrower interpretation. Moreover, practices may differ among MS, presenting a risk to the desired joint exit strategy from TP.

Figures 3 and 4 below illustrate the impact on the issuance of residence permits based on a calculation of 25% and 50% of TPBs remaining. Again, for the sake of comparison, calculations compare the average annual number of issued residence permits in EU+ MS in the past 5 years as an indicator of how many residence permits MS can process per year. This number is compared to the number of TPBs who might change to a residence permits, such as those for work, study, or family reunification, once TP ends.

While the numbers seem slightly less dramatic compared to the calculation of the asylum decisions above, for some MS this would still require a significant increase in workload. Bulgaria would need to issue 4.3 times as many residence permits if 25% remain, while Estonia would need to issue 2.6 times as many permits, and Slovakia 2.5 times as many as in recent years. At the other end of the spectrum, for Slovenia, Sweden, France, and Malta, the increase would be below 10% if 25% remain. EU wide, the increase would be by a factor of 1.4 if 25% of TPBs remain and 1.7 if 50% of TPBs remain.

### 3.3 Mainstreaming into non-protection residence permits

#### 3.3.1 Estimates of potential impacts on national permit systems

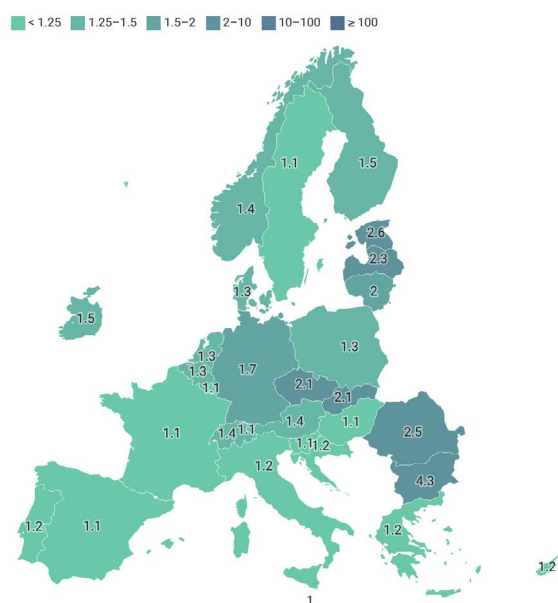
*Scenario 2: 25% or 50% of TPBs are mainstreamed into regular migration permits.*

19 Schultz, J et al (2022): [Collective protection as a short-term solution: European responses to the protection needs of refugees from the war in Ukraine](#). EU Immigration and Asylum Law and Policy. Odysseus Network.

20 UNHCR (2016): [GUIDELINES ON INTERNATIONAL PROTECTION NO. 12: Claims for refugee status related to situations of armed conflict and violence under Article 1A\(2\) of the 1951 Convention and/or 1967 Protocol relating to the Status of Refugees and the regional refugee definitions](#).

**Figure 5. 25% remain – impact on EU+ legal immigration systems**

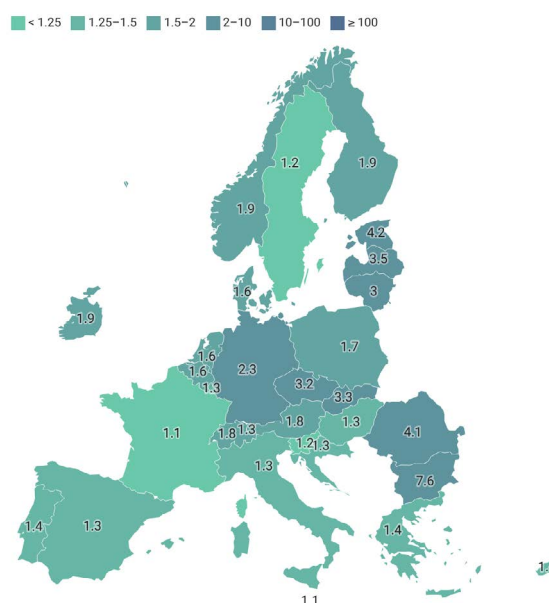
If **25% of Ukrainians** currently registered under temporary protection chose to remain and were to apply for a residence permit, this would increase the number of residence permits issued by a factor of



Author's calculations, based on Eurostat data

**Figure 6. 50% remain – impact on EU+ legal immigration systems**

If **50% of Ukrainians** currently registered under temporary protection chose to remain and were to apply for a residence permit, this would increase the number of residence permits issued by a factor of



### 3.3.2 Assessment of this option

At first glance and compared to asylum procedures, MS seem better prepared to process applications for residence permits. MS issue 2.7 million residence permits per year compared to 660,000 asylum decisions. MS therefore could potentially cope better with a lane change from TP into the legal immigration system, but the numbers would still require a significant increase in workload.

However, legal immigration procedures follow a different logic than humanitarian or protection-sensitive procedures. They require specific reasons such as a purpose of stay (for work, education, or family reunification). While a humanitarian approach takes into account an individual's special needs or vulnerabilities, the contribution-based approach prioritises possible economic contributions (e.g., self-sufficiency, a

valid employment contract, or self-employment). As such, certain criteria will be necessary to determine who should (and who should not) be able to remain.<sup>21</sup> In cases where TPBs found employment or started studies while under TP, a formal transition to a residence permit for work or study may be straightforward. However, the elderly and more vulnerable TPBs who do not possess needed skills or qualifications may not be able to fulfil the requirements for the respective residence permits.

In addition, the administrative burden to acquire the necessary documentation to determine

21 Criteria could encompass the length of residence, a valid employment contract, specific skills or qualifications obtained, ongoing education or training, private housing, specific vulnerabilities etc. See Wagner, M., et al (2023): Discussion Paper: Responding to displacement from Ukraine: Past, present, and future policies. ICMPD, p. 26.

whether or not residence permits can be granted should not be underestimated. Most states only collected basic information when Ukrainians registered for TP. Reaching out to and informing TPBs, gathering the necessary additional data, informing TPBs of the rules for applying for residence permits, and particularly determining cases by vulnerable TPBs will require increased capacities in MS.

Finally, residence permits are bound to a specific purpose (work, study, or family reunification). They come therefore with fewer rights than TPBs enjoy under the TPD, which might deter Ukrainians from applying for a specific residence permit (for more on this issue see the March 2023 discussion paper).

### 3.4 A “reconstruction permit”

One potential approach comes from Lodewijk Asscher, the Special Adviser for Ukraine who was appointed by European Commissioner for Jobs and Social Rights Nicolas Schmit in June 2022 to assist and coordinate efforts of the European Commission to promote the integration of displaced people from Ukrainian in EU MS in terms of work, housing, education, and healthcare. In his recent report,<sup>22</sup> he underscores the need to come up soon with a long-term strategy beyond the end of TP. To this end, he recommends “a joint commitment with the Ukrainian government to extend the TPD for the expected duration of the reconstruction of Ukraine, possibly ten years.”<sup>23</sup> This joint commitment could be launched in the form of a “Reconstruction Permit, to be launched after the second extension of the TPD,”<sup>24</sup> which would be after March 2025 and could provide

<sup>22</sup> Integration of people fleeing Ukraine in the EU note to European Commission, Lodewijk Asscher, Special Adviser for Ukraine, May 2023.

<sup>23</sup> Ibid.

<sup>24</sup> Ibid.

time for a coordinated exit from TP until 2035 and indeed tightly connect the exit with reconstruction efforts.

#### 3.4.1 Assessment of this option

In many ways, the proposal has its merits. Firstly, it would provide a reasonable time frame for exiting TP in a coordinated manner, as there is little hope or expectation that the war will soon end – and there is even less hope that reconstruction efforts will soon enable large scale return. Secondly, it would align the exit from TP with the reconstruction of Ukraine, which will be especially important for return arrangements, which are linked to the absorptive capacities of Ukrainian municipalities. Thirdly, a reconstruction permit could provide the necessary flexibility in status following TP, particularly in light of the concerns that would arise when mainstreaming individuals into asylum or regular immigration lanes, as mentioned above. In fact, such a permit could be the main transition status, while some TPBs – but fewer numbers than in the models above – would change into an ordinary residence permit and perhaps even asylum. In this case, the latter procedures would not be hampered, as the majority would move into the special reconstruction permit.

However, the proposal also raises some important questions. First, the type of legal basis it requires leaves some doubts about its feasibility when it comes to a timely agreement among MS and a potential adoption of the legal act. Time pressure constraints arise due to the upcoming European Parliament elections in June 2024. To be on track, such a legal project needs to commence very soon. Second, a potential point of discontent among MS could be related to the rights that beneficiaries of such a reconstruction permit would have. Would they enjoy the same broad rights as under the TPD? Would the reconstruction permit allow for a change to a long-term residence status, which in fact may

require in itself an amendment in the current proposals on the Long-term residents Directive? Third, should MS back such a permit, it could be the main EU-wide (or even EU+-wide) response, still leaving leeway for MS to introduce the possibility to change lanes as discussed above. Evidently, the details in such an arrangement, if agreed, will determine the administrative burden for national authorities.

Another key consideration, though, comes with regard to the potential duration of another temporary status. Ten years is a long period of ‘temporality’. The questions that were raised in the context of TP (e.g., with regard to the ability and readiness to integrate) will re-emerge with even greater force, as will questions related to family reunification and ultimately the context of Ukraine’s EU accession.

### 3.5 A special humanitarian protection status

At the EU level, protection statuses are limited to international protection. These include refugee and subsidiary protection status, which are regulated by the EU Qualification Directive, and TP, which is regulated by the TPD. Beyond these, the EU legal framework does not provide additional options for humanitarian protection status. However, EU MS have made broad use of non-harmonised national protection statuses, stemming either from international obligations not covered by the Qualification Directive or based on discretionary grounds adopted by national legislation.<sup>25</sup> In particular, national statuses on humanitarian grounds, statuses for exceptional circumstances, or special statuses for vulnerable groups such as unaccompanied children may offer options for national protection

<sup>25</sup> EMN (2020): *Comparative overview of national protection statuses in the EU and Norway*. EMN Synthesis Report for the EMN Study 2019.

statuses for TPBs after TP ends. While these forms of national statuses are very diverse, they can absorb hardships that may arise from a joint solution after the end of TP.<sup>26</sup>

### 3.6 Extension of Temporary Protection

Another option is to extend TP beyond its current maximum duration of 3 years. Precedent can be found in Türkiye, with its TP policy for Syrians since October 2014; in the United States, which has granted/extended Temporary Protected Status for more than two decades for nationals of Honduras, Nicaragua, and El Salvador; and Colombia, which has provided Venezuelans with a 10-year status after initially providing 2-year permits.<sup>27</sup>

While continued temporariness can defer a solution, there are also legal obstacles to a prolonged TP status at the EU level. The TPD is clear that three years is to be considered as a maximum timeline. If considered an option, the prolongation of TP within the EU would require a new EU legislative act. Theoretically the TPD could be triggered again by a respective Council Implementing Decision based on a proposal by the European Commission according to Art 5 TPD. Whether this solution would meet with political endorsement and find the necessary majority among EU MS remains an open question.

<sup>26</sup> Such statuses may also be relevant in relation to Art 23 TPD demanding MS to take the necessary humanitarian measures concerning residence of persons who e.g., cannot travel for health reasons or who are in medical treatment in the host state. Art 23 also provides leeway to MS to allow families to remain so that children can finalise the current school period.

<sup>27</sup> See the overview and discussion about prolongation of temporary status arrangements in Wagner, M., et al (2023): Discussion Paper: *Responding to displacement from Ukraine: Past, present, and future policies*. ICMPD, p. 23.

### 3.7 All options remain open

When looking at exit strategies, a mediating approach could also be considered whereby all accessible options are left open rather than searching for one exclusive solution. Instead of channelling TPBs exclusively into the asylum lane, the legal migration lane, or a possible humanitarian or other special status, all options could remain open and co-exist. This potential approach appears to reflect the text of TPD Art 20, referring to the general laws on asylum and aliens after TP ends. From the outset, there is no good reason to believe that TPBs would not have access to asylum or to a legal channel should they fulfil the respective requirements and should TP end. However, such individual solutions will inevitably lead to different standards across MS with different priorities. Further, as the figures above suggest, keeping all options open would not negate the need to adapt administrative procedures. On the contrary, there will have to be adjustments given the asylum procedure may not provide protection and the legal migration procedure may only cover selected people. The rest will – without adaptations – fall through the cracks.

### 3.8 Transition period

The calculations above clearly indicate – with the exception of the case of a prolonged TP status of some sorts – that any transition into regular procedures will require a significant transition period. They also indicate that the capacities of some MS will be more stretched than others and would certainly require both additional staffing and longer transition periods. Some inspiration as to how such a transition period could be set up can be derived from the transition arrangements for UK citizens in EU countries and EU citizens in the UK post-Brexit (see below).

Besides EU-wide transition arrangements, the TPD also provides leeway for MS to set individual transition arrangements. Art 21/3 allows an extension of TP for TPBs who benefit from a voluntary return programme, which can last until the date of return. Sweden, for example, transposed this provision into national law and set the possibility to extend TP after it ends with the aim of return to a period of two years at the latest.<sup>28</sup>

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<sup>28</sup> 21 ch 6 § Aliens Act (2005:716).



## 4. Potential lessons from Brexit

### 4.1 Brexit and how this may be relevant for the ending of TP

In the search for valuable lessons learned from past experiences, the framework that regulated the transition of residence statuses for UK citizens in the EU after Brexit offers valuable insights. Certainly, the background for the necessary transition policy differs significantly. However, a number of policies are worthwhile to review given that similar questions will arise in a post-TP period. Such questions include:

- What were the Brexit policies with regard to transition periods from freedom of movement to post-Brexit status?
- What outreach and awareness-raising initiatives were carried out by MS to reach and inform the concerned population?
- What additional administrative efforts were required at the national level?
- Was the process conducted in a harmonised and concerted approach across MS?

Although not all issues above have been sufficiently evaluated post-Brexit, some approaches may provide valuable food for thought when devising TP exit strategies.

### 4.2 The Brexit instrument: The UK-EU Withdrawal Agreement

The UK's formal departure from the EU on 31 January 2020 had residential consequences for UK citizens residing within EU countries as well as for EU citizens residing in the UK. To regulate the transition of the legal statuses of UK and EU nationals, the Withdrawal Agreement<sup>29</sup> was set to govern the UK's departure. It foresaw two important time periods: First, a transition period until 31 December 2020 and second, a grace period of at least 6 months, until 30 June 2021, during which those eligible could acquire a new post-Brexit status.

**The transition period.** Although the UK left the EU on 31 January 2020, both parties agreed on an 11-month transition period, lasting from 1 February 2020 to 31 December 2020. Following the agreement, UK nationals were able to continue enjoying free movement within the EU until the end of 2020.

**The grace period.** UK citizens did not have to apply for a new residence status before the end of the transition period. Therefore, the Withdrawal Agreement set another timeline of at least 6 additional months for submitting applications. This period, after the end of the transition period and before the application deadline, was called

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<sup>29</sup> COUNCIL AGREEMENT on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community (2019/C 384 I/01).

a grace period.<sup>30</sup> MS made different use of this grace period: While the majority of states stuck with the 6-month period, the Netherlands and Finland extended it for 9 additional months (until 30 September 2021) and Austria, Belgium, Hungary, Luxembourg, Romania, and Slovenia extended it for 1 extra year (until 31 December 2021).<sup>31</sup> During the grace period, protected UK nationals and their family members (those who resided in the host EU state on 31 December 2020 and continued to reside there) enjoyed a right of residence that was temporarily deemed to exist (a so-called 'legal fiction'). They could not be removed unless they committed a crime.<sup>32</sup>

The Withdrawal Agreement essentially suggested two types of residence systems for the transition from EU freedom of movement to a national residence right. While in the **declaratory scheme** (Article 18(4)) the new residence status was issued automatically if all conditions of the Withdrawal Agreement were fulfilled, the **constitutive scheme** (Article 18(1)) required a new application, which led to a new residence status if granted. MS could choose between these two schemes. While 13 MS chose a constitutive scheme, the remaining 14 opted for the declaratory scheme (see Table 1). Theoretically, the main difference was that under the declaratory scheme individuals were not to become irregular residents if they failed to apply by the given deadline.<sup>33</sup> However, the difference between the two has been described as blurry.<sup>34</sup>

The Withdrawal Agreement protected those UK nationals who had resided in the host EU state in accordance with the conditions that EU law on free movement attaches to the right of residence. In essence, UK nationals met these conditions if they:

- were workers or self-employed; or
- had sufficient resources and sickness insurance; or
- were family members of someone meeting these conditions; or
- had already acquired the right of permanent residence (that was no longer subject to any conditions).

30 European Commission (2021): MEMO - Situation as of 1 January 2021 - Questions and Answers – the rights of UK nationals under the Withdrawal Agreement.

31 See the European Commission: Information about national residence schemes for each EU country and the overview of Residence rights of UK nationals and their family members under the Citizens' Rights part of the Withdrawal Agreement - overview of implementation.

32 European Commission (2021): MEMO - Situation as of 1 January 2021 - Questions and Answers – the rights of UK nationals under the Withdrawal Agreement.

33 Aliyyah Ahad and Monica Andriescu (2020): Brexit on the Backburner Citizens' rights and the implementation of the withdrawal agreement in a pandemic, MPI, p. 11.

34 Ibid.

Table 1. Overview of implementation of the Brexit Withdrawal Agreement

	Choice of residence system under the Withdrawal Agreement	As of when UK nationals could apply for a new residence document	By when residents in host states with constitutive system needed to apply for a new residence status	National estimates of the population concerned
Belgium	constitutive	01/01/2021	31/12/2021	18,600
Bulgaria	declaratory	01/02/2020	-	11900
Czechia	declaratory	01/02/2020	-	9,500
Denmark	constitutive	01/01/2021	31/12/2021	19,000
Germany	declaratory	01/01/2021	-	85,100
Estonia	declaratory	01/12/2020	-	1,500
Ireland	declaratory	01/01/2021	-	115,000
Greece	declaratory	01/01/2021	-	34,000
Spain	declaratory	06/07/2020	-	430,000
France	constitutive	19/10/2020	30/06/2021	148,300
Croatia	declaratory	01/01/2021	-	1,100
Italy	declaratory	01/02/2020	-	33,800
Cyprus	declaratory	01/01/2021	-	38,500
Latvia	constitutive	01/10/2020	30/06/2021	1,200
Lithuania	declaratory	01/01/2021	-	800
Luxembourg	constitutive	01/07/2020	31/12/2021	5,300
Hungary	constitutive	01/01/2021	31/12/2021	5,500
Malta	constitutive	17/02/2020	30/06/2021	13,600
Netherlands	constitutive	01/02/2020	30/09/2021	45,000
Austria	constitutive	01/01/2021	31/12/2021	11,500
Poland	declaratory	01/01/2021	-	6,500
Portugal	declaratory	03/12/2020	-	34,500
Romania	constitutive	01/12/2020	31/12/2021	3,000
Slovenia	constitutive	01/01/2021	31/12/2021	900
Slovakia	declaratory	01/02/2020	-	
Finland	constitutive	01/10/2020	30/09/2021	5,000
Sweden	constitutive	01/12/2020	31/12/2021	13,000
<b>Total</b>				<b>1,092,100</b>

Source: Author's own adaptation from European Commission

### 4.3 Implementation

There are only estimates available on the number of UK citizens in EU MS at the time of Brexit.<sup>35</sup> According to the national data above, EU MS estimated that 1,092,100 UK citizens would need to change their status following Brexit, with the largest numbers in Spain, France, Ireland, Germany, and the Netherlands (see Table 1).

Available data also shows that MS opened the possibility to change status at different points in time. The earliest started on 1 February 2020

(Bulgaria, Czechia, Italy, the Netherlands, and Slovakia), while 12 MS only opened the process on 1 January 2021 (Austria, Belgium, Croatia, Cyprus, Denmark, Germany, Greece, Hungary, Ireland, Lithuania, Poland, and Slovenia) (see Table 1).

As part of their outreach and awareness initiatives, MS implemented a diverse range of programs and measures. These initiatives encompassed various approaches, including the establishment of hotlines, specialised websites, individualised communication, and targeted assistance specifically tailored for vulnerable groups (see Table 2).<sup>36</sup>

**Table 2. Overview of MS outreach and communication measures for UK citizens residing in EU on Brexit**

	BE	BU	CZ	DK	DE	EE	IE	GR	ES	FR	HR	IT	CY	LV	LT	LU	HU	MT	NL	AT	PL	PT	RO	SI	SK	FI	SE
A Brexit hotline	x	x		x		x	x	x	x				x	x		x	x	x	x	x	x	x	x	x			x
A specialised webpage			x		x	x		x		x					x		x		x							x	
Training for migration officers and/or local authorities	x	x															x			x							
National guidelines to economise the procedure					x			x				x															
Training for local partners in touch with migrants	x																										
Special assistance with applications for vulnerable groups	x			x	x	x		x	x		x			x				x	x	x	x		x		x	x	
Accelerating procedures by requiring only one appointment										x										x							

35 European Commission: [Information about national residence schemes for each EU country.](#)

36 The initiatives listed here are taken from [European Commission Information about national residence schemes for each EU country.](#)

	BE	BU	CZ	DK	DE	EE	IE	GR	ES	FR	HR	IT	CY	LV	LT	LU	HU	MT	NL	AT	PL	PT	RO	SI	SK	FI	SE
Individual communication by letter and/or phone	x																		x				x		x		
Answering coordinated questions via the UK embassy		x																		x							
Support via IOs/NGOs/etc financed by the UK			x		x					x			x								x						
Operating procedures agreed with the UK embassy												x															
Outreach via municipality healthcare organisations																											x

Source: Author’s own adaptation from European Commission

### 4.4 Lessons learned

While there are good reasons to explore Brexit arrangements as inspiration for exit strategies from TP, the different contexts must be kept in mind and should not be ignored. Above all, people from Ukraine are forcibly displaced because their country was invaded and is targeted by random shelling by Russian aggressors. To provide a safe haven, TP gives a special but temporary status to displaced people from Ukraine with far reaching rights. Conversely, prior to Brexit, UK citizens enjoyed freedom of movement within the EU as EU citizens, but this privilege was forfeited upon exiting the EU.

In both cases, the end of one residence arrangement (TP for Ukrainians and freedom of movement for UK citizens) requires a strategy for regulating residency and related rights after a certain expiration date. In both cases, a significant number of people were/are concerned and had/have to be properly informed to support informed decision-making

and a proper transition after the expiration of initial residence arrangements.

TP exit strategies may well be valuably informed by Brexit **transition arrangements** that established transition periods affording some flexibility for MS as regards timelines. The **different forms of transition schemes** (such as automatic versus application based), left to the discretion of MS, could additionally offer a valuable example for exiting TP. On the one hand, this could set a common and clear maximum transition period, but on the other hand it could offer the necessary flexibility for an orderly transition, especially for MS with high TPB numbers. Finally, Brexit required MS, together with the UK embassies, to apply a clear **communication and outreach strategy** to timely inform UK citizens about the necessary changes in their status. Communication and information strategies will be also valuable and important for the exit from TP. As with Brexit, an outreach and information strategy must also be closely coordinated with the country of origin, in this case Ukraine.

## 5. Conclusions

This discussion paper has focussed on the status options available for TPBs who wish to remain in EU countries once TP ends. From surveys and past experiences, it can be posited that approximately 25% to 50% of those under TP may wish to remain. The conditions for return may be unfavourable and may even worsen when TP ends. Remain will therefore play a crucial role in the strategies of TPBs when the TPD ends on 4 March 2025 (at the latest).

**There is a lack of concrete ideas on the table regarding post-TP arrangements.** The majority of MS have just begun to think about how a post-TP approach could be arranged, with some exceptions, like Poland, which recently opened the possibility for employed TPBs to change from TP to residence permits.<sup>37</sup>

**The TPD is vague when it comes to what happens when TP ends, referring to the regular asylum and immigration procedures and the prerogative of fostering voluntary over forced return.** When it comes to mainstreaming approaches, the shift to the asylum channel seems to be the least appealing strategy, not least because of legal doubts as to whether the majority of displaced people would in fact fulfil the criteria for refugee or subsidiary protection status, but also due to the administrative capacity that would be needed to avoid lengthy backlogs. The option of mainstreaming TPBs into immigration procedures may offer a more permanent solution for some, but will not offer a solution for people

<sup>37</sup> Act on assistance to Ukrainian citizens in connection with the armed conflict on the territory of the country of 12 March 2022. At this point in time, it is premature to evaluate the level of interest in status change and the administrative implications associated with this transition.

who do not fulfil the necessary requirements for obtaining a work, study, or family reunification-based residence permit.

**The only published idea thus far, the reconstruction permit (proposed by the Commission's Special Adviser for Ukraine), offers necessary flexibility and is linked to reconstruction.** A duration of ten years would significantly extend a period of temporality, after which return is even less likely and should thus rather lead to permanent residence rather than being primarily tied to return. Considerations on the permanence of continued temporality are also inherent in any option that proposes a continuation of TP in one form or another.

**Which approach will ultimately prevail and be developed further will depend significantly on available resources in MS and the deadline for finalising the transition.** Based on the calculations of the impact of somewhere between 25% and 50% of TPBs likely remaining, it is quite evident that – at least for those states hosting high numbers of TPBs – an asylum procedure would collapse. While MS seem to have higher capacities for immigration procedures, here too capacities would be stretched. Mainstreaming into asylum or immigration procedures will therefore only be feasible if MS significantly increase their national processing capacities and/or significantly reduce the administrative requirements for the procedures to allow the fast tracking of TPBs into another status.

**The example of Brexit offers some ideas from which a more flexible transition arrangement can be deduced.** Such a transition period could foresee different durations across European host

countries, taking into account the respective national capacities and size of population concerned residing in their countries. In line with the Brexit example, it could include a transition period during which people concerned can enjoy the same rights as TPBs beyond the validity of the TPD until the respective MS is able to process an application. Similar to the Brexit arrangements, this could be split into a transition period and a grace period, where the former could have a strict period of time and the latter could vary across MS taking their different capacities into account. In addition, Brexit's possibilities for MS to choose between an automatic (declaratory) and an application-based (constitutive) transition can be considered and could help MS to address tight national resources (particularly in MS that host high numbers of TPBs) and timelines in a flexible but transparent manner.

**Brexit also provides a plethora of possible outreach strategies for informing those affected by the end of TP and post-TP policies.** Most apparent in the Brexit example is the number of outreach strategies that go well beyond telephone hotlines and webpages to also include special arrangements for vulnerable groups and the inclusion of non-governmental and private sector actors, and even health care organisations. This example also underscores that cooperation with Ukraine and the Ukrainian embassies in EU MS will be crucial.

**First and foremost, it is essential that discussions on what will come after TP ends start gearing up now.** With less than one year until the June 2024 European Parliament elections, the window of decision making is limited in time, particularly if the chosen solution requires legislative action. The European Commission has yet to announce its ideas for a concerted exit from TP but will first need to propose prolonging TP to the Council for another year, so that the TPD reaches its maximum, 3-year duration. Discussions among EU Member States at EU level are slowly gaining momentum but need to be intensified during the forthcoming Spanish and Belgian EU presidencies.

**Much of the above overviews and assessments are driven by the belief that the exit from TP should reflect a concerted and coordinated EU approach.** Evidently the EU's competency on this matter is limited and may be more pronounced with respect to asylum and less with legal migration. It will, however, prove crucial for any EU-wide legislation, which would be required for any special status such as the reconstruction permit. Whatever solution is chosen, the sheer number of people concerned and the potential for undesirable spill-over effects provide strong arguments against national solutions and for a common EU-wide approach.

## 6. Annexes

### 6.1 Scenario calculation: Mainstreaming of TPBs into the asylum lane

Country	Annual asylum first instance decisions (2017-2022 average)	Beneficiaries of TP (TPBs) (April 2023)	25% of TPBs remain	50% of TPBs remain	25% of TPBs entering the asylum lane	50% of TPBs entering the asylum lane
			(in absolute #)		...will increase annual first instance asylum decisions by a factor of	
Slovakia	103	100,660	25,165	50,330	245	488
Poland	2,983	995,035	248,759	497,518	84	168
Czechia	1,160	331,850	82,963	165,925	73	144
Latvia	226	39,685	9,921	19,843	45	89
Estonia	443	35,135	8,784	17,568	21	41
Lithuania	888	68,735	17,184	34,368	20	40
Portugal	756	55,375	13,844	27,688	19	38
Croatia	343	20,400	5,100	10,200	16	31
Bulgaria	3,063	155,000	38,750	77,500	14	26
Romania	2,558	127,355	31,839	63,678	13	26
Ireland	1,870	81,220	20,305	40,610	12	23
Slovenia	252	8,365	2,091	4,183	9.3	18
Hungary	1,068	30,960	7,740	15,480	8.2	15
Norway	2,587	43,385	10,846	21,693	5.2	9.4
Liechtenstein	28	450	113	225	5.0	8.9
Denmark	2,705	34,920	8,730	17,460	4.2	7.5
Finland	4,068	52,145	13,036	26,073	4.2	7.4
Netherlands	14,443	120,690	30,173	60,345	3.1	5.2
Switzerland	13,033	65,615	16,404	32,808	2.3	3.5
Germany	219,383	1,090,235	272,559	545,118	2.2	3.5
Belgium	20,275	65,420	16,355	32,710	1.8	2.6



Country	Annual asylum first instance decisions (2017-2022 average)	Beneficiaries of TP (TPBs) (April 2023)	25% of TPBs remain	50% of TPBs remain	25% of TPBs entering the asylum lane	50% of TPBs entering the asylum lane
			(in absolute #)		...will increase annual first instance asylum decisions by a factor of	
Luxembourg	1,314	4,065	1,016	2,033	1.8	2.5
Cyprus	5,473	15,980	3,995	7,990	1.7	2.5
Spain	60,188	175,185	43,796	87,593	1.7	2.5
Austria	26,972	72,900	18,225	36,450	1.7	2.4
Italy	67,389	156,065	39,016	78,033	1.6	2.2
Malta	1,101	1,715	429	858	1.4	1.8
Sweden	25,093	33,360	8,340	16,680	1.3	1.7
Greece	37,926	23,310	5,828	11,655	1.2	1.3
France	115,493	66,760	16,690	33,380	1.1	1.3
EU+ (CH, NO, LI)	633,185	4,071,975	1,017,994	2,035,988	2.6	4.2
EU-27	617,537	3,962,525	990,631	1,981,263	2.6	4.2

Source: Author's calculations, based on Eurostat data

## 6.2 Scenario calculation: Mainstreaming of TPBs into non-protection residence permits

Country	Total annual residence permits (2017-2021 average)	Beneficiaries of TP (TPBs) (April 2023)	25% of TPBs remain	50% of TPBs remain	25% of TPBs entering the immigration lane	50% of TPBs entering the immigration lane
			in absolute #		...will increase annual residence permits issued by a factor of	
Bulgaria	11,675	155,000	38,750	77,500	4.3	7.6
Estonia	5,453	35,135	8,784	17,568	2.6	4.2
Romania	20,590	127,355	31,839	63,678	2.5	4.1
Latvia	7,862	39,685	9,921	19,843	2.3	3.5
Slovakia	22,176	100,660	25,165	50,330	2.1	3.3
Czechia	74,944	331,850	82,963	165,925	2.1	3.2
Lithuania	17,475	68,735	17,184	34,368	2.0	3.0
Germany	407,519	1,090,235	272,559	545,118	1.7	2.3
Finland	27,717	52,145	13,036	26,073	1.5	1.9
Ireland	44,487	81,220	20,305	40,610	1.5	1.9
Norway	24,765	43,385	10,846	21,693	1.4	1.9
Switzerland	40,021	65,615	16,404	32,808	1.4	1.8
Austria	45,001	72,900	18,225	36,450	1.4	1.8
Poland	725,378	995,035	248,759	497,518	1.3	1.7
Netherlands	93,737	120,690	30,173	60,345	1.3	1.6
Belgium	58,181	65,420	16,355	32,710	1.3	1.6
Denmark	31,886	34,920	8,730	17,460	1.3	1.5
Cyprus	20,477	15,980	3,995	7,990	1.2	1.4
Greece	30,128	23,310	5,828	11,655	1.2	1.4
Portugal	71,698	55,375	13,844	27,688	1.2	1.4
Italy	230,392	156,065	39,016	78,033	1.2	1.3
Croatia	31,043	20,400	5,100	10,200	1.2	1.3
Hungary	52,598	30,960	7,740	15,480	1.1	1.3
Spain	298,984	175,185	43,796	87,593	1.1	1.3
Luxembourg	7,229	4,065	1,016	2,033	1.1	1.3
Liechtenstein	852	450	113	225	1.13	1.3

Country	Total annual residence permits (2017-2021 average)	Beneficiaries of TP (TPBs) (April 2023)	25% of TPBs remain	50% of TPBs remain	25% of TPBs entering the immigration lane	50% of TPBs entering the immigration lane
			in absolute #		...will increase annual residence permits issued by a factor of	
Slovenia	25,373	8,365	2,091	4,183	1.08	1.2
Sweden	103,555	33,360	8,340	16,680	1.08	1.2
France	266,365	66,760	16,690	33,380	1.06	1.13
Malta	15,261	1,715	429	858	1.03	1.06
<b>EU+ (CH, NO, LI)</b>	<b>2,812,823</b>	<b>4,071,975</b>	<b>1,017,993.75</b>	<b>2,035,988</b>	<b>1.4</b>	<b>1.7</b>
<b>EU – 27</b>	<b>2,747,185</b>	<b>3,962,525</b>	<b>990,631.25</b>	<b>1,981,263</b>	<b>1.4</b>	<b>1.7</b>

Source: Author's calculations, based on Eurostat data

